
Subject: Macquarie Harbour

From: Peter Bender
Sent: Sunday, 4 October 2015 9:18 PM
To: 'Whittington, John (DPIPWE)'
Subject: Macquarie Harbour

Dear John,

Thank you for your letter dated 18th September 2015 regarding your proposed determination in regard to maximum permissible biomass in Macquarie Harbour (MH) and subsequent to your letter dated 8th April regarding the same issue.

We note that the later letter (18th Sep) does not include any information on intended whole of MH permissible biomass. This makes it difficult for Huon to comment on whether we believe the proposed biomass limit for Huon's three leases are appropriate or not. Given that it is generally accepted production in MH should be considered as one lease it is the whole of MH biomass that will be critical in understanding production sustainability in the region. Therefore your letter 18th September provides no context within which to be able to provide comment on your Huon specific determination.

Huon is of the strong view that regardless of how the maximum permissible biomass of 20,020 tonnes was determined, having a harbour wide cap allows for crucial transparency for a whole of harbour approach from all parties.

We believe a stated cap in the determination is critical to the future success of farming in the region.

Furthermore, the proposed future process for the determination and notification of permissible biomass limits in MH are not practical. The annual notification will occur at a time just after the smolt have already been transferred to MH. A longer term determination to give industry more certainty in production planning is desired. Huon's position would see a maximum permissible biomass set for a rolling two year period (reviewed annually), which is subject to environmental performance in MH.

Huon understands that a short term decision or amendment on maximum permissible biomass can be made at any time if an issue arises, but it seems unnecessary to build this uncertainty into the process.

We look forward to a further discussion with you regarding the determination following consideration of the above concerns. We would also like to understand better the scientific basis for you coming to your decision.

Regards,

Peter



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