

March 25, 2004

Ms. Beth MacKay
Introductions Biologist
Ministry of Natural Resources
5th Floor South, 300 Water Street
P.O. Box 7000
Peterborough, Ontario
K9J 8M5

Re: E.B.R. Registry Number RB04E6005

Dear Ms MacKay:

I am writing on behalf of Great Lakes United to express our support for the proposal to prohibit the buying or selling of live invasive carps, snakeheads and gobies under the Fish and Wildlife Conservation Act. Great Lakes United is an international coalition of approximately 200 environmental and conservation organizations, unions, academia and businesses in the U.S., Canada, First Nations and tribes dedicated to the protection and restoration of the Great Lakes-St. Lawrence River basin.

Great Lakes United supports the prohibition of buying or selling live silver, bighead, grass and black carps (Asian carp species), as well as any of the snakehead or goby species for the live food, horticultural, aquarium or other industries. We are extremely concerned that the threat of invasive fish being introduced into the Great Lakes basin, from either Canada or the United States, will compromise the already faltering biological integrity of Great Lakes waters. We have repeatedly expressed similar support for banning the live trade of invasive Asian carp species in the United States.

Examination of just one of these invasive species illustrates the threat to the Great Lakes. Silver carp, for example, pose a major threat to native mussels and fish communities. Silver carp are efficient filter feeders and compete directly for food with larval fishes, native mussels and some native adult fish species. This competition could reduce the numbers of native fish and alter the entire Great Lakes food web, which is already under significant stress from invasions.

Due to the threat live invasive fish stocks present, Great Lakes United also supports efforts to immediately prohibit the possession of these invasive species and remove the species from trade, markets, fishponds, or wherever they may be found.

Further, Great Lakes United promotes the creation of permitted and prohibited species lists. Any species not listed as permitted should be prohibited from entering Canada until reviewed and proven safe. Current regulations allow importation of some species that are later deemed harmful to natural resources. This is simply a backwards approach and

should be ameliorated. This approach often identifies harmful invasive species after extensive private investment, after escape into the wild, and after prevention measures are no longer available. This approach regularly requires extensive, expensive and questionably effective and safe control measures for invasive species. This approach is also divisive due to financial investments being made by industries to import potentially invasive species and should be avoided. To protect the Great Lakes biological integrity, fish communities, fisheries and general public, the burden of proof must be satisfied before entry is permitted.

We encourage you to take immediate, aggressive action to ban the trade and possession of live invasive fish species such as the Asian carp, snakehead and goby species, and make strong decisions to protect the Great Lakes biological integrity, fish communities, fisheries and the general public.

Thank you for the opportunity to comment on this critical issue.