



AUSTRALIAN
CONSERVATION
FOUNDATION



Mr Graeme Barden
Department of Environment and Heritage
GPO Box 787
Canberra ACT 2601

19 July 2006

Dear Mr Barden

Re: Nomination under the *Environmental Protection and Biodiversity Conservation Act 1999*: 'The Introduction of live native or non-native fish into Australian watercourses that are outside their natural geographic distribution' as a Key Threatening Process

Thank you for the opportunity to comment on the above nomination under the *Environmental Protection and Biodiversity Conservation Act 1999* ("EPBC Act").

Inland Rivers Network (IRN), the Australian Conservation Foundation (ACF) and the Nature Conservation Council of NSW (NCC) strongly support this nomination as an important addition to the key threatening processes detailed under the EPBC Act. IRN, ACF and NCC are of the opinion that the introduction of live native or non-native fish into Australian watercourses outside their natural geographic distribution has and will threaten the survival, abundance or evolutionary development of native species.

IRN was involved in the "Managing Fish Translocation & Stocking in the Murray-Darling Basin" workshop held in 2002. Whilst the workshop participants acknowledged that translocation and stocking activities are a valuable management action for certain purposes¹, there are risks associated with conducting such activities. The listing of translocation as a key threatening process under the EPBC Act recognises the significance of these risks to all aquatic species and provides an opportunity for these activities to be managed in a more ecologically sustainable manner through a Threat Abatement Plan, and for management to be more adequately coordinated and consistent amongst the states.

A Threat Abatement Plan will also be an important and valuable method to address a number of the key objectives in the Murray Darling Basin Commission Native Fish Strategy, as listed below:

8. Control and manage alien fish species;
9. Protect native fish from threats of disease and parasites;
10. Manage fisheries in a sustainable manner;

¹ However we note that this nomination does not include the translocation of native fish for the purposes of recovering endangered or threatened populations.

11. Protect native fish from the adverse effects of translocation and stocking;
12. Ensure native fish populations are not threatened from aquaculture.

Managing fish translocation and stocking is one of the six driving actions arising from the Strategy.

Scope of the threatening process

We support the inclusion of live native fish within the threatening process as natural populations are at risk from the potential release of genetically restricted material from native fish aquaculture. Such material can reduce the genetic fitness and hence viability of fish populations. Similarly, inadvertent translocations of diseased native fish could have enormous impacts on native fish populations (Native Fish Strategy, p 40-41).

We also support the expansion of this nomination to marine ecosystems. There is strong evidence that many marine species, especially those that have a marine and freshwater migration during their lifecycle, have regional genetic variation. Introduction of individuals not from this range has the potential to significantly impact on genetic fitness and there is evidence that marine diseases may be spread from marine aquaculture to live animals.

Species and Ecological Community impacts

IRN, ACF and NCC agree with the species identified and information provided in the nomination in relation to which species may be adversely affected by this process.

Information obtained from the NSW Department of Primary Industries indicates that recently discovered populations of redfin perch in the upper Lachlan River catchment could have adverse implications for Macquarie Perch and Southern Pygmy Perch populations.

Threat Abatement

IRN, ACF and NCC are of the opinion that the development and implementation of a national Threat Abatement Plan is a feasible, effective and efficient way to abate the threat from this process. The plan would enable a strategic and coordinated approach to the threatening process to be taken, which would enable the threat to be more adequately managed.

The Plan would include a range of activities such as determining national priorities for invasive fish eradication and control, and guide necessary research. There is also a need to determine containment solutions that will not negatively impact existing native fish populations. It will highlight the need for prevention through activities such as updating the quarantine list of permitted live fish under the EPBC Act to reflect the threat of invasive species entering our waterways.

There is a need for greater study into and management of the risks posed by fish translocation and stocking activities and there is a specific need for the Governments of the Murray-Darling Basin Agreement to recognise the full potential impacts of inappropriate stocking and translocation practices on fish species and communities and commit to reducing or avoiding such impacts through the introduction of consistent and appropriate risk assessment procedures. The Threat Abatement Plan is an appropriate avenue through which this recommendation can be realised.

The Native Fish Strategy recognises that “appropriate guidelines and codes of practice to minimise this risk are required. However, while some States do have guidelines in place, it is very difficult to verify whether these guidelines are being followed”. One of the key actions in the Strategy is to “ensure a consistent, coordinated and firm Basin-wide approach to the issue of fish translocation and stocking”, as well as to “Implement a comprehensive scheme for hatchery accreditation across the Basin”. An overarching Threat Abatement Plan would ensure that management is coordinated throughout the country, as well as assist the Murray-Darling Basin states to meet these requirements. It would be an important mechanism to ensure a precautionary approach is applied to manage the risk of disease outbreak, while providing an important vehicle through which a comprehensive quality assurance and accreditation scheme for aquaculture establishments can be developed for all States and Territories. It will also provide an education program to inform communities of the need for translocation management.

Please contact Amy Hankinson of IRN on 0407 279 088 if there are any questions arising from this submission.

Yours sincerely,



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