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Attention: Richard Tilzey
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QFAS RESPONSE TO "A STRATEGIC APPROACH TO THE MANAGEMENT OF ORNAMENTAL FISH IN AUSTRALIA"

Thank you for the opportunity to offer some input from the hobby of fish- keeping to this long awaited document. Some of us have been attending meetings on this topic with various State and Commonwealth officers every few years for well over twenty years and were not surprised to see public comment invited over the Christmas break when communication with membership would be most inefficient if not downright difficult.

You may not appreciate that **Q.F.A.S. (Queensland Federation of Aquarium Societies)** is an "Umbrella" organisation that helps to coordinate the various member clubs who are in turn answerable to their memberships. Accordingly the chain of communication is democratic but cumbersome. Also it must be remembered that all these people are volunteers and most have to make a living and attend meetings in their own time. **Q.F.A.S.** has been the major link between the aquarium hobby and the Aquarium industry in Queensland for two decades or more. Our member organisations run the gamut from specialist native fish keeping, **Australia New Guinea Fishes Association of Queensland**, to specialist Cichlid keepers the **Queensland Cichlid Group**, to general fish keeping clubs including Australia's oldest established Aquarium club **The Aquarium and Terrarium Society of Queensland**. The other member organisations are the **Queensland Aquarium Hobbyists** based in Caboolture, the **Bayside Aquarists Society** who are situated in the Redland Bay area, **The Gold Coast Aquarium Society**, the **Sunshine Coast Aquarium Society** and finally the **Toowoomba Aquarium Society** on the Darling Downs. We are in regular communication with smaller fish clubs and new organisations are considered for membership on a regular basis.



We encourage our member organisations to practise the best standards of fish keeping and they are aware of the environmental trust that is placed in them to maintain our Native Aquatic habitat both fresh and salt water and the biodiversity they contain.

We regularly supply judges to the major pet shows for their fish competitions. The result is that Queensland has the best supported shows with the best standard of fish and judges in Australia.

Why does the Commonwealth Government feel the need to control the aquarium hobby? A hobby which has been established in Australia since the 1890's. Presumably this is because you state that some 30-plus exotic species have become established so far, in our native aquatic habitat. This is a tragedy, especially when it is admitted that about one third of these did **not** come from ornamental sources and thus were due to agencies that tell us that they know what is good for us (with all the information and expertise that is available to them). It is a credit to the general public, the hobby and the industry that so few species have escaped and become established from "the millions being transported around the globe". Most of the evidence available to us suggests that very few people deliberately empty the contents of their aquarium into the native aquatic environment. Usually poor pond design and species selection in outdoor situations which are subject to heavy rain and/or flooding are a major factor. With a little more education and guidance by hobby organisations, industry and government we should be able to significantly reduce this problem.

The major concern for us is the continuing problem of smuggling of ornamental fish. The statement "currently, through one avenue or another any species is effectively available in Australia" is a sad reflection on the situation here. Instead of **DAFF/AQIS** projecting the impression that all aquarists are "**potential recipients of smuggled species**" perhaps examining the reasons why there is a demand for smuggled fish would be more productive. There are perhaps 1500 plus species and varieties available in this country - some previously allowed but currently not on the list, some incorrectly identified at point of Importation (surprisingly common), and still others arriving "unofficially" .

These smuggled fish and the water they were imported in escape the normal environmental and disease assessments especially quarantine and thus pose a significant risk to the hobby, the industry, aquaculture and the environment. The profitable nature of trade in smuggled ornamentals puts the law abiding majority of the industry at a considerable commercial disadvantage.

Because fish-keeping is an internationally popular past-time the hobby is serviced by a number of high quality monthly publications from overseas as well as local club newsletters, journals and of course the ubiquitous World Wide Web. Hobbyists get to see full colour articles extolling the beauty and suitability as aquarium subjects of all the newly discovered species as well as all the new colour forms of old favourites. This creates a demand here which

cannot be met by the legal trade because of bureaucratic barriers to their importation. DEH currently employs an assessment process for additions to the "allowed" list that is slow, cumbersome, expensive and poorly regarded.

Recently the first small batch of assessments was finally completed after 2-3 years (not the 6-12 months mentioned in the document) and although a handful of species were approved some were immediately vetoed by another Commonwealth agency (DAFF). Surely DEH and DAFF should have agreed on the health requirements that are part of the DEH protocol! We understood that it was the job of DAFF/AQIS officers to identify importations on arrival, ensure that they were from approved exporting premises, verify documentation complied with requirements and supervise quarantine. We have been unable to find verification that DAFF needs to conduct their own independent disease-risk evaluation of all the individual families of ornamental species.

Unfortunately this bureaucratic "roadblock" by DEH and DAFF prevents this demand for the new and exciting fishes from being satisfied and the smugglers have used this as an excuse to step in. Would it not make more sense to facilitate the addition of new species to the import list, therefore depriving the black market of high profit species that generate no taxes and may introduce disease through the lack of appropriate quarantine.

It is important to remember at this time that ornamental fish imported into Australia must come from approved export premises, with all the appropriate animal health documents. They do not come directly from the wild.

Because of the expertise needed to identify ornamental species, officers require training and experience. Our information is that any officer who has any previous interest or affiliations in the hobby is excluded from fish inspections because of "conflict of interest" so their expertise is lost to the department. Another factor is the "multi skilling" policy of the department which goes something like this. A new officer who knows nothing about ornamental fish is appointed to inspections and given a "crash course" in identifications with a species atlas, visits to wholesale and retail establishments and some initial supervision. Then they are on their own. After a couple of years they develop reasonable expertise, and usually by then some appreciation of the industry and hobby, and in turn earn some respect back. Then the department moves them on and the cycle starts all over again.

This same process is at work in our dealings with other government departments at State and Commonwealth levels (e.g. DPI Fisheries etc.) - as soon as we develop a working relationship with an officer who has had time to get to know the hobby, industry and individuals then they are moved sideways or onwards.

Since we are asked to comment on the strategic approach rather than the inclusion or not of various individual species on the noxious list that is the approach we are taking.

1. Firstly before applying pressure on the hobby and industry we believe the two Commonwealth Departments responsible for importations (DEH and DAFF) should have a united approach with mutually acceptable standards. A prime example is the recent intervention of DAFF into DEH process where a Federal Minister makes a public announcement in the Government Gazette that Salmon Red Rainbow fish (*Glossolepis incisus*) is allowed to be imported, then a public servant in another government office, (Bio-Security Australia) sends an email to the two major importers that this import will not be allowed, this notification occurs after the importers have placed their orders for this species.

2. Next we believe that all State and Commonwealth agencies involved should agree on a Noxious list that they can confidently defend and identify. It should be relatively easy to get hobby and industry support for this. It would seem to be common sense that trainee officers would find it easier to identify the 37 individual species and 25 Genera on the proposed Noxious list than thousands of species not listed.

3. It is imperative that DEH makes a final acceptance of an assessment protocol for all ornamental species. As a matter of urgency DEH should then allocate **funds** to use their accepted protocol immediately to assess all species in this country. We believe that the 2—3 years referred to in the document is far too long.

4. New species need to be assessed promptly to close down the “demand” pathway for the majority of smuggled species. Perhaps a DEH-approved consultant using the accepted protocol could be provided with a list of new species quarterly through a hobby and industry pathway. If DEH and DAFF are indeed serious about stopping smuggling then this should be done as soon as possible hopefully before organised crime sees fish smuggling as a profitable avenue.

5. We would expect to be further consulted when species on the “grey” list are reviewed and allocated a more permanent status. We are concerned about a possible “permit” system and the prospect of inspectors “raiding” hobbyist homes looking for “forbidden” fish in the future. In the past in Queensland we have had permit systems, this worked with full co-operation between the hobby and the State government. After a short period of time (approx 2-3 years) it was arbitrarily discontinued by DPI Fisheries.

6. There is a very real concern that registration of membership and accreditation of expertise by clubs may simply be used by departments as targets for future inspections and we would resist this approach.

We would hate to see the spectre of the “**GUPPY GESTAPO**” rise again, as we see this as a trigger for widespread release of fish into the environment by worried members of the **public**. It is important to realise that the organised aquarium hobby while influential, accounts for a fraction of the people that keep fish. To avoid the unwanted outcome of mass dumpings (such as happened when the Queensland Government declared *Tilapia* noxious) all

avenues need to be considered e.g. “buy back schemes or exchange for more acceptable species (at local aquarium stores or club meetings) or a free voluntary permit to keep until the death of the specimen.

7. Much importance has been made of including species (on the noxious list) that have established populations in the environment or are on noxious or other restricted lists. Unfortunately species like goldfish, guppies, swordtails, platys and mollies are beginners fish and form a huge proportion of the trade and hobby. Therefore it is unlikely that restrictions on these species will be acceptable to the trade or hobby. The feral populations of these species are usually found in degraded habitats around larger population areas. A point to note is that native fish respond most positively to habitat repair, the problem is exotic species do better in degraded habitats. We should look at spending some of the time spent on the “problem” of exotics on habitat repair. In the interests of transparency and uniformity some other established species on various lists may need to be reviewed. Once again education rather than prohibition may be the more successful approach.

8. The decision of where a hobby stops and a business begins is more properly one for the Taxation Office. Obviously individual privacy considerations are important here but a “paper trail” of the value of receipts from wholesalers or retailers should help decide.

9. Regulation of importers and large commercial breeders is not the province of the hobby.

10. We would welcome improved communication from all government agencies that impinge on our hobby and most clubs would gratefully accept regular contributions with information on individual species, habitat concerns, pond design, diseases etc. are all welcome and will be passed onto the membership for their meetings, publications, newsletters and could also be posted on public forums on the internet.

11. Aquatic plants used in the ornamental fish trade are also in dire need of education and communication assistance. While fish will die without water many plants can survive and even thrive in damp areas. The education will need to be ongoing and not only directed at aquarists and aquarium shops but also every garden and hardware outlet, nurseries and even the frog protection groups. Once again education rather than prohibition is more likely to be successful.

12. It is important to underline the aim of this whole exercise—to protect our aquatic environment. People don't like to kill their “**PETS**” and in this fish—keepers are no different to cat and dog lovers. If their pet fish are deemed to be noxious then a free voluntary permit to keep their fish until it dies seems to be the best option for those who are reluctant to surrender or swap. Obviously some world records for longevity are to be expected.

13. The organised hobby only represents a fraction of the fish keepers in this country so strategies will only be as effective as their appropriateness deserve communication which is a two way process so a pathway out for information should have an accompanying feedback direction as well.

14. We would hope that this process of communication, consultation and co—operation continues.

Yours faithfully,
William Smith
President
Queensland Federation of Aquarium Societies

CC to
Commonwealth Minister for Fisheries
Commonwealth Minister for Department of Environment and Heritage
Shadow Commonwealth Minister for Fisheries
Shadow Commonwealth Minister for Department of Environment and Heritage
Minister for DPI Qld
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