



The Minister, Environmental Affairs
Honourable Bomo Edith Edna Molewa

27 June 2014

Honourable Minister Molewa,

RE: Southern African Society of Aquatic Scientists support regarding the listing of trout in the NEMBA Alien and Invasive Species Regulations

The Southern African Society of Aquatic Scientists is a Society constituted for the advancement of research into, and management of, southern African inland, estuarine and marine waters and for the benefit of aquatic scientists in southern Africa and other concerned individuals and institutions. The Society currently represents 153 members, including leading academics, environmental practitioners and water resource managers.

During this year's annual general meeting of the Society, the National Environmental Management: Biodiversity Act – 2014 Alien and Invasive Species Regulations were discussed, as was the opposition to the listing of trout by certain interest groups. **The members of the Society would like to make the following statement regarding the listing of brown trout (*Salmo trutta*) and rainbow trout (*Oncorhynchus mykiss*) in the regulations.**

The Southern African Society of Aquatic Scientists considers all species of trout a threat to our native aquatic biodiversity and strongly supports the listing of brown trout and rainbow trout in the alien and invasive species regulations. This is because all **trout species are alien to South Africa where they have the proven ability to establish self-sustaining populations that impact negatively on biodiversity.**

There is compelling evidence in the scientific literature that brown trout and rainbow trout have had negative impacts on the ecosystems where they have been introduced. In South Africa, trout introductions have altered invertebrate communities and have reduced and/or caused the local extinction of several endemic fish and amphibian populations. Similar impacts on a global scale have resulted in trout species being listed among the 100 worst invasive species by the International Union for the Conservation of Nature (IUCN).

While the Society recognises that, in South Africa, our freshwater ecosystems are heavily impacted by human activities, it is the more pristine headwater streams where trout are likely to be introduced that require protection. Our aquatic biodiversity heritage in these ecosystems is of national importance and requires our protection.

The Society therefore fully supports the regulations that:

“The transfer or release of a specimen of rainbow (or brown) trout from one discrete catchment system in which it occurs, to another discrete catchment system in which it does not occur; or, from within a part of a discrete catchment system where it does occur to another part where it does not occur as a result of a natural or artificial barrier, is prohibited.”

The Society acknowledges that the intentional stocking of trout into rivers is a component of the economically important recreational angling industry but notes that this could facilitate new trout introductions into cool headwater streams, many of which are National Freshwater Environmental Priority Areas that are inhabited by endangered or critically endangered native fishes.

For this reason the Society acknowledges that there are situations where the stocking of trout might be economically desirable. The Society therefore accepts the Category 2 listing (Permit should be obtained to authorise activities involving the listed species) for rainbow and brown trout for (a) freshwater aquaculture facilities; (b) National Parks, Provincial Reserves, Mountain Catchment Areas and Forestry Reserves specified in terms of the Protected Areas Act; and (c) for release in rivers, wetlands, lakes and estuaries.

The Society would like to point out that, the requirement of a permit for the introduction of brown trout and rainbow trout into freshwater systems is entirely due to reasons of economy and that a permit prior to stocking should be a **minimum requirement for these species**.

Kind regards,

A handwritten signature in black ink, appearing to read 'J. Adams', written in a cursive style.

Professor Janine Adams

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