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26<sup>TH</sup> April 2008

Richard Perry Esq.  
Quarantine and Biosecurity Review Secretariat  
Department of Agriculture, Fisheries and Forestry  
Australian Government , Canberra

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Dear Sir,

NSWCFA Submission for the Quarantine & Biosecurity Review

The NSW Council of Freshwater Anglers Inc. (NSWCFA) is most appreciative of this opportunity to make a contribution to this important review, and in so doing wishes to focus on our border protection of the Australian freshwater aquatic fishery in the attached submission.

Since December 2005 the NSWCFA has been in correspondence with the Australian Quarantine Inspection Service (AQIS) in regard to safeguarding against the very real threat from the introduction of the northern hemisphere algae, *Didymosphenia geminata* (Didymo). While there still remain matters of concern to Australian recreational fishers regarding this particular threat, this submission will use this illustration to identify what appears to be weakness in the overall system of our border protection.

We have acknowledged the fact that to entirely eliminate risk is unrealistic. Yet to not have in place simple mechanisms that properly inform the travelling public entering Australia of the need for taking precautions, and disclose to the authorities upon entering Australia items that are capable of introducing disease and plant material that have the capability of destroying our native animal life and aquatic environments is not acceptable. Likewise, the inadequacy of inspection in circumstances of heavy throughput, and such like, is opening the door to the introduction of unwanted infestations which once released in Australia may be irreversible. We have such situations and these need correction without undue delay.

The threat of foot-and-mouth disease has given rise to strict and all embracing strategies to prevent the importation into Australia together with stand-by procedures of isolation should ever it be found here. Yet, in regard to our waterways and the aquatic life therein, there appears to be no such effective strategy. To shut down the spread of an infestation in waterways is virtually impossible as has been shown to be the case with Didymo in the South Island of New Zealand.

The economic and socio-economic significance of the recreational fishing industry is outlined in the submission.

NSWCFA seeks the introduction and a tightening of biosecurity procedures that will ensure that Australian freshwater environments are reasonably protected from the importation of aquatic disease and destructive plant material. This request, we believe, is in line with the managed risk systems outlined in your terms of reference.

I remain,  
Yours sincerely

Rodney Tonkin  
Immediate Past President  
NSWCFA Inc.

**NSW COUNCIL OF FRESHWATER ANGLERS INC.**

**SUBMISSION**

**TO THE**

**QUARANTINE AND BIOSECURITY REVIEW**

**CONDUCTED BY**

**THE  
FEDERAL DEPARTMENT OF AGRICULTURE,  
FISHERIES AND FORESTRY**

**Dated 27<sup>th</sup> April 2008**

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## INTRODUCTION

### Significance of the Australian Recreational Fishing Industry

The National Recreational and Indigenous Fishing Survey (Henry et al, 2003), the most comprehensive survey of this subject ever undertaken, identified 3,362,990 of the then population of Australia were actively involved in recreational fishing in this country. The economic significance of this activity, measure in annual attributable expenditure at that time, totalled \$1,854,800,000, or in excess of \$550 per recreational fisher.

The survey grouped attributable expenditure into 10 main categories, and excluded normal every day consumables such as food and drink. These categories of related expenditure consisted of accommodation, camping gear, bait and berley, boat and trailer, specialist clothing, diving and fishing gear, related travel expenditure, and fishing fees and licence expenditure. No attempt was made to identify salt and freshwater expenditure as many anglers fish in both mediums.

This economic analysis takes no account of the significant social and environmental values involved. Wide acknowledgement has been given to the health benefits involved from sport and recreation, such as an involvement in this relaxing outdoor recreational pursuit of fishing. Further, the condition of a fishery is a good indicator as to the wellbeing of any waterway, which in turn is essential to all living things on this planet.

### Increased Threat of Infestation

The ever increasing volume of in-bound people and baggage transport, linked together with the speed at which air travel is capable of today, presents an ever increasing challenge to effectively safeguarding our national biosecurity.

A flight half way round the world is now measured in only hours. Because of the sheer volume of people and goods inward bound only a relatively small portion are being subjected to investigative surveillance due to what appears to be the lack of adequate resources to handle the throughput. As a consequence the risk of disease and/or unwanted plant material gaining access to our shores, given our present level of control, would appear to be increasing.

Isolation in the South Pacific is no longer protection from infestation as once may have been considered protection enough. In recent times Australia has witnessed the pilchard kill round much of our coastline. New Zealand is now battling a freshwater infestation of the northern hemisphere algae *Didymosphenia geminata* (Didymo), which is not only impacting adversely on their commercial and recreational fisheries, but causing damage to their hydro electricity generators and blocking irrigation channels.

## **BACKGROUND TO CONCERNS FOR THE FISHERY**

### Reports of Introduced Infestations

The Great Lakes of North America have in recent times experienced the introduction of a virus that is adversely impacting on the wildlife salmon population and destroying much of both the commercial and recreational fisheries involved in those waters.

A somewhat similar impact was experienced around the coastline of southern Australia a few years back when the saltwater pilchard population was severely depleted.

Last year many of the fresh-waterways of the South Island of New Zealand were infested with *Didymo*. It is reported that this infestation originated from a North American tourist who inadvertently brought the algae in on some recreational equipment. Now this algae has spread throughout the South Island waterways bringing an unresolved costly problem to the aquatic wildlife and industrial operations, such as hydro-electricity generating power stations and agricultural irrigation systems.

### Impact of Pest and Disease Infestations

The cost to the New Zealand Government has already amounted to a multi-million dollar outlay in professional field work, control measures, public education, and scientific research in an attempt to find a solution to the *Didymo* problem. These are but some of the direct costs. Just as significant may be the eventual downgrading of the New Zealand fishery as an attractive location for international recreational fishers to spend their time and money.

The South Island has numerous water storages for hydro electricity generation. When the algae blooms vast amounts of the detached algae clog the generators and cause considerable damage to the turbines. Similar problems of clogging irrigation channels, developed for agricultural production, which is so important to the New Zealand economy, have also been occurring.

The risks to our Tasmanian and Snowy Hydro Schemes and all high level waterways and irrigation schemes would be the same as being experienced in New Zealand were *Didymo* to find its way into Australia. In addition, much of the recreational freshwater fishery is dependant on waters that would also be prone to being infected with this alga.

## The Irreversible Nature of an Infestation

While scientific developments have opened up new avenues of advancement, such as with genetic engineering, developing the daughterless carp, and the like, the lengthy delay involved in successfully advancing such developments more often than not provides a door-of-opportunity for uninvited pests and diseases to taken hold and become well established. Invariably the cost of eradication, or if that is not possible, control of an unwanted introduction far out reaches any cost that might otherwise be involved in preventing an introduction in the first place.

Being a continent located in relative isolation between the Indian and the Pacific Oceans no longer protects Australia from the intrusion of unwanted pests and diseases. The frequency of air transport and the ever increasing number of travellers presents a growing opportunity for the border entry of both known and unwittingly unknown passenger products. Anywhere in the world can now be measured in terms of only hours of travel, providing the survival of even the lowest forms of life such as algae. A similar problem arises with container imports, where apart from the few that AQIS inspect, reliance is totally left to the exporter's integrity and care.

Due to the physical difficulties of eradicating an outbreak of a pest or disease introduced from abroad, and usually being confronted with inadequate resources with which to combat a given situation, more often than not once introduced into Australia the undesirable matter becomes a permanent cost on our economy, and just as important adversely impacts on our environment.

## **GAPS IN OUR BORDER CONTROLS**

### Poor Response Time to a National Threat

The response time for AQIS to bring in regulations that require border inspection and where necessary treatment of used freshwater articles and equipment in countries listed in C17542 was two (2) years.

The NSWCFCA first advised AQIS of the Didymo threat in December 2005. This was the result of an interview with Mr Graeme Martin, a Director with the Otago (NZ) Regional Council, and NSWCFCA being provided with the Council's discussion paper on this subject.

While NSWCFCA is fully appreciative of the time it takes for AQIS to investigate a situation such as this, assess the risk, and develop procedures to secure our ports of entry from an introduction, there remains the very real likelihood of an introduction while we are getting our act together. In two (2) years many recreational anglers may have walked these infested rivers in New Zealand totally unaware of the risks involved and brought their used equipment back.

In the opinion of NSWCFCA the AQIS policy on managed risk requires a much more rapid response and intervention mechanism, be it temporary, where the risks to our environment and wildlife are reasonably catered for. Prevention in such circumstances requires immediate steps to be taken.

**NSWCFCA recommends that the AQIS response time to matters of all but low risk be reviewed with the intent of preventing the introduction of a biosecurity threat.**

#### Inadequate Inbound Traveller Information

A single sheet notice posted on the wall of the inward bound lobby, or included in the papers contained in the back of aircraft seats, warning passengers of the threat to the likes of Didymo, are not really effective mechanisms. A brief survey of passenger habits would indicate that in-flight few travelling refer to the advertising papers in the back of seats, and in their concern to get through customs few wall notices come to their attention.

Likewise, the completed Incoming Passenger Card – Australia required by all inward bound passengers to be filled in does not adequately describe the now required disclosure of used freshwater articles and equipment. As a consequence those travelling from the listed countries, at least until the end of last year, if not more recently, may have gone undetected with their fishing equipment stored in their baggage.

**NSWCFCA recommends that a biosecurity information card be handed to all inward bound passengers as is the case with the current health warning card.**

**NSWCFCA recommends that the Incoming Passenger Card – Australia more accurately state what articles and equipment must and should be declared.**

#### Inconsistent Border Surveillance

The NSWCFCA have from time to time received reports of inconsistent treatment at various ports of entry into Australia. These relate to the responses given to inward bound fishers at the various international airports.

While the specifics are unavailable, the purpose of raising this matter is to ensure that the briefing given to AQIS officers undertaking inspection duties at our international airports is sufficiently adequate. Protection of our Australian freshwaters is dependant on ensuring that all recreational fishing equipment, that is waders, nets, reels and lines, flies, lures, rods and rod covers are cleaned, treated and dry, before being released into Australia.

## Strategies for Responding to an Outbreak

NSWCFA requests what procedures are in place for responding to an outbreak of the likes of Didymo in Australian waters?

### SUMMARY

The NSWCFA is reasonably well informed and appreciative of the difficulties involved with our border protection, and in fully evaluating the risk factors involved in safeguarding our nation. In addition, the NSWCFA has been most appreciative of the responses that in recent years AQIS has provided regarding our concerns.

This submission has focused on matters that relate to the terms of reference stated in the review guidelines. In brief these are

- Appropriate level of protection of very low but not zero risk,
- A continuum of quarantine, and matters of
- Responsibility shared between layers of government, exporters and the community.

Three specific recommendations are made for your consideration. These are that

- AQIS response time to matters of all but low risk be reviewed with the intent of putting in place interim protection measures where need be.
- A biosecurity information card to be handed to all inward bound passengers entering Australia: and
- A review of the Australian Incoming Passenger Card be undertaken forthwith to more accurately state the required declaration of what must and should be made known to the authorities.

Finally, the NSWCFA would be interested to establish what, if any, strategies are in place for an effective response to an outbreak resulting from a biosecurity breach, such as would result from the introduction of Didymo into Australian freshwaters.

### REFERENCES

Henry, G.W. and Lyle, J.M., 2003. The National Recreational and Indigenous Fishing Survey. FRDC Project No. 99/158, NSW Fisheries Final Report Series No. 48; ISSN 1440-3544. pp 92/93.