# Michigan Bait Dealers Association

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I wish to thank USDA-APHIS in taking comments from our industry today about VHSv (Viral Hemorrhagic Septicemia) and the interim rule making process that you are working on to replace the Amended November 14, 2006 Order.

The commercial bait business started to develop a network of Retail and Wholesale operations in the early 1950's. Around 1980, the wholesale bait dealers formed our trade association that today represents an active membership of around 25 (virtually all wholesalers) members. From 1991 to 1996, we helped in the development of the Michigan Aquaculture Act of 1996 with our fellow Michigan Aquaculture Association members. 2001, with the help of the Minnesota and Michigan Sea Grant Program, the baitfish industry worked to establish an Aquatic Nuisance Species Hazardous Analysis Critical Control Point (ANS-HACCP) Program for the baitfish industry for the Upper Midwestern industry. We are now helping to revise that ANS-HACCP * program to include fish health issues concerning the bait industry. Finally, I personally have been in the bait business for 50 years and working around the Great Lakes.

Michigan's baitfish business is heavily dependant on wild caught fish (70% wild - 30% farmed) with a smaller proportions coming from aquaculture facilities. If interstate regulations are restricted to such a point that our wild caught minnows are cut off, such as Emerald Shiners, we would suffer a great loss of sales and it would also threaten our existence. Winter ice fishing season in Michigan, the Emerald Shiner is one of the most widely used baitfish and its loss of use, you would see both Michigan's fishing license and bait sales drop substantially. Whether you are talking about Michigan or the other Great Lake States, the overall economic impact with the lost of wild baitfish stocks, either being heavily restricted or eliminated will have a great effect on a Several Billion Dollars sport fish industry and could start a domino effect to the regions' economy.

State regulations that Michigan's bait dealers fall under, doesn't allow for the transport of any baitfish out of the territorial waters of the State. The restriction has been in place many years and the restrictions of the APHIS order doesn't necessarily affect our industry directly. Indirectly - it's another matter, we do rely on neighboring Great Lakes and upper Midwest bait wholesalers that could be blocked - depending how the Interim Order Rules are crafted. It appears to me that our biggest obstacle is the amount of time needed to run fish health tests, laboratory capacity and the time frame we normally hold baitfish before sale. A rapid test procedure would be greatly appreciated over what is currently available. We would like to see the interstate trade between the Great Lakes States to continue within the basin, if possible, but we also understand that neighboring states to the Great Lakes basin may increase restrictions for entry into their States and that would be understandable from their point of view, as long as it doesn't become a trade barrier instead of a fish health issue.

As we currently understand it, VHSv has only been found in the lower end of the Great Lakes basin (Lake St. Clair, Lake Erie, Lake Ontario and the St. Lawrence Seaway through New York). It also appears

to us that the pathogen has a good ***head start*** within the watershed. Research so far seems to indicate arrival of VHSv around 2002 into the Great Lakes watershed, give or take a year. We might be able as an industry and resource agencies to slow the progress of VHSv, but we won't be able to stop it or eradicate it with this much head start.

So far, VHSv has affected some species of fish within these lower lakes but the death rate isn't as large as we might have expected. The bait harvesters have also observed during this past season - Emerald Shiners, Yellow Perch, Salmon and Walleye populations to be in large schools and appear healthy during Fall bait harvest. The catchers has commented to each other that this is one of the largest year class groups - that they have ever seen! The picture isn't matching what you would expect to see, maybe fish populations are adapting and already building immunity faster than we thought could happen. Only time will tell the ultimate outcome.

We can offer to help the MDNR and APHIS in determining the potential geographical spread of VHSv by allowing the department's access to our winter minnows (Emerald Shiners primarily) holding ponds and the harvest location records. We feel this would give the agencies a leg up on any potential spread in the upper Great Lakes - instead of waiting later in the Spring when the minnows begin to move and school up again. Our harvested stocks would help both agencies and industry to better understand the pathogen current range within the basin as of late 2006.

As we see it, there are many different ways for VHSv could move around the Great Lakes watershed; by waterfowl, land animals, sportsmen, kids, aquarium trade, boat - live wells, ballast waters, fish migration, process fish (fresh and/or frozen), bait (commercial/individually caught), resource management departments (federal/state), private hatcheries, natural flowage, and etc., the pathogen is going to spread within the basin and eventually into the Mississippi River basin via the Chicago Sanitary & Ship Canal. We predict that in a few short years you will be able to compare the distribution maps of both Zebra Mussels and VHSv confirmations, and find them very similar in dispersal.

If APHIS has a solution that could stop VHSv and a way to eradicate it, we are all ears to hear your plan, but from our experience with Mother Nature, we believe that the battle is already over. It would be great, if we could turn back time, but our only hope now, is to learn how to live with the pathogen - if we can! We can suggest that APHIS works on a watershed basis and consider all interstate movement of fish stocks to be tested for VHSv throughout the United States. To date, we haven't found the mode of introduction that this pathogen took. We strongly believe that is something historically that we should understand first, if we are going to know how control any future non-native species introduction.

We agree that our outlook isn't very promising, but we can and will get through this, if we all keep our heads and work together. But be forewarned, be careful how you choose your path or you could eliminate the entire baitfish industry in a few short months, if mishandled!

Submitted by,

Richard Weidenhamer
President

*ANS-HACCP training manual was rename with the 2nd edition to Aquatic Invasive Species (AIS-HACCP)