

**Tasmanian Conservation Trust Submission on the
Western Lakes Wilderness Fishery Draft Fishery Management Plan**

Western Lakes Plan
Inland Fisheries Service
PO Box 288
Moonah
TAS 7008

May 6th 2002

Dear Sir/Madam

Western Lakes Wilderness Fishery Draft Fishery Management Plan

The Tasmanian Conservation Trust would like to make the following comments on this draft plan. The TCT's main concerns are summarised below.

The TCT considers the continued existence of the Western Lakes Fishery to be a privilege to the angling public. Tolerating, and even encouraging, the presence of an introduced predator species such as brown trout within a World Heritage Area and a significant conservation reserve is in itself a major concession to recreational anglers. In light of this, all other environmental impacts associated with angling activities should be absolutely minimised. Key points in achieving this are:

- Removal all weirs unless they are providing a specific management or conservation service.
- Banning wading and boating from sensitive areas.
- Maintaining trout-free waterways, and de-stocking some trout-full waterways.
- Identifying areas of high conservation value for the preservation of native fauna and flora.
- Careful consideration and regulation of trout stocking activities.
- Banning of bait fishing.
- Reviewing access points.
- Increased monitoring and research.
- Increased angler and general public awareness/education.

1. Vision statement

The overarching goals should be amended in the following way:

- "Preserve existing natural values for which the area is valued" should be amended to state "Preserve, and where possible rehabilitate, the natural values for which the area is renowned". This would acknowledge that there has been some degradation of the area, and that the plan embraces rehabilitation where possible.
- Whilst the TCT is very supportive of the concept of ecosystem based management, it is unclear to us how this concept could be reconciled with the continued sufferance, and even enhancement, of stocks of a significant, introduced aquatic predator in the form of brown trout. Ecosystem based management would demand the attempted de-stocking of this species from the area, something that we concede is unlikely to occur.

2. Water management

The presence of illegal weirs within the boundaries of the fishery should not be tolerated unless there is an urgent and specific conservation or management issue associated with a specific weir i.e. isolation of native fish/invertebrate populations from introduced species. IFS should conduct a review of weirs within the fishery and schedule dismantling of all unnecessary structures. Anglers must be informed about the impacts of weirs, and the penalties for illegally building such structures.

Research into the impacts of wading should be prioritised, and a wading ban implemented in sensitive areas until the results of the research is known. Similarly, boating should be banned from all waters without adequate boat launching facilities. Application of the precautionary principle when assessing where to place such bans is encouraged.

3. Native fauna and flora

The identification of comprehensive, adequate and representative system of waterways within the fishery that have a high diversity of native fauna and flora, and are also preferably free of introduced species, should be a priority. If introduced species are present in any of these waterways, then steps should be taken to remove these species. Survey and research work is obviously an integral part of this process, and is unconditionally supported by the TCT.

4. Introduced species

The TCT is highly supportive of survey work to determine the extent of introduced species within the fishery, and also of the banning of all bait fishing practices within the fishery. The latter is of particular importance, as

the continued allowance of bait fishing threatens the ecological integrity of the entire region. Partial bans are not an acceptable outcome.

As has been noted, the TCT is very supportive of de-stocking of particular waterways within the area. Similarly, trout stocking activities should only take place under the following circumstances:

- the waterway has been stocked with trout for at least 10 years;
- the waterway is not considered to have high conservation value;
- the stocking is done by IFS staff; and
- an assessment is made of the impacts on native freshwater fauna.

The TCT is very supportive of the active discouraging of illegal stocking and the identification and closing of illegal hatcheries remaining a priority for IFS. The TCT is also supportive of amending IFS regulations to make the possession of aquatic fauna within the entire fishery (not just the WHA) illegal, and the formalisation of a relationship with AQUIS.

5. Access

The issue of access is at the heart of illegal activities within the fishery, and the TCT is supportive of the stated intent to address access issues.

6. Research/Monitoring and Education activities

The TCT is highly supportive of the stated intent to generally increase research and monitoring activities, as well as angler and general public awareness/education activities.

If you would like additional information on this submission or any related matter, please contact Craig Woodfield on 6234 3552.

Yours sincerely

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