

Richard Tilzey  
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Dear Richard

**A strategic approach to the management of ornamental fish in Australia –  
Consultation Draft**

Thank you for the opportunity to provide comment on the above management approach for ornamental fish in Australia.

Recfishwest is the peak body representing the interests of the estimated 643,000 recreational fishers in Western Australia and we are formally recognised and funded by the Government in that role. We are concerned with environmental issues affecting marine and freshwater environments that may compromise the sustainability of recreational fishing.

The ornamental fish trade has been recognised by Recfishwest as a possible threat to our freshwater environment through the potential introduction of pests and diseases. A consistent national management strategy is something that has long been required for the ornamental fish trade, which at present has vastly differing regulations among states and territories.

The lack of licence requirements for the ornamental fish retail sector in Western Australia has long been a concern of Recfishwest and we would be willing to grant our full support behind a national regulatory licence for all retail operators.

Aquarium fish retailers can import thousands of exotic fish for commercial sale with little regulative control. However, if an aquaculture operator wished to import a similar number of non-native species, which will be held in strictly controlled impounded waters, the restrictions and regulations make such a request impossible. Interestingly it is the exotic fish imported for sale in the aquarium industry which would have the greatest chance of being translocated through irresponsible customers, but is the one most loosely regulated.

Implementation of a national noxious species list has the full support of Recfishwest. Regulation of noxious species already present in the aquarium trade needs addressing and strategies implemented for their elimination from the market. The risk of aquarium fish operators 'dumping' noxious species to prevent being caught could pose a significant risk.

Recfishwest agrees that there needs to be a review of the status of fish on the 'grey list'. A number of these species could pose significant threat to the natural environment if they find their way into our freshwater systems. It is important that the technical working group entrusted with this task has a broad

cross section of scientific expertise and industry experience to carry out this review.

An education program will be important to the implementation of the strategies developed in this management plan. Ornamental fish hobbyists need to be aware of the intense risk introduced species can have on the native environment.

The ornamental fish trade for a long time has flown under the radar due to a lack of regulative control. Recfishwest hopes that this management plan will be able to bring control to this industry that poses significant risk to the freshwater systems in Australia.

Should you require any further information or clarification please do not hesitate to contact me on 9246 3366.

Yours sincerely

Frank Prokop  
Executive Director

28<sup>th</sup> February 2006