



Great Lakes Fishery Commission

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

February 3, 2004

Admiral Thomas H. Collins
Commandant
U.S. Coast Guard
2100 Second Street, SW
Washington, DC 20593-0001

Dear Admiral Collins:

The Great Lakes Fishery Commission is keenly interested in protecting the Great Lakes resources from the introduction of invasive species through the discharge of ballast water. As such, we are writing to encourage the U.S. delegation to the International Conference on Ballast Water Management to insist on an agreement that allows member states to adopt more stringent ballast water measures than those outlined in the convention and that all ships undertake ballast water management by the earliest possible date. The commission believes strongly that U.S. leadership on these points will result in a convention that leads the way in worldwide ballast water management and that protects the Great Lakes from future introductions.

The Great Lakes Fishery Commission agrees strongly with the U.S. position that the convention should establish a minimum ballast standard, not a maximum standard. The commission believes that the convention should not in any way impede member states from adopting more stringent measures to prevent the introduction or spread of alien invasive species. Nations should retain the right to promulgate more protective ballast management measures than those of the convention if they believe such measures are warranted to protect their waters. Moreover, the commission believes that the individual states should retain the authority to promulgate appropriate regulations without the International Maritime Organization's approval of the domestic regulations. 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 introductions.

As the Great Lakes ecosystem continues to suffer invasions in the absence of effective ballast management, 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). To protect our fishery resources, the ultimate goal must be zero introductions and the rate of introductions must be reduced constantly and quickly until this goal is reached. The commission 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.

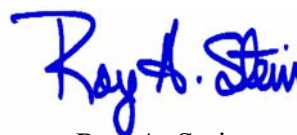
The convention must be written to allow timely progress, firm standards (not ever-extended deadlines) as we work toward zero introductions. The development of a strong convention that allows for strong, rapid action is imperative as ballast-mediated invasions in the Great Lakes continue; one reason may be that shipping practices changed to a mode (NOBOBs) 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. The U.S. delegation must not forget that short-term costs of preventive measures should be judged against the alternative, which is permanent degradation of aquatic ecosystems and permanent losses of aquatic resources.

The commission trusts the United States' strong leadership on this issue will prevail in securing a progressive, effective tool for swift progress toward the ultimate goal of zero introductions. Thank you for your work to protect the waters of the United States and the Great Lakes from aquatic invaders. We wish you success at the conference.

Sincerely,



F.W.H. Beamish
Chair



Roy A. Stein
Vice-Chair

Cc: Rear Admiral Thomas Gillmour
Secretary of State Colin Powell
LCDR Cathy Moore