

NATIONAL
Aquaculture
ASSOCIATION

December 21, 2006

Mr. Scott Newsham, Executive Secretary
Aquatic Nuisance Species Task Force
U.S. Fish and Wildlife Service

Fax: 703-358-1800

Re: Comments on the draft "Management and Control Plan for Asian Carps in the United States"

Dear Mr. Newsham:

The National Aquaculture Association (NAA) is a U.S. producer-based association dedicated to the establishment of national programs that further the common interest of our membership, both as individual producers and as members of the aquaculture industry. We are committed to the continued growth of our industry, to working with the federal government to create a climate conducive to our success, and to fostering cost-effective environmental stewardship and sustainability.

The NAA appreciates very much the opportunity to participate in the most inclusive effort to date to develop a national management plan for exotic species in the United States. The effort expended by the U.S. Fish and Wildlife Service to gather data, summarize positions, and insure representation by the large cross section of people and programs effected by Asian carp was without precedent, but very appropriate since three of the four species considered under this plan are of commercial importance: black, bighead, and grass carps.

The NAA is concerned about five issues associated with, or contained in, the Plan.

- 1) As a new component to the Plan, the NAA specifically requests that lead federal agencies be specifically named and a steering group of federal, state, and industry representatives created to guide Plan implementation and prioritization of the numerous recommendations contained in the Plan.

We are concerned that the Plan as written, without specific leadership, will not be implemented in an organized or effective manner. We note that prior national nuisance species management plans have not been implemented in a coherent manner. As responsible agencies we recommend the U.S. Department of Agriculture because of their past and on-going work concerning the control of snails, native and non-native, on fish farms, and the U.S. Fish and Wildlife Service, for their past and on-going program of certifying triploid grass carp for the biological control of aquatic weeds throughout the United States, be designated as agencies cooperatively responsible for plan implementation.

- 2) As the first national management plan that effects commercially cultured species, we request that the Plan be submitted to the Joint Subcommittee on Aquaculture for their consideration and potential involvement during implementation.

The Joint Subcommittee on Aquaculture (JSA) is a statutory committee that operates under the aegis of the National Science and Technology Council (NSTC) of the Office of Science and Technology Policy in the Office of the Science Advisor to the President. The JSA reports to the NSTC's Committee on Science, which is one of five research and development (R&D) committees established by NSTC to prepare coordinated R&D strategies and budget recommendations for accomplishing national goals. The JSA serves as a Federal interagency coordinating group to increase the overall effectiveness and productivity of Federal aquaculture research, technology transfer, and assistance programs and was authorized by the National Aquaculture Act of 1980 and National Aquaculture Improvement Act of 1985.

- 3) The Plan should be amended to allow the continued use of black carp on commercial fish farms until substitute snail control methods are proven under commercial conditions and limits.

To date, no reliable, economical, or effective alternative to the use of black carp to control snails on fish farms has been identified. However, the insidious effect of these parasites at below lethal levels has been documented that include slowed growth and reduced feed consumption that are severely affecting production economics.

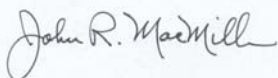
- 4) The risk of introducing live carp during live hauling has been exaggerated.

Carp producers have been live hauling bighead carp to northern U.S. markets and Canada since 1981 with the occurrence of one accident where fish might have been placed into local waters but were not because of existing regulatory and educational programs.

Creating triploid bighead carp as an alternative product is suggested in the Plan. It is unknown at this time whether the commercial production of triploid bighead carp is technically or economically feasible.

We thank you in advance for consideration given to the above comments.

Sincerely,



John R. MacMillan, Ph.D.
President