

**WRITTEN STATEMENT REGARDING POTENTIAL APHIS ACTIONS IN  
RESPONSE TO VIRUS HEMORRHAGIC SEPTICEMIA**

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&  
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Thank you for the opportunity to provide a written statement regarding the VHS situation. I would have liked to appear in person at the Romulus, Michigan meeting, however, my wife is scheduled for surgery the day of the public meeting, and I cannot attend.

I pursue a small niche market which supplements my fish taxidermy business growing out feed trained brook, brown, and rainbow trout, largemouth bass, yellow perch, and bluegill that I initially purchase from private out-of-state producers. These are grown to trophy size on artificial feed, and then sold and shipped frozen whole to taxidermists, taxidermy schools, and replica suppliers all over the U.S. My market is due to the difficulty of acquiring trophy size fish specimens on a regular basis, and gamefish in most states are illegal to buy or sale from public waters.

My concerns are as follows:

1.) **The effectiveness of targeting domestic fish producers for testing when the pathogen has only been found in waters of the Great Lakes and other open waters.** With most private producers using ground water for their aquaculture needs, and not tapping into wild fish for broodstock (especially now), I fail to see the effectiveness of going after these private producers to stop the spread of the pathogen. I'm puzzled as to how VHS is then supposed to make it to these isolated fish farms that use ground water as their aquaculture water, and do not use fish from infected waters. If birds such as the Great Blue Heron are a potential vector to fish farms, I would think increasing the depredation permit fee recently 10 times by U.S. Fish & Wildlife isn't going to help.

2.) **Other modes of transport of the pathogen are much more likely** as in tanker ballast water, bilge water, livewell water, illegal transport of fish from infected waters to other waters by anglers and private individuals into their private ponds. Although illegal, the movement of fish by anglers via their livewells is not uncommon, and I personally have heard second hand of anglers planting fish in their local lakes from the Great Lakes. I have yet to see anything worthwhile addressing any of these vectors.

- 3.) **Historically an absolute dismal failure in preventing the spread of nuisance exotics in the Great Lakes region and beyond**, so preventing the spread of a pathogen via the same mode of transmission is highly questionable IMHO. Additionally, I'm not aware of any evidence fish producers had any hand in the spread of Zebra mussels, other exotic mussels, Spiny waterfleas, Gobies, Purple loosestrife, Eurasian water milfoil etc. Ironically most nuisance exotic fish species that have been introduced in the history of North American were introduced by various government agencies. The common carp is a notable example. I wouldn't be surprised if pathogens were also accidentally introduced by government agencies when they brought in some exotic salmonids like the Seeforellen strain of brown trout, Pacific salmon to the Great Lakes and other exotics.
- 4.) **The economic hardship on producers if VHS has to be tested more than annually as in biannually or quarterly.** I question if an increased frequency of testing will help stop the spread of the pathogen, and will mostly likely simply force small and medium producers to close their doors. I'm all for stopping or slowing the spread of a pathogen that could be catastrophic to the aquaculture industry, but if it is not only ineffective and causes them to close their doors, it seems akin to killing the patient to have the remote chance of curing the disease.
- 5.) **If fish for stocking private waters become scarce due to excessive regulations and costs, many citizens will probably simply remove fish from public waters to plant their ponds, which will circumvent the initial intent of regulations by making the spread of the pathogen more likely.**

6.) **Putting the ball in the court of the state DNR's when it's been shown not only can they not agree with each other on importation requirements, have failed to address disease issues adequately in some cases, and have a serious conflict of interest.** I've done some research on the different importation requirements of Great Lakes states and they are all over the board as you probably know. Some were basically nonexistent as with New York and Pennsylvania. Some have made it virtually impossible for outside of basin producers to import salmonids as with Indiana. See: *Great Lakes and Surrounding States have Varied and Conflicting Salmonid Importation Requirements*

[http://aquanic.org/newsletters/state/indiana/IAAI14-1\(2005\).pdf](http://aquanic.org/newsletters/state/indiana/IAAI14-1(2005).pdf)

As far as a conflict of interest how can you expect an entity to fairly enforce disease protocols on an animal commodity, when they produce these animals themselves and have a vested interest? Case in point: Both Indiana and Ohio's DNR's have planted fish that tested positive for a viral pathogen (IPN) because they did not want to suffer the economic loss of destroying the fish. However the private industry is set to a different standard. If every time a disease crops up in state hatcheries that should cause them to destroy these fish, but they make an exception to avoid economic loss what good is that?

Please if anything comes out of this situation **MAKE THE GREAT LAKES STATES STANDARIZE THEIR IMPORTATION REQUIREMENTS!**

7.) **If restrictions become too tight some producers and customers will simply go under the radar.** I have already seen this with my own eyes with the tough importation standard for trout Indiana presently has for suppliers outside of the Great Lakes basin. Then as in #5 the initial intent of regulations will be circumvented.

8.) **I find it doubtful that there are enough lab facilities in place to do the amount of testing required on a timely basis if excessive testing is required.**

9.) **Is the science really there to justify the full blown emergency response that is being undertaken?** From what I have seen these “massive fish kills” that have been reported by the media comprise no more than 10 percent of the population of the fish in the area where they happen. If that is correct doesn't that mean many fish have developed an immunity or are not susceptible to this virus? From a college microbiology class I seem to remember pathogens typically run their course. Could we be just prolonging the inevitable by slowing the spread of this virus, needlessly causing a disruption in commerce and economic hardship?

10.) And finally, I'm disappointed more meetings could not be more centrally located, as many producers in Wisconsin and Minnesota, and other states, will have very long drives exceeding 10 hours just to come to the meeting.

Thank you for you time.

Cecil Baird

