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INCLUSION OF DOMESTIC KOI FISH ON THE NATIONAL ORNAMENTAL
GREY LIST

Dear Minister,

I refer to our letter to you of November 2008 (along with further letters to the previous Minister) and the most recent response to us from the Fisheries Department (reference 26-00878).

As suggested in your letter I contacted the person responsible for the issues of the Ornamental Implementation Group within the W.A. Fisheries Department, I was seeking consultation and input. After some discussion I was asked to liaise with and agree upon a single representative from the general hobby groups in W.A. This I did, in my time, and at my cost. For me it could have been time well spent as I felt we may at last be able to have some positive and constructive input into the process. I was therefore only too happy to do this.

Minister, I can honestly report to you that this effort has been in vain. I can say with considerable emphasis that there appears to me to be very little honest endeavour to get the hobby groups of W.A. involved in this process and consultation is at best minimal. I suspect from this that our Fisheries Department believes that consultation means, ' we will tell you how it will be, once we have decided'.

As a result I have today informed the various hobby groups in W.A. and the Director General of Fisheries that I no longer wish to fill this role.

It is ironic that this morning I was listening to the Premier on radio (I para phrase here) and he was yet again genuinely stating that one of his wishes for his term in office was to improve the Parliamentary process; particularly to recognise and improve the input from the public, on issues that matter to them.

I appeal to you as Minister; that this was an opportunity to start the very process the Premier espouses. The alternative is to have more bureaucratic overburden, with tools that provide for restrictions, licences, prosecution when we should be looking for self regulation, education , support for, and communication to our regulators.

As I fear that the response to this letter will again come from the very people who have been dismissive of our concerns and willingness to have responsible input can I please request an answer to the following specific questions:

1. Can you please define the term 'consult' to allow us to understand what to expect from our regulator. My Collins dictionary states, "seek council advice from specialist expert"!
2. Despite our efforts at responsible discussion there remain a number of glaring inconsistencies with what koi hobbyist see as normal welfare practice in koi keeping versus what the document 'A Strategic Approach to the Management of Ornamental Fish in Australia', states. This document has on the front cover "Consultation Draft" when can we expect an opportunity to have input into this document. We requested this over 3 years ago?
3. When are domesticated koi fish going to be risk assessed for appropriateness for the 'Grey Listing' and will we, the koi hobbyists, be consulted in this risk assessment?
4. What is the risk assessment process, who conducts it and will the results and process be available to our members?
5. As our purpose built (not dams) pond sizes range from 10,000 to 130,000 liters and cost up to \$120,000 will the Minister assure us that these currently existing ponds and future ponds will not come under a bureaucratic and costly process of licensing.
6. I have personally looked in detail at the current licensing process for commercial aquaculture installations. This is totally inappropriate for koi hobbyists and is clearly set up with commercial aquaculture operations in mind. Does the regulator intend to use this process to license koi hobbyists?
7. Can we have input into the definition of hobbyist versus commercial breeder?
8. We, the koi hobbyists, have been enthusiastically engaged in our hobby for many years without any concern being shown and certainly no specific approached on areas of concern, from regulators. Can the Minister please be specific as to what areas are of real concern to the regulators? In my day to day discussion there appears to be a lot of non factual nonsense. Can we have a response please on these issues which will allow us to better understand the concerns the regulators may have:
 - a. Can hobbyists and breeders make lots of money in W.A.?
 - b. Do domestic koi fish cause environmental damage in W.A.?
 - c. Is there a goal from the Regulator to get rid of any non indigenous fish species and are koi fish are part of this?

Minister, let me be clear that all we wish for is a say in the destiny of our hobby, a very healthy hobby, practiced worldwide. I am sure you will have some empathy with our frustration. We have tried hard for 3 years to have input into this process to no avail.

Your faithfully,

Allan Bennett
KSWA Focal Point
20th May 2009