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Chris Ritchie Manager  
Major projects Assessment  
NSW Planning and Infrastructure

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## **Marine Finfish Cage Trials – Providence Bay, Port Stephens Application SSI 5118**

Dear Mr Ritchie,

Thank you for the opportunity to comment on the Environmental Impact Statement and Management Plan relevant to this proposal. Imagine cruises operate all year around offshore in the waters suggested for the cages location and we have some very real concerns for this proposal.

In the following submission, we have a number of questions and concerns regarding this cage fish trial including some that might directly affect our business adversely. Despite the thorough EIS produced by DPI Fisheries NSW, we are not convinced that Ocean aquaculture is a suitable industry for the pristine waters offshore of Port Stephens.

We have engaged with a number of marine scientists to look in depth at the likely impacts regarding long term affects of faecal discharge from the caged fish and likely impacts to a number of species of marine mammals that currently use the waters where these cages are proposed. Although we would ultimately need more time to assess all their reviews but given the limited time frame allowed us for comment, this submission will have to suffice.

In conclusion, we have to register our opposition to this project based upon the following:

Yours sincerely  
Frank Future  
Director Imagine Cruises

# **Marine Finfish Cage Trials – Imagine Cruises submission**

## **Providence Bay, Port Stephens (Application SSI 5118)**

Although this proposal is presented by DPI Fisheries as an isolated “trial” or research project, Imagine Cruises is very aware that there is every likelihood that at some stage if this project is considered successful, Fisheries will support a major commercial project with a series of fish cages over many hectares of the waters between Cabbage Tree island and Broughton Island.

We are concerned that Blue Fin Tuna ranching or King Fish will ultimately be the primary fish farmed on this site, with the consequent discharge of hundreds of tons of faecal matter into the pristine offshore waters with potential for this matter to move over beaches and dive sites and cause benthic problems as a result.

The annexing of public waters currently used by tourism operators and the potential entanglement issues for marine mammals and subsequent danger issues from the attraction of predator species are all clearly problems that would have to be contended with. We would have to ask the question What net gain will there be to this community and Australia as a whole should this project be approved?

## **ISSUES OF MAIN CONCERN:**

### **Migratory whales and resident dolphins:**

**Humpback whales:** The location of the proposed cages are within the north-south path of the Humpback whale. Imagine Cruises has for 17 years operated whale watching cruises from Nelson bay from May to mid November and during this time observed Humpback Females with new born calves travelling close inshore through the proposed areas. Mainly on their southbound migration between late September and early December but some movement through the area has been observed from June to August. Following the well documented experience of whale entanglement on both the west coast of Australia in offshore Pearl farms and more recently on the east coast in fish trap gear it is a very real probability that at some time entanglement will occur.

The Pearl Farm controversy of 2001 proposed 62 hectares of open ocean farms but this aspect of the proposal was withdrawn (Nov.20-2003) after they were shown to be incompatible within the path of migratory whales. In the event commercial finfish farming is permitted in Providence Bay we must also assume that it will reach far beyond the 20 hectares and 8 cages of this project and we know there is already another 30 hectare site approved within the same area so the identified risks associated with location in the migratory path of increasing whale populations will escalate. This represents an entanglement hazard as acknowledged, (EIS-p187).

Imagine Cruises and all other commercial offshore operators will be prohibited from operating within the public waters of the proposed site.

**Short beaked Common dolphin:** Imagine Cruises has a permit to operate “Swims” with this species of marine mammal and many of these have for the last 3 years been conducted in the proposed area. Research regarding Dolphin movement around fish farms conducted by scientist J.Mann in West Australia noted that “females and calves often change course by several hundred meters, apparently to avoid swimming through lines,”(page 218 Marine mammals. Fisheries, Tourism and Management issues. Nick gales, Mark Hindell and Roger Kirkwood by CSIRO publishing).

**Bottlenose dolphin:** A population of between 40 and 50 resident Bottlenose dolphin range between Broughton Island and the bay itself, considered by research scientists to be genetically connected to the 80-90 resident dolphins of the Port and given a sub species heading or *Tursiops Aduncas*, this group of animals regularly moves through this area. *T. Tuncatus* the larger oceanic Bottlenose dolphin has also been seen in this area by Imagine Cruises.

**Southern Fur Seals:** A small population of Fur Seals probably New Zealand Fur Seals has for the last 10 years been observed hauling out on nearby Cabbage Tree island from June to October. These animals form an important component of our winter Eco tours and although these animals will have a keen interest in the cages proposed the small population may also become vulnerable to predation by an increasing Shark population attracted to the cages.

**Predation from sharks:** It is acknowledged (EIS-p189/190) that naturally occurring protected native species, Great White sharks, Australian and New Zealand Fur seals, and sea birds will be attracted to fish cages and comprise an on-going and increasing cost in predator deterrence. The attraction of extra sharks will for this company potentially compromise our “Swim “ programs as any shark observed means we have to stop the program and pull people out of the water. Imagine Cruises and Dolphin Swim Australia, our partner in this Swim Activity have invested over \$100,000 developing this new and unique tourism activity and anything that threatens its success is of concern to this company.

Imagine Cruises has for 17 years operated a daily Snorkelling discovery activity on nearby Cabbage Tree island during the summer and Autumn and an increasing shark population will threaten this activity. I am sure you will understand that there is nothing as bad as a shark attack for our business.

#### **Wild-fish as imported stockfeed**

The continuing importation of wild-fish stockfeed sourced from natural populations is clearly an unsustainable feature of finfish farming and a high-risk factor with its potential to introduce pathogens and infect naturally occurring species. We are aware of the significant progress in alternative stockfeed sources and while the risk of introducing pathogens is now less, a risk in marine waters is still present but would be eliminated in land-based aquaculture.

**Unsustainable use:** Any cost/benefit analysis would demonstrate that if, as reported, it takes 10kgs plus of wild-fish stockfeed to produce 1kg of Blue-fin tuna, and assuming a similar disproportionate outcome with other farmed species, this practice must be deemed to be unsustainable.

#### **Chemical, antibiotic/therapeutic use**

The EIS (p178) – *“A risk assessment will be used to evaluate exotic pathogens and pest hazards if any stock or equipment is imported from other states...”* This is welcomed but the marine environment can be devastatingly unforgiving in the event of accident or chemical over-use. Particularly since over 100 bacterial species (EIS-p167) are linked to diseases in marine-based farming.

The chemicals in use are likely to include (EIS-p163): Chemicals and therapeutics that include anti-foulants, fertilisers, disinfectants, anti-bacterial agents, paracitocides, feed additives, anaesthetics and breeding hormones.

Water (EIS-p166), is a good medium for unintentionally transferring chemicals into the environment however, there is too much reliance on the capacity of sea water in diminishing and dispersing the toxicity of chemicals, antibiotics and therapeutics.

We agree it is inevitable (EIS-p166), chemicals will reach and interact with near and intermediate environments, which is true of marine-based aquaculture but avoidable with land-based finfish aquaculture.

#### **Marine-based aquaculture questioned:**

Proposed for the high energy ocean environment of Providence Bay, this is adjacent to the former Pisces Marine Snapper Farm site which failed to cope with the often turbulent ocean conditions that can impact on this location. Even though valuable experience would have been gained from this failed project, known ocean impacts and storm events of cyclonic force would likely once again show that local off-shore locations, for the following reasons, are no place for the complexities of marine-based finfish aquaculture.

**Please accept this submission as of grave concern to our tourism related business. We question whether fish farming of any nature in the pristine offshore waters of Port Stephens is a suitable industry for what is essentially a Natural National and Pristine Icon. Port Stephens and its offshore waters and islands have a natural beauty that will not be enhanced by man-made fish cages and the subsequent risks as outlined above.**

Frank Future

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**Director Imagine Cruises**