October 19, 1998

Secretary Bruce Babbitt Department of the Interior 1849 C Street, NW Washington, DC 20240

## Dear Secretary Babbitt,

An aquarium-bred clone of the green seaweed, *Caulerpa taxifolia*, has invaded the Mediterranean coasts of France and Italy and now covers thousands of acres of the coastal zone. As ecologists and exotic species research scientists, we recommend that steps be taken immediately to keep this invasive seaweed out of United States waters.

France, Spain and Australia have already banned the possession, transport or sale of this dangerous organism. However, it continues to be available for importation and sale in the United States for use in public or private aquariums. If this practice continues, it is likely only a matter of time before the Mediterranean clone of *Caulerpa taxifolia* is released and becomes established in the United States, threatening coastal waters and coral reefs from North Carolina to Florida and the Gulf of Mexico, and in southern California, Hawaii, Puerto Rico, the U. S. Virgin Islands, Guam and American Samoa. To prevent this from happening, we request that you work with the Department of Agriculture to list the Mediterranean *Caulerpa taxifolia* as a prohibited species under the Federal Noxious Weed Act, preventing its importation, possession or sale in the United States. While a native strain of *Caulerpa taxifolia* is found in tropical U. S. waters, the Mediterranean clone is a distinctly different seaweed, much larger, more aggressive, and capable of invading both tropical and cooler regions.

This invasive clone was apparently introduced into the Mediterranean Sea from the Monaco Aquarium in 1984. It covered roughly one square yard in 1984, spread to over 2 acres by 1989, and now covers over 10,000 acres extending from the shore to depths of over 250 feet. It grows on both rocky and sandy bottoms, from protected bays to exposed capes, and attains great densities, forming monocultural stands whose impact has been compared to unrolling a carpet of astroturf across the bottom of the sea. In these regions it causes ecological and economic devastation by overgrowing and eliminating native seaweeds, sea grasses and invertebrates (such as corals, sea-fans and sponges). It has harmed tourism, destroyed recreational diving and created a costly impediment to commercial fishing.

Allowing the release of this organism into the Mediterranean was an act of environmental mismanagement that threatens catastrophic changes and the loss of biological diversity in one of the world's most valued marine ecosystems. We believe that allowing its importation and sale in the United States is equally ill-advised.

We further ask that you initiate a review of federal policies and practices regarding the importation and sale of nonindigenous marine and freshwater organisms by the aquarium trade. These practices generally take a "dirty list" approach, in which certain unacceptable species are prohibited and all unlisted species are freely imported and sold. It is in part this dirty list regulatory approach that has allowed the continued importation of the Mediterranean *Caulerpa taxifolia* clone and other potentially harmful organisms, despite clear evidence in some cases of substantial damage in other parts of the world.

Recent, well-documented cases of substantial economic and environmental harm caused by nonindigeous aquatic organisms demonstrate that it is time to move to a "clean list" approach, in which the United States would import only those organisms which evidence indicates will not be harmful. At stake is nothing less than the health of our commercial and recreational fisheries, the growing aquaculture and mariculture industries, and the rivers, lakes and coastal waters of our nation.

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Attachments: Photographs of damage from the Mediterranean clone of Caulerpa taxifolia

List of nonindigenous organisms in the aquarium industry that have been released into U. S. waters

cc: Secretary Dan Glickman

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