



Conservation Council SA

'Swim With the Tuna' proposal for Kangaroo Island

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The **Conservation Council of South Australia Inc (ConservationSA)** is the peak conservation body for South Australia, representing over 55 of the State's environment and conservation organisations.

ConservationSA is an independent non-profit, non party-political, community based organisation which provides resources, advice and representation for the SA environment movement, and which leads many of the key conservation campaigns in SA.

ConservationSA is known for its success in developing long term community development, education, and on-ground environmental restoration programs.

ConservationSA regularly liaises with Local, State and Federal Governments, Government agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

As a community organization, much of what ConservationSA achieves is through a large network of skilled volunteers from all walks of life – for its office, on-ground, governance and campaign activities.

ConservationSA is committed to a healthy environment for South Australia.

Introduction

ConservationSA has long been involved with coast and marine environmental issues in South Australia. We are concerned about the environmental impacts of aquaculture activities and in particular the use of threatened species for tourism use in this particular case.

This submission will briefly outline several issues with which we are concerned regarding the proposed 'Swim With the Tuna' venture for Kangaroo Island:

1. The use of a threatened species for this activity
2. Setting a precedent
3. Environmental impacts associated with tuna pens
4. Location near protected areas in the public estate

It should be noted that we have only become aware of this proposal in the last 24 hrs, and have not had the opportunity to further investigate the potential ramifications of this proposal. We are deeply concerned about this proposal and strongly encourage further dialogue with ConservationSA, and other stakeholders. It is unfortunate that ConservationSA has not been engaged in this process earlier. ConservationSA would like to make ourselves available for consultation at any stage during and after this consultation phase.

1. Threatened species

- a) Southern bluefin tuna (*Thunnus maccoyii*) are listed as Critically Endangered on the IUCN Red List of Threatened Species. This is a higher rating than tigers, elephants, blue whales, whale sharks and Tasmanian devils. It is estimated that only 5% of pre-industrial fishing stocks remain.

If the southern bluefin tuna to be used for this venture are to be taken from the wild, then ConservationSA does not support this. The use of threatened species for ecotourism is not a new idea but there is a difference between viewing threatened species in the wild and taking threatened species from the wild for this purpose.

Where threatened species are in captivity, e.g. zoos, they are usually part of a carefully controlled breeding program to increase their population. A breeding program is not part of this proposal and the company would need to continually take adults from the wild to top up the population, which is not recommended, given their Critically Endangered status. In addition, the tuna will be caught before they are sexually mature and will almost certainly not breed in captivity, thereby reducing the wild stock without enabling any restocking (if this were permitted).

- b) There are risks to other endangered species in close proximity to the proposed location. Two white-bellied sea eagle (Endangered) nests and an osprey (Endangered) nest are close to the proposed site where noise, traffic and entanglement are all potential risks to these species.
- c) The Australian sea lion recently reassessed as Endangered by the IUCN has breeding colonies at the nearby North and South Pages. The populations at these breeding sites have no clear trends and are likely to have already been severely negatively affected by the gillnetting practices in shark fisheries in adjacent waters. It is likely that the presence of a tuna feeding pen will result in unwanted sea lion interactions, putting sea lions at risk as evidenced in most existing tuna feeding locations.

ConservationSA strongly recommends not taking southern bluefin tuna, a threatened species, from the wild for this venture and is concerned about the likely impacts on other endangered species.

2. Setting a precedent

For many years, the residents of Kangaroo Island have successfully opposed tuna farming developments in their pristine waters. The 'clean and green' state of Kangaroo Island's coastline is part of its major ecotourism industry, and could potentially be threatened by this development.

The granting of an aquaculture license will set a precedent for others who may wish to farm tuna in Kangaroo Island's immaculate coastal waters. In addition, unless strict conditions are imposed the door will be left wide open for the company to trade.

We understand that they intend only to stock the pen with 60 tuna rather than larger numbers used by industry, however, again without strict conditions, this number could easily increase with future permit applications.

There is a risk that the operator might decide to turn the pen into a feedlot and start trading as a commercial tuna farm. In this scenario there would need to be significant public consultation.

ConservationSA strongly recommends not granting an aquaculture lease to this venture due to the precedent that it sets.

3. Environmental impacts associated with tuna pens

There are numerous environmental impacts associated with aquaculture pens, including tuna pens and this development proposal provides the opportunity for all of the following risks:

- a) Mobile high-order predators such as cetaceans that generally have a low reproductive rate, with low fecundity and low natural mortality, may not be obvious victims but many cetacean populations have been shown to be suffering substantial impacts due to aquaculture. Dolphins, whales and sharks have been fatally entangled in anti-predator nets surrounding fish farm sites. Fish farms and their role as fish aggregating devices have been implicated in behaviour modification of dolphins, reducing natural foraging behaviour. Relatively little is known about the abundance or distribution of bottlenose dolphins and common dolphins, both regularly sighted in the area, indicating this area forms part of the usual habitat of these species.
- b) The location of the site is in the migration path for southern right, humpback and blue whales. Given past entanglements it would seem that this site is not ideal for this venture.
- c) Aquaculture operations often have a substantial effect on the general health of the surrounding ecosystem. Aquaculture facilities (in their most common form) have no way of containing their wastes but release them directly into the surrounding environment, creating a variety of negative effects on the environment.
- d) Finfish farms often damage the seafloor beneath them due to the fallout of waste fish feed and faeces. The chemicals and antibiotics that operators (may) use affect more than the farmed fish they are treating. Moving the cage each year does not necessarily negate this impact and the cage would still be located inside a Marine Park (see point 4 below).
- e) Aquaculture pens are also ideal substrates to which introduced marine pests can attach themselves, including the European fan worm (*Sabella spallanzanii*) recently introduced to Kangaroo Island and found on or near human built objects such as jetties and marinas. The pen will be towed from Port Lincoln and unless it is thoroughly cleaned before moving, there is a high potential for the pen to act as a vector to translocate any marine pests it may be carrying.
- f) There is a high risk of three different kinds of waste to be released from this facility:
 - It would be very easy for paper and other kinds of litter to be blown from the platform into the sea, creating litter that was not present in the area

beforehand. There is no guarantee that the operator can provide that this will not happen.

- There will be extra nutrients created in the water column from the presence of the tuna in an enclosed pen. These additional nutrients could potentially detrimentally affect any seagrass and other marine plant communities in the local area.
 - There is the potential for a fuel spill either from the boat, or from a generator that may be used on the platform.
- g) Lights that may be used on the pontoon at night will disrupt the natural behavioural rhythms of marine life in the vicinity of the development. Wild marine animals are strongly dependent on the natural photoperiod and lunar period for the timing of significant events such as feeding, mating and spawning. Night lights may potentially disrupt these natural patterns. If lights are not used the pontoon will represent an unacceptable hazard to navigation.

ConservationSA strongly recommends not approving this development for all the risks outlined above.

4. Location near protected areas in the public estate

The site proposed for this activity is situated in a Marine Park whose outer boundaries have been proposed, it is also very close to the Pelican Lagoon Conservation Park and the American River Aquatic Reserve.

The declaration of three 'protected' areas in this relatively small area indicates that it has very high conservation value, which would be threatened by this development.

Locating this venture inside the boundaries of a Marine Park and not in an aquaculture zone also sets a dangerous precedent for other Marine Parks. The Encounter Marine Park, like all the other Marine Parks has not yet got a management plan and therefore there are no guidelines yet as to appropriate activities within these boundaries. Therefore, we are concerned that this proposal is circumventing and undermining the Marine Parks process, currently still underway.

There is a risk that the waste products produced by this venture could negatively affect the surrounding coastal environments, all of which is a Marine Park and much of which is protected in a Conservation Park and an Aquatic Reserve.

ConservationSA strongly recommends not locating this venture in a Marine Park, or near to a Conservation Park, or near an Aquatic Reserve. We strongly advise against this kind of activity in any coastal region in South Australia.

Conclusion

In conclusion, ConservationSA strongly recommends the following:

- not taking southern bluefin tuna, a threatened species, from the wild for this venture
- not granting an aquaculture lease to this venture due to the precedent that it sets.
- not approving this development for all the risks outlined above.
- not locating this venture in a Marine Park, or near to a Conservation Park, or near an Aquatic Reserve.

We strongly advise against this kind of activity in any coastal region in South Australia.