

8th of April 2018

Adrian Falconer

The Honourable Glenn Sterle

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Questions for the Senate Hearing on the National Carp Control Plan

Dear Senators,

The attached documents contain our main questions, with regard to the National Carp Control Plan and its planning process. We know this list is long, but so are the many questions, that did not make it onto this list. We would really appreciate you asking these questions, within a senate hearing where the answers can be seen openly by the public.

We all agree that European Carp are a major pest, which need controlling. We definitely need to do something about this introduced species, to improve the health of our rivers and wetlands. It is how we do this, along with how best to manage the planning process, around which those signing this letter, have significant concerns.

Based on what we have seen to date, we do not believe a control plan based predominantly on the use of this virus, can be implemented in such a way that does not lead to widespread, long-lasting anaerobic events, permanent changes to sediment health, risks to a range of critically threatened fish and bird species as well as the potential to jeopardise the drinking water of regional communities, including the majority of the state of South Australia.

Some of the most significant risks, focused on in this letter, are to the Ramsar-listed Coorong, where the Murray River terminates, however these are risks to all Australian riverine systems, including those as distant as the iconic Canning River, in Western Australia.

A virus-centric solution is overly simplistic, with a number of unquantified risk factors, along with a range of unknowns. At a minimum, the degree of efficiency and off-target impacts will depend on the speed of its effect, difficulty in containing or controlling its release and the size of the forecast fish kills.

As part of the planning process, we would like to see what was promised, a greater focus on Integrated Pest Management, with the Carp Herpes Virus as the final option if necessary, once there has been a fair and equitable trial of other measures, rather than the first order of attack.

Other aspects of concern involve the speed of impacts and the shock to aquatic ecosystems. Aquatic, particularly estuarine ecosystems, take a long time to recover from significant ecological shocks, which use of the Carp Herpes Virus will unavoidably be.

For an estuary the size of the Lakes and Coorong, this recovery period would be in excess of thirty years. This issue is compounded with the expected recurrence of mass kills in at least 40% of years, following the initial release.

It is expected that Carp populations will rebound after the viral release and that given the fecundity of European Carp, this will be relatively rapid. Unfortunately, the prior use of Carp Herpes Virus may render alternative follow up control measures non-viable, meaning that other more virulent (and therefore more risky) viral strains may be required while locking us out of even attempting other options.

This is an experiment of unprecedented scale, with no control and no back-up plan. An intentional release of any similar virus into an aquatic environment, has never been attempted before. At present, the proposal is to release the virus first, in the Lower Murray, Lakes and Coorong.

The Lower Murray, Lakes and Coorong includes the off-take for most of South Australia's drinking water and perversely, is likely to have the highest densities of carp infestation while being the slowest to recover. The rotted end-product of the Carp are likely to be significantly retained within the iconic Coorong, potentially exacerbating the critical state of this Internationally important wetland.

There are concerns that this may cause long-term impacts on commercial activities such as the Flounder, Black Bream and Coorong Mullet harvests, as well as the restoration efforts of programs such as the South East Flows project or the Coorong Environmental Trust.

Upstream irrigators have expressed their support of using the virus release as a way to reduce their long-term environmental flow commitments, regardless of the impact this may have to the aquatic ecology in their immediate surrounds or the flow on effects downstream.

Surface water in Australia is a rare and much contented commodity, with every drop being used multiple times, on its journey to the sea. Using our majestic Murray River and world-renowned 'Storm-boy Country' as an experiment of unprecedented scale, with no control and no back-out plan, is rash, in the extreme.

In addition to the ecological and water security concerns around the viral release, there are concerns around the safety of stock and native animals and importantly, any clean-up crews, particularly out on Lake Alexandrina. The public and wildlife exposed to the putrid waters and secondary infections from dead fish face very real risks caused by the viral release but not a result of direct infection by the virus. To be clear, while the NCCP has focused heavily on direct viral infection, this is not required for widespread botulism outbreaks to cause massive mortalities.

There are concerns that a fair consideration be given to businesses, carp fishermen, farmers, tourism operators and koi keepers, disadvantaged or potentially sent bankrupt, or losing a lifetime of work due to this experiment.

It is important to remember that this release has the potential to be a man-made disaster, with national consequences and a geographically imbalanced risk vs reward. The greatest potential negative impacts are on downstream regions, while the greatest potential benefit is to upstream vested interests. To date this is also the demographic on which the NCCP has chosen to focus its consultation and social science evaluations. To South Australians, already disenchanted by the mal-implementation of the Murray Darling Basin Plan, this is not the time to be intentionally using the SA River Murray as a drain.

More than anything, we are asking for data and time to analyse it, unrestricted by non-disclosure agreements, if for no other reason, to put our fears to bed and prove to the public that our concerns are being addressed. As concerned citizens of this country, particularly as scientists, we have an obligation to ensure that we pass this country on to the next generation, in a better state than we received it. We need free access to distribution maps of Carp infestations, scientific reports from the widest possible range of experts and practical examples of how this glut of rotting fish can be removed from the system and at what cost for the full duration of the projected fish kills, before any decisions are made.

Signed:

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