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Dear Dr. Inch:

I am writing to provide public input into the proposed regulations regarding the importation of live fish and other aquatic animals on behalf of the Canadian Association of Aquarium Clubs. We represent 21 clubs across the country with representation in all regions of the country save Quebec.

I understand the need to the proposed regulation – to protect Canada’s seafood industry, I am not sure that I understand the rationale in including non-food species of fish and crustaceans within the ambit of the proposed regulation. I am not aware of any studies that have linked the transmission of diseases in aquarium and ornamental fish to those of food fishes, here or abroad, save for some species that are both aquarium fish and food fish, e.g. *Osphronemus goramy* and *Oreochromis niloticus*. There are very few species that would fit into this category and most would be of such a size that it might not be inappropriate to bar their importation for the hobby. Even with koi where susceptibility to a number of diseases is well documented, I don’t believe there is evidence of transmission to non-ornamental fish.

I certainly do not believe that there has been any consultation with aquarium hobbyists that will be affected by these proposed changes. I understand that there has been consultation with some in the Pet Industry (PIJAC) but none of the 21 clubs which I represent have had any contact regarding these changes. I for one was completely unaware of these changes until the news release of January 15, 2010 which by the way erroneously indicates that public response will be accepted until March 7, 2010. I trust that you will take into consideration any late responses that come your way due to this error. Note that our website and my personal communication to members used the March 7 date.

It is also clear that the analysis of the impact on the pet industry of these changes is woefully inadequate. To be specific the economic analysis of the impact indicates that there will be no increased cost to the pet industry due to these regulations. How is that possible given that there will now be a requirement for inspection of some of the most popular aquarium fish, specifically *Poecilia reticulata* (the common guppy) and *Danio rerio* (the zebra danio). By numbers these two species represent a significant percentage if not an absolute majority of the fish imported for the hobby.

I am curious how these two species got added to such a list, I suspect that it was on the basis of a literature review which indicated that these two species have had certain diseases. Given that these are the two most commonly studied aquatic animals in the lab it is analogous to severely restricting the availability of lab mice because they are susceptible to cancers which the persons studying them have given to them.

While I appreciate that exceptions are made in the proposed regulations for the importation of Schedule III animals, I do not understand why some common aquarium animals are not included in the list of animals for the exception: eg. *Cyprinus carpio*, *Trichogaster trichopterus*, *Colisa lalia*, *Gambusia affinis* or any of the *Cherax* species. All of these are commonly kept aquaria species and none are used as food fish. Why should they not be allowed in pursuant to the restrictions found in s. 192 of the proposed Regulations? What means will there be to add or delete fish from the Schedule III list and the exceptions in 192(1)(a)?

I am told by an expert on crayfish that the idea of limiting the *Cherax* species is absurd since the disease that poses a risk to them is not a disease that they naturally possess but the “crayfish plague” *Aphanomyces astaci* which infects north american stocks of crayfish. Thus it would be appropriate to add these species to a list restricting their export from Canada to anywhere other than North America but not a list that restricts their importation.

Why are hobbyists only permitted to exercise the exception every 90 days? I am originally from London, Ontario, as a young hobbyist, I belonged to the Michigan Cichlid Association and frequently attended its activities and those of the many associations in the Detroit area. I frequently purchased fish for my aquarium and brought them back. If I buy guppies at the upcoming American Livebearers Association Convention, why should I not be allowed to buy guppies from the Central New York Aquarium Society Auction the next weekend and import them under the same conditions? The first is an event I plan to attend this spring and the second is an auction I have frequently attended in the past.

At the very least on behalf of Aquarium Clubs across Canada and on behalf of hobbyists I would ask that the government consult with us regarding the forms that will be required for importation pursuant to sections 192 and 193. In the long term, I am actually more concerned about importations by hobbyists under the latter section. Unless it is made clear to the CBSA personnel that importation of all pet fish as long as accompanied by the appropriate paperwork is ok, then there will be lots of problems for hobbyists seeking to import fish for their own use.

**For the ease of the hobbyist it will be helpful to have downloadable documents that they can fill out giving all of the information required by s. 192 or 193. We would make these documents available on our website for the benefit of all Canadians seeking to import fish for their own use. [www.caoac.ca](http://www.caoac.ca)**

Hobbyists are quite central to the efforts of preserving several species of fish that are threatened and extirpated from their native habitats. There are a number of Mexican livebearers e.g. *Skiffia francesae*, *Allotoca goslinei*, that may only exist at this point in hobbyist's tanks, it is of vital importance that these efforts not be hampered by increasing the red tape to such an extent that hobbyists quit importing fish. None of the Mexican livebearers are commercially available or imported by commercial brokers to the fish trade – they are kept by a handful of enthusiasts around the world in the hope that they might someday be reintroduced in their native habitat.

I would ask that you keep the interests of thousands of hobbyists across Canada in mind when enacting these regulations. They were not created with the pet trade in mind and they may have devastating consequences to the pet trade and to certain species of fish if they are not enacted and enforced with some sensitivity to the unique role of hobbyists in the preservation of species and ongoing research into fish behaviour.

Sincerely

**“Bob Wright”**

Bob Wright

President, Canadian Association of Aquarium Clubs.