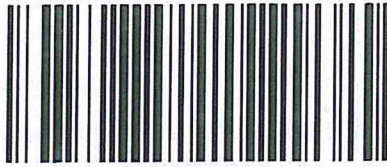


CONFIRMATION
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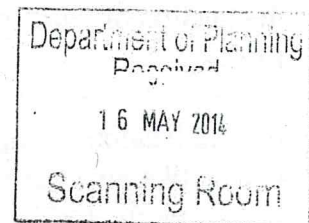
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→ Attention: Director, Industry, Key Sites and Social Projects

RE: Objection to Pindimar Abalone Farm (MP 10 0006)

Dear Sir/Madam,



We wish to object to the proposed Abalone Farm at Pindimar and request that the NSW Planning and Infrastructure Department rejects the entire proposal for the following reasons which we believe to be correct:

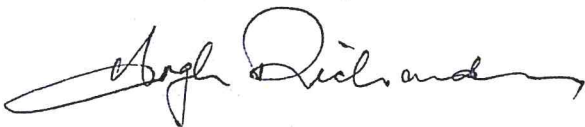
1. Abalone's optimal water temperature habitat is 18-19 degrees Celsius and therefore are not suited to a Pindimar water supply which comes from a shallow estuary, 7 km from the ocean inlet, the site where the Tomaree Pt experimental station obtained its water. At Pindimar, the water is several degrees warmer. Tomaree Pt data are not valid for Pindimar.

There are no Atlantic salmon farms in Queensland or barramundi farms in Tasmania precisely because water temperatures have to match species/temperature habitat. Data from satellite surveys demonstrate mean water temperature (at Corlette - 1km across the bay from the water inlet pipes) in summer months of over 24 degrees Celsius. Due to the shallow draft in Port Stephens there is no temperature stratification - deeper and surface water give the same readings. Despite the tidal nature of the estuary, total turn-around time of water content is two weeks. A high mortality and stress rate is predictable, with warmer waters breeding infectious diseases for the Abalone.

2. Perkinsus protozoal infection is widely spread along the NSW coast (prompting a ban on abalone fishing from Jervis Bay to Port Stephens by NSW Fisheries). This infection cannot be excluded by inspection of a live animal. Confirmation requires histological examination of a (dead) animal. Collection of "disease-free" wild abalone thus becomes a gamble.

3. The proposed farm lies immediately to the east of the Pindimar Marine sanctuary. Incoming tides will obviously wash out-flowing water from the tanks and their contents into the sanctuary twice daily.
4. Closed loops (whereby the abalone tank output is not returned to the sea) are mandatory in Tasmania and specified by NSW Dept of Fisheries. In contradistinction, this proposal is entirely open, returning 50 Ml of partially treated water to the estuary daily
5. No amount of meshing or filtration will prevent egress of a virus such as ganglioneuritis. This is not known/recognised in NSW waters but the same was true in Victoria where its later incubation and emergence from abalone farms resulted in near-total destruction of wild abalone - this has subsequently spread over 100km from its points of release.
6. All Abalone farms so far are only in open water locations, discharge in enclosed waters like our Port Stephens could have vast and unforeseen consequences. Imagine the impact on the tourist industry should discharge adversely affect our Port's Dolphin population
7. During seasons of very heavy rain the Myall Lakes drain large amounts of fresh water into Port Stephens reducing the salinity of the bay for weeks to such a degree that the water is almost complete fresh right up to Pindimar. What will happen to Abalone when exposed to fresh water. We had this several times over the last few years and all oyster farms were closed for months.
8. Likelihood of failure must be considered as a strong possibility on both biological (temperature) and financial grounds. Profitability has been calculated as requiring minimal 100 tons output and this calculation was made when the price of abalone was considerably higher than at present. No information is provided as to who will provide the funds for any clean-up which could be required.
9. The Victorian Government has recently been sued by those whose business has been destroyed by the contamination and destruction of wild abalone from discharge of ganglioneuritis from Government-approved abalone farms. Does the NSW Government wish to take this risk?

Yours sincerely,



for Hugh & Shirlye Richardson

12/5/2014