



December 21, 1999

Honorable Kirk Fordice, Governor  
State of Mississippi  
P.O. Box 139  
Jackson, MS 39205

Dear Governor Fordice:

I am writing to bring your attention to concerns raised by representatives of state conservation and department of natural resource agencies in the Mississippi River Basin regarding the stocking of black carp in your state. I serve as Chairman of the Mississippi Interstate Cooperative Resource Association (MICRA), an organization of 28 state conservation and natural resource agencies in the Mississippi River Basin, organized in 1990 to improve interjurisdictional river fishery resource management.

MICRA members met in Chicago on December 8 and unanimously agreed to oppose the release of black carp anywhere in the Basin. We recognize in approving the use of this species in Mississippi's farm fish ponds, that your Department of Agriculture and Commerce is only attempting to assist your state's catfish farmers with the control of snail populations in order to limit infection of their catfish by a trematode parasite. We share their concerns for this problem and their interest in treating it, but are more concerned that the use of black carp to address the issue could have devastating and far reaching impacts on fisheries and shellfish resources far beyond the geographic boundaries of the state of Mississippi and throughout the Mississippi River Basin. We believe sincerely that several native species could be substituted for the exotic black carp and provide as good or even better snail and trematode control.

If released to the wild, black carp pose a significant risk to several species of threatened and endangered shellfish and mussels because they serve as primary black carp food sources (see attached fact sheet). Gamefish habitats and food resources would also be significantly impacted by competing wild black carp populations. Some states in the Basin have already listed the black carp as a "prohibited species". Experience has shown that once released into pond environments that are not strictly controlled under laboratory-like conditions using extraordinary protection measures, escape to the wild is inevitable. Therefore we oppose the use of black carp anywhere within the Basin, whether it be in the diploid or triploid form. We feel strongly about the latter because we have also learned through experience that regardless of whether diploid (fertile) or triploid (supposedly infertile) forms are used; diploids must be present to produce triploids and regulating the use of triploids is impossible. Also because of past mistakes like this, made elsewhere in the Basin, we now have several other forms of Asian carp – the bighead, grass, and

silver – expanding in huge numbers in the Basin’s large rivers and destroying gamefish foods and habitats. In fact, even once-abundant commercial species such as bigmouth buffalo, smallmouth buffalo, paddlefish, and other fish native to the Basin are now threatened by the release of Asian carps (all with good intentions) for aquaculture purposes. With these facts in mind, we simply cannot stand by and allow another species like this to be released upon us!

Mississippi is not alone in addressing the snail issue, other MICRA member states are also actively pursuing solutions. For example, the native redear sunfish is providing excellent snail control in the ponds of at least one southeast Missouri fish farm, when stocked in catfish ponds at a rate of only 250 “nickle-sized” individuals per acre. We are offering Mississippi our assistance in addressing this issue by bringing the redear sunfish option to your state in addition to any other cooperatively developed solutions. We will also encourage the U.S. Fish & Wildlife Service to assist us in this endeavor. Just because a supply of redear sunfish may not be readily available right now from commercial sources, the supply problem should be easily solved if the resources of concerned state and federal agencies can be leveraged and combined to cooperatively provide a solution.

It is becoming clear that in order to protect the Basin’s valuable resources from invasive aquatic nuisance species the states must act as partners in the interest of everyone connected by the Mississippi and it’s tributaries. Both the American Fisheries Society (*Fisheries*, Vol. 11, No.) and a report to Congress from the Federal Aquatic Nuisance Species Task Force (*Findings, Conclusions, and Recommendations of the Intentional Introductions Policy Review 1994*) encourage a full review of proposed introductions and consultation with potentially affected jurisdictions or review by interjurisdictional panels before allowing a new species to be introduced.

On behalf of MICRA’s members, I ask that you direct your Department of Agriculture and Commerce to rescind their decision to allow stocking of black carp in Mississippi, and instead work with us to solve this important problem. I also ask that any black carp presently stocked in Mississippi be recovered and destroyed or kept in closely controlled, laboratory-like environments which can guarantee that escape to the wild can be prevented.

These requests are respectfully submitted in the best interests of interjurisdictional fishery resources throughout the Basin, including Mississippi; and we look forward to working with your state’s agriculture and natural resource agencies to find a solution to the snail problem that is satisfactory to all stakeholders.

Sincerely,

A handwritten signature in black ink that reads "William C. Reeves". The signature is written in a cursive style with a prominent initial "W".

William C. Reeves, Chairman

Attachment

cc: MICRA Member Agencies  
State Basin Associations  
Aquatic Nuisance Species Task Force  
Director, USFWS  
Regional Directors, USFWS Regions 2,3,4,5,6  
USFWS Division of Management Assistance  
Catfish Farmers of America  
American Fisheries Society  
American Sport Fishing Association  
Freshwater Mussel Conservation Society  
Mississippi River Basin Congressional Delegation



December 21, 1999

Honorable Mike Huckabee, Governor  
State of Arkansas  
250 State Capitol  
Little Rock, AR 72201

Dear Governor Huckabee:

I am writing to bring your attention to concerns raised by representatives of state conservation and department of natural resource agencies in the Mississippi River Basin regarding the production, export, and/or stocking of Asian carps, most recently the black carp, in your state. I serve as Chairman of the Mississippi Interstate Cooperative Resource Association (MICRA), an organization of 28 state conservation and natural resource agencies in the Mississippi River Basin, organized in 1990 to improve interjurisdictional river fishery resource management.

MICRA members met in Chicago on December 8 and unanimously agreed to oppose the release of black carp anywhere in the Basin. The Mississippi Department of Agriculture and Commerce has recently approved the stocking of diploid black carp in their state's catfish farm ponds for the control of snails which serve as an intermediate host for a trematode parasite infecting their catfish. We recognize that in approving the use of black carp, Mississippi is only attempting to assist their state's catfish farmers. Arkansas is directly involved in this situation because we understand that your state's aquaculture industry provides the primary source for black carp for export to other states nationwide. We share Mississippi's concerns for the snail/trematode problem and their interest in treating it, as I am sure that Arkansas does. But we are more concerned that the use of black carp could have devastating impacts on fisheries and shellfish resources throughout the Mississippi River Basin.

If released to the wild, black carp pose a significant risk to several species of threatened and endangered shellfish and mussels because they serve as primary black carp food sources (see attached fact sheet). Gamefish habitats and food resources would also be significantly impacted by competing wild black carp populations. Some states in the Basin have already listed the black carp as a "prohibited species". Experience has shown that once released into pond environments that are not strictly controlled under laboratory-like conditions using extraordinary protection measures, escape to the wild is inevitable. Therefore we oppose the use of black carp anywhere within the Basin, whether it be in the diploid or triploid form. We feel strongly about the latter because we have also learned through experience that regardless of whether diploid (fertile) or triploid (supposedly infertile) forms are used; diploids must be present to produce triploids and enforcement of the use of triploids is impossible. Also because of past stocking of other species of Asian carp – bighead, grass, and silver – made initially and primarily in Arkansas, we now have these three species expanding in huge numbers in the Basin's large rivers and destroying gamefish

foods and habitats. In fact, even once-abundant commercial species such as bigmouth buffalo, smallmouth buffalo, paddlefish, and other fish native to the Basin are now threatened by the release of Asian carps (all with good intentions) for aquaculture purposes. With these facts in mind, we simply cannot stand by and allow another species like this to be released upon us! We need Arkansas' assistance in protecting the Basin's native fishery and shellfish resources.

Mississippi and Arkansas are not alone in addressing the snail and other aquaculture issues, other MICRA member states are also actively pursuing solutions. For example, the native redear sunfish is providing excellent snail control in the ponds of at least one southeast Missouri fish farm, when stocked in catfish ponds at a rate of only 250 "nickle-sized" individuals per acre. We are offering the assistance the other Basin states in addressing these issues by bringing at least the redear sunfish option to the rescue. We will also encourage the U.S. Fish & Wildlife Service to assist us in this endeavor. Just because a supply of redear sunfish, or other native species useful to aquaculture may not be readily available right now from commercial sources, the supply problem should be easily solved if the resources of concerned state and federal agencies can be leveraged and combined to cooperatively provide solutions.

It is becoming clear that in order to protect the Basin's valuable resources from invasive aquatic nuisance species the states must act as partners in the interest of everyone connected by the Mississippi and its tributaries. Both the American Fisheries Society (*Fisheries*, Vol. 11, No.) and a report to Congress from the Federal Aquatic Nuisance Species Task Force (*Findings, Conclusions, and Recommendations of the Intentional Introductions Policy Review 1994*) encourage a full review of proposed introductions and consultation with potentially affected jurisdictions or review by interjurisdictional panels before allowing a new species to be introduced.

On behalf of MICRA's members, I ask that you prohibit the interstate sale of black carp from the State of Arkansas, and that you direct the agencies involved in your state to work with us to solve this and other important problems related to the spread of non-native aquatic nuisance species. I also ask that any black carp presently held in Arkansas be recovered and destroyed or kept in closely controlled, laboratory-like environments which can guarantee that escape to the wild can be prevented.

These requests are respectfully submitted in the best interests of interjurisdictional fishery resources throughout the Basin, including Arkansas; and we look forward to working with your state's agriculture and natural resource agencies to find solutions to the release to the wild of non-native aquatic nuisance species like the Asian carps.

Sincerely,

A handwritten signature in cursive script that reads "William C. Reeves".

William C. Reeves, Chairman

Attachment

cc: MICRA Member Agencies  
State Basin Associations  
Aquatic Nuisance Species Task Force  
Director, USFWS  
Regional Directors, USFWS Regions 2,3,4,5,6  
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Catfish Farmers of America  
American Sport Fishing Association  
Freshwater Mussel Conservation Society  
Mississippi River Basin Congressional Delegation

## Black Carp Facts

**General Biology:** The black carp (*Mylopharyngodon piceus*), also known as the snail carp, is the largest of the Chinese carps, growing to lengths of 4-5 ft. Larval black carp feed mainly on zooplankton, gradually changing to insects and benthic animals and shellfish (snails and mollusks). Snails are the preferred adult food, but a switch is made to other shellfish (i.e. mollusks, crustaceans, shrimps, etc.) and insect larvae once the snail population decreases to some low point. Black carp prefer northern warm temperate climates, spawning annually in rivers between April and July. Spawning occurs along the main channel and in major tributaries, with more the 400,000 pelagic or semipelagic eggs produced/female. Black carp can reach lengths of 12 in. at the end of their first year of life, 19 in. at age 2, and achieve weights of 11 lbs. at age 3. Black carp are similar to grass carp in appearance – juveniles are especially difficult to differentiate. Teeth structure, intestine length, and even swimming characteristics are used to separate black carp from grass carp.

**Occurrences in the U.S.:** The black carp is or has been in the recent past, maintained in research or production facilities in six states (Arkansas, Louisiana, Mississippi, Missouri, North Carolina, Oklahoma, and Texas). It was first introduced in Arkansas in the early 1970's as a contaminant in imported grass carp stocks shipped to a fish farm. In the 1980's U.S. importation was again made by a fish farmer in Arkansas, another in Mississippi, and a third in Missouri. These introductions were made in the interest of obtaining a biological control agent to combat the spread of yellow grub in aquaculture ponds. Thirty or more black carp escaped from the Missouri fish farm into the Osage River in April 1994 when high water flooded hatchery ponds. These fish were thought to be triploid (sterile) and the species has not yet been found in the wild. Brood stock are currently thought to be present in both Arkansas and Mississippi.

**Risk Assessment:** Risk Potential of the black carp to native U.S. fish and shellfish species is **HIGH**.

### Recommended Protection Measures:

- ! Use only certified triploid black carp;
- ! Restrict brood stock to facilities where the probability of escape or flooding is essentially zero;
- ! Develop mechanism to verify location and distribution of all live black carp;
- ! Use of black carp, experimental or otherwise, for testing their effectiveness in the control of disease-carrying snails, such as the yellow grub (*Clinostomum sp.*), must be restricted to triploid individuals;
- ! Release of triploid black carp into any streams, lakes, or reservoirs should be prohibited until there is additional research demonstrating that any such introduction will be beneficial (i.e., be effective in controlling zebra mussels and Asian clams) and will not cause significant harm to native mussel and snail populations;
- ! Black carp as a pathway for disease should be further investigated;
- ! Produce an identification guide to distinguish black carp from native and other nonindigenous fishes such as grass carp to reduce any risk of misidentification; and
- ! Establish a quality assurance and education program for the above recommendations.

Source: Nico, L.G. and J.D. Williams. 1996. Risk Assessment on Black Carp (Pisces: Cyprinidae). Rept. to the Risk Assessment and Management Committee of the Aquatic Nuisance Species Task Force, USGS, Biological Resources Division, 7920 NW 71<sup>st</sup> Street, Gainesville, FL 32653. 61 pp.