

Draft Trout Cod Action Plan – What We Heard Report

Prepared by: Freshwater Fisheries & Threatened Species Branch | DPIRD Fisheries

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Figure 1. Trout Cod Action Plan Roadshow - Wagga session, November 2023. Image credit: NSW DPIRD.

Introduction

The Draft Trout Cod Action Plan 2023-2033 was opened for public consultation online from October 18-November 17, 2023. In total, 26 submissions were received during the consultation process.

NSW Department of Primary Industries & Regional Development (DPIRD) Fisheries staff hosted the Trout Cod Action Plan information sessions from Monday 13 November to Thursday 16 November, which included four localised consultation events in Wagga Wagga, Barooga, Bathurst and Queanbeyan. Staff from NSW DPIRD's Freshwater Fisheries & Threatened Species Branch, Fisheries Research Branch and Fisheries Compliance Branch presented historical and legislative context, and data analysis, as well as discussed recreational significance. The sessions also featured a presentation from an external recreational fisher, Rhys Creed, on his own personal experiences engaging with Trout Cod as a species.

NSW DPIRD Fisheries staff present included:

- Sam Davis, Program Leader Habitat & Threatened Species, Freshwater Fisheries & Threatened Species Branch
- Luke Pearce, Senior Fisheries Manager, Habitat Rehabilitation, Freshwater Fisheries & Threatened Species Branch
- Simone Mabon, Project Officer, Habitat Rehabilitation, Freshwater Fisheries & Threatened Species Branch
- Rosy Lone, Communications Manager, Freshwater Fisheries & Threatened Species
- Dr Nathan Miles, Fisheries Scientist, Freshwater Ecosystems Unit (present at Wagga Wagga, Barooga and Queanbeyan)
- Sean Lethlean, A/District Fisheries Officer, Snowy Mountains, Fisheries Compliance Unit (Present at Wagga Wagga)
- David Potter, District Fisheries Officer, Hume, Fisheries Compliance Unit (Present at Barooga).

This report outlines the feedback received via the online Have Your Say consultation process and how NSW DPIRD has responded to incorporate feedback received during the process.

Summary

Overall, the majority of responses were in support of the Trout Cod Action Plan. There were some concerns regarding future management and interaction with other long-established recreational fisheries, particularly Trout and requests for additional detail to be included in research, monitoring and evaluation. There were some divergent views on timelines and delivery, however the consistent theme across the consultation process centred around future communications and engagement on all elements of the plan and its implementation.

On the basis of submissions and feedback received, the eight key changes being made to the Draft Trout Cod Action Plan 2023-2033 as a result of the consultation process are:

1. Page 2 - Vision: Amend wording to include reference to ecological value of Trout Cod - *“Re-establish viable Trout Cod populations in priority habitats across their former range, that can once again support ecological, cultural and recreational values.”*
2. Page 4 - Action Plan Summary: Addition of a breakout box with an action for a review of the Trout Cod Action Plan at Year 9 (2032). This will trigger an evaluation of all actions, recommendations and outcomes under the plan to date and make a recommendation on next steps. Also included in Year 9 review is to communicate the evaluation and recommendations to stakeholders.
3. Page 5 - Captive Breeding, Stocking & Translocations: under the long term priority actions “A minimum of three new viable populations of Trout Cod established” to align with the Summary Page actions.
4. Page 6 - Captive Breeding, Stocking & Translocations: Replace the short-term action with a more specific action “Undertake genetic assessment of the existing remnant and re-established populations.”
5. Page 8 - Recreational Fishing: Move Long Term Action ‘Anglers are able to readily distinguish Trout Cod from Murray Cod and have an increased value and appreciation for Trout Cod’ to Outcome section. Long Term Action has been replaced with ‘continue to deliver targeted education material regarding identification, handling techniques and best practice catch and release methods to anglers.’
6. Page 9 - River health and habitat: Add “Investigate and quantify natural habitat requirements including spawning sites, flow requirements and structural habitat preferences” to Research/monitoring & evaluation under priority action “Identify and prioritise reintroduction sites”.
7. Page 11 - Non-native/pest fish management: Under Medium term priority actions (2-5 years), remove ‘eradication’ and replace with ‘management’
8. Page 11 - Non-native/pest fish management: Substitute picture of Rainbow Trout in the lower right corner with alternative non-native species (suggest Redfin).

Feedback received and how it's been addressed

Table 1. Feedback received via online Have Your Say consultation process.

Comments received via online feedback	Feedback addressed
Q1. Do you agree with the vision of the action plan? If not, why not?	
You lot can't even make a decision on the eradication of European Carp. You've wasted so much time on that it's ridiculous. The Murrumbidgee is plagued with Trout Cod. Open all the b*****t closed waters, where all you are doing is protecting Carp. About time this department stopped wasting time and money. The average NSW angler has lost all faith in you lot.	No change to Action Plan Feedback related to Common Carp management – not relevant to TCAP.
How is it that on Page 11 depicts a photo of a rainbow trout?? With the complete understanding the “Trout” as an introduced species, could I make a suggestion, to change the photo of the rainbow trout out as the Dpi.F run fantastic hatcheries to specifically rear these salmonoid species to support recreational fishing; I fear this photo (and comments under it) to come across as a little hypocritical where we are promoting the Trout Cod species in this document on one hand..... and at the same time showing a relatively negative contradiction for a DPIF managed species on the other hand?? The vision appears to promote the removing of current rec fishing fish reared by DPI such as trout to make way for the Trout Cod as a rec species, however with minimal access areas to target them once established. Thats how it reads.	Action Plan updated The TCAP does not promote the removal Trout as a recreational species. Image on Page 11 of Rainbow Trout will be substituted for an alternative non-native/pest species.
As a rep for the respondents club our view is the current trout cod population has more then bounced back and are plentiful in the Murray River as well as many river systems south of the border. If they are protected for another 10 years, they will be more of a pest then carp in our waterways	No change to Action Plan Feedback on Trout Cod populations more generally, including in Victoria – not related to the Vision of the TCAP.

Comments received via online feedback	Feedback addressed
While the vision is commendable in the words used, it is hard to support a vision that based on past experience would seem to have little chance of success. It is concerning that to achieve the vision, the Action Plan appears to promote the removal of trout, for example, to establish Trout Cod as a recreational species. Perhaps the vision should be focused on protecting and the recovery of Trout Cod over the 10 years of the vision, rather than an aspiration of making Trout Cod a recreational species in this short time frame. We are concerned that by suggesting Trout Cod replace trout as a recreational species, the wider fishing community would be against such a proposal. In addition, this approach appears to be at odds with DPI's draft Trout Strategy that states, "NSW has an ambitious goal: to be positioned as a leading destination for trout fishing experiences". Specifically, why is there a heading Non-native/pest fish management. This section should focus on pest fish management only, otherwise it appears the document is heavily focused against trout. The current NSW Fishery Management Strategy at page 72, Trout Cod "There has been little to no evidence of the species establishing self-sustaining populations despite extensive stocking for 15 years.". There is little in this Action Plan to indicate how rebuilding the species to the extent that recreational angling could take place over the 10 years of the Action Plan could possibly be achieved. Further in the 2022 Audit and Review "Funding restrictions have fragmented monitoring programs leading to a reduced capacity to evaluate Trout Cod stocking effectiveness at several locations". The communication and engagement strategy section should also be divided into the three Action Plans, with monitoring and reporting added. The Action Plan Summary appears to be at odds with the vision of a recreational fishery.	No change to Action Plan The TCAP does not promote the removal Trout as a recreational species. The FMS is under review as it was written 2005 where there was little to no evidence of establishing populations (p. 72 of FMS). Since 2005, there has been a Trout Cod population that has been established via stocking that is now naturally recruiting. Comment regarding the funding restrictions have fragmented monitoring programs is addressed in the TCAP by planning for a regular/annual Trout Cod monitoring program. Comment regarding the communication and engagement strategy section is addressed in the TCAP as the communication and engagement underpins all Priority Actions listed in the plan.

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While the stated outcome is laudible, I have serious concerns whether the Threatened Species Unit truly has a recreational angling intent. Their poor engagement with the peak bodies of recreational angling, from Recreational Fishing NSW Ministerial Advisory Council, through the NSW Council of Freshwater Anglers, to the Acclimatisation Society throws into question their basic intent.	No change to Action Plan Subjective commentary on intent of Threatened Species Unit, not relevant to the TCAP.
It is hard to support a vision that has little chance of success. The DPI Threatened Species Unit (TSU) is merely using the spin of potential limited recreational fishing to create expectations, that to date have not been met. I refer to the current NSW Fishery Management Strategy at page 72, Trout Cod – Likelihood of establishing self-sustaining populations – medium – low. “There has been little to no evidence of the species establishing self-sustaining populations despite extensive stocking for 15 years.” There is next to nothing in the plan that indicates how a conclusion of rebuilding the species to the extent that recreational angling could take place is arrived at. There is no demonstration of where it has been done in the past. While it might be a vision, it is a foggy one at best.	No change to Action Plan The FMS is currently under review as it was written 2005 where there was little to no evidence of establishing populations (p. 72 of FMS). Since 2005, there has been a Trout Cod population that has been established via stocking that is now naturally recruiting. Comment relating to demonstrating where re-introduction has been done in the past is unsupported by the growing evidence base: • There is documented success of population establishment in the Ovens River, Mid Murrumbidgee and Bendora Dam. • Success is supported by peer reviewed literature (Lyon et al 2012) entitled <i>Re-introduction success of the threatened Australian Trout Cod based on growth and reproduction</i>. • The above research paper will be made available to attendees/feedback providers to address commentary around lack of evidence of past success.
Yes, it reads well and relates the recovery effort back to the intention of again having trout cod as part of a sustainable recreational and cultural-food based species.	No change to Action Plan Positive feedback noted.
No. The words have been described as a Vision when they are an objective sitting under a Vision statement. A Vision statement would put the Trout Cod Plan in context and how it	No change to Action Plan While it is noted in this comment that input into the drafting of the Vision of the plan in

Comments received via online feedback	Feedback addressed
contributes to the health of the freshwater aquatic asset. A Vision statement would be developed with the community including recreational anglers. The current draft Plan is a guideline and is missing what is usually in a plan, for example, a 360 degree feedback on the success or otherwise of the plan. It would have been useful to test the assumptions in the guideline with recreational anglers, for example, the timeline for establishing sustainable trout cod populations and the promotion of the species for recreational anglers vis-a-vis trout. The timeline is ambitious in the guideline and may be impractical. A plan needs to include a risk mitigation strategy noting that there has been 'no evidence of the species establishing self-sustaining populations despite extensive stocking for 15 years'.	conjunction with recreational fishers would have been preferable, the opportunity for input from all stakeholders during the Have Your Say process provided an equitable platform for input. While the TCAP may be ambitious, NSW DPI feels it is achievable in the proposed 10-year timeframe. Comment relating to demonstrating where re-introduction has been done in the past is unsupported by the growing evidence base: • There is documented success of population establishment in the Ovens River, Mid Murrumbidgee and Bendora Dam. • Success is supported by peer reviewed literature (Lyon et al 2012) entitled Re-introduction success of the threatened Australian Trout Cod based on growth and reproduction. • The above research paper will be made available to attendees/feedback providers to address commentary around lack of evidence of past success.
Yes. Supportive but some explicit acknowledgment of the ecological/biodiversity values as well as cultural and rec fishing value would be good.	Action Plan updated Noted - feedback incorporated into Vision statement.
Yes. we agree with the vision of the Action Plan. Trout cod are a species of interest to the respondents as the species was at one time abundant in the upper Murrumbidgee. Today only very few numbers of the species remain in the upper Murrumbidgee and as such they represent an upland population of the species. We welcome increased action to recover this important and iconic species, especially in the upper Murrumbidgee River.	No change to Action Plan Noted.
Q2. Do you support the short-term priority actions? If not, why not?	

Comments received via online feedback	Feedback addressed
No. Because no matter what you say or do your department won't get it right.	No change to Action Plan N/A Feedback not constructive/relevant to TCAP.
Yes. Appears achievable.	No change to Action Plan Noted.
No. They are everywhere. We catch several on our club trips and comps. I've heard many stories of fisherman keeping and cooking to try and get them out of the Murray cod habitats	No change to Action Plan N/A Feedback not constructive/relevant to TCAP.
No. Most actions seem to be either strategies, planning or office-based activities and given sufficient resources should be achievable. The outcomes across each of the three actions do not appear to align. It would be far better to have outcomes, monitoring and evaluation for each action term. It is doubtful that it is possible to increase the genetic diversity in 1 to 2 years – how will this be done? The Action Plan seems to suggest that Trout Cod should replace Trout as a recreational species. For example, in some of the rivers identified for stocking Trout Cod, trout are also currently stocked and have been for over 150 years. It would be better for both trout and Trout Cod if under this action item Trout Cod stocking sites are identified and prioritised without impacting on trout stocking sites. For example, it would be better to identify a buffer zone around trout stocking sites and then stock Trout Cod outside of these buffer zones. Such an approach would minimise the impact Trout Cod stocking will have on recreational fishing for trout. ***Under the section Non-native/pest fish management, the proposal is the removal or cessation of stocking. This proposal will not find favour with the recreational fishing community. Removal or cessation of stocking of trout is merely weaponizing Trout Cod against trout anglers. It would be preferable if the plan	No change to Action Plan Confusion regarding snapshot of key actions Reference to "increase genetic diversity of remnant populations" - suggestion to expand this line/section to explain what actions will take place in 1-2 years to increase genetic diversity. The TCAP does not suggest Trout Cod should replace Trout as a recreational species. Comment on buffer zones and Trout Cod stocking sites: - Stocking sites for Trout Cod under the TCAP 2023-2033 have not yet been finalised. This work to identify stocking sites will take place in the short term under the TCAP. The work to identify stocking sites will involve a variety of environmental factors (e.g. waterway health, habitat, other species present etc), and consultation with key stakeholder groups to better understand concerns, considerations and process for site selection. - Current TCAP proposes (in the medium term) two riverine stocking sites and one impoundment, and (in the longer term) to identify two more riverine and one more impoundment.

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recognised trout as a valued recreational species (see comments on the DPI Trout Strategy above) and removal or cessation of stocking will not occur without stakeholder approval including that of the NSW Trout Allocation Committee.	
No. Under Recreational Fishing. Other than the dot point on the emerging fishery in Talbingo Dam, the actions are strictly about protection of the trout cod. This section needs to articulate the interaction between the Trout Cod enhancement/stocking and recreational angling. ***What impacts will there be on freshwater recreational angling in terms of closure of waters etc. Are the continued closures on the Murray River Trout Cod zone the full extent of closures given the expansion in reintroduction sites. Under River Health and Habitat These are laudible actions, but should be extended to recreational fish species also. Are Stages 1, 2 and 3 on-ground works defined anywhere? Under Non-native/Pest Fish Management The conflation of non-native and pest gives a misleading message. The actions to investigate the interaction between Trout Cod and introduced freshwater fish is valuable science, but to have an image of a rainbow trout with a statement that “Introduced and stocked species can negatively impact on Trout Cod” suggests a pre-judgement of the science. Identifying risks and management options is then followed by a firm list (“i.e.”) and includes “cessation of stocking”. Trout stocking of larger fish to combat Redfin may offer additional options. Under Communications and Engagement The authorities will need to improve on the engagement performance seen to date, which has been adhoc and rushed.	No change to Action Plan In the short-term priorities under the Recreational Fishing section, protection of the Trout Cod is prioritised and recreational fishing isn’t addressed specifically (in the short term) as populations require time to recover/re-establish. Comment regarding on actions being extended to other recreational species as well – this plan specifically addresses Trout Cod. Stages 1, 2 and 3 of on-ground works under River Health and Habitat section are not currently defined or specifically identified. Once these are defined, these can be communicated to stakeholders as part of the communications strategy as regular updates. Feedback given on heading and picture choice rather than lack of support for short term priority actions. Feedback on wording including “cessation of stocking”. Feedback on previous communications and engagement noted and will be addressed via a proactive communications strategy and plan as noted on Page 12 of TCAP.

Comments received via online feedback	Feedback addressed
No. Under Captive breeding, Stocking and Translocation Develop a trout cod reintroduction strategy that identifies and prioritises stocking sites ... The Goodradigbee River is an important case here. In some of the rivers identified for stocking TC, trout are also currently stocked and have been for over 150 years. It would be better for trout and TC if under this action item TC stocking sites are identified and prioritised without impacting on trout stocking sites. It would be quite easy to identify a buffer zone around trout stocking sites and then stock TC outside of these buffer zones. Such an approach would minimise the impact TC stocking will have on recreational fishing for trout. Under Non-native/pest fish management, the proposal is removal or cessation of stocking. This proposal will not find favour with the recreational fishing community. Removal or cessation of stocking of trout in the Goodradigbee is unnecessarily weaponizing TC against trout anglers. Over time, the very large numbers of TC being stocked in the Goodradigbee will achieve sufficient size to become the apex predator in this system and many stocked trout will be consumed. It would be preferable if the plan recognised trout as a valued recreational species and removal or cessation of stocking will not occur without stakeholder approval, specifically the NSW Trout Allocation Committee.	No change to Action Plan Comment on buffer zones and Trout Cod stocking sites however, stocking sites for Trout Cod under the TCAP 2023-33 have not yet been finalised. This work to identify stocking sites will take place in the short term under the TCAP and will involve a variety of environmental factors (e.g. waterway health, habitat, other species present etc.), and consultation with key stakeholder groups to better understand concerns, considerations and process for site selection. Current TCAP proposes (in the medium term) two riverine stocking sites and one impoundment and (in the longer term), the plan prioritises identifying two more riverine and one more impoundment for future actions.
Yes. The hybridisation with Murray Cod needs to be looked at straight away and seriously in relation to picking sites and may restrict their introduction range until it is know	No change to Action Plan Noted - hybridisation of Trout Cod and Murray Cod is addressed throughout the TCAP including on Page 6.
No. A Snapshot of Priority Actions does not provide a basis for determining outcomes for priority actions. They are implementing actions which come under the objective of a plan. Outcomes need to be provided and a schedule for them. It seems that the document is designed to satisfy scrutiny under NSW budget	No change to Action Plan Reference to the halting of Trout stocking - Stocking sites for Trout Cod under the TCAP 2023-2033 have not yet been finalised. This work to identify stocking sites will take place in the short term under the TCAP. The work to

Comments received via online feedback	Feedback addressed
processes. In view of the track record in establishing sustainable trout cod populations, the outcomes from the listed priority actions appear optimistic. Again, wider consultation and a transparent process might assist with working out how to achieve outcomes for the establishment of trout cod populations. The 'Snapshot of Key Actions' and the sub-headings, for example, 'River health and habitat' should be reworked in order to clarify how actions and the mechanisms related to them are necessary for the outcomes. There is a mix of strategy, resource issues (the assumption is that the Plan is to convince the NSW budget office) and activities which would benefit from being disassembled so there is a clear thread from the beginning of the plan and its conclusion. The current Plan seems to suggest that trout cod replace trout as a recreational fishing species. Since some of the waters identified for trout have been stocked with trout for many years (150 years) it would be useful to identify those waters and the decision-making process for halting the stocking of trout.	identify stocking sites will involve a variety of environmental factors (e.g. waterway health, habitat, other species present etc.), and consultation with key stakeholder groups to better understand concerns, considerations and process for site selection. If stocking sites of other species (for example Trout, as referenced in this comment) are going to be impacted, NSW DPI will engage with affected stakeholders throughout the stocking site selection process. Comment that “the current Plan seems to suggest that Trout Cod replace Trout as a recreational fishing species – this is not the case. There is no wording under the TCAP that suggests that Trout Cod replace Trout as a recreational fishing species.
Yes. but it should be a key priority action to adequately resource the hatchery production of trout cod (which may include additional ponds, dedicated staff, \$ etc). Otherwise the risk is that trout cod production remains as a lower priority activity (subserving to rec fish production), and without the resource allocation to Trout cod production, the medium term priority action of "Comprehensive captive breeding program established with increased output capacity" cannot be achieved. Trout cod recovery is totally dependent on hatchery production, and without a significant increase in hatchery production the whole Action Plan will fail	No change to Action Plan Comment noted around resourcing and supported in full.
Yes we support the short term actions. Specifically we would like to see the upper	No change to Action Plan Noted

Comments received via online feedback	Feedback addressed
Murrumbidgee prioritised as a reintroduction site. The respondent has been working with a number of partners to address threats to native fish and restore habitat in the upper Murrumbidgee for native fish recovery. We do have very small numbers of Trout cod present. We have an engaged community that is already addressing a number of the priority actions outlined in this plan (such as habitat restoration) and hence the upper Murrumbidgee would be an ideal area where recovery of Trout cod could occur. We are aware that the upper Murrumbidgee was stocked for a number of years and a self sustaining population has not established in the upper Murrumbidgee. However we would like to see renewed effort given that there is now a significant and ongoing effort occurring by a range of partners to implement the complimentary actions required to assist in the recovery the species in our catchment. Furthermore, our community would also very much like to see a recreational Trout cod fishery established in the upper Murrumbidgee. Our local fishing clubs (such as at Bredbo) are very active in reducing pest species (such as carp) and keen to assist with the recovery of native species, including via stocking. Unfortunately the only species available for stocking to date have been Golden perch and Murray cod. There is concern that the stocking of Murray cod upstream of the ACT border is inappropriate and may be contributing to the hybridisation of Murray cod and Trout cod that we are seeing in the upper Murrumbidgee. There is also concern that the current stocking of Murray cod into the upper Murrumbidgee will impact the natural population of Murray cod found in the river in the ACT via the introduction of genetics into that population which is not part of a planned conservation stocking	

Comments received via online feedback	Feedback addressed
program. The stocking of Trout cod would be a huge benefit for our community. Prioritising the upper Murrumbidgee is also significant in regard to the small population of Trout cod found in Gigerline Gorge (ACT), just downstream of the NSW/ACT border. This population is surveyed every year by the ACT Government. The management of this population must not be constrained by state borders and we strongly call for the NSW to help strengthen the ACT population via reinstating of stocking of Trout cod upstream.	
Q3. Do you support the medium-term priority actions, if not, why not?	
No. Again it'll turn to crap.	No change to Action Plan Feedback not constructive/relevant to TCAP.
No. How will you be monitoring the recreational catch numbers? note "Monitor non-native fish populations at key sites and undertake eradication or control programs if required" What is the control program for eradication of non-native fish populations that supports this action plan?	No change to Action Plan Monitoring and control programs will be informed by experts and best available science, as well as related projects.
Yes. pond Spawning already done in Victoria with good success	No change to Action Plan Noted.
No. Talk to fishing clubs and fisherman who fish regularly. Trout cod are no longer a threatened species	No change to Action Plan Feedback not constructive/relevant to TCAP. Demonstrated science indicates this a key threatened species in NSW.
No. The Action Plan needs to deal with the issue that it is perceived to be anti-Trout, particularly for medium-term priorities. The focus of this time frame is improving captive breeding and stocking at new locations. It is unclear how the Action Plan would "Monitor non-native fish populations at key sites and undertake eradication or control programs if required" What are the control programs for eradication of non-native fish populations? Are these	Action Plan updated Monitoring and control programs will be informed by experts and best available science. As the TCAP is implemented over the next 10 years, communication of management and control actions will be given to stakeholders at regular intervals via the stakeholder database. This will be outlined in the communications and

Comments received via online feedback	Feedback addressed
specifically pest species or does this include trout? If Trout Cod are to be stocked in popular trout fishing waters and any trout eradication or control programs are undertaken, this should be with the consent of regional recreational fishing stakeholders such as Acclimatisation Societies and NSW Fisheries recreational fishing management. If these eradication or control programs have no boundaries, the removal of trout could occur year-round to prepare for the Trout Cod stocking. We note that trout are stocked by a substantial network of volunteers and financed through the recreational fishing fee – the NSW Government is investing heavily in new trout hatchery infrastructure. The number of Trout Cod proposed to be stocked indicates there is a will be an adequate supply to amortise any predation by non-native fish. If the stocking policy avoids popular trout sites, then the impact on trout will be negligible, the loss can be tolerated and over time the larger Trout Cod will be preying on stocked trout. In summary, the medium priority should focus on pest fish and not non-native fish. There is little in the Action Plan that identifies how pest species removal will occur where they are in direct competition with Trout Cod. Investigate hybridisation is not a recreational fishing action. The river health section needs monitoring and evaluation to be included for each action.	engagement strategy – addressed on Page 12 of the TCAP. Emphasis on importance of engagement also noted from information sessions. There is currently no eradication program for non-native fish populations. Suggest remove “eradication” from Page 11 of TCAP to allay confusion. Non-native/pest species are yet to be determined, as is stocking locations. This will be communicated as the plan is implemented. Stocking site selection and non-native/pest species management/control has yet to be determined and will occur with consultation with all stakeholders. Hybridisation is a recreational fishing action under the TCAP because it has implications for the Murray Cod fishery which is a key recreational species in NSW. Current legislation around compliance of hybridisation is silent. Comment on lack of MER in river health section noted.
No. Under Non-native/Pest Fish Management “Monitor non-native fish populations at key sites and undertake eradication or control programs if required”. What is the definition of a ‘key site’? How extensive might the eradication/control be effected over? No. Under Non native / pest fish management, Monitor non-native fish populations at key sites and undertake eradication or control programs if required An option that would sit better with recreational fishers would be to include a	Action Plan updated Key sites referenced on Page 11 are the proposed stocking sites which are yet to be determined but will be under the TCAP. Monitoring and control programs will be informed by experts and best available science. As the TCAP is implemented over the next 10 years, communication of monitoring and control will be given to stakeholders at regular intervals.

Comments received via online feedback	Feedback addressed
section that identifies TC are not to be stocked in popular trout fishing locations and any eradication or control programs will only be carried out with the consent of regional recreational fishing stakeholders such as Acclimatisation Societies and NSW Fisheries recreational fishing management. Our fear is that the eradication/control has no boundaries, so removal of trout could occur year-round on the basis that it is laying the foundation for the TC stocking. It must be remembered that trout are stocked by a substantial network of volunteers and is financed through the recreational fishing fee – the NSW Government is investing heavily in new trout hatchery infrastructure and for fish to be eradicated after a stocking effort is wasteful and not in the spirit of modern fisheries stakeholder cooperation. It is not lost on members of the Acclimatisation Societies that it is a bewildering concept that one hatchery bred and stocked fish is to be eradicated to be replaced by another hatchery bred stocked fish. The number of TC proposed to be stocked indicates there is a will be an adequate supply to amortise any predation. We understand that big fish will eat little fish, this is not limited to trout but is a universal truth. If the stocking policy avoids popular trout sites then the impact of trout will be negligible, the loss can be tolerated and over time the larger TC will be preying on the trout stocked. Simply put, time will turn the balance in favour of TC so no such eradication or management policy will be needed for trout. Naturally, we support pest species removal as a matter of course and regardless of where they occur.	There is currently no eradication program for non-native fish populations. As above, suggest remove “eradication” from Page 11 of TCAP to allay confusion.
Yes. The hybridisation with Murray Cod needs to be known at this stage and incorporated into the planning.	No change to Action Plan Noted and supported.
There is no mention 'in medium term priority actions' of the process for selecting riverine sites and how the introduction of trout cod will	No change to Action Plan Stocking site selection and non-native/pest species management/control is yet to be

Comments received via online feedback	Feedback addressed
fare in relation to pest species like carp and redfin. There is also no discussion of how a wide range of interlocutors like the Acclimatisation Societies and other parts of DPI NSW will be engaged in decision making about the introduction of trout cod. It is worth noting that there has been considerable investment by the NSW Government in trout hatchery infrastructure and recreational anglers paying a fishing fee to assist with recreational angling.	determined and will occur with consultation, with all stakeholders. This includes the NSW DPI Fisheries Trout cod Working Group which has representations from all branches of NSW DPI Fisheries.
Yes. But see comment about short term priority actions. Without additional dedicated resources, the "Comprehensive captive breeding program established with increased output capacity" cannot be achieved.	No change to Action Plan Noted - acknowledged comment around resourcing. Supported in full.
Yes. However we believe that limiting the recovery and stocking to two new riverine sites may be limiting and the action should be reworded to 'at least two new riverine locations'. The riverine locations should include both lowland and upland reaches. The new locations should include those that have previously been stocked as 'new' locations. Locations where stocking would assist a natural population should be prioritised, such as upstream of the ACT where a small population of Trout cod are present in Gigerline Gorge. Locations where other key complementary actions are occurring (such as habitat restoration, improved flow management etc) and there is capacity and engagement by the community to assist with actions such as habitat mapping, stocking (including co-investment), education programs and championing the recovery of the species should be prioritised as this will be a factor in determining the success of recovery actions. Furthermore, the upper Murrumbidgee River is the major waterway that flanks our nations capital. It is an ideal location to highlight how NSW is working to recover a nationally significant icon species of the Murray-Darling Basin. The establishment of a viable catch and	No change to Action Plan The number of re-introduction sites will be limited by the hatchery production output number. The current production targets will only allow for concerted and consistent stocking at the number of sites identified in the plan. Only if production increases beyond the numbers identified in the plan will additional sites and locations be considered. All potentially suitable stocking locations will be included and assessed on their merit and prioritised. This will include sites previously stocked and sites in both the upland and lowland sections within the historical distribution of Trout Cod.

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release Trout cod fishery upstream of the ACT would have many fishers who would use and support it. The large population base means that education within the cod fishing community would also have a large reach. Although these fishers may be based in the ACT- many do fish for both Murray and Trout cod in NSW and so are part of NSW's recreational fishing community. We also know that there is hybridisation occurring in the upper Murrumbidgee and hence it would be an ideal location to support the investigation of the effects of hybridisation with Murray cod, and whether this could be addressed via increasing Trout cod numbers. For these reasons we strongly advocate for the upper Murrumbidgee be included as a future recovery location for the species.	
Q4. Do you support the long-term priority actions? If not, why not?	
No. See above answer ("Again it'll turn to crap")	No change to Action Plan Feedback not constructive/relevant to TCAP.
No. 2 viable catch and release fisheries is not enough to sustain the high number of freshwater anglers of the state.	Action Plan updated Noted comment, and if successful, NSW DPI could look to increase the amount of catch and release fisheries in the longer term (beyond the 10-year period). This could be addressed in the Year 9 review being added.
No. The vision states that a cultural and recreational fishery is viable by 2033. This is extremely unlikely and the long-term priority actions certainly do not support this hypothesis. It would seem improbable that a viable catch and release fishery could be established given the high number of freshwater anglers in NSW. Anglers able to distinguish Trout Cod from Murray Cod needs to be in the 1-2 year action plan. A better education and communication program may be required. Major threats need to be identified and managed (and not simply	No change to Action Plan Feedback on timeframes in the longer term (e.g. distinguishing between Murray Cod and Trout Cod) could be achieved in shorter time frames i.e. 1-2 years but are included in the longer-term objectives to make them more achievable within the timeframe. Non-native/pest fish management does not specifically target Trout. As above, stocking site selection has not been completed. This will be identified in consultation with key stakeholder groups to better understand

Comments received via online feedback	Feedback addressed
prioritised). Non native / pest fish management, again appears to target trout rather than pest species. The long priority should focus on pest fish management and not non-native fish.	concerns, considerations and process for site selection.
No. Under Captive Breeding, Stocking & Translocations. 250,000 fingerlings per year seem a very large number. Will this impact on the captive breeding of other species?	No change to Action Plan 250,000 Trout Cod fingerlings being produced annually in the long term, may appear to be a large quantity. However, in comparison to other species in production by NSW DPI, this number is substantially less (e.g. over a 1.2 million Murray Cod produced and stocked in 2022-23). With additional resources, Narrandera Fisheries Centre has the capacity to increase production of Trout Cod to the amounts referenced in the TCAP, without impacting on production numbers of existing species.
No. Under Non native / pest fish management, continue to monitor and manage non-native fish at key sites. As it currently stands the Goodradigbee River is stocked with about 2,000 trout annually. Many are stocked at fry level. The longer-term TC stocking for the Goodradigbee is currently at about 8,000 and this will rise over time. Monitor and manage non-native species is not defined but seems to align with the eradication of trout. There is no doubt, if TC are successful, they will become the dominant species. In the long term, TC have significant potential to become the dominant species in the upper Goodradigbee River without expensive trout eradication measures.	Action Plan updated On average, 22,000 Rainbow Trout fry and fingerlings are stocked annually into the Goodradigbee River, supplied by DPI's Gaden Trout Hatchery. There is currently no plan for eradication of Trout, as above, suggest removing "eradication" wording on Page 11 to allay confusion. As above, stocking site selection and non-native/pest species management/control is yet to be determined and will occur with consultation, with all stakeholders. Monitoring and control programs will be informed by experts and best available science. As the Plan is implemented over the next 10 years, communication of monitoring and control will be given to stakeholders at regular intervals.
Yes. But the longer term does not mention any 'take' options and I think to gain support from recreational fishers you need this in there, doesn't guarantee that it will happen, thats evidence dependent, but should be in there, or it doesnt fit the vision as recreation and cultural fishing has a 'take' component. So something	No change to Action Plan Initially, if populations can sustain a catch and release fishery and if research indicates there could be a sustainable take, NSW DPI will adjust and address.

Comments received via online feedback	Feedback addressed
simple as 'investigate sustainable take and size limits for selected areas' will bring a lot more fishers on board including in our area. At present in our area they are known as 'trout carp' or 'rats' as their value is diminished as many anglers don't see them ever being able to fish for them again so why bother with them.	
No. In view of the history of trout cod in freshwater sites in NSW, the establishment of a sustainable trout cod recreational fishery by 2033 is ambitious and I reiterate may be impractical.	No change to Action Plan While the TCAP's goals of re-establishment of a sustainable Trout Cod recreational fishery by 2033 may be ambitious, with dedicated resourcing and funding, actions under the TCAP are achievable.
Yes. We support the long term actions.	No change to Action Plan Noted.
Yes we support the long term actions.	No change to Action Plan Noted.
Q5. Are there any priority actions missing?	
The plan does not take into considerations for pest species control, sure you mention investigations into interactions between the trout cod and "other freshwater species". there is a caveat for monitor and manage, however there is no reference to how this management is to take place??	Action Plan updated As above, monitoring and control programs will be informed by experts and best available science. As the Plan is implemented over the next 10 years, communication of monitoring and control will be given to stakeholders at regular. Addition of the Year 9 review in 2032 offers stakeholders a chance to review actions and outcomes.
The plan does not take into consideration any management of pest species. This is a significant omission of the Plan. We note that in the Audit and Review of the Trout Cod Recovery Plan in 2022 it is stated that "Funding for full implementation of the Basin Plan Environmental Outcomes Monitoring (BPEOM), which provided annual data on pest fish populations associated with the remnant Trout	No change to Action Plan Management of pest species is addressed on Page 11 of the TCAP. Comment around established populations are not relevant to the TCAP, as the plan focuses on establishing new populations over the next 10 years. Ongoing management of existing Trout Cod populations will continue to occur.

Comments received via online feedback	Feedback addressed
Cod population and all stocking locations, ended in 2018/2019. Monitoring may re-commence in 2021/2022 (funding pending)". And further that "No new pest eradication/control programs or research into the impacts of non-endemic fish species on Trout Cod have been implemented anywhere in NSW since the 2017 Statutory Review". Given that Trout Cod are established in the Mid Murray and attempts in the Goodradigbee River and Talbingo Dam, there should be specific actions in this plan in relation to these locations such that anglers are aware of programs being proposed in these areas in this Action Plan.	
There is limited consideration of research into natural breeding habits of Trout Cod, the habitat required, migration for breeding etc and the consequential actions required to improve natural recruitment. Re-establishment will require stocking, but support to natural recruitment will assist genetic diversity and ongoing sustainment.	Action Plan updated The TCAP acknowledges knowledge gaps and key research areas that need to be addressed including spawning habitats. Noted feedback regarding knowledge gap on Trout Cod natural breeding. Addressed via change number 8: • Add to Research/monitoring & evaluation under priority action "Identify and prioritise reintroduction sites", additional wording: "Investigate and quantify natural habitat requirements including spawning sites, flow requirements and structural habitat preferences."
I think the emphasis and a priority action (its in there, but so are many others) on angler involvement in sampling and tagging programs etc. These fish can easily be caught, and involving anglers in doing that will bring ownership of the programs and this linked to capture recapture type work as with cod brings a lot of interest and partnerships.	No change to Action Plan Anglers can currently report Trout Cod sightings via the DPI Fisheries webpage in the Threatened Species section and on the FishSmart app.
I don't see any priority actions missing from a recreational angler perspective.	No change to Action Plan Noted.

Comments received via online feedback	Feedback addressed
YES A risk mitigation strategy is required. A 360 degree review: what was the objective of the Plan and was it achieved. If the objective is not achieved what were the reasons for not achieving them. There is not mention of groups like Landcare and others who might be able to assist with improving riverine habitat. With reference to Mulwala and trout cod, you might ask Defence whether its mitigation measures for the Explosives Factory to prevent chemical residues from flowing into the Murray River have been successful. In terms of pest species, there is not mention of redfin eggs escaping through the mesh in the tunnels in Snowy Two into Tantagara Dam (a suitable trout fishery which is not stocked).	Action Plan updated Under the TCAP, the Outcomes serve as measurement of the successful objectives. Recommend addition of an end of plan review in Year 9 2033, to recap on outcomes achieved/not achieved and why. NSW DPI will work with all groups and stakeholders who may assist in improving riverine habitat under the TCAP, including Landcare groups and others. References to Defence and Snowy 2.0 are not relevant to the TCAP.
Needs a commitment to fund a monitoring program. This should be a part of a national monitoring effort, and the Commonwealth should contribute.	No change to Action Plan Noted and supported in full.
The recovery of Trout cod must not be constrained by state borders and we strongly call for the NSW actions to be complementary to those in the ACT as the territory encompasses a significant stretch of the upper Murrumbidgee that is identified as the Trout cod's range. We strongly suggest that cross border collaboration and joint management should be included in the strategy. This has many benefits including: — by working to strengthen Trout cod populations upstream of the ACT via stocking of Trout cod in NSW upstream, the population in the upper Murrumbidgee will be strengthened. — efficiency benefits via sharing of resources such as for surveying populations. — increased outcomes for actions such as education and awareness campaign. The ACT and region is the largest population	No change to Action Plan Noted

Comments received via online feedback	Feedback addressed
center in the Murray-Darling Basin and includes our Nation's capital. There is a very significant cod fishing community which fishes not only in the ACT but also in NSW and hence could make a significant contribution to championing the recovery of the species. — We would also like to see an action in the plan that areas where Trout cod may be present (even if they are not recognized to be self-sustaining populations) be excluded from the recreational stocking of Murray cod.	
Q6. Any further comments?	
I think it's a great idea to bring back trout cod to sustainable numbers again. I'm in full support of this initiative.	No change to Action Plan Noted.
I'll have a heart attack if your department dies anything let alone get the job done correctly	No change to Action Plan Feedback not constructive/relevant to TCAP.
After establishment provide accurate information concerning access points for recreational fishing. Fully support catch & release. Also consider fly & Lure only. More fisheries officers for enforcement.	No change to Action Plan Noted.
Again The vision of this plan appears to promote the removing of current rec fishing fish reared by DPI such as trout to make way for the Trout Cod as a rec species, however with minimal access areas to target them once established.	No change to Action Plan As above, comment that "the vision of this plan appears to suggest that Trout Cod replace Trout as a recreational fishing species" – this is incorrect. There is no wording under the TCAP that suggests that Trout Cod replace Trout as a recreational fishing species.
Need to maintain the Trout cod protection area - it has been vital for the long-term survival of the species & facilitated the dispersal of Trout cod down the Murray River beyond Swan Hill Might be better to do some translocations of juvenile Trout cod from the protection area to selected stocking sites.	No change to Action Plan Noted and supported in full.

Comments received via online feedback	Feedback addressed
As fisherman we hope common sense in this matter shines through but unfortunately your getting your data from an unreliable source.	No change to Action Plan Data is being sourced from the most up-to-date and reliable information NSW DPI has access to including best available science.
We have serious concerns regarding the lack of engagement with recreational anglers and the undue haste to have this Plan commented upon. The so-called community engagement has a very short lead time and lacks a genuine approach to engage about this very important issue. A more comprehensive process is warranted to enable interested parties to be thoroughly involved in the development and implementation of this Action Plan. The Plan appears to promote the removal of current recreational fish reared by NSW DPI such as trout to make way for the Trout Cod as a recreational species over 10 years. This is a very dubious proposition and will alienate trout fishing anglers while attempting to create the illusion that a recreational Trout Cod fishery can be established within 10 years. While the respondents are supportive to protect, recover and support range expansion of Trout Cod, we are disappointed that this Action Plan sets out to demonise trout but makes no specific mention of pest species, such as carp, redfin perch or gambusia and their impacts on Trout Cod and the overall NSW fishery. The plan does nothing to tackle the big issues surrounding all threatened species, the tone of this plan is merely “get rid of trout and Trout Cod will thrive”. There certainly appears to be a lack of will to have this plan comprehensively reviewed by interested parties given the short timeframe for consultation and lack of suitable announcements.	No change to Action Plan Feedback noted on short time frames for community engagement and consultation. This was also raised in the information sessions and it was acknowledged that although time constrained, all stakeholders were given the same opportunity to comment. As above, comment that “the plan appears to promote the removal of current recreational fish reared by NSW DPI such as Trout to make way for Trout Cod as a recreational species over 10 years”. This is incorrect. There is no wording under the TCAP that suggests that Trout Cod replace Trout as a recreational fishing species. Reference to “demonising Trout” and lack of mention of pest species such as Carp, Redfin Perch or Gambusia; important to note that under the TCAP, no specific non-native/pest species of fish have been specifically identified as site assessment has not yet occurred. Important to note, the TCAP does not identify a priority action or intention to “get rid of Trout”.
The limitations and limited notice engagement with the recreational fishing peak bodies causes great concern over the underlying intent of this action plan. In particular, the lack of	No change to Action Plan Feedback noted on short time frames for community engagement and consultation. This was also raised in the information sessions and

Comments received via online feedback	Feedback addressed
information on the full extent, and specific locations, of the intended sites is a worry to the trout community. References to ‘the Goodradigbee River’ covers a huge length of a very successful trout fishery, supported by Trust Fund stocking and natural recruitment. The Action Plan places a dark cloud of this recreational fishery.	it was acknowledged that although time constrained, all stakeholders were given the same opportunity to comment Reference to lack of information on the full extent and specific locations of the intended key stocking sites. • As above – this is due to stocking site selection has not yet been undertaken (it is a listed priority action under the TCAP). • This will be identified and communication with stakeholders will occur as the site selection takes place.
Members of the respondents Society are generally supportive of trying to maintain TC. We are disappointed that the plan sets out to demonise trout but makes no mention of redfin or gambusia, both far more environmentally damaging than trout. We are disappointed that TC (and in another matter, galaxiid) have been used by the Threatened Species Unit (TSU) to weaponize an attack on trout and trout anglers. Unlike the TSU, trout anglers have expressed a desire to work with the TSU on native species to develop outcomes that would present a win/win, but the TSU has adopted a combatant approach that seeks to alienate trout anglers and to only tackle the low-hanging fruit of trout stocking. The plan does nothing to tackle the big issues surrounding all threatened species, the tone of this plan is merely “get rid of trout and TC will thrive”. It is so disheartening to observe the TSU head down this path, when so much has been achieved through cooperation in the past.	Action Plan updated • As above, comment that “the plan appears to promote the removal of current recreational fish reared by NSW DPI such as trout to make way for Trout Cod as a recreational species over 10 years” - this is incorrect. There is no wording under the TCAP that suggests that Trout Cod replace Trout as a recreational fishing species. As above, reference to “demonising Trout” and lack of mention of pest species such as Carp, Redfin Perch or Gambusia; important to note that under the TCAP, no specific non-native/pest species of fish have been specifically identified as site assessment has not yet occurred. Important to note, the TCAP does not identify a priority action or intention to “get rid of trout”. Suggested action - substitute picture of Rainbow Trout on Page 11 of plan with another non-native species to allay concerns and confusion.
The upper Edward above Deniliquin is also a strong hold for trout cod, with each year coming further down towards Deniliquin and	No change to Action Plan Noted.

Comments received via online feedback	Feedback addressed
now sporadically caught as far and beyond as Stevens weir.	
We appreciate the work gone in to this plan, and thanks for allowing the community and rec fishos to have an input.	No change to Action Plan Noted.
I attended one of the workshops (Queanbeyan) and there was quite a bit of discussion around communication and the consultation process relating to the draft. My feedback on that is that I feel the consultation process has actually been quite good, with consultation invited from the entire community, rather than being filtered through representative bodies that may represent a particular interest or perspective. I think the workshop that I attended genuinely addressed some misinformation and misunderstandings held by some attendees in relation the the draft Plan, and was quite useful. On another note, it was pleasing to see the extent to which recreational fishing has been considered in the draft Plan in the context of the adverse impact that recreational fishing may have on Trout Cod, how that impact might be mitigated, and the inclusion of the development of Catch and release trout cod fishery as a priority action in the draft Plan.	No change to Action Plan Noted.
There is a large gap in the consultation process which needs to be fixed: recreational anglers and organisations and how they will be involved with the Plan and its operations in the future. Zoom could have been used in addition to the face to face meetings.	No change to Action Plan Engagement of recreational fishers and organisations is covered in the TCAP on Page 12 (including identifying Trout Cod Champions, to promote the species and champion the recovery of the species). More details about this will be further outlined in the communications and engagement strategy Noted feedback on face-to-face consultation process and lack of an online meeting option. Online meeting options were not provided through this consultation process due to time constraints, but could be used to 'close the loop' at the end of the consultation process to

Comments received via online feedback	Feedback addressed
	update stakeholders on the process and next steps.
Overall I believe this is a positive Action Plan to address the very real problem of a potentially endangered species, the trout cod. Attending the public information session in Queanbeyan, a key issue that was highlighted for me was the communication aspect, or rather the lack of it in the past. Thus, I think this is an aspect that can be improved looking forward. I understand that the DPI team dealing with this matter is small and resources are limited. It would be unreasonable to expect the DPI team to know all interested parties and to consult with them about potential future actions. I would therefore encourage the plan to include the ability for interested parties to be able to register their interest so that they may be kept informed of future developments on the trout cod matter. It would make sense to have this on the relevant DPI website and pages, but it should also be stated in the Action Plan and provide alternate methods for interested parties to be able to register their interest.	No change to Action Plan Reference to an opt-in/register your interest, database for email updates regarding Trout Cod updates etc under the TCAP. This is covered under Page 12 of the TCAP referencing the development of a stakeholder management system.
The statement to "Investigate funding opportunities to support and/or expand Trout cod stocking in priority areas" is too vague, as if funding opportunities are not found, what happens to the program? There should be a clear commitment that NSW will adequately resource increased hatchery production of trout cod. Without increased hatchery production, there is no scope to meet other commitments such as within 5-10 years "Have at least 2 viable and valued catch and release fisheries for Trout cod" as all existing hatchery production is required for conservation stockings. Impoundment stockings for rec fishing are important, but a lesser priority.	No change to Action Plan Noted comment on existing funding allocations.
Small stockings of trout cod across multiple impoundments could give an indication of which waterways would be suitable for long term	No change to Action Plan

Comments received via online feedback	Feedback addressed
stocking events. With the low success in previous river releases and given that very few habitats exist that could sustain a viable long term fishery, impoundments may hold the key. Trout Cod are apparently doing well in N.S.W and Victoria in impoundments where today a large percentage of angling is carried out. Impoundments would give quicker growth rates so anglers would see them turn up in captures in a shorter timeframe. Long term stockings of trout cod could be achieved in a suitable impoundment with no chance of hybridisation. I would like to give credit to all involved in this draft as it certainly is step in the right direction for recovery.	Under the TCAP, three sites over the 10-year period (two riverine and one impoundment) Past experience has demonstrated that small stockings of Trout Cod have not been successful and most of the reestablished populations have been established from stocking of substantial numbers of over long periods of time (10 years). There has been limited success with stocking impoundments to date with self-sustaining populations occurring in Cataract Dam and Bendora Dam in the ACT. There is currently no successfully established impoundment populations in Victoria. The Victorian Fisheries Authority did have a program which attempted to establish populations and a recreational fishery for Trout Cod in Lakes Kerferd and Sambell, however the VFA has recently announced that they are now abandoning this program due to Trout Cod failing to establish populations and sufficient size to support a recreational fishery.
Thankyou for the opportunity to comment. Our catchment community looks forward to being part of the effort to recover this species.	No change to Action Plan Noted.

The following table outlines submissions received directly via e-mail, separate to the online Have Your Say form. This table outlines the feedback received via specific Priority Action.

Table 2. Feedback received via e-mail direct from stakeholders.

Feedback received directly via e-mail	Feedback addressed
1. Captive Breeding, Stocking and Translocations Priority Action: Maintain/expand/ increase populations of Trout cod in NSW to support recovery, including establishing self-sustaining populations through stocking	
Short term (1-2 years)	
The respondent is supportive of the Short Term (1-2 years) Plan.	No change to Action Plan Supported.
Medium Term (2-5 years)	
The respondent is not supportive of the Medium Term (2-5 years) Plan as this is still a small number of fingerlings DPI released an average of 52600 fingerlings per year 1986-2005. Given one Trout Cod can lay 11,000 eggs each, this is the equivalent output of five breeding pairs across all stocking sites in NSW per year. ACT Gov released an average of 11500 fingerlings per year 1996-2005 (sites not specified) & 14700 per year 2005-2007 (one site). This is the equivalent output of 1-2 breeding pairs across all stocking sites in the ACT per year. While the proposed increase to 100,000 fingerlings is welcome, that number is small given the draft Plan covers a broad geographic area. This is the equivalent output of 10-11 breeding pairs across all stocking sites in NSW per year. However, this may not be enough to ensure stocked fingerlings can result in successful future breeding populations. In comparison, the ACT stocked 624,807 Murray Cod and 401,815 Golden Perch (a total of 1,062,622 fingerlings) from 2008 to 2022 or an average of 44,600 Murray Cod and 28,700 Golden Perch per year (and a total average of 73,330 fingerlings per year). For Lake Burley	No change to Action Plan Whilst a female Trout Cod can produce a maximum of 11,000 eggs a year, this is a maximum number that a large female can produce, smaller animals produce fewer eggs, with the range being between 1,200-11,000. NSW DPI has been finding it challenging to source large brood fish from the wild and the inclusion of smaller animals in the captive breeding program has resulted in overall lower fecundity (ability to produce eggs). The number of eggs produced by a female per year does not equate to number of fish produced. This is because: • not every female successfully spawns every year; • not all eggs produced are fertile; • not all eggs are fertilised; • not all eggs that are fertilised hatch; • not all eggs that hatch survive; • not all larvae stocked into grow out ponds survive. There are losses at all stages of the production and the level of these losses varies between years.

Feedback received directly via e-mail	Feedback addressed
Griffin alone, a study undertaken on behalf of the National Capital Authority (which manages Lake Burley Griffin) recommended stocking targets of 40,000 Murray Cod and 60,000 Golden Perch fingerlings per year. Like many locations across the Murray Darling system, ACT's waterways are infested with Carp and Redfin, necessitating a large number of native fish fingerlings being released each year to overcome competition from the Carp and Redfin populations. Accordingly, it is suggested that DPI will need to adopt similar targets for each waterway, necessitating a larger number than the proposed 100,000 fingerlings per year.	The increase in production to 100,000/year is reliant on three key factors; • Transitioning from hormone induction and stripping of the fish to pond-based spawning, similar to Murray Cod - this will allow for increased production and fertilisation and reduces handling stress on the fish and will increase the useable lifespan of the broodfish, which is currently only 3-4 years with hormone induction and stripping. • Increased number of broodfish - currently there are 57 Trout Cod broodfish in the program. In order to achieve a production output of 100,000/p.a. and increase to 250,000/p.a., the estimated minimum requirement is 90 broodfish (45 pairs). These are significant numbers of additional fish that need to be sourced from very small and already depleted populations, so a conservative approach needs to be adopted so as not to have a negative impact on the remaining functional donor populations. The Victorian Fisheries Authority (VFA) has also requested approval to source Trout Cod broodfish from NSW adding additional pressure on a very limited resource. Further to this, broodfish have a limited lifespan and need to be regularly replaced, this lifespan will be increased with pond-based spawning however it is still limited. • Additional broodfish and larval rearing ponds - the increase in broodfish number and the move to a pond-based spawning method will require both additional broodfish ponds and larval rearing ponds. The production numbers presented within the TCAP are based on the number of proposed re-introduction sites and the best available knowledge on the number of fish required to be

Feedback received directly via e-mail	Feedback addressed
	stocked at these sites and stocking effort duration.
Long term (>5-10 years)	
<u>The respondent is not supportive of the Medium Term (2-5 years) Plan as this is still a modest number of fingerlings.</u> This number is the equivalent output of 22-25 breeding pairs. This is a considerable improvement but, for the reasons outlined above, may still be insufficient to ensure stocked fingerlings can result in successful future breeding populations.	No change to Action Plan See comments above.
Outcome	
<u>The respondent is supportive of the Outcomes</u>	No change to Action Plan Noted.
Research/monitoring & evaluation	
<u>The respondent is not supportive of the research/monitoring & evaluation</u> The <u>respondent</u> is of the opinion that we need to better understand why previous stocking efforts have only yielded mixed results at best. Why is there little or no natural recruitment occurring in many of the stocked Trout Cod populations? What is preventing those stocked sites becoming naturally reproducing Trout Cod?	No change to Action Plan Determining why some historical Trout Cod stocking have failed in the past is very difficult, and in most cases not achievable. NSW DPI is taking the alternate approach to look at where Trout Cod re-introductions have been successful and what factors have contributed to those successes and then identifying locations, conditions and approaches to replicate and build on these past successes, applying knowledge from any past experiences.
Increase genetic diversity of remnant populations	
I agree with this goal, and believe it is important. Increasing research is emphasising that the very real and measurable harmful effects of low genetic diversity is a far greater risk to small populations of threatened species than the largely unproven and theoretical effects of outbreeding depression (Frankham et al. 2011).	No change to Action Plan Noted and supported. NSW DPI is currently working with the ACT Government on investigating options to increase the genetic diversity of the Bendora Dam population, and well as some of the drivers behind successful establishment there from very low stocking numbers.

Feedback received directly via e-mail	Feedback addressed
For species like trout cod (also Macquarie perch, and across the Great Dividing Range, eastern freshwater cod and Mary river cod), maximising genetic diversity through strategic translocations and stockings, sometimes known as “genetic rescue”, is definitely a priority (Nock 2009, Pavlova et al. 2017a). The Bendora Dam population (technically ACT jurisdiction) now successfully recruiting to some degree but established by two undesirably small stockings, is a high priority population for expanding genetic diversity.	
Increasing Trout Cod production medium and long term	
I agree with this goal, and believe it is important. Too many trout cod stocking have failed because the numbers of fish were too small, and they weren’t repeated for a substantial number of years in a row. Increased numbers of trout cod fingerlings will alleviate this.	No change to Action Plan Noted and supported.
New stocking sites identified and prioritised	
I agree with this goal, and believe it is important. However, this includes acknowledging that the trout cod is primarily a montane/upland native fish, and that its primary habitats were montane/upland streams, and that they are now absent from these habitats because of their long-term domination by predatory alien trout, reinforced by constant stockings of alien trout (Cadwallader 1977, Cadwallader 1978, Cadwallader 1979, Cadwallader and Gooley 1984, Rhodes 1999, Trueman 2007, Trueman 2011, Kaminskis 2023). I believe it is time to provide trout cod with some decent montane/upland stream habitats in which alien trout stockings have permanently ceased, and where alien trout are either completely eradicated or suppressed to the greatest extent possible. Then we will see some self-sustaining trout cod populations recover in the upland/montane stream habitats which	No change to Action Plan The identification and prioritisation of new stocking locations will encompass the entire historical range of Trout cod including the montane/upland streams as well as the lowland areas.

Feedback received directly via e-mail	Feedback addressed
were their primary habitats and to which they are most biologically adapted. (E.g. jaw morphology, egg size, larvae size, adult and larval swimming abilities (trout cod larvae have strongest swimming ability out of all large MDB native fish — Kopf et al. 2014), temperature tolerance, breeding temperatures, etc.)	
Investigate skewed sex ratios in Trout Cod broodstock	
This research is needed. However, the possibility that this is a natural phenomenon cannot be entirely discounted at this stage. It may — along with a vastly smaller size at first sexual maturity compared to Murray cod — be another adaptation to montane/upland stream habitats. I could see it achieving a form of in situ or sympatric resource partitioning between female fish (with their greater energetic needs for ova development) and male fish. Allopatric resource partitioning has been observed in other south-eastern native fish species such as Australian bass (Harris 1987, 1988) and long-finned eel (Walsh et al. 2003, 2004, 2006).	No change to Action Plan The research into skewed sex ratios would include whether it was a natural phenomenon or an artefact of anthropogenic changes to the environment.
Priority Action: Secure existing populations	
Short term (1-2 years)	
<u>The respondent is not supportive of initiating recommendations from the Trout Cod Recovery Plan Review</u> What are the recommendations? The 2022 DPI Audit and Review of the Trout Cod Recovery Plan does not appear to have any recommendations, just commentary and broad findings.	Action Plan updated The 2022 DPI Audit and Review of the Trout Cod Recovery program supports the ongoing overall objectives of the Trout Cod Recovery Plan, however we can see how this may be unclear and will consider some adjustments to reflect the Trout Cod Recovery Plan rather than the Audit and Review. This has been replaced with the more specific action; “Undertake genetic assessment of the existing remnant and re-established populations”
Medium term (2-5 years)	

Feedback received directly via e-mail	Feedback addressed
<u>The respondent is not supportive as we should be doing this in the short term, why wait 2-5 years?</u> Why has this not been done already?	No change to Action Plan This has not already been completed as resources have not been available to date - the reason it is included as a medium term action is to provide time to build capacity within the existing monitoring programs undertaken by DPI.
Long term (>5-10 years)	
<u>The respondent is supportive of the Long term (>5-10 years) Plan</u>	No change to Action Plan Noted.
Outcome	
The respondent is supportive of the Outcomes	No change to Action Plan Noted.
4.1 Monitor the range and status of the Trout cod population in the Murray River, particularly (a) identification of the area and extent of the population; (b) estimates of the size and structure and (c) inference or estimation of population change. 4.5 Maintain fisheries compliance activity along the Murray River Trout Cod zone. This is extremely important, especially given (1) the culture of flagrant breaching of the Murray cod closed season with intentional fishing for Murray cod, as recorded by Forbes et al. 2015 (2) the probable level of take of trout cod by anglers accidentally or deliberately confusing them for Murray cod (Lyon et al. 2018). Regarding this second point, I suggest a permanent catch-and-release only zone for all cod species, in the complete section of the middle Murray River where trout cod naturally occur, is the logical solution that would completely alleviate this problem. I suspect another problem affecting numbers of larger adult trout cod is these fish dying after catch-and-release due to poor handling technique and excessive time out of water for	No change to Action Plan This information references the National Recovery Plan Action. This is addressed on page 6 of the TCAP in the medium-term actions. 4.5 Maintain fisheries compliance activity along the Murray River Trout Cod zone. This information references the National Recovery Plan Action. This is addressed on page 7 in the Research Monitoring and evaluation section and on page 8.

Feedback received directly via e-mail	Feedback addressed
photographs, especially during periods of high temperature. In one reference Dr John Lake observed trout cod to be less resilient to handling during hot weather than Murray cod. As well as continued education on best-practice catch-and-release techniques, there needs to be more emphasis on the use of barbless hooks. In fact, using barbless hooks IS a key component of best-practice catch-and-release techniques. There should, without doubt, be areas in south-eastern Australia where the use of barbless hooks is mandatory – starting with the Trout Cod Protection Zone in the Middle Murray. In many fisheries all over the world, including in Canada and the USA, barbless hooks are mandatory. It is about time Australia started to catch up on this aspect of management.	
Short term (1-2 years)	
<u>The respondent is supportive of the Short Term (1-2 years) Plan and offers some additional comments below.</u> The ACT Action Plan suggests hybridisation might be occurring due to a scarcity of other Trout Cod to breed with. In addition, the ACT Action Plan appears to suggest restocking efforts of Murray Cod occurred in catchments that were previously Trout Cod habitats: Murray Cod are thought to have been historically absent or very rare in the upper Murrumbidgee Catchment upstream of Gigerline Gorge (Lintermans 2002), which was an important consideration in the selection of <i>M. macquariensis</i> stocking sites in this subcatchment. However, in response to recreational angler requests, Murray Cod stocking by NSW Fisheries commenced in the Numeralla Catchment in 2008–09, with 16,000 fingerlings stocked across three rivers (Big Badja, Kybeyan, Numeralla) between 2009 and 2015 (NSW Fisheries unpublished data).	No change to Action Plan Noted. Hybridisation of Trout Cod and Murray Cod is addressed throughout the TCAP including on Page 6.

Feedback received directly via e-mail	Feedback addressed
This may be a factor in the limited success of some stocked Trout Cod populations. Murray Cod stocking may need to be phased out in some waterways to maximise Trout Cod success. Also note the National Recovery Plan rated this as a Low risk in all waterways except Cataract Dam. The ACT Action Plan also reported some hybridisation occurring in the ACT in the Upper Murrumbidgee.	
Medium term (2-5 years)	
<u>The respondent is supportive</u>	No change to Action Plan Noted.
Long term (>5-10 years)	
<u>The respondent is supportive</u>	No change to Action Plan Noted.
Outcome	
<u>The respondent is supportive</u>	No change to Action Plan Noted.
I am extremely concerned by the hybridisation problem in the Upper Murrumbidgee (Couch et al. 2016). My concern is that we could lose genetically distinct populations of both cod — both the rare non-viable trout cod from stockings and the previously healthy wild Murray cod populations — and end up with an unfortunate single hybrid population instead. Increased stockings of trout cod should alleviate these problems. Also, to maximise survival, these trout cod stockings should not be sabotaged by much larger stockings of alien trout species. (As NSW Fisheries was warned in Faragher et al. 1993.) The deliberate sabotage of endangered natives species stockings by ongoing mass releases of predatory alien trout into the same habitats is completely unacceptable. Similarly, the	No change to Action Plan Noted.

Feedback received directly via e-mail	Feedback addressed
ongoing mass releases of predatory alien trout into habitats of the endangered Macquarie perch — a species once sympatric with trout cod in montane/upland streams — is also completely unacceptable. I would like to make the point that the stockings of the Upper Murrumbidgee with trout cod were not a fair trial. According to NSW Fisheries' own data, approximately 53,000 fingerlings were sporadically released over a period of <10 years. This total number of stocked trout cod was vastly outweighed by the number of predatory alien trout released into the Upper Murrumbidgee and its tributaries every single year of this stocking period. Noting, of course, that alien predatory trout and constant stockings of them were the reason for the loss of trout cod from the Upper Murrumbidgee and a myriad of other montane/upland river and stream habitats in the southern Murray-Darling Basin in the first place. It is clear that NSW Fisheries wishes to avoid confrontation with an extremely presumptive and unreasonable “trout lobby” when it comes to alien trout and alien trout stocking impacts on native fish such as trout cod. However, these hard conversations need to be had. Again, it is unacceptable that trout cod conservation stockings in the Upper Murrumbidgee were sabotaged by vastly bigger alien trout stockings every year. They need to stop, and the “trout lobby” needs to be told they need to stop. The deliberate sabotage of the trout cod stockings in the Lower Goodradigbee with alien trout stockings also needs to stop, and the “trout lobby” needs to be told this. The “trout lobby” do not own our montane/upland rivers, they do not have final say or veto over what happens in them in regards to native fish conservation or alien fish stocking, and it is about time this was made clear to them.	
2. Recreational Fishing	

Feedback received directly via e-mail	Feedback addressed
Priority action: increase community awareness of Trout Cod status, threats and recovery through education programs.	
Short term (1-2 years)	
<u>The respondent is not supportive of the Short Term (1-2 years) Plan as the identification of additional catch and release fisheries for Trout cod should occur in the Short Term and while the stated vision of the draft plan is to 'once again support cultural and recreational fisheries', the draft Plan is either silent or fails to include any actions in relation to cultural fisheries.</u> The respondent is also asking why not include the ACT alongside NSW and Vic with the education action? - ACT also has a Trout Cod population in the Murrumbidgee River - ACT anglers also fish NSW inland waterways The Minister signed a Trout Cod Order in 2014 approving nine locations for catch and release Trout Cod Fishery - To date, only Talbingo Dam has been opened as a Trout Cod catch and release fishery - What is the status of the other eight locations listed in the 2014 Trout Cod Order? - Given there are already eight other sites listed in the 2014 Trout Cod order, what progress has there been since 2014 to create viable catch and release fisheries for those sites? - The identification of candidate sites for catch and release fisheries needs to occur in the short term in order to meet the long term action of establishing two or more viable and high valued catch and release fisheries. The respondent would actively promote the use of the DPI's 'Report a Trout Cod sighting' page to promote the DPI's conservation efforts and	No change to Action Plan The identification of an additional catch and release fishery is a medium term action rather than a short term as there are other actions occurring in the short term that will inform this action. Some are those outlined on page 5 of the TCAP. Implementation of actions within the short term time frames will be constrained by resource availability. The identification of the additional catch and release fishery location will include an assessment of all potential locations including the other 8 sites identified in the Ministerial Order from 2014 - all sites will be assessed on their merits with the most suitable site being selected. To date only Talbingo Dam has been stocked with Trout Cod due to limited production and it being the most suitable location of those identified within the Ministerial Order. NSW DPI is working collaboratively with both the ACT and Victorian governments and will continue to do so to achieve the best outcomes possible. No change to Action Plan Noted No change to Action Plan The threatened species reporting form is available for anglers to report sightings of Threatened Species within the FishSmart NSW app under the 'Contact' section.

Feedback received directly via e-mail	Feedback addressed
encourage anglers to help build DPI's picture of NSW's Trout Cod population and its movement. DPI should upgrade the FishSmart NSW app to facilitate reporting by anglers of Trout Cod and other threatened species. There are no actions pertaining to cultural fishing - while Indigenous cultural fishing falls outside the remit of the respondent, recreational anglers need to be informed of any proposals allowing for cultural fishing of Trout Cod. - It would appear unlikely that cultural fishing can be exercised on a catch and release basis. Open communications and targeted messaging with recreational anglers about proposed changes to cultural fishing practices involving Trout Cod is essential to ensuring recreational anglers remain committed to current restrictions on recreational fishing. Any new Trout Cod Action Plan must be relevant for both Indigenous Australians seeking to practice cultural fishing and recreational anglers to ensure their continued commitment to the recovery of Trout Cod in NSW.	Action Plan updated The vision has been changed to include ecological values and now refers to ecological, cultural and recreational fishing values rather than fisheries.
Medium term (2-5 years)	
<u>The respondent is not supportive of the Medium Term (2-5 years) Plan until there is an equitable distribution of catch release fisheries across the current and former range of Trout Cod, especially west of the Hume Highway and the initial stocking of the selected catch and release fisheries sites needs to commence in the mid-term if the long-term action of establishing those fisheries is to be met.</u> Are options for any future catch and release fisheries limited to the remaining eight locations in the 2014 Trout Cod Order?	No change to Action Plan The locations of all re-introduction sites will be based on a number of criteria, with sites that have the most suitable conditions being chosen to allow the best opportunity for additional populations to establish. The TCAP does not stipulate the nature or locations of the catch and release fishery, the location of which is yet to be determined. This location will be identified and assessed against a number of critical criteria and may be either an impoundment or a river system/reach. Options for further catch and release fisheries are not limited to the sites identified in the

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The nine catch and release sites in the 2014 Trout Cod order predominately favour Sydney and Canberra anglers. We need ensure an equitable selection of candidates catch and release sites including waterways south of Wagga Wagga and west of the Hume Highway. Given the comments made in response to the short term actions regarding the identification of catch and release sites, why is this action occurring as a Medium Term Action instead of a Short Term Action. Given Trout Cod take 3-5 years to reach sexual maturity (35 cm for male and 45 cm for female cod), the initial stocking of the selected catch and release fisheries sites needs to commence in the Medium Term in order to have viable catch and release fisheries ready for anglers in the Long Term time range. Consideration should be given to including the sections of one or two rivers for catch and release - this could also form the basis for angler participation in citizen science for data capture and monitoring, which could be facilitated by the upgrading of the Fish Smart NSW app as part of the Short Term Actions.	Ministerial Order, these sites will be included in the assessment and assessed on their merit along other potential sites.
Long term (>5-10 years)	
<u>The respondent is not supportive of the Long Term (5-10 years) Plan and while it may be unrealistic to expect sufficient recovery of Trout Cod populations to remove it from the threatened species list within ten years and to allow anglers to take Trout Cod, there needs to at least be a road map towards limited harvesting of Trout Cod by cultural fishers and recreational anglers in the long term.</u> Given the draft action plan aims transition Trout Cod to de-listing as a threatened species, there needs to be a road map of transitioning rec fishing rules from limited catch and release	No change to Action Plan A limited catch and release fishery is the first step, once this has been established, and it has been demonstrated that there is a high-level of compliance and that populations can sustain a level of take, then options for take of the species will be examined. Given past examples and experiences this is very unlikely to occur with the time frames of the TCAP hence why it has not been included. The VFA has recently abandoned the Trout Cod Fisheries at both Lakes Sambell and Kerferd due to poor establishment and lack of fish achieving harvestable size. Trout Cod from

Feedback received directly via e-mail	Feedback addressed
towards some degree of rec fishing harvest (and likewise for Cultural fishers) Victoria already allows limited harvesting opportunities for rec fishers (fulfilling one of the deliverables of the 2008 National Recovery Plan) The respondent Suggest we adopt Vic size and bag/possession limits for proposed harvesting of Trout Cod depending on the success of the draft action plan Murray Cod size limits are not fit for purpose in relation to Murray Cod given the size differences between Murray Cod and Trout Cod, the precedent of Victoria providing for a different size rule, and likely success in the short term actions of educating anglers about the differences between the two fish. Initially, the DPI could plan for limited harvest in trial areas as part of the design phase of the Road Map.	these systems will now be salvaged and the lakes stocked with other recreational species.
Outcome	
<u>The respondent is not supportive of the outcome as it must also reflect the draft plan's vision of supporting cultural and recreational fisheries.</u> The stated outcome can be achieved on the short term actions alone and does not reflect the medium and long term actions. It also falls short of the stated vision of the draft plan to 're-establish viable Trout cod populations in priority habitats across their former range, that can once again support cultural and recreational fisheries. National Recovery Plan for the Trout Cod <i>Maccullochella macquariensis</i> (2008) stated that 'the ultimate aim is to recover the species to the point where it is no longer considered threatened, and therefore is able to provide recreational fishing opportunities again.	No change to Action Plan Comments are noted - however the TCAP is a timebound 10-year program unlike the National Recovery Plan and the NSW Recovery Plan, both of these plans are still active and current as are their long-term objectives for de-listing of the species, however this is not achievable within the 10 year timeframe of the TCAP.

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It should also be noted that the DPI's previous Trout Cod Recovery Plan (2006) stated: In the long term, if the recovery program for trout cod is successful there is the potential for possible future legalisation of catch-and-release fishing or controlled harvest fishing for trout cod in inland rivers, which could lead to the growth of fishing-based tourism and greater economic and social benefits for regional communities. The direct economic value of the recreational fishery in the range of trout cod is unknown, but is likely to be in the order of tens of millions of dollars per year, and the tourism income generated by the fishery is likely to be critical to the survival of a number of businesses in the region (NSW Fisheries 2002a)".	
Research/monitoring & evaluation	
<u>The respondent is supportive.</u>	No change to Action Plan Noted.
I tentatively support the catch-and-release-only recreational fishery in Talbingo Dam, but only provided it remains catch-and-release in perpetuity. Catch-and-release fisheries may build community awareness for the species, and support for their conservation and recovery. In contrast, I vehemently disagree with the development of two catch-and-kill trout cod fisheries in Victoria, and believe it is an extremely foolish and counter-productive development. Not only does this send profoundly the wrong message to the community, but also creates legal loopholes and excuses for being in possession of trout cod which may have been illegally taken in other waters.	No change to Action Plan Noted.
Quantify the impact of angling on nesting fish and eggs during breeding season	
This is a huge problem, and it extends beyond just breeding season. There is a huge trend	No change to Action Plan

Feedback received directly via e-mail	Feedback addressed
towards fishing for Murray cod in winter ... and obviously, in places like the Middle Murray and the Ovens River, many trout cod will also be caught in winter. All evidence indicates that ALL cod species caught and released in winter OR spring, from early June onwards to the actual act of spawning, resorb their eggs (i.e. atresia and resorption of developing ova) and fail to breed (Lake 1967, Rowland 1988, Rowland 1998, Rowland and Tully 2004, Rowland 2005, Rowland 2013, Rowland 2020). Increasing research further indicates catching males of any of the cod species while their guarding the nest of eggs has a high probability of causing an abandoned nest, predated eggs and a failed spawning effort (Butler and Rowland 2009, Butler pers. comm.). And I have already mentioned research by Forbes et al. 2015 that indicates a widespread culture of illegal deliberate targeting of cod during the Murray cod closed season. My suggestions to remedy this problem is simple. At the very minimum, wild Murray cod populations (and wild trout cod populations) in rivers and streams should have a closed season that commences on the 1st of July and finishes on 30th November. In other words, cod are protected in July and August as well the current existing closed season. Further, it should be a proper “no fishing” closed season, the same as we provide to damaging alien trout in rivers and streams.	This research would likely include impacts on Trout Cod in pre-spawning period, however this will be limited number of small numbers of large breeding Trout Cod and limited distribution of the species.
Priority action: Reduce fishing related mortality and maximise angler compliance	
Short term (1-2 years)	
The respondent is not supportive of the Short Term (1-2 years) Plan as this does not add value to the draft plan - this is merely a continuation of existing actions. This does not appear to be new action but a continuation of existing actions.	No change to Action Plan This action is reinforcing the need to maintain these ongoing actions, all of the most recent evidence supports the need for and the continuation of the current closure within the Trout Cod Protection Area (TCPA), whilst all anglers might not support this approach, the

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Accordingly, it is a missed opportunity to achieving better outcomes in reduced fishing related mortalities and improved fisheries compliance. The current short term actions focus solely on compliance and missed an opportunity for facilitating behavioural change in anglers The Long Term actions listed should be moved forward to Short Term actions. The rationale for the total fishing ban needs to be reassessed - while the total fishing ban is not unique nor unprecedented, it needs to be reviewed at regular intervals to ensure it does not impose unnecessary regulatory burdens on stakeholders and continues to be relevant in the recovery of Trout Cod populations. The respondent notes the 2022 Murray River Fishing Socio-Economic Study reports that many people surveyed as part of the study supported the fishing closure between Tocomwal and Barmah Weir during 1 August - 30 November, and that they reported little or no impacts • However, the respondent is aware that not all anglers support the fishing closure, and they argue it serves little purpose other than to 'impose a double layer of protection on a species that is already totally protected'. In their view, to again allow recreational fishing for other species, even the despised carp, during this period would have benefits for local tourism and retail business as well as the opportunity for residents to fish locally. If the DPI is not prepared to ease restrictions between Tocomwal and Barmah Weir during 1 August - 30 November, the respondent requests the DPI offers some form of offset for recreational anglers residing in the region. For example, establishing one of the two or more proposed Trout Cod catch and release fisheries in the region, and to look at offering opportunities for limited harvesting of Trout	majority of anglers, community and business surveyed for the 2022 Murray River Fishing Socio-Economic Study are in favour of the seasonal closure in the TCPA, with only 10% of anglers surveyed in favour of the closure being abolished and 7% in favour of it being reduced. The establishment of the proposed Trout Cod recreational fishery will be determined via a process that utilises the best information to determine the most appropriate location that has the highest chance of successfully establishing a population that can support a recreational fishery. The VFA has recently abandoned the Trout Cod fisheries at both Lakes Sambell and Kerferd due to poor establishment and lack of fish achieving harvestable size. Trout Cod from these systems will now be salvaged and the Lakes stocked with other recreational species.

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Cod, similar to the Trout Cod fishery in Lake Sambell and Lake Kerferd, Victoria.	
Medium term (2-5 years)	
<u>The respondent is not supportive as it unclear why it falls under the priority actions for recreational fishing.</u> It would appear that this is better off under Captive Breeding, Stocking & Translocations A better action might be educating anglers in improved catch and release techniques, improved handling techniques (including handling of fish when posing for photos prior to release), and adverse impacts capture of fish may have during spawning activities, and for nesting sites etc.	No change to Action Plan Hybridisation is a recreational fishing action under the TCAP because it has implications for the Murray Cod fishery which is a key recreational species in NSW. Current legislation around compliance of hybridisation is silent.
Long term (>5-10 years)	
<u>The respondent is not supportive and is questioning why is this action going to take 5-10 years? This needs to happen sooner if we are to prevent restocking efforts being undermined by misidentification of fish.</u> Out of Mary Cod, Eastern Freshwater Cod and Trout Cod, surely Trout Cod is the easiest to distinguish from Murray Cod. It should not take 5-10 years to educate the public on this issue. Prioritising this action more urgently will also facilitate the easing of compliance actions and restrictions on fishing.	Action Plan updated This long-term action has been moved to the outcome section and has been replaced with a short term action regarding a focus on handling and catch and release techniques. Long term action has been replaced with “continue to deliver targeted education material regarding identification, handling techniques and best practice catch and release methods to anglers”
Outcome	
<u>The respondent feels this should also include improved angler behaviour informed by personal commitment to the recovery of Trout Cod populations.</u>	No change to Action Plan Noted.
Research/monitoring & evaluation	
<u>The respondent is not supportive of this priority action as it is predominately focused on compliance and enforcement activity. Research</u>	No change to Action Plan This action is not focused on compliance or enforcement, it's focused on gaining greater

Feedback received directly via e-mail	Feedback addressed
<u>should also focus on understanding angler motivation and behaviour to develop effective behavioural management strategies in anglers to strengthen their commitment towards the recovery of Trout Cod populations and to act accordingly.</u>	understanding of the incidental catches of Trout Cod during and preceding spawning periods in areas where they may be caught as by-catch. It is acknowledged that the suggested action has merit however there is a need to focus on specific priority actions in the term of this plan.
3. River Health and Habitat Priority action: identify and prioritise reintroduction sites	
Short term (1-2 years) Medium Term (2-5 years) Long term (>5-10 years) Outcome: Research/monitoring & evaluation <u>The respondent is supportive of all of the above.</u>	No change to Action Plan Noted.
2.1 Survey and map potential habitat, using ecological and bioclimatic information that may indicate habitat preference. I agree. But this would require (1) ending ongoing misrepresentation of trout cod as a primarily lowland fish, whose decline is linked with desnagging in alluvial lowland rivers (2) ending the ongoing emphasis on recovering trout cod in secondary lowland habitats. The species is primarily a montane/upland native fish, sympatric with Macquarie perch. Reestablishment in montane/upland streams that are alien-trout-free, or at least are alien-trout-suppressed and free of alien trout stocking, should be investigated/attempted. In regards to ‘indications of habitat preference’, it is worth noting some extremely dubious unpublished results from aquaria experimentation have been referenced in past trout cod management literature, claiming implausibly high temperature tolerances for trout cod. These conflict with the species	No change to Action Plan Good contextual information. This information references the National Recovery Plan Action.

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Feedback addressed

former primary range in montane/upland habitats and conflict with observations by earlier researchers such as Dr John Lake and Dr Phil Cadwallader about markedly lower maximum temperature tolerances and resistance to summer thermal stress in the species compared to Murray cod. This phenomenon is at least partly brought about because we have allowed all montane/upland trout cod populations to lapse into extinction (excepting the translocated Seven Creeks population), our broodfish come from the Middle Murray, and many hatchery fish are bred in the hot lowland Narrandera Fisheries Centre. This has probably had the effect of artificially selecting for warmer temperature tolerances in trout cod, to the point where aquaria based assessments of temperature preference in juvenile trout cod fresh — from hot hatchery grow-out ponds — are very misleading. Even the Snobs Creek Fishery Centre is nowhere near as cold or as elevated as many of the places trout cod once occurred.

Several more points:

- Allen-Ankins and Stoffels (2017) documents excellent research on blackfish species (*Gadopsis* sp.) that show a similar split in primary habitats to trout cod and Murray cod (i.e. montane/upland versus midland/lowland). (One of species (*G. bispinosa*) was sympatric with trout cod and Macquarie perch.) Their research notes that fish do not live near their long-term thermal maxima because they need to maintain a substantial buffer to allow stochastic temperature fluctuations. Their research is extremely applicable to questions of ecological niche and adaptation and original primary habitats in the trout cod, and their differentiation of primary habitat with the Murray cod.
- It is interesting that where trout cod are stocked in relatively cold habitats, those rare fish that escape alien trout predation do survive

Feedback received directly via e-mail	Feedback addressed
in these cold habitats, and in some cases, breed successfully in them. It is clear that despite several decades of probable hatchery selection for warmer-adapted trout cod, their ability to survive and thrive in cold montane/upland habitats has not been lost yet. • J.O. Langtry recorded that “trout breed at least 3 weeks before Murray cod [in the Middle Murray] and there was no overlap to any degree” (Cadwallader 1977). This strongly indicates that (1) trout cod are adapted to cooler thermal regimes than Murray cod (expected if their primary habitat in montane/upland streams) (2) there was a temporal and behavioural barrier to inbreeding where the species were sympatric (3) this temporal and behavioural barrier to inbreeding has, regrettably, since broken down as trout cod populations have undergone precipitous declines.	
Priority action: identify known and potential threats to key Trout Cod population locations and habitat	
Short term (1-2 years)	
<u>The respondent is not supportive as this does not add value to the draft plan - this is merely a continuation of existing actions.</u> The priority actions appear more focused on preventing future degradation of waterways and less focused on remediating past degradation and restoring aquatic habitats. The Action Plan must address: • resnagging of waterways • addressing river regulation • overharvesting of water • barriers to fish passage • siltation • thermal pollution • chemical pollution	No change to Action Plan Comments noted - addition of continuation of existing programs is important to maintain ongoing commitment and focus. Many of these other actions are addressed as part of larger broad scale programs across government agencies and are outside of the scope of the TCAP.

Feedback received directly via e-mail	Feedback addressed
• water quality • preventing future fish kills As noted in the respondent's Floodplain Harvesting Submission: It is commonplace for many politicians and other stakeholders resisting calls to increase protections to the environment or measures to mitigate environmental degradation to religiously chant the recital that 'Australia is a land of great extremes of drought and flood and bushfire etc' when rationalising the poor state of our environment and to deflect responsibility how this occurred. Many scientists have previously given evidence in other inquiries exposing this myth. The respondent notes the scientific paper provided by Dr Martin Mallen-Cooper in his submission to the Murray-Darling Basin Royal Commission in 2018 that the natural state of the Murray River is a flowing river, and that the River is now experiencing 1:1000 year event conditions on an annual basis. This has led to the localised extinction of many species (Trout Cod, Murray Crayfish, River Snails) and the decline of other species (such as mussels and Murray Cod) in many parts of the Lower Murray. The respondent contends that this is due a failure to fully implement the Water Management Act 2000 in accordance with its objectives, and not due to Australia being the 'land of extremes', or climate change. Australian inland rivers continue to deteriorate despite efforts towards more coordinated management approaches and, as a result, most species of native fish in these waterways are under great pressure. The massive and erratic fluctuations of many rivers have been drastically altered and regulated before they have been fully understood. In addition, land clearing, barriers to fish passage, introduced species and pollution have been detrimental to native fish.	

Feedback received directly via e-mail	Feedback addressed
In 2003, an expert panel commissioned by the Murray-Darling Basin Commission estimated that native fish populations across the MDB were at approximately 10% of those existing prior to European settlement. In 2020, expert opinion commissioned by the Murray-Darling Basin Authority confirmed that native fish populations in the MDB have further declined since that 2003 assessment. The loss of water and changes to the flow of water in the MDB is one of the major threats to its native fish species and the ecosystems that support those species. The Murray Darling Basin Authority's Native Fish Recovery Strategy (June 2020) (at page 16) identified changes to water availability and flow patterns and changes to flowing water habitat availability as major threats to the MDB's native fish species. The MDBA's predecessor, the Murray Darling Basin Commission, in its Native Fish Strategy for the Murray-Darling Basin 2003-2013 (May 2003) reported that restoring environmental flows alone could see native fish populations return to 30% to 40% of pre-European levels.	
Medium Term (2-5 years) Long term (>5-10 years) Outcome	
<u>The respondent is supportive of all of the above.</u>	No change to Action Plan Noted.
Priority action: identify and prioritise on-ground works and rehabilitation efforts at Trout Cod populations and stocking locations.	
Short term (1-2 years) Medium Term (2-5 years) Long term (>5-10 years) Outcome Research/monitoring & evaluation	No change to Action Plan Noted.

Feedback received directly via e-mail	Feedback addressed
The respondent is supportive of all of the above.	
4.Non-native / pest fish management Priority action: minimise impact of stocked, translocated and non-native/pest fish species.	
Short term (1-2 years)	
<u>The respondent is not supportive as the priority actions must also address disease and parasites impacting on Trout Cod and other native fish species.</u> The Action Plan will need to incorporate the implementation of the National Carp Control Plan (NCCP) should it proceed in the future. Diseases and parasites known to be impacting on Trout Cod and other native fish species: • Epizootic Ulcerative Syndrome • Eustrongylides excisus (invasive parasites) • Epizootic Haematopoietic Necrosis Virus (EHNW) • protozoan Chilodinella • parasitic copepod Lernaea cyprinacea • tapeworm Bothriocephalus acheilognathi Even if the NCCP does not proceed, there are other steps governments and the community can take to address the damage caused by carp and improve the health of Australia's inland waterways. These include: • habitat restoration of aquatic ecosystems; • restocking native fish; • improving water quality; and • addressing unsustainable harvesting of water from the Murray-Darling Basin.	No change to Action Plan NSW DPI agree that these are all very relevant issues, however they are not specific to Trout Cod and are applicable to many native fish species and the broader aquatic environment and ecosystems. These broader issues are outside the scope and remit of the TCAP.
Medium Term (2-5 years)	No change to Action Plan
Long term (>5-10 years)	Noted.

Feedback received directly via e-mail	Feedback addressed
Outcome The respondent is supportive of all of the above	
Research/monitoring & evaluation	
<u>The respondent is not supportive as research must also must also address disease and parasites impacting on Trout Cod and other native fish species.</u> Research on carp control and control of other pest species needs to build on the existing body of research carried out under the National Carp Control Plan.	No change to Action Plan The National Carp Control Program (NCCP) is a matter for the Federal Government and outside the scope of the TCAP.
• 3.1 Investigate the precise impacts of known and potential threats to Trout cod. • 3.2 Investigate the interaction between Trout cod and introduced freshwater fish. Agreed and supported. Investigations between alien trout and trout cod are the priority, including rainbow trout, and including stocked rainbow trout. (There is no scientific evidence or justification whatsoever for the often-repeated claim that rainbow trout are less of a threat than brown trout, and plenty of scientific evidence to contradict it.)	No change to Action Plan This information references the National Recovery Plan Action. Supported
Short term (1-2 years) Medium term (2-5 years) Long term (> 5-10) years • Ensure the Freshwater Fish Stocking Fishery Management Strategy (FMS) is updated and adhered to so impacts on Trout cod populations from stocking is minimised or removed The FMS should be updated so that it is no longer permissible to stock alien trout in sites where trout cod are trying to be recovered with conservation stockings, or where Macquarie perch persist, or are trying to be recovered.	No change to Action Plan Noted.
Identify risks of non-native/pest fish at stocking locations and management options, i.e. removal, cessation of stocking, relocation, fish downs etc.	No change to Action Plan Noted and supported.

Feedback received directly via e-mail	Feedback addressed
Agreed. All of these options should be on the table. Cessation of alien trout stockings where endangered native fish occur and/or are trying to be recovered is the first priority.	
• Research interactions between introduced species and Trout cod to establish the level of threat posed by each species. Multiple lines of biological, historical and scientific evidence show that the trout cod's primary habitats were montane/upland streams, both the large and the surprisingly small, and that the introduction of alien trout, and the constant stocking of alien trout, is responsible for the total extirpation of wild trout cod from such habitats, and the near extirpation of the sympatric Macquarie perch from such habitats (Cadwallader 1977, Cadwallader 1978, Cadwallader 1979, Cadwallader and Gooley 1984, Rhodes 1999, Trueman 2007, Trueman 2011, Kaminskas 2023). Urgent research into alien trout and alien trout stocking impacts on both of these endangered native species should be undertaken. Such research should treat rainbow trout as an equally severe threat as brown trout. (There is no scientific evidence or justification whatsoever for the often-repeated claim that rainbow trout are less of a threat, and plenty of evidence to contradict it.) Predation on native fish larvae and early stage juveniles is difficult to detect visually. Such studies should use DNA assays of alien trout stomachs to detect presence, and therefore predation, of trout cod and other endangered native fish (Kaminskas 2023).	No change to Action Plan Noted.
Communication and Engagement	
• Develop an action plan communication strategy. • The plan will include targeted community engagement in key focus areas and the	No change to Action Plan Noted and supported.

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development of a stakeholder management system. • Identify and engage Trout Cod champions (fishing identities’) to promote the species and champion the cause. • Provide opportunity for involvement of recreational fishers in Trout Cod activities, such as fish releases, broodstock collection and fish downs in release locations. The respondent is supportive and can work with different recreational fish bodies such as fishing clubs, ANSA etc. to promote these.	
• Continue seeking opportunities to engage with other jurisdictions and organisations, particularly around key learnings, broodstock /progeny exchange. • Deliver national recovery plan actions in collaboration with other jurisdictions and organisations. • Develop and distribute additional advisory and educational materials that cover a range of topics including the impacts of non-native species in waterways. • Specific advisory materials regarding the cultural significance of Trout cod will also be developed and distributed • Foster long-term, two-way knowledge transfer with Aboriginal communities. The respondent feels the Draft Action Plan is rather muted on how it will engage with Aboriginal communities. There needs to be open communication with all stakeholders to prevent perceptions of favourable or less favourable treatment towards different stakeholders. This will contribute to ensuring all parties remain committed to the recovery of Trout Cod even in the face of continued restrictions, whether it be recreational fishing, cultural fishing, land management etc.	No change to Action Plan NSW DPI will develop the details and mechanisms of this process in consultation with Aboriginal communities. This work like many aspects of the TCAP cannot commence until the plan is finalised and funded.

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There are no actions pertaining to cultural fishing - while Indigenous cultural fishing falls outside the remit of the respondent, recreational anglers need to be informed of any proposals allowing for cultural fishing of Trout Cod. - It would appear unlikely that cultural fishing can be exercised on a catch and release basis - Open communications and targeted messaging with recreational anglers about proposed changes to cultural fishing practices involving Trout Cod is essential to ensuring recreational anglers remain committed to current restrictions on recreational fishing. - Any new Trout Cod Action Plan must be relevant for both Indigenous Australians seeking to practice cultural fishing and recreational anglers to ensure their continued commitment to the recovery of Trout Cod in NSW.	
• Incorporate Aboriginal knowledge and involvement into planning and actions for recovery. • Continue to encourage community reporting of Trout cod via the NSW DPI Threatened and Pest Species Sightings Program online form. The respondent suggests that DPI should upgrade the FishSmart NSW app to facilitate reporting by anglers of Trout Cod and other threatened species. Consideration should be given to including the sections of one or two rivers for catch and release - this could also form the basis for angler participation in citizen science for data capture and monitoring, which could be facilitated by the upgrading of the Fish Smart NSW app as part of the Short Term Actions.	No change to Action Plan NSW DPI will develop the details and mechanisms of this process in consultation with Aboriginal communities, however this work like many aspects of the TCAP cannot commence until the plan is finalised and funded.
Quotes to consider the in context of future trout cod recovery projects in NSW	
Cadwallader 1977 <i>'Much is said about the fact that Trout cod prefer faster water and will travel further upstream than</i>	No change to Action Plan

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<i>Murray cod, hence its slimmer and more active appearance when compared with Murray cod.'</i> <i>'Upstream of Wangaratta it becomes obvious that trout and native fish will not coexist. Trout inevitably gain the upper hand not only in the headwaters but also, especially in the case of brown trout, in the lower reaches Would it be feasible to discontinue the liberation of brown trout?'</i> 'At Yarrawonga, spawning of trout cod preceded that of Murray cod by 3 weeks. There was no overlap to any degree.' Cadwallader 1979 <i>'...conditions in the main channel upstream of the steep-gradient zone, including a stretch of about 5–6 km upstream of Polly McQuinn's Weir, appear to be suitable for them. Possibly their progressive disappearance from this area since 1921-22 has been caused by continual releases of trout. In aquaria young trout cod (1-18 months old) exhibit intraspecific aggression and establish well-defined territories similar to those described by Kalleberg (1958) for young trout, so young trout cod and trout may compete for space on the stream bed. Because of the small numbers of trout cod in the Seven Creeks system the stomach contents of only two fish were examined; both contained aquatic insects (Table 8). Shrimps (Atyidae), yabbies and Murray crayfish (Parastacidae) have also been found in their stomachs (Cadwallader 1977), so that competition for food may occur between trout cod and exotic species present in the system. In addition, Butcher (1967) indicates that trout may eat small trout cod.'</i> Cadwallader and Gooley 1984 <i>'Apart from the effects of overfishing and man-made changes to the environment, trout cod have probably been adversely affected by introduced trout, although there is little substantial evidence to support this view. In the Seven Creeks system, trout cod and trout were found to occupy the same type of habitat (Cadwallader 1979). Furthermore, in aquaria, young trout cod establish well-defined territories similar to those established by trout, so that young trout cod and trout may compete for space on the stream bed. Also, since they take the same types of food and live in similar situations, they may also compete directly for food items. Butcher (1967) also indicated that trout probably eat small trout cod. From what is known about the habitat requirements of trout cod it may be said that in general a 'good trout stream' is also a good trout cod stream. Perhaps it is more than coincidence that the areas formerly occupied by trout</i>	Noted.

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<i>cod in north eastern Victoria, from where the species appears to have been almost eliminated, are areas which have been heavily stocked with trout.'</i> I think we can say with some certainty that trout cod have never existed naturally in the Upper Goodradigbee. Given the importance of the Upper Goodradigbee as an established highly valued trout stream this should be taken into account in developing a trout cod recovery plan. Experimental introduction of trout cod into areas where they have never been should be a low priority compared to their establishment in known habitats where they are known to survive. Non-native/pest management It is important that the respondents' group is involved in any updating of the Fish Stocking Management Strategy (FMS). Stocking strategies should take account of the different habitat preferences of trout and trout cod; in maximising the effective use of limited funding for both trout and trout cod stocking it would make sense to concentrate efforts on stocking each species in environments with the highest survival rates. So, introduction of trout into established trout cod environments should be avoided and introduction of trout cod into trout waters of uncertain survivability limited to special cases. The Upper Goodradigbee, being free of Murray cod, presents a possible habitat for the preservation of non-hybridised trout cod. However, there is no certainty of survival so the stocking of trout cod here is experimental. Whilst this experiment might be judged worth a try, it would be premature to reduce the value of the stream to trout anglers until it has been demonstrated that trout cod could be established and that the trout are having any impact on their survival. Given the paucity of sightings or catches of trout cod since they were first introduced in 2020, preliminary indications are that the trout cod are not flourishing in this environment. Without effective scientific monitoring there should be no drastic change to the FMS for trout in the Upper Goodradigbee. The stocking program for trout is small, principally only 12,000 rainbow trout fry each year and it is recommended that this be unchanged pending the outcome of studies over the 10 year plan. There would be no problems with a strategy saying there should be no increase in the current rate of trout stocking. As hybridisation with Murray cod is a reason to attempt to establish a stock of trout cod in the Upper Goodradigbee, we need more information on the	No change to Action Plan Whilst there are no formal records of Trout Cod in the Upper Goodradigbee, there are records at similar and higher altitudes in the streams adjacent to the east and west (Tumut and Murrumbidgee rivers) and therefore the Upper Goodradigbee is considered within the natural historic range. Under the draft TCAP, on Page 5 in the short term goal this has been addressed. Also, under the TCAP, research, monitoring and evaluation is covered on Page 5 to stocking survival rates. While concerns are noted around current stocking sites in the Goodradigbee, this area is not covered under the draft TCAP. NSW DPI will continue to consult with stakeholders on the current Trout Cod stocking program. 22,000 Rainbow Trout fry and fingerlings are stocked into the Goodradigbee River, supplied by DPI's Gaden Trout Hatchery. Stocking site selection and non-native/pest species management/control is yet to be determined and will occur with consultation, with all stakeholders. Monitoring and control programs will be informed by experts and best available science. As the Plan is implemented over the next 10 years, communication of monitoring and control will be given to stakeholders at regular intervals. Feedback around knowledge gaps on hybridisation is covered under the draft TCAP on page five under "Research Monitoring & Evaluation".

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potential decline of trout cod due to hybridisation. Clearly, if hybridisation occurs then it must have been going on naturally for aeons and the analysis of early records suggests that both species were abundant in some localities.	
Recreational fishing Since the introduction of trout cod into the Upper Goodradigbee from 2020 there has been no noticeable decline in the quality of fly fishing. Nor have there been any known catches of trout cod. The Ovens River was mentioned in the information session as a successful introduction of trout cod by stocking with large numbers. One of our members, has a place on the Ovens at Bright and relates that he has never in years of fishing had a rise of trout cod to a fly. He also says that trout cod are caught from Porepunkah downstream but using much different lures and in snag habitats. The point of mentioning this is that it is unlikely fly fishing would have much impact on trout cod numbers. Anglers fishing for both species use different techniques as is the case for most angling.	No change to Action Plan Noted. Not relevant to the TCAP.
Importance of monitoring Without adequate monitoring, particularly in trial introductions to new locations, conclusions about the trials are mere conjecture. Monitoring is a critical part of the science and must be scheduled and funding guaranteed as part of the plan. Costing for each element of the Plan must include monitoring.	No change to Action Plan Noted and covered in the TCAP.
How can our branch help? • Our members will be encouraged to report all sightings and catches and take photographs where possible. • We will contribute water temperature data from sites upstream (cooler) and mid-valley.	No change to Action Plan Noted.

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• We will not seek increases in our established stocking regime. • We will actively support funding for monitoring elements of the Plan.	
Conclusion • Planning should take into account the long-standing premium nature of the Goodradigbee River for trout angling. • We support the trial stocking of trout cod at the northern end of the Upper Goodradigbee provided we can continue, as in the four stockings to date, to maintain the status quo for trout. • The plan should include mandatory collaboration between stakeholders in areas of overlapping interest for trout cod and other species. • Projects under the Plan should include scheduled monitoring.	No change to Action Plan Noted and support engaging with stakeholders and dedicated monitoring.