



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Mr Bola Oyetunji
Auditor-General for New South Wales
Audit Office of New South Wales
GPO Box 12
Sydney NSW 2001

13 May 2026

Dear Auditor-General,

Request for a performance audit of compliance with the requirements of the *NSW Freshwater Fish Stocking Fishery Management Strategy 2005*

Key issues

- The *Freshwater Fish Stocking Fishery Management Strategy 2005* requires a review of local environmental issues prior to stocking watercourses with trout.
- In the case of Wentworth Falls Lake in the Blue Mountains, a review of local environmental issues appears not to have been completed for at least ten years.
- In addition, trout may have been stocked without the requisite Fish Stocking Permits in 2012-2013, 2013-2014, 2014-2015, 2015-2016, 2016-2017, 2019-2020 and 2020-2021.
- Wentworth Falls Lake is an environmentally sensitive area. The watercourse creating and flowing from the Lake (Jamison Creek) flows into the Greater Blue Mountains World Heritage Area less than five kilometres downstream.
- It may be the case that reviews of local environmental issues have not been completed in equally¹ or less sensitive areas in NSW.

Trout are a major threat to biodiversity

1. Authoritative NSW Government publications report brown and rainbow trout to be a major threat to NSW river and wetland biodiversity including the *Environmental Impact Statement (EIS)* for the *Freshwater Fish Stocking Fishery Management Strategy*² which specifically identified the threats to

¹ For example, the Gondwanan Forests (of northern NSW) World Heritage Area.

² *Freshwater Fish Stocking in NSW Environmental Impact Statement 2003*:

<https://www.dpi.nsw.gov.au/dpi/biosecurity/aquatic-biosecurity/aquaculture/stocked-fish/freshwater-fish-stocking-eis-and-fms> (access 3 April 2026)

the Greater Blue Mountains World Heritage Area (pages 180-185 – see Attachment C³), and the *NSW State of the Environment Report 2021*⁴ and *Fish Stocking Key Threatening Process* listed under the *NSW Fisheries Management Act 1994*⁵.

Trout stocking

3. The Department of Primary Industries and Regional Development stocks watercourses with juvenile and subadult trout for recreational fishing. The stocking of trout takes place under the authority of Fish Stocking Permits issued by the Minister for Agriculture in accordance with the *NSW Freshwater Fish Stocking Fishery Management Strategy 2005*⁶. The *Strategy* endeavours to both support recreational trout fishing and conserve the natural environment by adopting various protective measures including requiring the completion of a review of local environmental issues prior to each release of trout.

4. Releasing trout into NSW waters without a Fish Stocking Permit is illegal (*Fisheries Management Act 1994*, s 216).

Fishery Management Strategy adopts recommendations of the EIS

5. The EIS emphasised the high degree of uncertainty about the magnitude of the threat posed by stocking trout, even on foundational issues such as the distance trout may move from the stocking point, and recommended the adoption of a precautionary approach including the creation of five-kilometre buffers between stocking points and national parks and habitat of threatened species (and other 'high conservation value' assets), and a process of review prior to proposed stocking.

6. The *Freshwater Fish Stocking Fishery Management Strategy* largely adopted the recommendations of the EIS including five-kilometre buffers⁷, and a review process (section 3.5, page 19). The review process is implemented through a comprehensive review framework (Figure 3, page 20), and mandatory *Stocking Review Guidelines*⁸ (Annexure A to the *Strategy*). The *Guidelines* identify the criteria to be considered in *Part 3: Local Environmental Issues* (clauses 3.1 to 3.13) and *Part 4: Review of the Stocking Proposal and Permits*. Parts 3 and 4 of the *Stocking Review Guidelines* are reproduced in Attachments A and B.

Blue Mountains Conservation Society access requests under the GIPA Act.

7. The Blue Mountains Conservation Society is a community-based volunteer organisation with 900 members. The Society's mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains.

³ Also see Vol 1 Part B *Review of the Existing Activity of Fish Stocking* and Vol 2 Part E *Assessment of the Implications of the Draft FMS* [Fisheries Management Strategy])

⁴ <https://www.epa.nsw.gov.au/About-us/Strategy-and-reporting/State-of-the-Environment>.

⁵ Key Threatening Process: *Introduction of fish to fresh waters within a river catchment outside their natural range*. See Department fact sheet: <https://www.dpi.nsw.gov.au/fishing/threatened-species/what-current/key-threatening-processes1/introduced-freshwater-fish>

⁶ *NSW Freshwater Fish Stocking Fishery Management Strategy 2005*: <https://www.dpi.nsw.gov.au/dpi/biosecurity/aquatic-biosecurity/aquaculture/stocked-fish/freshwater-fish-stocking-eis-and-fms> (access 3 April 2026)

⁷ Except in the case of Wentworth Falls Lake. For reasons which are not explained.

⁸ Although the *Stocking Review Guidelines* are called 'guidelines', section 3.2 of the *Strategy* makes clear that the *Stocking Review Guidelines* are mandatory.

8. The Blue Mountains Conservation Society issued formal access requests under the *Government Information (Public Access) Act 2009* on 5 June 2023 and 30 May 2025. Taken together the requests sought access to all assessments of the environmental impact associated with stocking Wentworth Falls Lake with trout made on or after 1 July 2012, including ‘documents recording the [Local] Environmental Review undertaken prior to each occasion brown trout were released into Wentworth Falls Lake ...’. Copies of the GIPAs and the documents to which the Department provided access are Attachments D and E.

9. As part of its response the Department helpfully provided a memorandum which stated as follows:

All trout releases into Wentworth Falls Lake between 2012 to 2022 were undertaken by DPI. Annual stocking permits were issued from 2016-17 onwards for stocking across multiple sites in NSW, including Wentworth Falls Lake. Searches of the records management systems did not locate copies of the annual permits for 2016-17, 2019-20 and 2020-21. Regarding environmental impact assessments, as multiple waterways across NSW are stocked the assessment is progressed as a bulk process. Each location is assessed individually in line with the NSW Freshwater Fishing Stocking Strategy and the associated ‘Stocking Review Guidelines’ (SRG) found at Appendix 1 of the Strategy (link to Strategy and EIS). However, a fully completed review document is not written up for each waterway. Rather, key information is recorded in a spreadsheet for each waterway, including a decision on whether stocking is approved / not approved for each site. SRG extracts are provided for Wentworth Falls Lake in Document 7 (for the periods 2013-14 and 2021-22). These are representative of SRG assessments over the time-period specified in the GIPA application. [emphasis added]

10. Attachment C is a matrix which compares the requirements of *Stocking Review Guidelines Part 3: Local Environmental Issues* and *Part 4: Review of stocking proposal and permits* with the process or results described in the documents to which the Department granted access. While evidence of assessment of criteria is lacking on nearly all issues, given the proximity of stocking to the Greater Blue Mountains World Heritage Area and the changing scientific consensus in relation to trout stocking (see further below), of particular concern to the Society is the lack of any evidence of consideration of the following issues:

- 3.5 *Is the possible distribution of the species following stocking of concern?*
- 3.6 *Is the event likely to impact on cultural, heritage or aesthetic values?*
- 3.7 *Are the waters suitable for stocking the nominated species in terms of climate and location?*
- 3.8 *Will the activity impact upon adjoining land use?*
- 3.10 *Is a loss of the aesthetic, cultural, recreational or other environmental quality of the locality likely?*

11. In the view of the Blue Mountains Conservation Society, the matrix demonstrates that the assessments undertaken by the Department fall far short of the requirements of the *Fishery Management Strategy* such that the Department has not completed a valid and effective review of local environmental issues prior to releasing trout into Wentworth Falls Lake for at least ten years.

12. The Department has not been able to provide access to the Fish Stocking Permits 2012-2013, 2013-2014, 2014-2015, 2015-2016, 2016-2017, 2019-2020 and 2020-2021. These may have been

misplaced but they may also never have been issued. If so, the Department may be in breach of the *Fisheries Management Act*.

Wentworth Falls Lake and its proximity to the Greater Blue Mountains World Heritage Area

13. The Greater Blue Mountains World Heritage Area is recognised by the United Nations Educational, Scientific and Cultural Organization (UNESCO) as a natural site of 'outstanding value to humanity' because of its globally significant diversity of habitats, species and ecosystems (including 152 plant families, 484 genera and c. 1,500 species), and the fact that it contains a significant proportion of the Australian continent's biodiversity⁹. Wentworth Falls Lake is an artificial impoundment of Jamison Creek. The Creek flows into the Greater Blue Mountains World Heritage Area less than five kilometres downstream of the Lake.

14. The Lake has been stocked with trout for many years. However recently trout have been observed breaching the Wentworth Falls Lake weir, and swimming downstream in the direction of the World Heritage Area. From time-to-time trout have been observed swimming in the waterhole below Wentworth Falls waterfall, which is located inside the World Heritage Area. This was a threat foreseen in the EIS.

Changing scientific consensus in relation to trout

15. Present-day scientific knowledge shows that the threat posed by trout is greater than was appreciated when the EIS and *Fisheries Management Strategy* were prepared 20 years ago¹⁰. The new scientific knowledge in relation to 'invasive species' is reflected in the *NSW State of Environment Report 2021* identifying trout and other 'invasive species' as one of the three greatest threats to native animals, plants and ecosystems in NSW, and noting that the threat to native fish is particularly severe with native fish species at threat of dying out in record numbers with one of the main reasons being competition from non-native fish¹¹.

Requested action

15. The Society requests that you undertake a performance audit of compliance with the *NSW Freshwater Fish Stocking Fishery Management Strategy 2005*, with particular focus on the reviews of local environmental issues required by the Parts 3 and 4 of the *Stocking Review Guidelines*.

⁹ See entry on UNESCO World Heritage List:

[https://whc.unesco.org/en/list/917/#:~:text=Its%20exceptional%20biodiversity%20values%20are,Mountains%20pine%20\(Ptherosphaera%20fitzgeraldii\).](https://whc.unesco.org/en/list/917/#:~:text=Its%20exceptional%20biodiversity%20values%20are,Mountains%20pine%20(Ptherosphaera%20fitzgeraldii).)

¹⁰ Jackson JE, Raadick TA, Lintermans M, Hammer M. *Alien salmonids in Australia: impediments to effective impact management, and future directions*. New Zealand Journal of Marine and Freshwater Research, 2004, Vol. 38: 447–455; Kaminskis S. *Alien fish ascendancy and native fish extinction: ecological history and observations on the Lower Goodradigbee River, Australia (2021)* <https://www.publish.csiro.au/pc/fulltext/PC21048>; Lintermans M, Geyle HM, Beatty S, Brown C, Ebner BC, Freeman R, et al. *Big trouble for little fish: identifying Australian freshwater fishes in imminent risk of extinction*. Pac Conserv Biol. 2020 <https://www.publish.csiro.au/pc/pc19053>; Stuart L. *Trout and trout stocking: acknowledging the harm, finding the balance (2023)* <https://finterest.au/trout-and-trout-stocking-acknowledging-the-harm-finding-the-balance/>; Ward M, Carwardine J, Yong CJ, Watson JE, Silcock J, Taylor GS, et al. *A national-scale dataset for threats impacting Australia's imperilled flora and fauna*. Ecol Evol. 2021: <https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.7920>.

¹¹ <https://www.soe.epa.nsw.gov.au/all-themes/biodiversity/invasive-species>; <https://www.soe.epa.nsw.gov.au/all-themes/biodiversity/native-fauna-2021#listing-of-key-threatening-processes-pressures>

If you have any queries regarding this submission, please contact either me on president@bluemountains.org.au or Paul Toni on paultoni99@gmail.com or mobile 0410 086 986.

Yours sincerely

A handwritten signature in black ink that reads "Annette Sartor". The script is cursive and fluid, with the first name "Annette" written in a larger, more prominent hand than the last name "Sartor".

Annette Sartor
President
Blue Mountains Conservation Society

Attachment A

Freshwater Fish Stocking Fishery Management Strategy 2005, Stocking Review Guidelines, Parts 3 & 4

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2.7 Will the consignment be reliably certified free of undesirable and non-target species under the Hatchery Quality Assurance Program?	Yes/No	If "No", stocking cannot proceed	Another source of stock must be nominated
2.8 Are any non-target species, diseases or parasites likely to escape, and if so at what scale?	Yes/No		
2.9 In the event of an escape, what life stages (eg. gametes, fertilised eggs, juveniles, adults etc) are likely to escape?			
2.10 Based on the outcomes from the above is there a likelihood of escape?	Yes/No		
2.11 Is further assessment of translocation issues required?	Yes/No	<i>If yes, refer to the National Translocation Assessment Guidelines (stocking open waters) before proceeding to Part 3</i>	
Comments regarding issues raised in Part 2:			

Part 3: Local Environmental Issues

Issue	Response	Significance of potential impacts	Comments – Action required to mitigate impacts (e.g. further assessment required; special conditions; consideration of threatened species)
3.1 Is the nominated site subject to any local management plan or action that would preclude stocking?	Yes/No	If "Yes", stocking cannot proceed	Another waterway area must be nominated
3.2 Are any terrestrial threatened species recovery plans in force in the area?	Yes/No		
3.3 Are any aquatic threatened species recovery plans in force in the area?	Yes/No		
3.4 Is the recovery of a threatened species likely to be adversely impacted by the stocking event?	Yes/No	If "Yes", stocking cannot proceed	Event must be amended
3.5 Is the possible distribution of the species following stocking of concern?	Yes/No	If "Yes", stocking cannot proceed	Another waterway and/or species must be nominated
3.6 Is the event likely to impact on cultural, heritage or aesthetic values?	Yes/No		

3.7 Are the waters suitable for stocking the nominated species in terms of climate and location?	Yes/No	If "No", stocking cannot proceed	Another waterway and/or species must be nominated
3.8 Will the activity impact on adjoining land use?	Yes/No		
3.9 Are any endangered or vulnerable species listed under the TSC Act or FM Act known to be present within 5km of the release site?	Yes/No	If "Yes", stocking cannot proceed	Another waterway and/or species must be nominated for harvest stocking
3.10 Is a loss of the aesthetic, cultural, recreational or other environmental quality of the locality likely?	Yes/No		
3.11 Is the release site either upstream or downstream of a barrier to fish passage where, according to official records, the species has not been previously stocked?	Yes/No		
3.12 Does the nominated site provide suitable access to anglers?	Yes/No		
3.13 Is the area subject to and compliant with a NPWS Plan of Management	Yes/No		
Comments regarding issues raised in Part 3:			

Part 4: Review of the Stocking Proposal and Permits

4.1 Taking into account information under Part 1 and Part 2 of this review, is the event consistent with the Fish Stocking FMS?	Yes/No
4.2 Taking into account information under Part 3 of this review and proposed permit conditions, is the event likely to have unacceptable impacts on the local environment given the expected benefits to the angling public?	Yes/No
4.3 Does the event require further review? (e.g. an eight part test for threatened species) (If yes, provide details and course of action in the 'Conditions' box below)	Yes/No
4.4 Having weighed up all the factors, in the delegated officer's opinion should the stocking event proceed?	Yes/No
4.5 Are special conditions required to mitigate any potential negative impacts and ensure the event satisfies the requirements of FMS? (If yes, provide necessary conditions)	Yes/No

Attachment B

Matrix which compares the requirements of Parts 3 (*Local Environmental Issues*) and 4 (*Review of stocking proposal and permits*) of the *Stocking Review Guidelines* with the process or results contained in the documents to which the Department granted access.

Abbreviations: **NA**: not applicable. **NMA**: document not made available (either because the Department was unable to locate it or it does not exist). **NRA**: no record of assessment under Stocking Review Guidelines. **PAR**: possible assessment under Stocking Review Guidelines recorded in Wentworth Falls Lake Assessment Results (GIPA 2025 document 1) though the record is ambiguous

Part 3: Review of Local Environmental Issues

Event/criteria	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
Date of restocking [see Stoking List and SRG (GIPA 2023 document 7)]	7/1/13 (brown)	6/1/14 (brown and rainbow)	27/1/15 (brown)	28/12/15 (brown)	9/1/17 (brown)	12/3/18 (brown)	1/4/19 (brown)	28/1/20 (brown)	12/4/21 (brown)	12/1/22 (brown)		
Relevant Fish Stocking Permit (GIPA 2023 documents 1-4)	NMA	NMA	NMA	NMA	NMA	30/7/2017 -30/6/2018	15/6/18 - 30/6/2019	NMA	NMA	5/7/2021 -30/6/2022	29/6/2022 - 30/6/2023	
Draft Salmonid Impoundment Stocking Plan (GIPA 2023 documents 5-6)]								2000 finger-lings	1500 finger-lings	500 subadults	500 subadults	(prop) 500 subadults
3.1 Is the nominated site subject to any local management plan or action that would preclude stocking?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.2 Are any terrestrial threatened species recovery plans in force in the area?	NRA	NRA	NRA	NRA	NRA	PAR	PAR	NRA	NRA	PAR	PAR	
3.3 Are any aquatic threatened species recovery plans in force in the area?	NRA	NRA	NRA	NRA	NRA	PAR	PAR	NRA	NRA	PAR	PAR	
3.4 Is the recovery of a threatened species likely to be adversely	NRA	NRA	NRA	NRA	NRA	PAR	PAR	NRA	NRA	PAR	PAR	

Event/criteria	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
impacted by the stocking event?												
3.5 Is the possible distribution of the species following stocking of concern?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.6 Is the event likely to impact on cultural, heritage or aesthetic values	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.7 Are the waters suitable for stocking the nominated species in terms of climate and location?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.8 Will the activity impact upon adjoining land use?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.9 Are any endangered or vulnerable species listed under the TSC or FM Act known to be present within 5 km of the release site?	NRA	NRA	NRA	NRA	NRA	PAR	PAR	NRA	NRA	PAR	PAR	
3.10 Is a loss of the aesthetic, cultural, recreational or other environmental quality of the locality likely?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.11 Is the release site either upstream or downstream of a barrier to fish passage where, according to official records, the species has not been previously stocked?	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
3.12 Does the nominated site provide suitable access to anglers?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
3.13 Is the area subject to and compliant with a NPWS Plan of Management	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Comments regarding issues raised in Part 3												

Part 4: Review of stocking proposal and permits

Event/criteria	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
4.1 Taking into account information under Part 1 and 2 of this review, is the event consistent with the Fish Stocking FMS?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
4.2 Taking into account information in Part 3 of this review and the proposed permit conditions, is the event likely to have unacceptable impacts on local environment given the expected benefits to the angling public?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
4.3 Does the event require further review? (e.g. an eight part test for threatened species) (If yes, provide details and course of action in the 'Conditions' box below)	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
4.4 Having weighted up all the factors, in the delegated officer's option should the stocking event proceed?	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	NRA	
4.5 Are special conditions required to mitigate any potential negative impacts and ensure that the event satisfies the requirements of the FMS? (If "yes", provide necessary conditions')	NRA	NRA	NRA	NRA	NRA	PAR	PAR	NRA	NRA	PAR	PAR	

Attachment C

Potential impacts of fish/trout stocking on the Greater Blue Mountains World Heritage Area identified in the *Environmental Impact Statement for the Freshwater Fish Stocking Fishery Management Strategy 2003*

[World Heritage] values, for both the [Greater Blue Mountains] area and the [Central Eastern Rainforest Reserve Area], include endemic species^[12], relict species^[13], species with restricted ranges and rare or threatened species. Any of those species that are aquatic, primarily fish and frogs, are likely to be affected by fish stocking, although as discussed previously, the extent and magnitude of this impact is as yet unknown. The potential for an impact in the absence of evidence to the contrary suggests that stocking is likely to undermine ... [World Heritage values], and is thus considered to be at medium risk. [page 182]

Similar findings are made with respect to the Kanangra-Boyd Wilderness Area, which is contiguous with the Blue Mountains National Park, and forms part of the Greater Blue Mountains World Heritage Area, and part of the same river catchment:

... stocking fish into any wilderness area is going to modify its plant and animal communities, and even though we do not know to what extent the community will be modified, stocking must be considered a medium risk to those areas. A complete lack of any information means that there is a high degree of uncertainty associated with assigning the level of risk, but as a medium risk it ensures that the draft FMS needs to address the issue of stocking into wilderness areas. ... [page 180]

According to the fish stocking database maintained by NSW Fisheries, fish stocking currently occurs within or adjacent (within 5km by river) to 31 of those 47 wilderness areas (Table B37), or more than 60% of wilderness areas. As discussed above, it is not known to what magnitude individual areas are affected, but at 60% the potential extent of impact is relatively large. ... [page 181]

Note: Central Eastern Rainforest Reserve Area is now called Gondwanan Forests World Heritage Area.

¹² Species found only in the Blue Mountains.

¹³ Ancient species that were once widespread but are now found only in a small area; AKA 'living fossils.'

Attachment D
GIPA June 2023 and documents produced



Wentworth Falls Lake GIPA June 23.zip



GIPA23-123_Notice of Decision FINAL.zip



Documents made available by DPI GIPA June 2023.zip

Attachment E
GIPA May 2025 and documents produced



GIPA May 25.zip



RSN-000244 - Notice of Decision.zip



01. Wentworth Falls Lake Assessment Results.zip