

OPEN LETTER: BEST AQUACULTURE PRACTICES MUST IMMEDIATELY STOP CERTIFYING EXTINCTION

To the members of the Global Seafood Alliance Board

25th July, 2023

Re: The urgent need for BAP to revoke certification from Macquarie Harbour fish farms

Dear Members of the Board,

We call on you to immediately revoke the Best Aquaculture Practices (BAP) certification from farmed salmon and ocean trout raised in Macquarie Harbour, Tasmania.

We make this request in light of new scientific evidence that identifies salmon farming in Macquarie Harbour as a key human activity significantly impacting the harbour's environmental health and contributing to the decline of the endangered Maugean skate – a relic from Gondwana that is considered possibly the rarest skate species in the world.

Macquarie Harbour on the west coast of Tasmania has been confirmed to be the last remaining habitat for the endangered Maugean skate. One third of the harbour is located within the boundaries of the Tasmanian Wilderness World Heritage Area; with the Maugean skate listed as one of the World Heritage Area's values.

The endangered Maugean skate also shares its habitat with salmon and ocean trout farms certified by the Global Seafood Alliance's BAP scheme.

A recent Institute of Marine and Antarctic Studies report¹ found the Maugean skate population has rapidly declined by nearly half (47%) from 2014 to 2021. The authors state that decline is likely to have "significant implications" for the population status of the skate, with any further reduction in numbers "increasing their risk of extinction". The Threatened Species Scientific Committee, which advises the federal government on endangered species, has proposed the Maugean skate be prioritized for assessment as "Critically Endangered".²

¹ Moreno and Semmens (2023) *Interim report - Macquarie Harbour Maugean skate population status and monitoring*. IMAS. Available at: https://imas.utas.edu.au/data/assets/pdf_file/0007/1655611/Maugean-skate-2021-interim-report-FINAL.pdf

² Parliament of Australia. Order of 19 June 2023 (255) relating to Maugean skate. Available at: https://www.aph.gov.au/Parliamentary_Business/Tabled_Documents/2606

The report attributes the skate's decline to degraded environmental conditions in the harbour, particularly dissolved oxygen (DO) levels, caused by anthropogenic inputs, namely the expansion of salmon aquaculture industry:

*"The unique hydrology of Macquarie Harbour results in a naturally challenging habitat. While anthropogenic activities since European colonisation have long impacted the harbour, in the past 15 years altered river flows (growing reliance on hydroelectric generation and production demand) and **large-scale development of salmonid aquaculture have resulted in considerable changes to the environment.***

The Maugean skate has been shown to have behavioural and physiological mechanisms that allow it to survive in the challenging conditions of Macquarie Harbour. However, recent changes to the environment (particularly DO levels and mixing dynamics) mean that high impact environmental events have increased in duration, magnitude, and frequency (e.g., duration and severity of low DO periods). Likewise, there is an increased potential for overlap of multiple stressors that may have compounding effects (DO, salinity, temperature)...

*Accordingly, it is apparent that the species is already being pushed beyond their adaptive threshold. This highlights one of the unique challenges of managing micro-endemic, hyper-specialised species, which is that **the viability of the species is intrinsically linked to the health of their restricted habitat.** Therefore, in the case of the Maugean skate, the ongoing impacts to DO levels and mixing dynamics are of extreme concern to the persistence of the species." [emphasis added]*

Alarming, the evidence suggests the Maugean Skate is only one environmental event away from extinction, with IMAS researcher Professor Jayson Semmens stating, "The environmental changes in the harbour have increased the skate's vulnerability to sudden high-impact events, such as water column turn-over driven by westerly winds, which can happen at any moment and potentially decimate the population".³

The findings have prompted scientists to take the unprecedented step of calling for urgent conservation action to save this species from extinction – including taking immediate action on salmon farming activities in the harbour.

³Under Pressure: Scientists call for urgent conservation action to save Maugean skate. IMAS. Available at: <https://www.imas.utas.edu.au/news/news-items/under-pressure-scientists-call-for-urgent-conservation-action-to-save-maugean-skate>

Meanwhile, Petuna and Tassal's Macquarie Harbour farms are Best Aquaculture Practices (BAP) certified as being "environmentally responsible" and being sold to unsuspecting shoppers as 'sustainable'.

From a consumer perspective, the BAP "best practice" label on products from Macquarie Harbour can be viewed as entirely misleading. According to the BAP website, environmental responsibility is defined as being "water quality, proper disposal of waste, and ensuring marine habitats are protected".⁴ BAP-certified Macquarie Harbour farms are failing to meet this definition. Instead, they are associated with waste inputs that have caused low dissolved oxygen, habitat degradation, and contributed to the decline in population of the endangered Maugean skate.

In 2021, WWF released a commissioned review⁵ on the circumstances that led to ecosystem degradation in Macquarie Harbour, as well as the efficacy and limitations of certifications, including BAP, to prevent adverse impacts. The review found certification criteria that rely on farm compliance with local laws and regulations is not enough to ensure environmental responsibility - particularly when local regulations are weak and/or enforcement is inadequate. It also found certifications were ineffective at addressing the cumulative impacts of the industry within the harbour. Today, these same farms remain BAP-certified.

Given the new evidence that the rapid decline of the endangered Maugean skate is associated with salmon and trout aquaculture operations in Macquarie Harbour, we contend that allowing the continued use of the BAP label on Macquarie Harbour products places the BAP scheme's credibility at risk.

Simply put, greenwashing the extinction of the Maugean skate is not "best practice" or "environmentally responsible".

We strongly urge the Global Seafood Alliance to immediately revoke its BAP certification from all Macquarie Harbour fish farms.

Sincerely,

Kelly Roebuck
SeaChoice representative, Living Oceans

Jessica Coughlan
Neighbours of Fish Farming

On behalf of the following signatories:

⁴ The Pillars of Responsibility. Available at: <https://bap.globalseafood.org/bap-label>

⁵ Seafood Advisory Ltd (2021). Review of Eco-labelling Standards in Relation to Salmon Farming in Macquarie Harbour. WWF. Available at: https://assets.wwf.org.au/image/upload/v1/website-media/resources/Review-of-Ecostandards-for-salmon-farming-in-MH_1Sept2021



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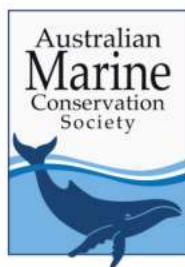
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**Trish Bailey, Representative, Tasman Peninsula
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**Trish Bailey, Vice Chair, Tasmanian Alliance for
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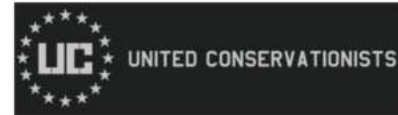


**tasmanian
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