



Monaro Acclimatisation Society Inc
9 Thompson Drive
Tathra NSW 2550

Sustainable future fishing for trout and native fish

20 March 2024

The Hon. Tara Moriarty MLC
Minister for Agriculture, Regional NSW and Western NSW
52 Martin Place
Sydney NSW 2000

Dear Minister,

Recent Bans on Stocking of Trout in Monaro Streams

Since you have not as yet responded to my letter of 12 February 2024, I write to elaborate on a point I made in my earlier letter that “the viable existence of *Galaxias terenassus* (GT) ...is more concerned with the effects of climate change and loss of habitat from poor land use.” Yet DPI (Fisheries) immediate response to the listing of GT as endangered has been to ban stocking of trout in some of the premier trout fishing streams in the Monaro region of New South Wales. This decision defies the counterfactual observation that trout and GT have coexisted in these streams for over 130 years and that the sampling that underpinned the Conservation Advice showed that GT numbers were stable or increasing.

That Conservation Advice identified a range of issues that should be addressed to ensure viable GT populations, as follows:

1. Maintain any existing instream barriers (natural or artificial) and construct new instream barriers, where appropriate (i.e., not creating additional fragmentation to the subpopulation), to prevent incursion of introduced salmonid predators and other non-native fish species. This should include routine inspection and maintenance of barrier integrity to ensure the continued effectiveness.
2. Fire and climate change and extreme weather impacts:
 - a. Provide maps of known occurrences (including any translocations) and likely habitat to local and state Rural Fire Services and seek inclusion of mitigation measures in fire risk management plans, risk registers and/or operation maps.
 - b. Develop and implement a fire management strategy that optimises the survival of the species during fires.
3. Habitat loss, disturbance, and modifications impacts:
 - a. Maintain vegetated protection zones (no harvesting or soil disturbance) along the entire stream drainage network (wet or dry, stream channel to headwater drainage lines), within catchment(s) where the species occurs.
 - b. Control damage to riparian areas from domestic stock. Where required, use fencing to prevent access to stream banks.

4. Ex-situ recovery actions through translocation programs.
5. Information and research priorities:
 - a. Investigate the ecological traits and habitat requirements of the species, including:
 - i. life history traits, such as time to maturity, longevity, fecundity, spawning period, and number of young.
 - ii. diet and habitat preferences.
 - iii. desiccation, low dissolved oxygen, and water temperature tolerance (adults, juveniles, larvae, and eggs).
 - iv. predator-avoidance behaviour.
 - b. Investigate population genetic structure, levels of genetic diversity and minimum viable population size for successful self-sustaining subpopulations as per the primary conservation objective.
 - c. Investigate movement and dispersal patterns of adults and juveniles. This will provide additional information on key aspects of the species biology to aid management of GT subpopulations.
 - d. Investigate techniques for captive maintenance, breeding, on-growing and translocation.
 - e. Investigate options to enhance the resilience of the species' current habitat to climate change and options for providing new habitat that would be suitable for the species under climate change scenarios.
 - f. Undertake data-gap surveys and acquire baseline data for any newly discovered subpopulations.
 - g. Investigate susceptibility to endemic diseases and parasites. This includes (if possible) infectivity trials and monitoring through targeted or passive surveillance.

Not mentioned in the Conservation Advice is the issue of predation by the Great Cormorant and the Little Black Cormorant, which may be a greater threat to GT than trout. There has been an explosion in Cormorant numbers in recent years, which we believe is due to the large increase in target fish of the 5 to 9 cm size. These fish include gambusia, GT, carp, redfin perch and trout. Each individual Cormorant will eat between 400 to 700 grams of fish per day every day.

Not only did DPI (Fisheries) fail to notify the angling public of the stocking bans, it has not communicated to the angling public what actions it proposes to address the issues listed above. The angling public can rightly be cynical that the stocking bans have more to do with an anti-trout bias than with any serious attempt to manage GT populations. It is, after all, the angling public whose interests are served by DPI (Fisheries) – and whose interests appear to have been disregarded.

MAS is a primary stakeholder with DPI (Fisheries) and is recognised as such under the *Fisheries Act 1935* (NSW). In order that we may continue to effectively work with

DPI (Fisheries), I request your advice on the actions that will be taken to deal with the above matters.

Further, again as previously noted, we request that DPI (Fisheries) reconsider the bans. We believe that, had we been given the opportunity to comment on the Conservation Advice at its contemplative stage, we might have been able to influence the outcome in a constructive fashion.

I reiterate that we value and wish to continue our partnership with DPI (Fisheries), but the MAS believes that a new approach to decision-making regarding trout and river ecology issues needs to be developed and agreed upon. In particular, it should be an approach that recognises the MAS as an Organisation of Interest and a local manager of the fishery. We need to be engaged and consulted on these issues.

Yours sincerely

Kerry Pfeiffer

President
Monaro Acclimatisation Society