The Chief Executive Officer
Attn: Executive Officer, Recreational Fishing Advisory Committee
Department of Fisheries
3rd Floor, The Atrium
168 St George's terrace
PERTH WA 6000

Dear Stuart

Re A Five-Year Management Strategy for the Recreational Trout Fishery

Thank you for the opportunity to provide comment on Fisheries Management Paper 234 - *A Five-Year Management Strategy for the Recreational Trout Fishery*. Recfishwest has been represented in the development of this management strategy as part of the Recreational Freshwater Fisheries Stakeholder Sub-Committee (RFFSS).

Recfishwest recognizes the need for sound management of Western Australian's limited freshwater fishing resources. The development of a balanced management strategy that ensures conservation values are upheld while maintaining access to freshwater fishing opportunities is essential if this fishery is to be enjoyed by future generations of Western Australians.

Recfishwest for the most part supports the recommended proposals in this document as a policy framework for the future management of the recreational trout fishery. We have the following comments relating to the proposals;

Recfishwest is concerned about the tone of section *4.2.1.2 Category 2 – Restricted waters*. This section contains the most important trout waters in Western Australia and the inference that the presence of any native (to Western Australia) species would preclude trout stocking is not supported.

A balance is required and trout and native species have co-existed in the waters of the Blackwood, Warren and Donnelly Rivers for a long period. Environmental degradation and not trout predation is the greater threat to native species, yet this is not made clear. Recfishwest does not support the banning of trout stocking just because managing environmental degradation is seen as too difficult.

The commentary on irrigation dams is overly restrictive. Recreational stocking of private dams, including by fishing clubs or other responsible groups should be permitted within catchments rather than a case by case basis.

In light of this, and the inappropriately draconian translocation policy, Recfishwest does not support *Proposal 3*. Recfishwest believes that approvals should not be required within all waters adjacent to waters in *Category 2 and 3*.

Similarly, Recfishwest believes that the conditions in *Proposal 6* are unnecessarily restrictive and that other groups should be allowed or encouraged to stock waters according to this and other

policies. The advent of a revamped Recreational Trust Fund will see the stocking of many other species such as barramundi, snapper, bream and King George whiting. The Department should not be given the opportunity to object to these initiatives each and every time they are proposed as would be the case in this management strategy.

Recfishwest would like to correct a historical inaccuracy in the document. The outbreak of *Mycobacterium marinum* was caused by the outdated and unfavoured practice of feeding trout untreated offal (in this case livers from pigs) which extraordinarily continues to this day. Known diseased fish and contaminated areas at Pemberton hatchery were continued to be utilised and stocked into the wild. It is therefore unbelievable that the Department, which was responsible through poor management practices to be the cause of a major disease, should insist that they be the sole provider of fish due to its concerns about disease.

Recfishwest agrees with ongoing disease testing as per *Proposal 7*. However, we believe that brown trout ova should be regularly sourced from Gaden trout hatchery in NSW. This would mean that local brown trout broodstock would not be required.

Recfishwest believes that there needs to be two major reforms to the husbandry practices at Pemberton. Firstly, the hatchery should be managed as part of the recreational fisheries management objectives. Research should be sub-contracted out at fully cost recovered rates. Fish should only be supplied to aquaculture ventures after production for recreational stocking has been reached. The staff should undertake education, extension and potentially compliance activities during quiet periods.

Secondly, rainbow trout broodstock should be selected for beneficial features for the recreational fishery. Fish should be fast growing, slow maturing and not docile. Rainbow trout become egg bound in the wild when no suitable spawning substrate occurs. Suitable spawning substrate is conspicuously absent in most of Western Australia. It is therefore logical to promote slow maturing fish to increase the benefit from stocking, as well as continue to explore the use of haploid or polyploidy fish which would in effect be sterile females.

Selecting docile fish might be easier for the hatchery or aquaculture but is not a preferred characteristic of fish to be stocked into the wild, especially if redfin perch are also present.

Recfishwest does not support the use of the current translocation risk assessment process. This document is incredibly restrictive and impractical and has never been subject to management review or scrutiny by the RFFSS. A more logical and practical policy must be developed as a priority by the managers of the resource in conjunction with the users.

As with our comments on *Proposal 7*, the protocol in *Proposal 9* should be actively explored for brown trout ova from NSW or Tasmania.

Recfishwest supports *Proposals 10, 11* and *12*, however, a case can be made for a bag limit of two trout per day throughout Western Australia.

Recfishwest supports *Proposal 13*, although we recognise that this is somewhat controversial. We would like to add that the two rods must be within 10 metres and in line of sight of the angler at all times.

Recfishwest has not been able to reach a consensus on *Proposal 14*, so would prefer not to comment.

Recfishwest supports the changes to the closed season in *Proposal 15*, including allowing Big Brook Dam to remain open. We are, however, concerned that signage is some areas is inaccurate. For example a sign adjacent to the Warren River near King Trout on the Pemberton – Northcliffe Road describes the closed season without informing the public that the water of the Warren River is in fact not closed.

Recfishwest has been a proud contributor to the deliberations of the RFFSS. While trout management is difficult and controversial the RFFSS has proved to be a very constructive and well serviced committee. We believe that the trout fishery and its management have an important place in Western Australia.

Please do not hesitate to contact our office on 9246 3366 should further information or clarification be required.

Yours sincerely

Frank Prokop
Executive Director

31 December 2009