

#138

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 31, 2023 1:46:48 PM  
**Last Modified:** Tuesday, October 31, 2023 1:49:43 PM  
**Time Spent:** 00:02:54  
**IP Address:** [REDACTED]

Page 1

**Q1**

First name

[REDACTED]

**Q2**

Last name

[REDACTED]

**Q3**

Organisation name (if relevant)

NSW Council of Freshwater Anglers

**Q4**

Email address

[REDACTED]

**Q5**

Phone number

[REDACTED]

**Q6**

Yes

Can we contact you about your submission (if required)?

**Q7**

I am representing an NGO or community group

What best describes you?

Q8

Statewide NSW

Which of the following regions best describes your location/area of interest?

---

Q9

I agree to have my submission published with my name or company/organisation

The Commission publishes submissions on its website for transparency. If you do not want your personal details or responses published, please tell us below.

---

Page 2

Q10

To what extent are the NSW environment, industries and communities currently impacted by invasive species?

The current impact of invasive species in NSW is significant and little is being done (or seen to be done) to control many of these invasive species. We welcome the recent announcement of aerial culling of wild horses in Kosciusko National Park and we hope this is effective and undertaken without delay. However, much more needs to be done with respect to feral deer, carp, redfin perch, tilapia and gambusia (noting that tilapia is a new threat in the north of the state and could be stopped now. Gambusia are a hidden threat to juvenile native species). There are no obvious actions being undertaken to control these species.

---

Q11

To what extent do you think existing programs in NSW are effectively managing invasive species?

Current management programs appear to be completely ineffective. For example, feral deer populations continue to increase and encroach further into both public and private land. Nothing is being done to control carp numbers or that of redfin perch.

---

Q12

What, if any, are the key barriers to effective management of invasive species?

Key barriers appear to be lack of Government intervention to control invasive pests. In addition, there are key barriers to individuals such as complex permit systems. There are clubs and organisations that would like to take action against freshwater fish species, but this is limited to line fishing. These organisations need to be able to trap or net areas under permits to make some impact on the pest fish with others being returned to the water. These actions should be encouraged and co-ordinated by DPI.

The lack of any first strike response from any agency only allows the increased spread of pest species. We need to see more on ground action from NSW agencies.

It is suggested that the NCCP may release a virus to control carp, but if the virus is ever put to use, surely there is a need to plan for remaining populations to be targeted by another measure. The fact that there is no such plan is a further indication of the lack of action by NSW Government agencies.

DPI state that they do not have resources to control carp. For example, on the Carp Control Information page of the NSW DPI it advises that " ...NSW DPI does not have the resources to send staff to remove carp from local sites on request...". It appears to us there is significant under resourcing within NSW Government agencies to undertake effective invasive species control. This situation should immediately be rectified. This lack of progress of invasive species control and resourcing has been ongoing for far too long.

---

**Q13**

How has invasive species management changed since the introduction of the NSW Biosecurity Act 2015 legislation and associated programs and plans?

We do not see any effective management changes since this Act was introduced. Further, while the NSW Invasive Species Plan 2023-2028 seems to indicate that more will be done, history will show that these actions have failed in the past. This document is poorly delivered with no effective definition of what an invasive species is in the opening section of the document and there are no specific management plans for the state of NSW described in this plan. It is mostly motherhood statements and actions, such as "For example, the Plan will help guide regional prioritisation and work programs for weed and pest animal management. The Plan states that "NSW DPI will coordinate monitoring of and reporting against implementation of this Plan ", but there are no specific management actions mentioned in the Plan.

---

**Q14**

What are the future risks posed by invasive species to the NSW environment, industries and communities?

It is well known that future risks are large in terms of environmental and economic harm and there has been little progress in reducing these risks over the past decade. It is likely that risks and harm have only increased, such as we have all witnessed with feral horse populations in Kosciusko National Park.

---

**Q15**

What opportunities do you see to improve the outcomes of invasive species management in the future?

Opportunities abound. There are significant opportunities to work with organisations such as ours across areas impacted by invasive species in NSW. Significantly, much better resourcing of efforts is required within the NSW Government and much better relationships with key stakeholders need to be established. Species management plans, action targets, and reporting are required. For example, what waterways in NSW are impacted by carp and which waterways are free of this invasive species? What actions are being taken to protect those waterways free of carp? What management actions are being taken to protect waterways recently invaded by carp? What is being done to assist the community in managing carp populations, such as not allowing live or dead carp being returned to waterways?

---

**Q16**

Any other comments?

The NSWCFCA believes that the present level of invasive species management in NSW is very disappointing, particularly in respect to protecting NSW waterways. We would encourage this review to specifically address the lack of funding for management actions being undertaken in NSW and the inaction by various NSW Government agencies in addressing the costly issue of invasive species in NSW.

---

**From:** [REDACTED]  
**Sent:** Tuesday, 31 October 2023 6:10 PM  
**To:** NRC  
**Subject:** Further information - Invasive Species Management Review

Dear Sir/Madam,

The NSW Council for Freshwater Anglers made a submission earlier today on the Invasive Species Review. We wish to add a further example but the online website survey has closed. Please accept this further submission to our earlier comments.

**Additional comment:**

We have highlighted below some specific examples in addition to our previous submission:

It appears that carp *Cyprinus carpio* is not scheduled anywhere obvious. We found it was much easier to find things when it was all under the Fisheries Management Act. Now information is spread across various websites and documents.

**Biosecurity Regulation 2017**

**Division 5 Aquatic pests and diseases**

**18 Prohibition on certain dealings**

(1) A person must not engage in any of the following dealings with an aquatic pest or disease listed in Part 2 of Schedule 1—

- (a) have possession or control of the pest or disease,
- (b) buy or sell the pest or disease,
- (c) move the pest or disease,
- (d) release the pest or disease.

(2) This clause does not apply to a dealing that merely involves—

- (a) a person catching a fish (other than *Oreochromis mossambicus* (Tilapia/Mozambique Mouthbrooder)) from waters and then immediately returning the fish to those waters, or
- (b) dealing with a dead fish.

**Comment**

Cl 18 (2)(a) sends completely the wrong message in respect of redfin perch. Looking at social media, it would appear that the redfin fanciers take some encouragement from this regulation to assert that redfin really aren't that much of a problem. We know that they are of course.

The exception as regards *O. mossambicus* at (2)(a) should apply to (2)(b) also.

Being a mouth breeder, a dead Mozambique tilapia may have live fry or viable eggs in its mouth, so any dealing with a dead fish has the potential to spread the species. The Queensland legislation is very explicit regarding this and we believe that the NSW Regulation should do also.

In regards to tilapia from the DPI website at:

<https://www.dpi.nsw.gov.au/fishing/aquatic-biosecurity/pests-diseases/freshwater-pests/finfish-species/tilapia>

Tilapia is the common name for a large number of cichlid species. In particular, *Oreochromis*, *Pelmatolapia* and *Coptodon* genera, which have been found in Australia's waterways.

Mozambique tilapia are listed in the top 100 of the world's worst invasive species.

The NSW Biosecurity Act 2015 lists Mozambique tilapia (*Oreochromis mossambicus*) as a notifiable species under Schedule 1, Part 2 of the Biosecurity Regulation 2017.

Under Clause 18 of the Biosecurity Regulation 2017, it is illegal to possess or control, buy or sell, move or release this pest in NSW.

Under Clause 19 of the Biosecurity Regulation 2017, this pest, if landed through recreational fishing or other means, must be dispatched immediately and may not be returned to the water.

These all seems reasonable BUT the Regulation actually only states:

#### **19 Tilapia**

A person who catches any fish of the species *Oreochromis mossambicus* (Tilapia/Mozambique Mouthbrooder) from waters must not deal with the fish except to the extent necessary to humanely kill the fish.

Note 1—

The presence of *Oreochromis mossambicus* (Tilapia/Mozambique Mouthbrooder) is required to be notified under Division 2.

Note 2—

*Oreochromis* spp. (except *O. mossambicus*), *Sarotherodon* spp. and *Tilapia* spp, (except *T. buttikoferi*) are prohibited matters under Part 4 of the Act.

We believe that Cl 19 needs to explicitly state that the dead tilapia cannot be returned to the water and must be disposed of in garbage bins or buried well above the high water mark (required in Queensland) due to the reasons we have noted above. The penalty for contravention in Queensland is 500 penalty units – for an individual = \$154.80 x 500. The penalty for NSW is not apparent to us but for similar matters it seems to be a \$200 fine.

These examples are intended to further highlight the poor approach to invasive species management in NSW.

Regards

[REDACTED]

[REDACTED]

NSW CFA

Our email address is :

[REDACTED]