



Great Lakes Fishery Commission

ESTABLISHED BY CONVENTION BETWEEN CANADA AND THE UNITED STATES TO IMPROVE AND PERPETUATE FISHERY RESOURCES

3 February 2004

Mr. Tom Morris
Manager, Environmental Protection
Marine Safety
Transport Canada
11th Floor, 330 Sparks Street
Ottawa, Ontario, K1A 0N8

Dear Mr. Morris:

On behalf of the Great Lakes Fishery Commission (GLFC), we commend Canada for its leadership in initiating the draft *International Convention for the Control and Management of Ships' Ballast Water and Sediments*. We understand that during the summer of 1990, GLFC and International Joint Commission staff worked with you to vet the first draft that Canada introduced for consideration by the International Maritime Organization. The current draft reflects 15 years of negotiation as well as an improved appreciation of the importance of the ballast issue. We urge Canada to continue its leadership by insisting that the draft convention support progressive, swift progress toward the ultimate goal of zero introductions.

It is the GLFC's strong opinion that the IMO convention must not impede members in any way from adopting more stringent measures to prevent the introduction or spread of alien invasive species. We believe that nations should retain the right to promulgate more protective ballast management measures than those of the IMO convention, if they believe such measures are warranted to protect their waters. The Great Lakes are an excellent case-in-point, as this system, being extremely sensitive to invasive species, needs the strongest possible ballast measures to prevent any further introductions.

We are concerned that the time-frame proposed in the draft convention for application of an environmentally protective discharge standard is too long, ranging to at least 2016 (and possibly beyond). The GLFC recommended in 2000 that the governments of the United States and Canada develop and implement a coordinated, adaptive 10-year strategy to end ship-mediated invasions. To protect the Great Lakes ecosystem, the ultimate goal must be zero introductions and the rate of introductions must be reduced constantly and quickly until this goal is reached.

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The convention must be written to allow timely progress toward the goal of zero introductions. We note that aquatic invasions continue in the Great Lakes; one reason may be that shipping practices changed primarily to NOBOBs, a mode not addressed by ballast exchange. The lesson for IMO is that the draft convention must be attuned to emerging problems, as well as to shortcomings in existing treatment regimes, and it must be capable of quick response. Any costs of preventive measures should be judged against the alternative, which is permanent degradation of aquatic ecosystems and permanent losses of aquatic resources.

The GLFC trusts that given Canada's early leadership on this issue, Canada and her allies will prevail in securing an effective tool for swift progress toward the ultimate goal of zero introductions.

Sincerely,

A handwritten signature in blue ink, appearing to be 'F.W.H. Beamish', with a long, sweeping horizontal stroke extending to the right.

F.W.H. Beamish
Chair

A handwritten signature in blue ink, clearly legible as 'Roy A. Stein', written in a cursive style.

Roy A. Stein
Vice-Chair

c.c. Ron Pierce