



Great Lakes Fishery Commission

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

18 September 2003

Mr. Everett Wilson, Chief
Division of Environmental Quality
U.S. Fish and Wildlife Service
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Attn: RIN 1018-A187

Dear Mr. Wilson:

The Great Lakes Fishery Commission offers the following comments in reply to “Review of Information Concerning Silver Carp (*Hypthalmichthys molitrix*)” [RIN 1018-A187].

Silver carp pose a significant threat to aquatic communities and to fisheries of the Great Lakes. As such, silver carp should be listed as an injurious species as provided for by the Lacey Act (18 U.S.C.) and implementing regulations (50 CFR 16.13). Importation of silver carp into the United States should be prohibited. Interstate transportation should also be prohibited, except by permit for scientific or medical purposes. The Commission recommends against the use of sterile or triploid silver carp for non-permitted purposes. The Commission also recommends listing bighead carp (*H. nobilis*), and encourages cooperation with Canada and Mexico to implement a single, unified North American strategy for preventing invasion and range extension by Asian carp. The Commission supports a rigorous process for screening any future proposals for importing new species into the United States.

The Commission believes that, unless listed as an injurious species, silver carp will inevitably find their way into the Great Lakes and contiguous waters. The Commission trusts that, once improved, the barriers on the Chicago Ship and Sanitary Canal will block migrating Asian carp from entering our waters from the Mississippi River. Nevertheless, the Great Lakes remain vulnerable to silver carp invasion through other vectors, such as live transport for food, baitfish and the aquaculture industry—directly and as contaminants in shipments of other species. Clearly, barriers alone will not prevent all possible introductions—federal listing of silver carp is also required.

Listing silver carp as an injurious species is consistent with state, provincial, and tribal recognition of silver carp as a threat to native fish and fisheries of the Great Lakes. The eight Great Lakes States (and the Province of Ontario) are working together to develop a policy framework to prevent Asian carps from invading the Great Lakes. Currently, importation, rearing, and/or trade of live silver carp are severely restricted in all but Ontario and New York (where regulations are pending). Yet another indication of the silver carp's—and other Asian carps'—perceived threat to the Great Lakes are the millions of dollars being spent on Chicago barriers by the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, the International Joint Commission, the Great Lakes Fishery Commission and other agencies.

If silver carp are allowed entry into the Great Lakes and connecting waters, we expect that the species will quickly and extensively establish itself in the Great Lakes and connected waters, as have other invasive species such as zebra mussels, gobies, sea lamprey, and alewife. The Great Lakes lie within the latitudes of the silver carp's native range. Moreover, silver carp have proven to be highly active in cold waters in the U.S., feeding at temperatures at least as low as 2.5° C. Once in the Great Lakes, we believe that, migrating with and against currents and leaping over barriers, silver carp will quickly spread throughout the Great Lakes, its tributaries and connected waters. We expect silver carp would become abundant in the Great Lakes because

- ? conditions are appropriate for spawning,
- ? rapidly reaching large size, adult carp would have no significant predators and
- ? as relatively non-selective filter-feeders, silver carp would find a sufficient supply of phytoplankton and zooplankton.

We understand that in the relatively short period since their introduction in the lower Missouri River, silver carp have become one of the most abundant of larger fish species (i.e., greater than five pounds).

Silver carp can only exacerbate the ecological damage now being exacted in the Great Lakes by recent invaders—in particular the filter-feeding dreissenid mussels and the predaceous cladocerans, *Bythotrephes* and *Cercopagis*. Scientists are attributing transformations of native food webs, declines in biomass of important plankton species, and even extirpations of species (*Diporiea*, native clams) to the arrival of filter-feeding, dreissenid mussels and the predaceous cladocerans. Fish managers are seeing reduced recreational and commercial landings, smaller spawning populations, declining year classes, and poor condition in many of the fish populations that they manage. Introducing a relatively non-selective, filter-feeding species such as silver carp will place even more pressure on native phytoplankton and zooplankton, on young fish which consume zooplankton, and on the fisheries that they sustain.

In addition to their impacts on the food web, silver carp, which jump when disturbed by outboard motors, have injured boaters in the Mississippi River and could be expected to likewise affect commercial and recreational fishermen in the Great Lakes. The charter boat industry could suffer indirectly: their customers, who are dissuaded from fishing by news stories or rumors about contaminants, bad weather, or poor fishing, may similarly be influenced by the inevitable news stories about jumping silver carp. Silver carp have little economic or sport value compared to Great Lakes fishes, which support a fishery valued at \$2 to \$4 billion.

In addition to supporting the listing of silver carp as an injurious species, the Commission recommends against the use of sterile, triploid silver carp for non-permitted purposes. We oppose the use of sterile or triploid silver carp because

- ? reproductively active carp could escape from facilities producing or housing triploid carp,
- ? current triploid-inducing techniques are not fully effective, and
- ? testing all fish to ensure triploidy would be cost-prohibitive, as diploid carp cannot be distinguished from triploid fish for routine quality control, nor for routine law enforcement.

The Commission also recommends listing bighead carp (*H. nobilis*) as an injurious species. While bighead carp itself would constitute an undesirable addition to Great Lakes fauna, its continuing importation also can introduce silver carp as a “contaminant”. Moreover, the Commission believes that the continuing import of Asian carp risks the introduction of pathogens that simply have not yet entered the United States. For example, Spring Viremia, a viral disease of carp, was recently reported for the first time in North America. There is concern that the virus—apparently an Asian genotype—will affect native species such as Northern Pike and cyprinids, including threatened and endangered species.

The United States should cooperate with Canada and Mexico to implement a single, unified North American strategy for preventing invasion and range extension by Asian carps (and other potentially harmful species). The United States should ensure the effectiveness of its actions and those of its states by sharing concerns and information with neighboring countries.

The Commission supports a process for screening any future proposals for importing new species into the United States. While we appreciate the Service’s current solicitation of information about threats posed by silver carp, we believe that such information is more effectively deployed as a screening process prior to importation rather than in declaring a species injurious once here.

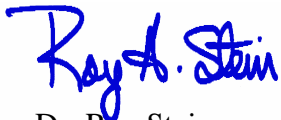
GLFC on Silver Carp
September 18, 2003
Page 4 of 4

In summary, the Great Lakes Fishery Commission:

- ? requests that the U.S. Fish and Wildlife Service add silver carp to its list of injurious fish, mollusks, and crustaceans,
- ? recommends against the use of sterile or genetically altered, triploid silver carp for non-permitted purposes,
- ? recommends listing bighead carp (*H. nobilis*),
- ? encourages cooperation with Canada and Mexico to implement a single, unified North American strategy for preventing invasion and range extension by Asian carps and
- ? supports a process for screening any future proposals for importing new species into the United States.

Thank you for the opportunity to comment.

Sincerely,



Dr. Roy Stein
Vice-Chair

cc: Great Lakes Task Force
Council of Lake Committees