

Native Fish Australia (Vic) has for more than 30 years worked to improve the status of native fish across Victoria. This has included running an endangered native fish hatchery, displaying live native fish at numerous public events, and advocacy for better management and regulations for native fish. One significant part of our advocacy is the management of upland native freshwater fish habitat.

The Australian Alps include special fragile Alpine ecosystems representing habitat for many unique and often endemic Australian flora and fauna.

Our organisation is particularly interested in the aquatic environment and the catchments and streams which provide habitat for our unique array of indigenous Australian freshwater fish.

The Australian Alps encompass special sensitive unique Alpine wetland ecosystems and mossy grassland and woodland habitats. They also encompass the headwaters of so many of our major river systems of south-eastern Australia, from coastal & inland NSW, the ACT and eastern and north-eastern Victoria.

Most of these headwaters lie within National Parks, in New South Wales, ACT, and Victoria.

National parks are supposed to be the highest-level protected areas in all States of Australia. Tolerance of feral animal populations, within our National Parks system, defies the purpose and intent of protecting natural ecosystems, as is the primary purpose of such National Parks.

The impact of feral horses on the fragile Alpine and sub-Alpine environment of these National Parks, and the sensitive grasslands, woodlands, and wetlands, is well known and scientifically documented.

What is often overlooked, is the impact the damage by feral horses is having on these delicate upland wetlands and stream headwaters, and its direct impact on upland native freshwater fish habitat, or the indirect downstream consequences for our native freshwater fishes, and the stream and river habitats they depend on.

These Alpine wetlands and streams have only recently been better studied, and understood, for the value they provide as habitat to unique endemic fish, amphibians, and aquatic invertebrates.

Applying the precautionary principle, to natural area management, especially in our National Parks, is essential to protecting biodiversity, known and unknown.

Some of the indigenous freshwater fishes of the Australian Alps have only recently been discovered, sometimes accidentally, or taxonomically described, and their distribution and conservation status clarified.

For example, the rare endemic Stocky Galaxias, *Galaxias tantangara*, was only recently discovered, accidentally, in Kosciuszko National Park, and studied for its conservation status.

[ <https://www.dpi.nsw.gov.au/fishing/threatened-species/what-current/critically-endangered-species/stocky-galaxias> ]

There are a number of other upland headwater-dependent locally-endemic species of the genus *Galaxias*, that have similarly only recently been discovered and studied.

There may be threatened relic populations of other similarly endemic *Galaxias*, or other native freshwater fishes, struggling to survive, in remote pockets of the Australian Alps, that we don't know about, yet.

It is for this reason that our organisation NFA(Vic) sees no justification whatsoever, in retaining any numbers of feral horses in the Australian Alps, and especially in the National Parks and stream & catchment conservation areas. The destructive impact of feral horses on our upland Alpine streams and headwaters needs to be immediately reduced, and eliminated from ever recurring in the future.

Apart from the direct damage that feral horses pose to streams and fish habitats, in the upland catchments of the Australian Alps, such damage to headwaters has a secondary indirect impact on streams, water quality, and seasonal water yield patterns and flows, in all the downstream recipient river systems.

The entire catchment hydrology of our Australian river systems, both inland and coastal-draining, is driven by what happens in the upland Alpine catchments. Undamaged well-vegetated Alpine bogs and wetlands, and associated grassland and woodland ecosystems, is essential to having high quality water, and dry season water yield and flows, to all our recipient rivers, and is thus essential to many of our larger freshwater native fish, and ensuring water for all sorts of downstream users, and thus safeguarding surplus environmental flows, lower down in these river valleys.

It is for these reasons, that our organisation NFA(Vic) appeals to the Australian Senate, and the Australian and State Governments, to take all measures possible, to rid the Australian Alps of all feral horse populations, and to prevent them from ever recolonizing and rebuilding, throughout our National Parks and stream catchment conservation areas.