

TESTIMONY BEFORE THE HOUSE RESOURCES COMMITTEE  
OVERSIGHT HEARING REGARDING INVASIVE ASIAN CARP  
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Thank you, Mr. Chairman, for the opportunity to appear before you today to share the perspectives of the International Association of Fish and Wildlife Agencies (IAFWA) regarding the growing problem of invasive Asian carp in the Great Lakes and Mississippi River systems, and particularly the role and interest in general of the State fish and wildlife agencies in addressing this and other aquatic invasive species challenges. I am Eric Schwaab, Resource Director for the IAFWA. We appreciate the leadership you have demonstrated in addressing invasive species concerns and look forward to working with you to bring about needed change.

The IAFWA was founded in 1902 as a quasi governmental organization of public agencies charged with the protection and management of North America's fish and wildlife resources. The Association's governmental members include the fish and wildlife agencies of the states, provinces and the federal governments of the U.S., Canada and Mexico. All 50 states are members. The Association has been a key organization in promoting sound resource management and strengthening federal, state, and private cooperation in protecting and managing fish and wildlife and their habitat in the public interest.

Aquatic nuisance or invasive species present a very real threat to the long term viability of many of our nation's aquatic systems. To put this problem in context, we need look no further than the issue at hand today: Asian carp introduction and spread in the Mississippi River and Great Lakes systems. The 1997 Species Report Card: The State of US Plants and Animals (The Nature Conservancy, 1997) listed a variety of freshwater organisms as among our nation's most vulnerable species. Over 40% of freshwater fishes and amphibians, over 50 % of crayfish species and close to 70% of freshwater mussel species are imperiled. Notably, these rates of concern place these groups of species as the top four groups of concern in the Report Card, well above tiger beetles, reptiles, birds and mammals, none of which scored above 20% in assessed risk. While many threats to habitat imperil aquatic species, as a result of their feeding behavior and proliferation, Asian carp currently in the Mississippi drainage pose a serious threat to freshwater mussel species and native fishes.

In my testimony today, I will address four key areas of interest to our members: 1) The role of states in addressing invasive species challenges, 2) general recommendations from our membership, 3) legislative priorities to address aquatic invasive threats, and finally, 4) specific response to questions related to the Asian carp challenge in the Mississippi and Great Lakes systems. I will note two things up front regarding my Asian carp testimony. First there are others who will or have testified today with more direct experience with the regional Asian carp threat, and secondly, while most states support significant new controls on Asian carp possession or use in this country, there remain among the states varying degrees of support for many of the specific control or management strategies under consideration.

#### State management interests and approaches:

The State fish and wildlife agencies have broad statutory authority and responsibility for the conservation of fish and wildlife resources within their borders. The states are thus legal trustees of these public resources with a responsibility to ensure their vitality and sustainability for present and future citizens of their States. Because of our responsibility for and vital interest in the conservation of fish and wildlife resources, state fish and wildlife agencies have significant vested concerns in the preventing introduction of and controlling aquatic invasive species.

Recognizing the tremendous adverse impacts that aquatic invasive species are having on the nation's fish and wildlife populations, the Association has devoted increasing attention in recent years to a wide range of invasive species problems. Earlier this fall, the Association created a new standing committee to address invasive species issues. We are also currently completing a two year project to develop and improve aquatic nuisance species outreach strategies for state wildlife agencies and to improve coordination of regulation and enforcement related to aquatic nuisance species. IAFWA has long been an active participant with the Aquatic Nuisance Species Task Force (ANSTF) and is also represented on the national Invasive Species Advisory Committee. Member states across the country work as a part of many state and regional aquatic nuisance species control panels.

Despite all of these efforts, we are not keeping pace with growing invasive species problems. This is particularly true with aquatic species introductions. Given the inherently interjurisdictional nature of aquatic invasive species introduction and spread, the States have expressed strong support for national and international efforts to coordinate management response, including expressing particular interest in strategic actions that will move us beyond our current system of reactive management. The most strategic actions available involve identifying and screening species prior to import to

this country, or, failing that to undertake aggressive identification and rapid response. Working together is necessary to success in these efforts.

A hierarchy of general recommendations to prioritize action so as to most effectively utilize limited resources to achieve resource management gains have been identified. They are as follows:

#### General Recommendations:

Prevention of introductions is the single most effective control action. Prevention strategies can be important globally, regionally or even locally. Prevention of purposeful movement of potentially harmful species requires a strong scientific base of knowledge to assess risk, and effective government controls to prevent or restrict movements found to exceed acceptable risk standards. At the IAFWA annual meeting in 2004, the Association adopted a resolution that urged the federal governments of the US and Canada to develop and implement a multinational exotic species screening process to identify and prioritize potential aquatic invasive species threats.

Accidental introductions can be addressed through a variety of mechanisms, including government regulation, such as with ballast water controls, but also through education of a broad array of potential audiences, ranging from pet owners to anglers and boaters.

Once a situation moves beyond prevention, early detection and rapid response pose the next most effective and efficient opportunity for addressing ANS. The opportunity to identify and eradicate problems in early stage generally applies in only limited circumstances, with a limited window and limited geographic scope.

Finally, failing at prevention or early detection and eradication, long term management responses are needed to minimize spread and or other impacts. There are many examples of this type of response, and most carry very large price tags, require perpetual vigilance, and have limited prospects for long term reversal. Significant funding is necessary to address the most damaging threats once this management challenge is identified.

A focused, effective and coordinated partnership among state and federal agencies is essential to using scarce natural resource management funds most effectively. Because pathways for introduction of invasive species at the nation's borders are under the statutory authority of the federal government, we expect federal agencies to take a significant role in prevention strategies, but we also expect the state fish and wildlife agencies to play an integral role, as full resource management partners, in achieving the aquatic nuisance species management objectives.

#### Federal Legislative Priorities:

Based upon their collective experiences and the work noted above, at its 2005 Annual Meeting in September of this year, IAFWA identified the following issues as are priorities for inclusion within any invasive species legislation:

**Comprehensive Reauthorization:** A comprehensive federal structure is needed to support regional and state efforts for the prevention and management of invasive species. Any comprehensive reauthorization must include strong and meaningful ballast water measures for implementation, monitoring, and regulating ballast water exchange requirements and ballast water treatment standards. But ballast water is only one pathway. Other pathways must be identified and addressed as aggressively.

**Codify the National Invasive Species Council:** Implementation of a national invasive species management plan is difficult without a congressional mandate. Codifying the National Invasive Species Council will strengthen coordination among federal agencies and allow for the reinforcement of relationships among state and federal agencies and non-governmental organizations. A strong, unified federal government effort will be most effective, and allow a clear federal point of coordination for state partners to engage.

**Screening Provisions:** The enhancement of federal and state regulatory authorities to prevent importation and establishment of invasive species should include provisions for screening procedures prior to importation, risk assessment to identify pathways that pose significant risks, and resources required to enforce importation laws. The current tools available are not sufficiently proactive to prioritize pathways and identify species of greatest concern in a timely fashion.

**Detection and Response:** Establishment of proactive early detection and rapid response procedures for the identification and control of newly established invasive species.

Funding: Appropriations are needed at state, regional, and national levels for the regulation, enforcement, planning, education, and control of invasive species. Furthermore, development and use of economic impact information to promote prevention strategies among traditional and nontraditional fish and wildlife constituent groups and audiences should be encouraged.

Mr. Chairman, we appreciate the steps you have taken to advance comprehensive reauthorization of NAISA and bring to bear additional research and funding to achieve some of these legislative priorities.

#### Asian carp in the Mississippi and Great Lakes drainages

What is the current status of threats to freshwater resources from Asian Carp?

Through feeding behavior, both silver and bighead carp compete directly with native paddlefish, bigmouth buffalo and gizzard shad, as well as larval and juvenile fishes and native freshwater mussels. Rapid expansion through out Midwestern rivers is already impacting native fish species to the point that aquatic systems, commercial fisheries and recreational fisheries are being severely impacted.

Grass carp, which through a variety of mechanisms are found in at least 45 states, present a variety of problems for natural habitat and native species. These include the ability to compete for food with native fish and other aquatic organisms, the ability to rapidly change the aquatic plant communities in many systems through direct feeding activity, interference with reproductive activities of native fish, other modification of aquatic habitats and the introduction or hosting of non native parasites and diseases.

While not as currently pervasive as other Asian carp species, as a result of concerns for direct predation impacts, most states in the region feel that black carp pose a serious threat to native mollusks and snail species. Addressing black carp in particular now, before they spread, presents one opportunity for strategic intervention.

Have control efforts been effective?

Too many examples of costly introductions, from a variety of pathways, exist to be able to declare current efforts effective. Once introduced and established, reversing the growth of introduced populations is always logistically difficult and often fiscally impossible. Prevention is the only consistently effective and affordable approach to these problems.

While there are many positive and situationally effective examples of current control efforts, they are not adequately stemming the full range of threats to native habitats and fish and wildlife resources. Referring back to the general principles noted previously, the primary concern with current control efforts is that they are: 1) reactive in nature, 2) they place the burden of proof on state and federal agencies to prove a threat or risk level, 3) they focus on particular pathways of introduction rather than a systematic evaluation and prioritization process, and 4) resources dedicated to addressing these threats do not match the scale of the challenge.

How effective is current legislation in preventing and controlling these threats?

Current legislation achieves several important objectives. First, it provides a framework for coordination among agencies and organizations with a role in invasive species management. In addition, it brings some needed resources to support priority work. Current legislation also provides for controls on species that are known to be of particular concern. Finally, current legislation focuses attention on some priority pathways that have been responsible for many introductions.

There are several key shortcomings in current law. The placement of a "burden of proof" on the management authorities when engaged in deliberations over purposeful importation of new species is overly reactive and relegates government agencies to numerous and costly investigations that often provide too little, too late. In addition, while needed focus on select pathways, such as ballast water discharge, occurs, other prominent pathways do not receive due attention. Finally, current appropriations are inadequate to address the known problems, and fail to take into account the economic impact of invasive species spread.

What is the status of an injurious wildlife listing, and what are the positive and negative impacts?

Injurious listing of the black carp is currently subject to an open comment period. This is the only of the four Asian carp species that has moved beyond the information gathering phase and moved to current listing action underway.

Listing does help to bring notice to problem species and often helps slow the spread to regions that have not been subject to direct introductions. Listing also forces investigation of alternative species to meet needs currently satisfied by the target species.

However, listing is a costly and time consuming process, which places the burden of proof to identify problem species on the agency. In most cases, problem species do not become listed until they have already been introduced, which is often too late to effectively control growth and spread of invasive populations. In addition, the listing process is slow, and often can not keep pace with the spread of species of concern.

In summary, states place the control of invasive species at high priority when judging current threats. The nature of these threats, particularly in the aquatic systems, dictates cooperation across jurisdictions and with affected industries and user groups. The scale of the challenge requires careful, strategic choices regarding where to place limited resources. Given these choices and limited ability to address them, the states place efforts at prevention of new introductions at the top of the list of strategic efforts, followed closely by rapid response and detection. We must address these problems at the first opportunity so as to manage at the smallest scale possible. Once a significant spread has occurred, serious impacts to natural systems, lost economic opportunity and diminished recreational experiences will almost certainly result, and corrective opportunities are limited and costly.

Thank you for the opportunity to share our perspectives and I would be pleased to answer any questions.