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Chair: Mike Conlin, Illinois DNR
Vice-Chair: James Grazio, Pennsylvania DEP

Gary Frazer and Timothy R.E. Keeney
Co-Chairs, ANS Task Force
U.S. Fish and Wildlife Service
4401 North Fairfax Dr., Mailstop 322
Arlington, VA 22203

February 22, 2008

Dear Co-Chairs:

On behalf of the Great Lakes Panel on Aquatic Nuisance Species (Great Lakes Panel), I am writing to convey to the ANS Task Force the urgent need for effective federal regulations to prevent the discharge of organisms from vessels declaring ballast and no ballast on board. Nearly two decades ago, the National Aquatic Nuisance Prevention and Control of 1990 (NANPCA) recognized the need to “prevent and control unintentionally introduced species in a timely manner,” and to “prevent unintentional introduction and dispersal of nonindigenous species into water of the United States through ballast water management.” Regulation of ballast water is recommended by the Great Lakes Regional Collaboration, and preventing introduction of aquatic invasive species (AIS) associated with ballast water is a priority for the Great Lakes Panel. Members of the Panel are gravely concerned that federal legislation to effectively regulate AIS introduction via ballast water may falter due to the inability to find resolution on issues involving timelines, enforcement, state authority and the Clean Water Act.

A comprehensive approach to management of AIS has long been supported by the Great Lakes Panel, to address all pathways of AIS introduction and spread, including ballast water, and to provide for rapid response, support of state management plans, research and education. Opportunities are currently before Congress to pass critical legislation regulating ballast water, a necessary part of a comprehensive approach to prevent AIS introductions. The Panel is unified in our strong desire for resolution of outstanding issues to obtain passage of federal ballast water legislation, a critical step in establishing effective national ballast regulations.

Strengthening ballast water regulations is critical to protect the environmental health and economic viability of the Great Lakes region and beyond. The members of the Great Lakes Panel respectfully urge the ANS Task Force to do all it can to help the Administration and Congress expedite passage of effective federal regulation of ballast water discharge.¹ This recommendation is concordant with the Task Force Strategic Plan (2007-2012) under Objective 5.2: *explore opportunities to establish statutory and regulatory authorities necessary to implement ANSTF goals and objectives*. The need is urgent; each year that passes without significantly improved ballast regulations risks the introduction of new invasive species.

Sincerely,

Mike Conlin
Chair, Great Lakes Panel on Aquatic Nuisance Species
Director, Office of Resource Conservation, Illinois Department of Natural Resources

¹ The U.S. Coast Guard and the U.S. Army Corps of Engineers recused themselves from endorsement of this letter and its submission as a recommendation to the ANS Task Force.

