



IMAGINE
THE YARRA

DRAFT YARRA STRATEGIC PLAN

PUBLIC CONSULTATION

SUBMISSION COVER SHEET

Submission Number:	215089
Name (Individual/Organisation):	Native Fish Australia (Vic)
Attachments:	Attachment 1 – Written submission



NATIVE FISH AUSTRALIA (Vic) Inc.

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Draft Yarra Strategic Plan

Native Fish Australia (Vic) was formed in the early 1980s as a wholly volunteer representative organisation, with the main aims to promote and protect native fish species for future recreational angling. Since inception we have advocated for native fish by organising numerous public live fish displays, regular talks to community and angling groups and participation at countless meetings and workshops on the future of native fish particularly in the Yarra River catchment.

NFA (Vic) has had a long association of involvement with the fish and the environment of the Yarra River. This has included sitting on a number of consultative committees with Melbourne Water, the VEW and Fisheries Victoria where we have spoken on behalf of the ecological communities within the river. Since around 1993, we have actively engaged in the research and breeding of Macquarie perch from the Yarra River at our hatchery at La Trobe University and also assisted the Snobs Creek hatchery with the capture and provision Macquarie perch for their breeding program.

NFA (Vic) supports the aspirations of the Yarra Strategic Plan but have a number of concerns with the current plan.

Firstly there is little or no mention of other reports/plans that have been produced recently and should have a direct influence on the YSP. These include:

- The recent report by the Commissioner of Environmental Sustainability on the “State of the Yarra and its Parklands” published in 2018
- The Co-Designed Catchment Program for the Yarra Catchment – Working together for healthy waterways published in October 2018.
- The National Recovery Plan for the Macquarie Perch (*Macquaria australasica*) published in May 2018
- The Freshwater Fisheries Management Plan published by the Victorian Fisheries Authority in September 2018.
- The Native Fish Report card for the Yarra River that can be found at <https://www.nativefishreportcard.org.au/>

Much of the language in the draft report is vague and aspirational in its wording. Clear definitions need to be provided for the following;

- What is a clean river?
- What is a healthy river?
- What is “net gain”?
- How is the “health of the river” actually measured?
- How are the objectives actually going to be measured?
 - Is there a current baseline to work from?
 - How will success be measured?
 - Are there going to be timelines for key objectives
 - How are the actions within the objectives going to be delivered?
 - Where will funds for the actions in the objectives be sourced?

In essence NFA (Vic) is concerned that within the draft YSP there is no recorded baseline, and therefore it is difficult to assess what gains will actually be made with the implementation of the plan.

NFA (Vic) believes that one of the major problems with the ecological health of the Yarra River is the levels of turbidity & Suspended solids. Historically the river used to run clear for the majority of the year. In recent times the levels of turbidity & suspended solids appear to have increased dramatically. This increase has a detrimental effect on the aquatic flora & fauna within the river with critical habitat often smothered in layers of fine silt. There is no mention of this within the draft plan.

- Is Turbidity & Suspended Solids measured as part of routine monitoring?
- Is there any up to date data on Turbidity & Suspended Solids levels throughout the river?
- Will SEPP (waters) be used as a guide to improve water quality in the river?

There is no mention in the YSP of actual key stone endangered species. Macquarie perch were first translocated into the Yarra River in the 1850s and the population is the result of numerous translocations from populations across the state. Recent studies have found that this population is the most important of all existing populations in Victoria due to its genetic robustness. It has recently come to our attention of a change in population structure from a seemingly stable and robust population into one that is in decline with a lack of larger fish. This has been demonstrated by recent surveys conducted by scientists at Arthur Rylah Institute, and by anecdotal evidence collected by NFA (Vic) members from many years fyke netting and angling across the river.

The YSP needs to include actions to support and promote health native fish populations within the river, particularly Macquarie Perch and Australian Grayling.

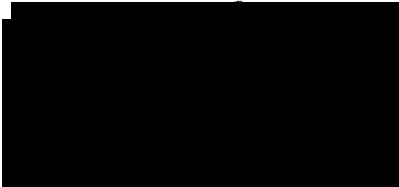
Other points that need to be included:

- Environmental flows need to be planned and implemented for ecological outcomes.
- There needs to be acceleration of the acquisition of land/properties that are adjacent to the river and are currently covered by the overlay
- There needs to be an action to reinstate suitable instream habitat for fish and other aquatic fauna throughout the catchment

NFA (Vic) is concerned that there appears to be no funds allocated to the actions listed within the YSP. Does that indicate that only a portion of the actions within the performance objectives of the YSP will be attempted? Will actions that appear to be easily/cheaply implemented be chosen over other actions?

Native Fish Australia (Vic) is keen to be involved in the discussions around the draft Yarra Strategic Plan. We remain available to participate and support any forum to review the draft plan and assess suggestions by various stakeholders.

Yours faithfully,

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29 March 2020