

## Feedback Form

### Oceanic Victor Pty Ltd marine aquaculture pilot lease and licence application - LA00358 – AQ00315

Feedback is now being sought on PIRSA's assessment of a marine aquaculture pilot lease and corresponding licence application submitted by Oceanic Victor Pty Ltd to establish a tourism venture in the waters of Encounter Bay near Granite Island, Victor Harbor.

To provide comment on the application, please complete the form below.

Submissions must be received by **5pm on Friday 31 July 2015**. Related documents are available at [www.pir.sa.gov.au/graniteisland](http://www.pir.sa.gov.au/graniteisland)

This feedback form can be submitted via email to [pirsa.aquaculture@sa.gov.au](mailto:pirsa.aquaculture@sa.gov.au) or in writing to: Matthew Hoare, PIRSA Fisheries & Aquaculture, GPO Box 1625, Adelaide SA 5001.

Required fields are marked with an asterisk (\*)

#### Contact details

Name:\*                                    \_ Friends of Gulf St Vincent \_\_\_\_\_  
Company (if applicable): \_\_\_\_\_  
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What is your interest in the application?  
(multiple options can be selected):

- Member of the public
- Conservation
- Tourism
- Industry peak body
- Aboriginal Traditional
- Recreational Fishing
- Fishing Authority Holder

- Aquaculture Authority Holder
- Local Government
- Other** (other interest not listed above, please enter details below)

Further details (other interest not listed or lease/licence number):

\_\_\_\_\_Community Group\_\_\_\_\_

The Friends of Gulf St Vincent is a Community Group whose principal aim is to foster a unified approach to the protection and wise use of Gulf St Vincent.

Our comments regarding the Oceanic Victor aquaculture venture are as follows:

**Attraction of seals**

We note that the biogeographical report states that 15km is the recommended separation distance between aquaculture facilities and sea lion breeding sites, and mentions The Pages Islands (38km away) as the nearest breeding colony. It should be pointed out that there is currently concern about the impact of long-nosed fur seals on fisheries in the Coorong, while there are regularly around 20-30 seals at West Island (2-3km away) and seals are commonly seen all along the coast near Victor Harbor.

Aquaculture tuna pens in lower Spencer Gulf are subjected to continuing interactions with seals (Hamer et al. 2009). Long-nosed fur seals were seen frequently around cages, within the cages and resting on the pontoons of the cages. Whilst the fences on the proposed facility, planned to be 2.5 M in height, are likely to reduce the ingress of seals into the cage, they will need to be maintained efficiently to be successful in keeping seals out.

Furthermore, there is still a high likelihood of more marine mammals being attracted to the vicinity of the pen.

**Impact on little penguins**

Numbers of little penguins have declined in recent years in South Australia, including the colony at Granite Island. Little penguins are part of the diet of long-nosed fur seals (Page et al. 2005) and the fur seals have been implicated as a cause of the little penguin decline (Bool et al. 2007).

Installation of a tuna pen at Encounter Bay is likely to increase the number of long-nosed fur seals in the area and could increase predation of the already besieged little penguins at Granite Island.

**Attraction of sharks**

Moving up the food chain, the presence of more seals around granite island is likely to result

in greater frequency of their main predator, sharks, also being drawn to this location, with an increased risk of attacks on humans. Is there an intention to notify local communities and clubs involved in water-based activity (sailing clubs, surf lifesaving clubs, dive clubs and snorkelers in the community) of the potential increase in risk to people in the water?

#### **Entanglement or injury to other marine animals**

Apart from the Head of the Bight, Victor Harbor is the premier location in South Australia for whale watching, and during winter females and calves are regularly seen close to shore for extended periods. Accidental entanglement should be regarded as a possibility for whales and also dolphins.

#### **Wellbeing of the captive species**

The proposal states there will be daily inspections and removals of sick, injured or dead fish. Is there a frequency of fish deaths that will be regarded as excessive or unacceptable? Has there been any assessment of the likelihood of predation among the species in the second (non-BFT) cage? With a large number of species, can we expect that there will be an inevitable level of predation, and how will this impact on the experience of people diving or observing?

What precautions will be taken to safeguard the fish in the enclosure from the people swimming among them? For example, at Baird Bay, swimmers are not supplied with fins (to avoid accidental injury to the young sea lions) and are not allowed to apply sunblock - to minimise the potential impact of chemicals on marine life.

#### **Protection of local water quality**

Despite assurance that the fish will not be fed to satiation and that the floor underlying the proposed area is not noteworthy in terms of marine habitat, we believe there is still a risk of degradation and nutrient build up. Storms and tidal movement can potentially result in the area of impact of the pen being larger than predicted.

Coastal water quality is a prime matter of concern to the Friends of Gulf St Vincent. We have an ongoing Secchi turbidity monitoring program (funded by the AMLRNRM Board) and one of our most active volunteers submits regular readings from Victor Harbor. The EPA SA *Nearshore Marine Aquatic Ecosystem Condition Reports – Gulf St Vincent bioregional assessment report 2010–11* states of the Encounter biounit that "...habitats ... are slightly impaired and are beginning to show initial signs of nutrient enrichment" and "expanding coastal development throughout the Encounter Bay to Port Elliot stretch of coastline is putting considerable strain on infrastructure as well as the quality and quantity of stormwater discharges". We would urge PIRSA to make it a condition of any licences of this or other facilities in the area to conduct regular water quality/turbidity monitoring on site - particularly over summer when one might expect higher visitor numbers, more fish feeding and calmer conditions - to add to the marine condition data being collected by state agencies.

## Tourism/educational value

From the application it is not yet clear how educational values will be embedded into the facility. The licence application lists 61 marine species to be held in a series of enclosures, providing experiences for customers including swimming with fish, feeding fish from the surface and a touch pool. Apart from the pelagic species, none of them will be in a "normal" environment (as they might be seen, for example, at Noarlunga Reef) so there will be no opportunity to observe the ecology of the marine environment. We would be interested to see what learning materials and training the licensees propose to use or commission, and would recommend they liaise with the Marine Discovery Centre or other marine-focused centres with established educational credentials.

## References

Bool, N., Page, B. and Goldsworthy, S. D. (2007). *What is causing the decline of little penguins (Eudyptula minor) on Granite Island, South Australia?* SARDI Publication number F2007/000288-1.

Hamer, D., Shaughnessy, P. D. and Goldsworthy, S. D. (2009). *Operational interactions between seals and the tuna farming industry in Port Lincoln. In 'Innovative solutions for aquaculture planning and management: addressing seal interactions in the finfish aquaculture industry. FRDC Project number: 2004/201.'* (Eds S. D. Goldsworthy, B. Page, P. D. Shaughnessy, D. Hamer, K. D. Peters, R. R. McIntosh, A. M. M. Baylis, and J. McKenzie.) pp. 22 - 51. SARDI Aquatic Sciences Publication Number F2008/000222-1. SARDI Research Report Series No. 288.

Page, B., McKenzie, J., and Goldsworthy, S. D. (2005). *Dietary resource partitioning among sympatric New Zealand and Australian fur seals. Marine Ecology Progress Series 293, 283-302.*

Nelson, M., Gaylard, S., and Noble, W. (2012) *Nearshore Marine Aquatic Ecosystem Condition Reports – Gulf St Vincent bioregional assessment report 2010–11.*

This submission becomes part of the public record unless otherwise requested.

The aquaculture application to PIRSA forms part of an overall proposal by Oceanic Victor Pty Ltd submitted to State Government and managed under the unsolicited proposals process. The Department of Environment, Water and Natural Resources website has further details about the unsolicited proposal at [www.environment.sa.gov.au/granite-island-unsolicited-proposal](http://www.environment.sa.gov.au/granite-island-unsolicited-proposal)