



## Great Lakes Fishery Commission

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

September 24, 2002

Mr. Everett Wilson, Chief  
Division of Environmental Quality  
U.S. Fish and Wildlife Service  
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Dear Mr. Wilson:

The Great Lakes Fishery Commission offers the following comments in reply to “Injurious Wildlife Species; Black Carp (*Mylopharyngodon piceus*)” [RIN 1018-AG70].

The Great Lakes Fishery Commission requests that the U.S. Fish and Wildlife Service add black carp to its list of injurious fish, mollusks, and crustaceans. Importation into the United States should be prohibited. Interstate transportation should also be prohibited, except by permit for scientific, medical, educational, and zoological purposes. The Commission further recommends destroying any black carp (including triploids and eggs) currently held in the United States. The Great Lakes Fishery Commission also requests that the U.S. Fish and Wildlife Service list two additional Asian carp species: the bighead carp (*Hypophthalmichthys nobilis*) and the silver carp (*H. molitrix*). Finally, the Commission encourages cooperation with Canada and Mexico to implement a seamless North American strategy for preventing invasion and range extension by Asian carps.

Without the actions described above, black carp will invade the Great Lakes. The Commission trusts that, once improved, the existing barrier and the soon-to-be-constructed second barrier on the Chicago Ship and Sanitary Canal will collectively block migrating Asian carp from entering our waters from the Mississippi River. Nevertheless, the Great Lakes remain vulnerable to invasion through other vectors, such as live transport for food, baitfish, and the aquaculture industry. Clearly, barriers alone will not prevent all possible introductions.

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The Commission believes that black carp, following their inevitable escape into the Mississippi River, would ultimately find their way into the Great Lakes and would rapidly become established. The Great Lakes lie within the latitudes of the black carp's native range and Great Lakes tributaries provide conditions necessary for spawning. A ready supply of food exists and no predators, save perhaps the sea lamprey, will be able to successfully prey on adult black carp.

Scientists find it difficult to extrapolate invader impacts from one system to another. Nevertheless, there is agreement that an introduction of black carp is likely to have significant impacts in the Great Lakes. The black carp could be particularly damaging in the Great Lakes, which are being transformed by recent invaders such as zebra and quagga mussels (dreissenids). Unfortunately, even black carp are unlikely to control dreissenid mussels, which have proven well suited to grow and reproduce in all of the Great Lakes except the open-water expanses of Lake Superior. At the same time, the abundant supply of zebra mussels, which will provide food for black carp, may allow rapid expansion of black carp populations to nuisance levels. The Great Lakes' native unionids, decimated by the zebra mussel, could be completely eliminated by an obligate molluscivore such as the black carp. Moreover, black carp may, with mollusks such as the dreissenid mussels, provide a host community that would allow a previously undetected or yet-to-be-introduced parasite to thrive in the Great Lakes. Permitting black carp to invade the Great Lakes could lead to serious, unforeseen consequences. The only way to remove this threat is to eliminate any potential for black carp introduction.

Therefore, the Commission recommends the destruction of existing stocks of black carp (including triploids and eggs) currently held in the United States. The Commission believes, as does the Food and Agriculture Organization, that

“... experience has shown that animals will usually escape the confines of a facility. As a consequence, the introduction of aquatic organisms for aquaculture should be considered as a purposeful introduction into the wild, even though the quarantine/hatchery facility may be a closed system.”

In addition, we share the Service's reservations with triploidy as an injury-reducing tool as: 1) reproductively active carp could escape from the facilities producing or housing triploid carp; 2) current triploid-inducing techniques are not fully effective; and 3) 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.

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Again, other Asian carp species such as bighead and silver carp should be listed. While these species themselves constitute undesirable additions to Great Lakes fauna, their continuing importation also can introduce black carp. As the Service notes, "This species (black carp) originally entered the United States in the early 1970s as a 'contaminant' in imported grass carp stocks." Moreover, the Commission believes that the continuing importation of Asian carp risks the introduction of pathogens and parasites that simply have not yet entered the United States. Also, listing the bighead and silver carp as injurious species under the Lacey Act would restrict interstate transportation of the live Asian carp currently cultured in the United States and would significantly reduce the chances that these species will become introduced in the Great Lakes.

In summary, the Great Lakes Fishery Commission:

- requests that the U.S. Fish and Wildlife Service add black carp to its list of injurious fish, mollusks, and crustaceans;
- recommends destroying black carp currently held in the United States (including triploids and eggs);
- recommends adding the bighead carp and silver carp to the Service's list of injurious fish, mollusks, and crustaceans; and
- encourages cooperation with Canada and Mexico to implement a seamless North American strategy for preventing invasion and range extension by Asian carps.

Sincerely,



Dr. Roy Stein  
Vice-Chair