

**Mr Peter Rose**  
**Project Manager**

North Central Catchment Management Authority  
PO Box 18, Huntly Vic 3551

By email: [peter.rose@nccma.vic.gov.au](mailto:peter.rose@nccma.vic.gov.au)

Dear Peter,

***RE: VRFish Response to Draft Mid-Murray Floodplain Fish Recovery Plan***

Thank you for the opportunity to comment on the draft fish recovery plan.

As the Peak body for recreational fishing in Victoria we rely on healthy and connected native fish populations to support our recreation. Healthy aquatic communities play the most important role in supporting and sustaining our recreational activity and recreational fishers today are keenly aware of this role.

Recreational fisher support for organisations such as OzFish Unlimited, the annual VRFish Advocacy Priority survey response<sup>1</sup> and current recreational fishery best practice (i.e. Care for cod program, digitisation of Murray Cod tournaments, etc) show that recreational fishers share the same goal as the Draft Mid-Murray Floodplain Fish Recovery Plan - *increase native fish populations, recover threatened species and create a connected, healthy fish community.*

Social license for the Plan (p86) communicates an important part of plan development and delivery, that is, ensuring maximum support and preventing any barriers there may be to the Plan's implementation.

The inclusion of recreational fishing as a 'major threatening processes affecting fish and fish habitats in the MMFRR' is absolutely rejected by VRFish. To suggest that recreational fishing has an impact on Trout Cod of the same magnitude as altered flow seasonality<sup>2</sup> or loss of riverine lentic habitats or invasive species on Murray Cod is insulting. Likewise, the listing of 'Angler take' as an unquantifiable (and unclarified) threat in the subsequent MMFRR Management Unit sections is equally so.

VRFish suggests that the larger threat to recovering our native fish species will be to lose support from the largest stakeholder group for a plan with a thinly veiled anti-

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<sup>1</sup> Aquatic habitat enhancement and replacement consistently ranks as the number 1 priority for recreational fishers (freshwater)

<sup>2</sup> Tonkin *et al* (2021). Linking flow attributes to recruitment to inform water management for an Australian freshwater fish with an equilibrium life-history strategy. Science of The Total Environment, Volume 752.

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better, for everyone.***

recreational fishing agenda. NCCMA would receive the same response if irrigation or dryland agriculture had been listed. The value add of this loss of support could further extend to use of Recreational Licence Fee funds by CMA projects that could otherwise be delivered by recreational fishers themselves.

In summary and setting aside the nomination of recreational fishing (angler take) as a key threatening process, the synthesis of threats and especially the multicriteria analysis in the draft plan are both rational and achievable. However, in its current form, VRFish will not support the Draft Mid-Murray Floodplain Fish Recovery Plan.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Loats', with a stylized flourish at the end.

Robert Loats  
VRFish Chair

10.12.2021