



The voice for the environment since 1955



6 April 2005

Threatened Species Unit (silver perch recovery plan)  
NSW Department of Primary Industries  
Private Bag 1  
Nelson Bay NSW 2315

Dear Threatened Species Unit,

**Re: Public exhibition of the silver perch draft recovery plan**

The Nature Conservation Council of NSW (NCC) and Inland Rivers Network (IRN) would like to thank you for the opportunity to comment on the NSW draft recovery plan for the silver perch. As the State's peak environmental organisation since 1955, the Nature Conservation Council of NSW (NCC) works closely with member groups, local communities, government and business to ensure a positive future for our environment. NCC serves as the umbrella organisation for more than 120 environmental member groups to co-ordinate and develop NSW-based community education projects, scientific research, conferences, publications and awareness campaigns. NCC also advises key decision-makers at a local, state and national level. IRN is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. Since 1991 the Network has advocated for the conservation of biological diversity in these environments, the maintenance of essential ecosystem functions and the restoration of degraded habitats.

NCC and IRN strongly support the establishment of a recovery plan to *promote the recovery of silver perch in NSW to the extent that it can be considered secure and self-sustaining in the wild*. NCC and IRN would like to congratulate those involved in the development of this draft recovery plan and acknowledge the large amount of work and thought that it represents. Having said this, there are a number of additional actions that NCC and IRN would like to see included in the recovery plan. Most importantly, NCC and IRN believe the recovery plan does not take the necessary legislative action that will ensure recovery is achieved. It is lacking in the detail needed to limit development adjacent to wild remnant populations. New water-hungry developments could potentially have a huge impact on the remnant populations and without the ability and demonstrated will to prevent future developments that could further threaten the silver perch the recovery process will be slow and uncertain. Additionally, the lack of timelines in the plan significantly decreases the ability to measure the performance of the plan. Further information on these concerns is outlined in the following pages.

If you wish to discuss these comments further, please contact Megan Kessler, Fisheries and Marine Networker, NCC on ph: 9279 2466 or email: [mkessler@nccnsw.org.au](mailto:mkessler@nccnsw.org.au) or Brendan Fletcher, Coordinator, IRN on ph: 9212 5112 or email: [coordinator@irnsw.org.au](mailto:coordinator@irnsw.org.au)

Yours sincerely,

A handwritten signature in black ink that reads "Brendan Fletcher".

Cate Faehrmann  
Director

Coordinator

## NCC and IRN Submission Silver Perch Draft Recovery Plan April 2005

As the State's peak environmental organisation since 1955, the Nature Conservation Council of NSW (NCC) works closely with member groups, local communities, government and business to ensure a positive future for our environment. NCC serves as the umbrella organisation for more than 120 environmental member groups to co-ordinate and develop NSW-based community education projects, scientific research, conferences, publications and awareness campaigns. NCC also advises key decision-makers at a local, state and national level. Inland Rivers Network (IRN) is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. Since 1991 the Network has advocated for the conservation of biological diversity in these environments, the maintenance of essential ecosystem functions and the restoration of degraded habitats.

NCC and IRN strongly support the establishment of a recovery plan to '*promote the recovery of silver perch in NSW to the extent that it can be considered secure and self-sustaining in the wild*'. NCC and IRN would like to congratulate those involved in the development of this draft recovery plan and acknowledge the large amount of work and thought that it represents. Having said this, there are a number of additional actions that NCC and IRN would like to see included in the recovery plan. These are outlined below.

### Overall Comments

- The existing recovery plan objectives (page 30) should be changed to reflect the fact that it is important to not only protect existing stocks but to enhance them if the species is to recover. The third objective should be changed to *Protect and enhance remaining natural populations of silver perch*.
- An additional objective of the plan should be: *Apply scientific knowledge of silver perch to the management of remnant populations, aquaculture and stocking programs, recreational fishing and environmental flow management*.
- NCC and IRN believe the recovery plan does not take the necessary legislative action that will ensure recovery is achieved. It is lacking in the detail needed to limit development adjacent to wild remnant populations. New water-hungry developments could potentially have a huge impact on the remnant populations and without the ability and demonstrated will to prevent future developments that could further threaten the silver perch the recovery process will be slow and uncertain.
- While there are clearly defined performance criteria within the plan there are no timeframes or priorities for each action. There are a number of actions, such as the development of the Hatchery Quality Assurance Program, which should be given a high priority and a short timeframe and there are others that will require ongoing attention. The lack of timelines in the plan significantly decreases the ability to measure the performance of the plan.
- The plan currently stands in isolation. There should be better linkages between this plan, the Murray-Darling Basin Commission's (MDBC) Native Fish Strategy, and the work proposed for Victoria and South Australian. Cross-border projects should be included in this recovery plan.

### Habitat Protection and Restoration

- 7.2.2 – The Performance Criteria are currently too limited – this action should be expanded to include developing removal priorities for all significant barriers and require the removal of the top five of these barriers within the next 10 years.
- Add 7.2.4 Action 5) Require all development applications in the vicinity of remnant silver perch populations to undertake habitat restoration of the riparian zone as part of any development approval.
- Add 7.2.4 Action 6) Develop a comprehensive communication strategy for silver perch as per the recommendations from the Murray Darling Basin Commission Downstream Movement of Fish Workshop.
- Add 7.2.4 Action 7) Where a development of any sort will impact on wild populations of silver perch the Department of Primary Industries will not to provide consent to the development application.
- Add 7.2.5 Action 2) Establish aquatic reserves under section 194 of the Fisheries Management Act 1994 where there are remnant populations of silver perch to assist in minimising impacts.

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- Add 7.2.5 Action 3) Coordinate with the MDBC Native Fish Strategy to establish demonstration reaches where there are remnant populations of silver perch to assist in minimising impacts and rehabilitating habitat.
- 7.3.3 is the key action to address the many concerns raised throughout the document on the impacts of aquaculture facilities. This action must be completed within one year and that fact should be recognised in the document.

### **Fishing**

- 7.4.1 Action 2) should include distribution of information through fishing licence purchase and renewal and advertising in recreational fishing magazines.
- 7.4.2 This review should be incorporated into the current review of recreational fishing that is underway. In addition to those actions listed, it should specifically look at (1) banning the use of set lines in the areas where remnant silver perch populations occur and (2) closed seasons or gear restrictions below Torrumbarry weir and in other areas of significant populations during silver perch breeding periods.

### **Aquaculture and Stocking**

- 7.5.1 Action 3) should be removed. As per the Managing Fish Translocation & Stocking in the Murray-Darling Basin Workshop Proceedings all aquaculture and conservation stockings should be managed with the same integrity that would be given to a conservation stocking program.
- Add 7.5.1 Action 4) Improve compliance of fish releases including ensuring no transfer of diseased animals to waterways or other aquaculture facilities.
- Add 7.5.3 Action 3) Do not allow stocking outside the natural range of silver perch and allow no new stockings into waterways until management of the genetics of stocked populations has been improved.
- Add 7.5.3 Action 4) Determine the interaction (if any) between fish stocked in impoundments and wild populations and any impacts on genetics, disease spread etc that are associated with stocking.

### **Further Information**

Should you wish to discuss this proposal further, please contact:

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