



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



In Reply Refer To
FWS/AFHC/049979

DEC 15 2011

Dr. Philip B. Moy
Chair, Great Lakes Panel
Eisenhower Corporate Park
2805 S. Industrial Highway, Suite 100
Ann Arbor, Michigan 48104-6791

Dear Dr. Moy:

Thank you for your letter of October 17, 2011, concerning the Aquatic Nuisance Species Task Force (ANSTF) conveying the Great Lakes Panel's strong concerns about the need to prevent the introduction and spread of aquatic invasive species through the trade of live organisms. The U.S. Fish and Wildlife Service (Service) shares your concerns and your commitment to finding effective solutions to this urgent problem.

The United States legally imports millions of live animals each year for a variety of purposes. Many help make cutting-edge medical discoveries and help us discover the wonders of the entire natural world in zoos and aquaria. They are also valued members of our families. However, nonnative species which are invasive cost our country tens of billions of dollars each year. They are among the primary factors that have led to the decline of native fish and wildlife populations in the United States, and pose one of the most significant natural resource management challenges facing the Service. We continue to face enormous economic and environmental consequences posed by the accidental and intentional introduction of invasive species.

We are making strides to tackle these problems together--government, academia, industry, non-governmental organizations and private citizens alike, working hand-in-hand with the understanding that we must be more responsible and take swift and effective action. The ANSTF continues to be very important to these efforts, and I thank you and the other members of the Great Lakes Panel for your participation.

The Lacey Act, the nation's oldest wildlife law, was enacted in 1900 as a key tool to strike a balance in trade. It prevents the transportation of illegally taken animals and wildlife products across State lines and the importation of injurious wildlife. While it remains an important law enforcement tool to control trafficking and importation, due to the lengthy regulatory process to list species, it has clearly been unable to keep up with the unprecedented pressure and scope of

the invasive species threat. Globalization has increased many times over since 1900. Collectively, we are not equipped to deal with the new challenges that have emerged over the past century.

Since the Lacey Act was introduced, our nation has been bringing in species at a much faster rate than when the Lacey Act was signed into law. In the meantime, we are only making a listing decision once every four years. This means that many organisms are entering the country, posing significant risks to our nation's economy and natural resources. We can improve our abilities to address those risks without sacrificing the scientific integrity that lies at the foundation of each listing decision. As world trade in exotic species expands, the Service must possess the capability to respond nimbly to potential introductions of injurious species and take action where appropriate. As mentioned earlier, we're reviewing both regulatory and non-regulatory approaches to address this urgent problem.

A combination of methods must be brought to bear on this challenge. For example, our two national campaigns, Stop Aquatic Hitchhikers! and Habitattitude, have been important communication tools. While education and voluntary efforts are absolutely essential, we also recognize the need to improve other tools to ensure the nation's biosecurity in both terrestrial and aquatic ecosystems. As a result, I have directed Service staff to develop potential measures that can more effectively prevent the introduction of new invasive threats. That effort is currently underway. The ANSTF and other partners will have an important role to play in the public process of vetting the recommendations once we are ready for that review. Any policy ultimately adopted must be implemented openly and transparently.

Every State and territory in our nation has invasive species that we have to spend precious time and money controlling. Prevention could have stopped the problems before they started. We need to educate and inform the public more effectively about what we are doing and why. The responsibility for control of injurious wildlife rests with everyone, including government, landowners, pet owners, and private users alike, who have an interest in species trade for a variety of reasons. By continuing to work together, we can ensure economic opportunities while also preventing future ecological and economic harm. The Service is committed to working with you on this issue, and we are excited about the prospects the efforts will produce.

Sincerely,


Deputy DIRECTOR