



**NATIVE FISH AUSTRALIA (Vic) Inc.**  
PO Box 162 Doncaster 3108

Travis Dowling  
Executive Director Fisheries Victoria  
DEDJTR  
1 Spring Street  
Melbourne 3001

Dear Travis,

**Re: Fisheries (Trout cod) Notice**

Native Fish Australia (Vic) has recently been contacted by you requesting feedback on a Fisheries notice to open a recreational Trout cod fishery in Lakes Sambell and Kerford. At a recent meeting of NFA(Vic) and via email and other electronic mediums, members and supporters discussed the merits of the proposed Trout cod fishery in detail.

NFA (Vic) fully supports the opening of a Trout cod recreational fishery at Lakes Sambell and Kerford. We have for many years lobbied for the opening of a Trout cod recreational fishery in North East Victoria and believe this is a step in the right direction. NFA (Vic) has demonstrated long time support for the establishment of a recreational Trout cod fishery and documented this back in July 2006 with the publishing of the "Proposal for the Establishment of Recreational Fisheries for the Bluenose or Trout cod *Maccullochella macquariensis* in Victoria". We have breed Trout cod on a number of occasions in our native fish hatchery and collected numerous Trout cod for Snobs Creek that were used for broodstock. We continue to support actions taken by Fisheries Victoria and other stakeholders in developing new self sustaining populations of Trout cod and in promoting the opening of a recreational Trout cod fishery in Victoria. NFA (Vic) welcomes the input and efforts of other representative angling groups that have recently joined this long running campaign.

NFA (Vic) is in favour of a **bag limit of one fish per person per day** and the **introduction of a slot limit**. We believe that is proposed **slot limit of 40 to 50 cm is too small** and should be increased to be in line with the current Murray cod slot limit of **55 to 75 cm..**

This is for a number of reasons as listed below:

- Most members would rather a "catch and release" fishery only. This is mirrored in the recent survey conducted by VRFish and NFA where 5

comments by theme said that the fishery should be catch and release only. The survey also showed 44.3% of respondents preferred a slot limit greater than the one proposed in the notice.

- There is clear problems with most anglers not being able to distinguish between a Trout cod and a Murray cod. Whilst this is not seen as a major problem in these two lakes, when the recreational fishery is expanded to include other waterways, there will be major problems if there are different size regulations for the similar looking species. NFA (Vic) have conducted a number of catch, measure and release angling competitions in the Murray below Yarrawonga for the last 21 years. We have found that up to 50% of experienced local anglers notate "Cod" rather than Trout cod / Murray cod as they still cannot differentiate between the two species. This is the case even though we have provided clear illustrations of the differences between Trout cod and Murray cod on all entry documentation.
- The Conservation status of Trout cod under both the FFG act and the EPBC act. Trout cod are currently listed as **Critically Endangered** on the Advisory list of threatened fauna in Victoria and **Endangered** under the EPBC act. Both listings suggest the species is facing an **extremely high risk of extinction** in the wild. It is our understanding that no matter how or where Trout cod are sourced, as soon as they are stocked into any waterway they are directly covered and need to be managed under both pieces of legislation.

Along with the changes proposed in the fisheries notice NFA (Vic) believes there are a number of other important issues directly relating to but not covered by the fisheries notice that need immediate attention by Fisheries Victoria and other stakeholders.

1) **There needs to be a clear plan for the delisting of Trout cod from Critically Endangered/Endangered to Vulnerable.**

With a number of self sustaining populations of Trout cod throughout Victoria, it is well and truly time to delist the conservation status of Trout cod in Victoria. A good understanding of artificial propagation techniques for the species and the ability to restock large numbers of Trout cod also support this.

2) **There needs to be a plan for the intensive stocking of at least two other waterways designated for recreational fisheries.**

NFA (Vic) believes that a number of other waterways should be intensively stocked over an extended period with Trout cod in a similar way to the Ovens river stocking between 1996 and 2006. This should include the middle Goulburn River around Trawool and possibly Lake William Hovell or Lake Buffalo. A meeting of major stakeholders needs to be held to designate future fisheries.

3) **There needs to be substantially better management of both lake Sambell and Lake Kerford.**

Historically, both lakes have effectively been managed as mixed fisheries. This is still the case with Lake Sambell, with Golden perch, Rainbow trout and Trout cod all stocked in 2014. There have been a number of reports of Golden perch and Redfin caught that have juvenile Trout cod in their stomachs. If a premier Trout cod recreational fishery is to be established for both lakes there needs to be a concentrated effort on Trout cod, with other species not stocked for a period of time. With recent stock assessments showing limited numbers of Trout cod in both lakes, there is also a

need to increase stocking rates well above the current 5000 per year. NFA (Vic) also suggests the stocking of a good number of larger fish into both lakes to kick start the fishery, with fish either translocated from the Murray or Ovens rivers, or on grown to a much larger size before stocking.

4) Fisheries need to introduce a seasonal angling closure of the Ovens River between Wangaratta and Myrtleford as described and justified in the **NFA proposal for the introduction of a seasonal angling closure on the Ovens River**. We believe this will greatly enhance the Ovens River population of Trout cod in the same way the seasonal angling closure in the Murray River below Yarrawonga weir has resulted in a much expanded Trout cod population in the Murray. Protecting breeding Trout cod in the Ovens River will also assist with the delisting of Trout cod from Critically endangered to Vulnerable.

5) NFA (Vic) is concerned that **populations of Trout cod in both lakes are not yet ready for the demands of a sustainable 'put and take' recreational fishery** as documented to VRFish in a letter from Ross McGowan in December 2014. This is particularly evident in Lake Sambell with only one Trout cod found in the 2015 survey. The assessments also showed a low average length for Trout cod in Lake Kerford with an average length of only 15-20 cm and a maximum length of 40cm. As already documented in this letter, NFA (Vic) is fully supportive of the opening of a Trout cod recreational fishery for Lakes Sambell and Kerford. Due to the low numbers of Trout cod and the low average length, it would be better to delay the opening of the fishery until future stock assessments show a larger population and a larger average length in both lakes. By delaying the opening of the fishery until it is ready, it will prevent large amount of angler dissatisfaction if the fishery is opened prematurely.

Thank you for giving Native Fish Australia (Vic) the opportunity to provide feedback on the opening of the Trout cod fishery for Lakes Sambell and Kerford. We hope the comments documented in this letter will lead to major improvements in the proposed fishery.

If you would like to discuss any of the points raised, I can be contacted on the number below or via [nfavic@yahoo.com.au](mailto:nfavic@yahoo.com.au).

Yours faithfully

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