

***Botia kubotai*: Report addressing the Department of Agriculture, Water and the Environment terms of reference for proposed amendments to the *List of Specimens taken to be Suitable for Live Import* (Live Import List)**

**Submitted by the Aquarium Industry Association of Australia**



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## Summary

Consideration of the Department of Agriculture, Water and the Environment (DAWE) terms of reference for proposed amendments to the List of Specimens taken to be Suitable for Live Import (Live Import List) against information available for the Polka-dot loach (*Botia kubotai*) indicates the risk of allowing the importation of the species would pose minimal biosecurity risk to Australia. Notably, *B. kubotai* is not reported to have established breeding populations outside its natural range overseas despite being traded internationally for over 40 years and similar species such as *Botia lohachata* have not established self-maintaining wild populations in Australia despite decades of importation. Populations of *B. kubotai* may exist in the Australian hobby having been intermittently traded in Australia over the last 15 years – these populations have not led to the establishment of feral populations in Australia.

*B. kubotai* would be a welcome addition to the species permitted live importation, especially given the growing popularity of the hobby in Australia and the significant economic and social benefits of the aquarium fish trade to Australia. Furthermore, the addition of *B. kubotai* would be a common-sense decision given it is closely related to and shares a similar environmental risk profile to other species currently permitted live importation to Australia.

A structured risk assessment based on the methodology of Bomford (2008) estimated a 'moderate' risk, generally consistent with the risk that would be posed by most of the species currently permitted live importation to Australia. It is recommended that *B. kubotai* is added to the Live Import List.

### 1. Provide information on the taxonomy of the species.

- Polka-dot loach or Burmese border loach, *Botia kubotai* Kottelat 2004.
- Actinopterygii (ray-finned fishes); Cypriniformes (Carps); Botiidae (loaches); Sub-family Botiinae.
- Synonyms: Nil, although included in the *Botia histrionica complex* (Grant 2007).
- Common names: Polka-Dot Loach, Marble Loach, Cloud Botia, Angelicus Loach, Botia "Angelicus", Burmese Border Loach (Thoene 2015).

### 2. Provide information on the status of the species under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). For example, is the species listed on CITES Appendix I, II or III, and if so, are there any specific restrictions on the movement of this species? Include information on the conservation value of the species.

- *B. kubotai* is not CITES listed.
- This species is listed on the IUCN Red List as Data Deficient (DD) as little is known about its population trends (Vidthayanon 2012).
- These loaches are found mainly in the Salween River system which is mostly in Myanmar. It was first discovered in Ataran River, a tributary of Salween River. A population in Thailand was discovered in early 2006 in another tributary of Salween River, Suriya River in Thungyai Naresuan Wildlife Sanctuary (Wikipedia n.d.). The

species is popular in the aquarium trade, however numbers found in trade have declined, most likely due to political instability in source countries. Specimens in the aquarium trade are largely imported from Myanmar (Vidthayanon 2012).

- Most fish are still wild caught. Dey *et al.* (2015b) determined methods for induced breeding that worked for the three *Botia* species tested (*Botia dario*, *Botia lohachata* and *Botia almorhae*). While there are no official reports of *Botia kubotai* being bred by hobbyists or commercially (Brough and Roche n.d.), the techniques for doing so do exist (Seriously Fish n.d.).

### 3. Provide information about the ecology of the species.

Much of the information about *B. kubotai* besides from taxonomic information comes from hobbyist information sites so applies to aquarium behaviour and requirements. Some sites do give some information on diet in the wild. *Botia* spp. live in mountain streams on a gravel or stony bottom with lots of driftwood and some leaf litter. They are bottom dwellers, mainly carnivorous in the wild feeding on benthic crustacea and insects. In aquaria they take snails, small shrimp, sinking pellets, blood worms, and black worms. All Botiids are recommended as snail control in aquaria, and are considered likely to eat much smaller tank companions. They are gregarious in aquaria, suggesting that they likely live in small groups in the wild.

*Botia* species require very pure water at 23.9-30°C, pH at 6.5-7.3 and hardness (dgh) 0 to 8.0. Most hobby websites recommend at least weekly if not more regular water changes and high filtration rates.

- *Lifespan of the species*: 8-12 years (Brough and Roche n.d.)
- *Size and weight range*: *B. kubotai* grows to about 150mm total length, but most are around 100mm in aquaria. Juveniles at about 25mm appear very similar to *B. histrionica*. In the wild they are reported to grow to 85mm (Brough and Roche n.d.).
- *Natural geographic range*: *B. kubotai* is endemic to headwaters of the Salween River basin around the border between Myanmar and Thailand. The type specimens were collected from the Megathat Chaung (Megathat stream) in the upper Ataran river basin, Kayin/Karen State, Myanmar (Kottelat, 2004). Another population was discovered in the Hanthayaw River, Tak Province, Thailand (Seriously Fish n.d.)
- *Habitat*: No definite habitat descriptions for *B. kubotai* have been published. However, the rivers in areas from which it is collected are clear sections of forest shaded, slow flowing waters with a sand/gravel substrate. These conditions correspond with the aquarium requirements.
- *Diet, including potential to feed on agricultural plants*: *B. kubotai*, like most Botiids, may eat small portions of plants but is not considered a threat to planted aquaria. The diet is mainly benthic invertebrates, although it may eat small fish (up to 20mm) in aquaria (Brough and Roche n.d.). The species is not reported to present a risk to agricultural plants.
- *Social behaviour and groupings*: *B. kubotai* is gregarious as are all Botiids, preferring to live in groups of over 5 as they maintain complex social hierarchies (Seriously Fish

n.d.). All botiids are also known to nip fins of larger, slow moving fish with large fins (Brough and Roche n.d.).

- *Territorial and aggressive behaviours*: The specie is not territorial but may nip fins or eat small fish in aquaria.
- *Natural predators*: Not reported but piscivorous birds, mammals or fish in their habitat would likely prey on them.
- *Characteristics that may cause harm to humans and other species*: No characteristics that may cause harm to human or other species have been reported in this species. *B. kubotai* does have sub-ocular spines which could cause minor injury if carelessly handled.

#### 4. Provide information on the reproductive biology of the species.

The reproductive biology in the wild is largely unknown for this species.

- *Age at maturity (first breeding)*: Not reported in the scientific literature but estimated to be about 3 years under captive bred conditions (Gary Parker, Aquarium Industry Association of Australia, pers. com.).
  - *How frequently breeding occurs*: Breeding frequency in the wild has not been reported. About three spawns a year are expected from a female under aquaculture conditions (Gary Parker, Aquarium Industry Association of Australia, pers. com.).
  - *Can the female store sperm*: Females are not reported to store sperm. It is unlikely as there is no intromittent organ.
  - *How many eggs or live-born young are produced at each breeding event*: There is no published information on the fecundity of this species in the wild. Under aquaculture conditions, the fecundity is estimated to be in the order of 200 eggs per spawn (Gary Parker, Aquarium Industry Association of Australia, pers. com.). Joshi and Pathani (2009) reported a mountain species, *Botia almorhae* producing 908-3616 eggs depending on size. Another species, *Botia dario* produced 5245 to 53754 eggs averaging 31833 (Hossain *et al.*, 2007).
  - *Has the species hybridised with other species (both in the wild and in captivity) or has it the potential to hybridise with any other species*: There are no reports of hybridisation in wild populations. Hybridisation during captive breeding has been reported (Seriously Fish n.d.).
  - *If the species can hybridise, are the progeny fertile*: Not known.
- #### 5. Provide information on whether this species has established feral populations, and if so, where those populations are. Include information on whether this species has been introduced to other countries, even if it has not established feral populations.

The species has not been reported as having established feral population outside of their natural geographic distribution, despite being traded internationally for the aquarium trade for about 15 years in volumes in the order of 1.5 million fish per year (Jared Patrick, Premier Pet, pers. com.).

6. *Provide information on, and the results of any other environmental risk assessments undertaken on the species both in Australia and overseas, including any Import Risk Analyses undertaken.*

A search of the scientific literature did not identify any previous environmental risk assessment of this species. The species is not on the BRS 'grey list' of ornamental fish species, i.e. non-native species that are present in Australia through historical imports that are not on the Live Import List, nor is it one of the species of non-native freshwater fish that are reported to have established self-sustaining populations in the wild in Australia (Corfield et al. 2008).

However, *B. kubotai* has been present and intermittently traded domestically in Australia in the past 15 years and small numbers likely persist as aquarium specimens (Jared Patrick, Premier Pet, pers.com.).

The addition of *B. kubotai* to the Live Import List would be generally consistent with Australia's biosecurity arrangements for live fish given that the species is closely related to and shares a similar environmental risk profile with the clown loach (*Chromobotia macracanthus*) and the yoyo loach (*Botia loacharta*), both of which are currently permitted live importation to Australia.

7. *Assess the likelihood that the species could establish a breeding population in the Australian environment should it ever be released from effective human control.*

Assessing the risk of the potential of introducing a new organism into the environment involves assessing the risk of it becoming established and spreading and the likely impacts if establishment occurred. The risk assessment method 'Exotic Freshwater Fish Model 1' developed by Mary Bomford has been adopted by DAWE for its freshwater fish risk assessments (Bomford 2008). The following considers each of the risk factors considered by Bomford to be applicable to freshwater fish and is guided by the recent Australian Government risk assessment of glass catfish (DAWE 2020a). The specific criteria in the DAWE template terms of reference are also covered. The potential impacts of established feral populations are addressed in the next term of reference (#8). A structured risk assessment based on the Bomford methodology is at Appendix A.

- *Propagule pressure—the release of large numbers of animals at different times and places enhances the chance of successful establishment:* As a stream dwelling tropical fish with an affinity for slow flowing, shaded streams with soft, clean, clear water, the opportunity to find shelter in the event of deliberate or inadvertent release into the wild would be limited to a few wet tropics streams in far northern Queensland and therefore highly unlikely to occur. It is unlikely therefore that enough fish would be released into a suitable receiving environment to establish a breeding population as a result of an accident or being deliberately released into the local waterways in or near populated area. A moderate to high probability of establishing a self-sustaining population would require deliberate release into very specific waterways – it is unlikely therefore to happen at random (DAWE 2020a). It is highly unlikely that enough fish would be accidentally or deliberately released into a suitable receiving environment to establish a breeding population.

- *Climate match—introduction to an area with a climate that closely matches that of the species’ original range:* *B. kubotai* is endemic to headwaters of the Salween River basin around the border between Myanmar and Thailand. The type specimens were collected from the Megathat Chaung (Megathat stream) in the upper Ataran river basin, Kayin/Karen State, Myanmar (Kottelat, 2004). Climatch (original v1.0) was run with the source region set to circumscribe an area in Myanmar consistent with that described in Vidthayanon (2012), extending across the Thai border to allow for the more recent finding of the species in Thailand (Seriously Fish n.d.). A climate match prediction was generated using the Euclidian algorithm applied to the ‘world stations’ data set. Climatch calculated a ‘value X’ (Climate Euclidian Sum Level 5) of 607, equating to a climate match score of 5, increased to 6 because there were less than 12 meteorological stations used in the prediction. DAWE (2020a) suggested the need for some caution in predicting climate suitability for freshwater aquatic species because Climatch is based on terrestrial climate measurements. The new upgraded version of Climatch (v2.0) was not used in this assessment because its improved mapping resolution results in higher output values that are yet to be calibrated for purposes of applying the Bomford methodology.
- *Overseas range:* *B. kubotai* is endemic to headwaters of the Salween River basin around the border between Myanmar and Thailand. The type specimens were collected from the Megathat Chaung (Megathat stream) in the upper Ataran river basin, Kayin/Karen State, Myanmar (Kottelat, 2004). Another population was discovered in the Hanthayaw River, Tak Province, Thailand (Seriously Fish 2020). The species is estimated to occupy a total two, 1° latitude x 1° longitude grid squares (Bomford 2008).
- *History of establishment elsewhere—previous successful establishment:* There have been no recorded establishment of wild populations of *B. kubotai* outside its natural range, despite likely inadvertent or deliberate introductions as an internationally traded aquarium species. The species is considered to have been “introduce but never established” (Bomford 2008).
- *Introduction success:* The species is not known to have been released or established. However, after many years of trade worldwide it can be assumed it has been released into non-native areas on many occasions. The introduction rate is conservatively considered to be less than 0.25 (Bomford 2008).
- *Taxonomic group—belonging to a family or genus which has a high establishment success rate:* FishBase recognises 10 species of *Botia* of which two species, *Botia dario* and *Botia lohachata* are reported as having established in the wild outside the countries of their natural range (Froese and Pauly n.d.—a). If the Bomford (2008) methodology is applied to the genus *Botia*, then of a total 10 species, 4 are traded as ornamental species and of this 4, there are 2 reported populations (representing two species) that have been found established outside the countries to which they are native. As internationally traded aquarium species, it is reasonable to assume that there would have been many instances of inadvertent or deliberate introduction of these four species around the world – conservatively, 25 past introductions are assumed for the purposes of this risk assessment. However, there are only two records (representing only two species) on FishBase of *Botia* species being found to have established wild populations outside the countries to which they are native. The ‘genus level’ taxa risk is therefore 2/25 (8%). Notably, *Botia lohachata* a species similar to *B. kubotai* is on the current list of specimens taken to be suitable for live import,

have been imported to Australia for at least 15 years and have not established wild populations.

- *Ability to find food sources:* As a carnivore feeding primarily on benthic invertebrates, the species is expected to find food sources in the unlikely event it is introduced into the wild.
- *Ability to survive and adapt to different climatic conditions (e.g. temperatures, rainfall patterns):* *B. kubotai* lives in apparently pristine clear water streams in Myanmar and Thailand. The species requires tropical climate in water with a 6.5-7.3 pH, a water hardness of 0-8 dGH and a temperature range of 24 to 30°C. This climatic range together with its stream habitat requirements limits the potential geographical range where the species could theoretically establish to a very few wet tropics streams.
- *Ability to find shelter:* As a stream dwelling tropical fish with an affinity for slow flowing, shaded streams with soft, clean, clear water, opportunity to find shelter in the event of deliberate or inadvertent release into the wild would be limited to a few wet tropics streams in far northern Queensland and therefore highly unlikely to occur.
- *Rate of reproducing:* Reproductive rate (the number of offspring that a female produces during its lifetime) data in wild population have not been reported. Under aquaculture conditions, females are productive for about 5 years and produce in the order of 200 eggs per spawning (Gary Parker, Aquarium Industry Association of Australia, pers. com.).
- *Any characteristics that the species has which could increase its chance of survival in the Australian environment:* The species is not considered to have any characteristics that would increase its likelihood of survival in the wild in Australia.

In summary, *B. kubotai* is considered unlikely to establish, in main because the species is not reported to have established breeding populations outside its natural range despite being traded internationally as an ornamental species for over 15 years and there are few areas in Australia expected to have habitat suitable for the species to establish. This conclusion can be ground-truthed to an extent by comparing *B. kubotai* with similar species such as *Botia lohachata*, which have not established self-maintaining wild populations despite decades of importation to Australia for the aquarium trade. Furthermore, captive aquarium populations of *B. kubotai* are likely persist in the Australian hobby – these have not led to the establishment of feral populations in Australia.

The above information is presented as a structured Bomford (2008) risk assessment at Appendix A.

8. *Provide a comprehensive assessment of the potential impact of the species should it establish feral population/s in Australia. Include, but do not restrict your assessment to the impact of this species on:*
  - *Similar niche species (i.e. competition with other species for food, shelter etc.):* In the unlikely event this species establishes in the wild in Australia, it may compete for benthic invertebrates with other small tropical benthic fish typically in habitats with sandy or gravel substrates. These niche species could include bottom feeders such as eel tailed catfishes (*Neosilurus* spp., *Porochilus* spp.) or juvenile eels (*Anguilla reinhardtii*). No competition would be expected with mid-water or surface feeding fish.

Most of the lower reaches of potential habitat streams are dominated by species that penetrate freshwaters from the sea.

- *Is the species susceptible to, or could it transmit any pests or disease:*  
No significant pests or diseases have been associated with this species, including any of the diseases to which there are disease-specific risk management measures applied for importation of ornamental fish to Australia. The loaches are as a group considered of low risk in terms of disease risk in that they are subject to the minimum one-week post arrival quarantine isolation on importation to Australia (DAWE 2020b). Botiids are especially susceptible to white spot of fish (*Ichthyophthirius multifiliis*) as are most fish with small or no scales (including Neosilurids). Another disease (called skinny disease) has is relatively common in imported loaches and is thought to be caused by the flagellate parasite *Spironucleus* sp. (Seriously Fish n.d.). This parasite is found throughout the world in most vertebrates but is poorly characterised although they may be reasonably species specific (Williams *et al.* 2011).
- *Probable prey/food sources, including agricultural crops:* *B. kubotai* feeds on benthic invertebrates. It does not feed on any agricultural crops.
- *Habitat and local environmental conditions:* *B. kubotai* has not been reported to change its environment or habitat. It is a stream dwelling fish with an affinity towards natural, clear waters within a narrow temperature range.
- *Control/eradication programs that could be applied in Australia if the species was released or escaped:* Potential control measures include listing as a noxious species; eradication or containment programs (including movement controls) or broader education/awareness building campaigns such as labelling aquarium fish bags with messaging.
- *Characteristic or behaviour of the species which may cause land degradation i.e. soil erosion from hooves, digging:* There are no reports of this species exhibiting any behaviours that may cause habitat degradation.
- *Potential threat to humans:* The species is not reported as posing any threat to humans (Froese and Pauly n.d.—b)

9. *What conditions or restrictions, if any, could be applied to the import of the species to reduce any potential for negative environmental impacts (e.g. single sex imports, de-sexing animal prior to import etc.).*

Potential environmental impacts from importation of live animals into Australia can take the form of direct pest risks or indirect risks associated with the introduction of new diseases that may be carried in imported stock. In the case of *B. kubotai*, importation under Australia's current import conditions would reduce potential disease risks to an acceptable level, consistent with previous Australian Government disease risk analyses (AQIS 1999, DOA 2014).

10. *Provide a summary of the types of activities that the specimen may be used for if imported into Australia (e.g. pet, commercial, scientific).*

- *Benefit of this species for these activities:* Permitting importation of this species will support the ornamental fish industry. In a broader context, the ornamental fish hobby is



an important one. Aside from creating employment and contributing to the economy of all states and Territories, it has become especially important during the CoViD pandemic where individuals subject to movement restrictions are turning increasingly to the hobby for recreation – the hobby therefore plays a significant part in helping alleviate the stressors associated with the pandemic and post-CoViD recovery, both from economic and social perspectives.

The direct and indirect economic benefits of ornamental fish importation carry through the aquarium industry supply chain and into the hobby. The economic beneficiaries include, but are not limited to, aquarium fish importers, wholesalers, aquarium hard goods distributors, retail pet and aquarium shops, commercial and hobby breeders as well as freight and logistics providers and other associated vendors.

Importantly, keeping ornamental fish fosters companion animal care which has benefits to society beyond the direct economic value of the trade. There are companionship as well as mental health benefits. There has never been a more important time for these benefits to flow through Australian society. The aquarium hobby also plays an often undervalued educational role, especially relevant to younger Australians. The benefits in this respect include, but are not limited to, an increased understanding of, and appreciation for, biology, chemistry, physiology as well as geography and natural history.

- *Potential trade in the species:* The species is routinely traded internationally and would be a welcome addition to the species permitted importation. In the order of 1.5 million fish of the species are traded internationally and given the growing popularity of the hobby in Australia, the likely market demand in Australia for imported *B. kubotai* stock would represent about one percent of this (Jared Patrick, Premier Pet, pers. com.).
- *Why this species has been chosen:* Internationally, the species is in high demand by hobbyists and would be extremely popular in Australia. Similar loach species currently permitted importation such as *Chromobotia macrocanthus* and *Botia lohachata* are very popular in Australia. The species is not aggressive and compatible to keep in aquaria with other most other tropical species.

11. *Provide detailed guidelines on the way in which the species should be kept, transported and disposed of in accordance with the types of activity that the species may be used for if imported into Australia.*

- *The containment (e.g. cage, enclosure) and management standards for this species to prevent escape or release. This should also talk about the security standards for this specimen:* The fish will be transported as per the International Air Transport Association (IATA) guidelines and the provisions of the *BICON Import Conditions for Freshwater Aquarium Fish: Effective 18 July 2020* (DAWE 2020b).
- *The disposal options for surplus specimens:* Fish will be imported for purposes of supplying the aquarium fish trade and as such no surplus specimens are expected. In the event of mortality, animals will be disposed as per the provisions of the *BICON Import Conditions for Freshwater Aquarium Fish: Effective 18 July 2020* (DAWE 2020b) and in accordance with the Pet Industry Association of Australia (PIAA) National Code of Practice (PIAA 2008).

12. Provide information on all other Commonwealth, state and territory legislative controls on the species, including:

- *The species' current quarantine status:* The species is not currently on the permitted species list.
- *Pest or noxious status:* The species is not listed on any state or federal pest or noxious species list.
- *Whether it is prohibited or controlled by permit or licence in any state or territory:* The species is not prohibited or controlled by permit or licence in any state or territory.

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## **Appendix A: Bomford model risk assessment: *Botia kubotai***

Assessing the risk of the potential of introducing a new organism into the environment involves assessing the likelihood of it becoming established and spreading and the likely impacts if the species does establish. The following analysis applies the assessment method for determining the risk of establishment of exotic freshwater fish introduced to Australia (Model 1) described in Bomford (2008) and is guided by the recent DAWE risk assessment of glass catfish (DAWE 2020a).

Bomford (2008) identified a range of factors that determined establishment success of freshwater fish, including propagule pressure, climate match, history of establishment elsewhere, geographic range and taxonomic group. These risk factors together with potential impacts should *Botia kubotai* (Day 1865) establish wild populations in Australia are discussed below, as are the outputs of applying the Bomford (2008) methodology. These findings should be considered together with information addressing the DAWE terms of reference for proposed amendments to the *List of Specimens taken to be Suitable for Live Import (Live Import List)* in the body of this submission.

### **Establishment success**

*Propagule pressure—the release of large numbers of animals at different times and places*

As a stream dwelling tropical fish with an affinity for slow flowing, shaded streams with soft, clean, clear water, the opportunity to find shelter in the event of deliberate or inadvertent release into the wild would be limited to a few wet tropics streams in far northern Queensland and therefore highly unlikely to occur. It is unlikely therefore that enough fish would be released into a suitable receiving environment to establish a breeding population as a result of an accident or being deliberately released into the local waterways in or near populated area. A moderate to high probability of establishing a self-sustaining population would require deliberate release into very specific waterways – it is unlikely therefore to happen at random (DAWE 2020a). It is highly unlikely that enough fish would be accidentally or deliberately released into a suitable receiving environment to establish a breeding population..

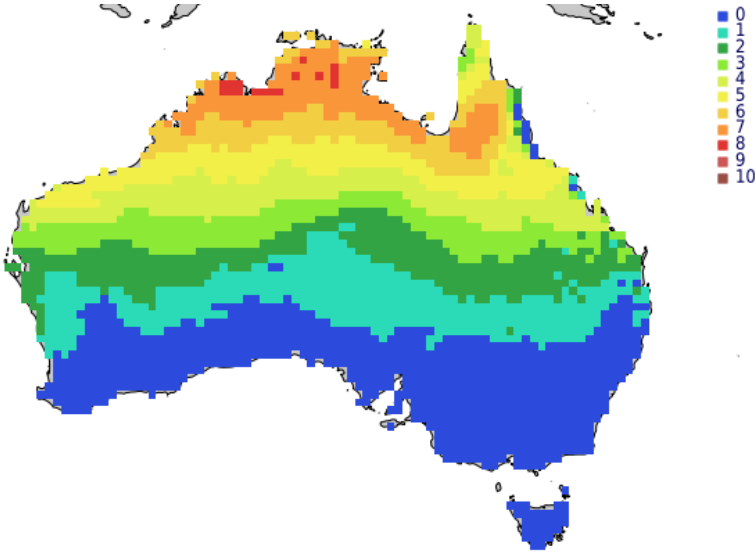
If permitted importation *Botia kubotai* would be freely available in Australia through aquarium stores. The species would be common enough in Australia that theft due to lack of availability is unlikely.

Only a very deliberate and planned release might result in establishment of the species, although the limited potentially suitable habitats and their remoteness from populated areas makes this scenario highly unlikely.

*Climate match—introduction to an area with a climate that closely matches that of the species' original range:*

Climatch (v1.0) was run with the source region set conservatively to circumscribe an area in Myanmar consistent with that described in Vidthayanon (2012) but extending further across the Thai border to allow for the more recent finding of the species in Thailand (Seriously Fish n.d.). A climate match prediction was generated using the Euclidian algorithm applied to the 'world stations' data set (Figure 1). Climatch calculated a 'value X' (Climate Euclidian Sum Level 5) of 607, equating to a climate match score of 5, increased to 6 because there were less than 12 meteorological stations used in the prediction. DAWE (2020a) suggested the need for some caution in predicting climate suitability for freshwater aquatic species because

Climatch is based on terrestrial climate measurements. The recently released upgraded version of Climatch (v2.0) was not used in this assessment because its improved mapping resolution results in higher output values that are yet to be calibrated for purposes of applying the Bomford methodology.



Score	0	1	2	3	4	5	6	7	8	9	10
Count	811	453	367	266	281	238	180	173	16	0	0

**Figure 1** Climatch output for *Botia kubotai*

*History of establishment elsewhere—previous successful establishment:*

There have been no recorded establishment of wild populations of *B. kubotai* outside its natural range, despite likely inadvertent or deliberate introductions as an internationally traded aquarium species. The species is considered to have been “introduce but never established” (Bomford 2008).

*Overseas range:*

*B. kubotai* is endemic to headwaters of the Salween River basin around the border between Myanmar and Thailand. The type specimens were collected from the Megathat Chaung (Megathat stream) in the upper Ataran river basin, Kayin/Karen State, Myanmar (Kottelat, 2004). Another population was discovered in the Hanthayaw River, Tak Province, Thailand (Seriously Fish 2020). The species is estimated to occupy a total two, 1° latitude x 1° longitude grid squares (Bomford 2008).

*Introduction success:*

The species is not known to have been released or established. However, after many years of trade worldwide it can be assumed it has been released into non-native areas on many occasions. The introduction rate is conservatively considered to be less than 0.25 (Bomford 2008).

*Taxonomic group—belonging to a family or genus which has a high establishment success rate:*

FishBase recognises 10 species of *Botia* of which two species, *Botia dario* and *Botia lohachata* are reported as having established in the wild outside the countries of their natural range (Froese and Pauly n.d.—a). If the Bomford (2008) methodology is applied to the genus *Botia*, then of a total 10 species, 4 are traded as ornamental species and of this 4, there are 2 reported populations (representing two species) that have been found established outside the countries to which they are native. As internationally traded aquarium species, it is reasonable to assume that there would have been many instances of inadvertent or deliberate introduction of these four species around the world – conservatively, 25 past introductions are assumed for the purposes of this risk assessment. However, there are only two records (representing only two species) on FishBase of *Botia* species being found to have established wild populations outside the countries to which they are native. The ‘genus level’ taxa risk is therefore 2/25 (8%). Notably, *Botia lohachata* a species similar to *B. kubotai* is on the current list of specimens taken to be suitable for live import, have been imported to Australia for at least 15 years and have not established wild populations.

### Potential impacts of established feral populations

As there are no reports of *B. kubotai* establishing feral populations direct impacts are not certain but unlikely. In the unlikely event this species establishes in the wild in Australia, it may compete for benthic invertebrates with other small tropical benthic fish typically in habitats with sandy or gravel substrates. These niche species could include bottom feeders such as eel tailed catfishes (*Neosilurus* spp., *Porochilus* spp.) or juvenile eels (*Anguilla reinhardtii*). No competition would be expected with mid-water or surface feeding fish. Most of the lower reaches of potential habitat streams are dominated by species that penetrate freshwaters from the sea.

*B. kubotai* poses a minor impact risk to the Australian environment as they have been freely traded internationally for many years, with no evidence of establishment of feral populations or any detrimental impact in any other country.

### *Disease transmission to Australian fish and aquarium fish populations*

No significant pests or diseases have been associated with this species, including any of the diseases to which there are disease-specific risk management measures applied for importation of ornamental fish to Australia. Botiid fishes as a group are considered of low risk in terms of disease risk in that they are subject to the minimum one-week post arrival quarantine isolation on importation to Australia (DAWE 2020b).

### Bomford 2008 Exotic Freshwater Fish Risk Assessment Model

Common name	Polka dot loach
Scientific name	<i>Botia kubotai</i> Kottelat 2004
Date assessed	10 October 2020
Literature Search Type and Date:	FishBase October 2020

Risk criterion	Value	Explanation
A. Climate Match Score (1–8)	6	Climatch (v1.0) Euclidian Sum Level 5 (Value X) = 607. This value equates to a climate match score of 5, which is

		increased to 6 because there were less than 12 meteorological stations used in the prediction.
B. Overseas Range Score (0–4)	0	Estimated to occupy a total two, 1° latitude x 1° longitude grid squares
C. Establishment Score (0–3)	0	The species is considered to have been “introduce but never established”, representing a establishment score of 0.
D. Introduction Success Score (0–4)	1	Never known to have been released or established. However, after many years of trade worldwide it can be assumed it has been released into non-native areas on many occasions. The introduction rate is conservatively considered <0.25, representing an introduction success score of 1.
E. Taxa Risk Score (0–5)	2	As internationally traded aquarium species, it is reasonable to assume that there would have been many instances of inadvertent or deliberate introduction of the four <i>Botia</i> species traded internationally as ornamental fish – conservatively, 25 past introductions are assumed for the purposes of this risk assessment. There are only two records (representing two species) on FishBase of <i>Botia</i> species being found to have established wild populations outside the countries to which they are native. The ‘genus level’ taxa risk is therefore 2/25 (8%).

Summary	Score	Rank
Establishment Risk	9	Moderate

## Conclusion

The estimated risk of ‘moderate’ using the Bomford (2008) methodology is generally consistent with the risk that would be posed by most of the species currently permitted live importation to Australia. It is recommended that *Botia kubotai* is added to the Live Import List.