



1st September 2014.

Att: Alex Dobes
Aquaculture Review
Queensland Competition Authority
GPO Box 2257
BRISBANE QLD 4001
aquaculture@gca.org.au

**Submission to QCA Draft Report on Aquaculture Regulation in Queensland,
released 22nd July 2014.**

Dear Alex

The QCA Draft Report issued July 22nd provides a good overview on issues that the aquaculture industry has faced and is currently facing.

Seafarms notes that key considerations for this review were to balance environmental protection with industry development, and to suggest a framework that will give prospective investors greater certainty when proceeding with development.

As noted in our submission paper to the review, Seafarms has been frustrated by the business risk associated with the complex regulatory environment in Queensland, and has looked to greenfield development in WA or the NT as an alternative.

Seafarms would like to provide commentary on some of the key recommendations contained in the Draft Report.

DEVELOPMENT AREAS FOR TERRESTRIAL AQUACULTURE (Section 8.1)

Seafarms notes the QCA approach of GIS modelling to identify possible suitable aquaculture sites, as illustrated in the draft report with respect to the Ayr region; and has applied its own GIS modelling capability across Queensland and across other states in its search to identify potential large scale sites for aquaculture.



Seafarms supports the Draft Report's recommendations, noting that the need to achieve commercial scale may lead to a single company becoming a majority operator of suitable land within a designated aquaculture development area.

ENVIRONMENTAL OFFSETS (Section 8.2)

Seafarms notes the QCA observation that *“Regulators take a different view of the reason for aquaculture receiving regulatory scrutiny that does not apply to comparable agricultural activities. Aquaculture waste-water is a 'point source' discharge which is easily identified and measured. Agricultural runoff is 'diffuse source pollution', which is more difficult to predict and monitor.”* (QCA Draft Report, page 36)

Seafarms believes that a consistent offsets framework is a desirable goal. However, the “point source” measurement of aquaculture waste water means that regulators might be likely to continue their focus on aquaculture, rather than on larger scale, or more polluting, non-point source operations. This would see aquaculture continue being placed at a comparative disadvantage compared to other industries.

PROPOSED ADMINISTRATIVE ARRANGEMENTS (Section 8.3)

The QCA recommends that the government consider the best structure to ensure the implementation of this review's recommendations. Options include a task force consisting of representatives of relevant agencies, and varying degrees of centralisation of departmental functions. QCA notes that each of the above options has specific advantages, but that the costs of centralisation outweigh the benefits.

Seafarms agrees in general with the case made by QCA regarding the best structure to implement the review's recommendations.

LEGISLATIVE REFORM (Section 8.4)

Seafarms agrees with the QCA position that the more urgent need is for regulatory reform rather than legislative reform. Seafarms supports the QCA recommendation.

Seafarms would like to thank the QCA staff involved in consultation, investigation and preparation of the Draft Report. We look forward to the final report.

Yours sincerely

Robert Bell
Managing Director