

AQUATIC SPECIES IN TRADE ENFORCEMENT

AMFGLEO and
MAFWA Directors

June 27, 2023



-- Lieutenant Conservation Warden Robert Stroess --
Administrator – Aquatic Species in Trade
Enforcement Program

Topics

- Aquatic species in trade industries
- Case summaries
- Balancing sport-related enforcement with commercial-related enforcement
- Working with partner programs/agencies
- AIS-OIT Team
- Forensic auditing



Wisconsin DNR – Aquatic Species in Trade Enforcement Program Administrator Roles . . .

- Oversee LE Effort Towards:
 - Commercial Fishing
 - Lake Michigan
 - Lake Superior
 - Mississippi River
 - Inland Waters
 - Wholesale Fish Dealing
 - Live Fish Haulers
 - Aquatic Invasive Species (pets, food, plant nurseries)
 - Bait Dealers
 - Great Lakes Charters
 - Great Lakes Guides
- 25% Investigations
- Obtain/Manage AIS-OIT Funding
- Provide Training
- Represent Wisconsin DNR on:
 - Joint Management Team of the 12-Party MOU
 - Great Lakes Fishery Commission LE Committee
 - AFWA Invasive Species Committee
- Network with other DNR Programs, States, Provinces, and Federal Agencies
- Finger on the Pulse of these Industries

Commercial Fishing



Wholesale Fish Dealers





Live Fish Transport and Stocking



Ethnic Grocery Stores/Fish Markets



Invasive Species – Pet Industry



Invertebrates | Blue Lobster

THE FISH STORE

\$ 14.99



Invertebrates | Orange Lobster

THE FISH STORE

\$ 14.99



Invertebrates | White Lobster

THE FISH STORE

\$ 14.99



Invasive Species – Live Food



I just wanted to let you know that our Mishicot matbug boil was a huge success for the youth wrestling club. we ordered 750 lbs Live crawfish shipped to Milwaukee on 5-30-14 by Southwest air.

Charter Fishing and Guiding



The aquatic species in trade industries are everywhere!



Case Summaries

- Operation Crusty Crab – Pet Industry Crayfish
 - WI/IL/GLFC– LE Committee
- Li Fish Farm – Asian Carp Distribution
 - WI/IL
- Louisiana Crawfish Company – Red Swamp Crayfish in Food Industry
 - WI/IL/GLFC – LE Committee

Bridging the Gap between Aquatic Invasive Species Staff and Law Enforcement Staff

Pre-2019 Discussions



*Law
Enforcement
Staff*

*Organisms in
Trade Regulatory
Coordinator*

*AIS
Education
Staff*

**ALS-in-trade enforcement has
nothing to do with “weeds on a trailer” . . .**



**. . . yet this is the extent of what many law
enforcement programs do for aquatic invasive
species work.**

But then . . .



Red
swamp
crayfish
complaint

Bighead, silver,
and grass carp
complaint



Case Study: *Operation Crusty Crab* (Industry: Invasive Pets)



Each program had separate thoughts on how to handle this issue.



Law
Enforcement
Staff

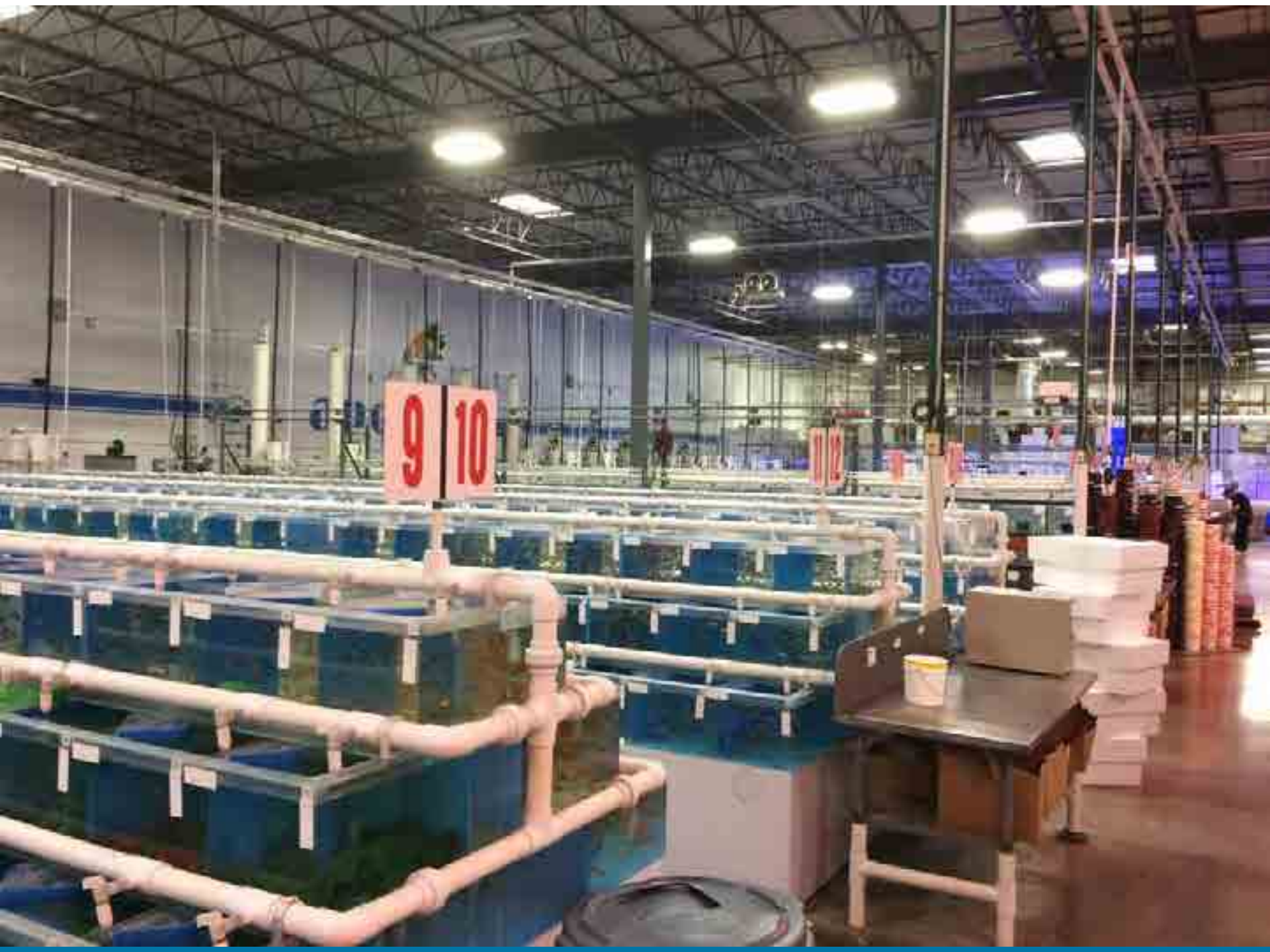
Organisms in
Trade Regulatory
Coordinator

AIS
Education
Staff

*“ Warden **Xxxxxx** continues to work with Invasives Staff addressing concerns associated with an Aquatic Pet store selling prohibited species Red Swamp Crayfish and potentially in possession and selling Malaysian Trumpet Snails. Given the distribution process of this industry to retail outlets, this could evolve into a larger scale issue for the Dept to address in the aquatics trade in terms of AIS.”*

4,544 products later . . . 76 prohibited (including many crayfish)

| | | | |
|-------|-------------------------------|-----------------------|------------|
| F3148 | Crayfish Blue Diminutus Mini | Cambarellus diminutus | Prohibited |
| F3149 | Crayfish Blue Texanus Mini | Cambarellus texanus | Prohibited |
| F3150 | Crayfish Electric Blue | Procambarus alleni | Prohibited |
| F3151 | Crayfish Mexicanus Mini | Procambarus mexicanus | Prohibited |
| F3152 | Crayfish Mexicanus Dwf Orange | Procambarus mexicanus | Prohibited |
| F3153 | Crayfish Neon Red | Procambarus clarkii | Prohibited |
| F3154 | Crayfish Lg | Cambarus bartonii | Prohibited |
| F3156 | Crayfish Sm | Cambarus bartonii | Prohibited |
| F3157 | Crayfish Papua Black Sapphire | Procambarus clarkii | Prohibited |
| F3158 | Crayfish White | Procambarus clarkii | Prohibited |
| F4956 | Lobster Red Crimson | Procambarus clarki | Prohibited |
| F4951 | Crayfish Papua Red Claw | | Prohibited |
| F4959 | Lobster Neon Red | Procambarus clarkii | Prohibited |
| F4944 | Lobster Red Chili | | |
| F4946 | Lobster Aussie Zebra | | |
| F4947 | Lobster Apricot | Cherax holthuisi | |
| F4948 | Lobster Black Tiger | Hymenochirus curtipes | |
| F4950 | Lobster Blue | Procambarus Alleni | |
| F4952 | Lobster Blue (Prawn) | Procambarus alleni | |
| F4953 | Lobster Blue Marble | | |
| F4954 | Lobster Blue Yabbie | | |
| F4955 | Lobster Pink Coral | C. lorentzi cherax sp | |







09

F2165

V140018

OCEAN WHITE TAIL

06

3/16/2024

F2165

OCEAN WHITE TAIL

7 3
3/4



Apet, Inc. Corporate

Crayfish Report

For 3/21/2017 to 3/21/2019

| Date (MM/DD/YY) Inv No. | Cust No. Cust Name/Address | Inv. Line No | Cus Qty Ship | Item No. | Description |
|----------------------------|--|-----------------|-----------------|----------|-------------------|
| 01/18/18 1108318 | PZ247 PET SUPPLIES PLUS 247 2352 LINEVILLE RD. #115 Green Bay, WI 54313 (920)-320-9911 | 3 | 3 | F3153 | Crayfish Neon Red |
| 01/25/18 1109656 | PZ247 PET SUPPLIES PLUS 247 2352 LINEVILLE RD. #115 Green Bay, WI 54313 (920)-320-9911 | 14 | 3 | F3153 | Crayfish Neon Red |
| 02/15/18 1113623 | PZ247 PET SUPPLIES PLUS 247 2352 LINEVILLE RD. #115 Green Bay, WI 54313 (920)-320-9911 | 69 | 4 | F3153 | Crayfish Neon Red |
| 03/01/18 1116353 | PZ247 PET SUPPLIES PLUS 247 2352 LINEVILLE RD. #115 Green Bay, WI 54313 (920)-320-9911 | 58 | 3 | F3153 | Crayfish Neon Red |
| 03/01/18 1116357 | CR211 CRITTERS & TACKLE 211 S. MAIN ST. Necedah, WI 54646 (608)-548-3495 | 17 | 4 | F3153 | Crayfish Neon Red |

Investigative Plan

- Cross-program coordination!!!
- Train LE and AIS staff on crayfish ID
- Pair up LE and AIS staff
- Visit the 23 stores
- Track down the crayfish



Retail Store Visits

- 24 stores visited (found 1 extra)
 - Couldn't explain what happened to 554 of the crayfish
 - Some had live crayfish
 - Some vacuumed up and into wastewater treatment system
 - Numerous staff described “hitchhiker” crayfish
 - One store owner ordered prawns but received crayfish
 - Five more wholesalers id'd
 - Some stores admitted to previously being educated by DNR about invasive crayfish
- *Two stores had previously been investigated by field officers based on individual complaints*



... Retail Store Visits (continued) ...

- Store interviews and invoices showed Apet delivered another 41 AFTER we had visited Apet.
- ~95 more crayfish from other suppliers



AIS Program Internal Documentation

- Lack of documentation
- No centralized system in the program area
- But . . . gold mine!
 - Mary
 - Amy



[This Photo](#) by Unknown Author is licensed under [CC BY-NC-ND](#)

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Daniel L. Meyer, Secretary
Telephone 608-266-2621
Toll Free 1-888-938-7463
TTY Access via relay - 711



December 6, 2017 |

Apet, Inc.
195 Prairie Lake Rd.
East Dundee, IL 60118

REF: Sale of regulated species to Wisconsin retailers

Dear Apet, Inc.,

The Wisconsin Department of Natural Resources (WDNR) is working to prevent the spread of invasive species in Wisconsin through partnerships with businesses, landowners, other agencies and the public. In May of 2015, the Wisconsin Legislature approved and updated the Wisconsin Administrative Code Chapter NR 40 -- *Wisconsin's Invasive Species Identification, Classification, and Control Rule*. This rule mandates consistent statewide regulation of a list of potentially harmful invasive species in order to prevent their introduction and spread. With a few exceptions, the Invasive Species Rule makes it illegal to sell, transport or introduce regulated invasive species in or into the state of Wisconsin.

You are receiving this letter because it has come to our attention that your company has sold *Cabomba caroliniana* (fanwort) and species of crayfish that are not native to Wisconsin (mini Mexican crayfish) to retailers in Wisconsin. *Cabomba caroliniana* and all non-native crayfish are **Prohibited** and cannot be sold, transferred or transported within our state. Please make the necessary adjustments so that these

Instructions: Bold fields must be completed. Only one location per sheet. Record multiple visits for one location.

Record the Location and Address/Web Address, County/Region, Location Contact (Name/Information/Phone), if possible, record Latitude and Longitude (in decimal degrees).

| Location Name | Address/Web address | County/Region | Latitude | Longitude | Location Contact |
|---|---------------------------------|---------------|----------|-----------|---|
| Natural World/ River & Lake Aquarium to Chicago | 107 N Main St. Ford delaware | Ford delaware | | | Sharon Woolhether naturalworldaquarium@yahoo.com |








Record Location Type (pet store, nursery, dealer, website, etc.), Licensed Circle Yes or No, method of contact (describe how the location was initially contacted mail, visit, etc.), Initial Visit date, Initial Visit Collector(s), and Collector Contact Information.

| Location Type | Licensed | Method of Initial Contact | Initial Visit Date | Initial Visit Collector Name(s) | Initial Visit Collector Contact Information |
|---------------|-----------------|---------------------------|--------------------|---------------------------------|---|
| Aquarium | Yes / No | Visit | 7/21/10 | Amy Kretlow | Amy.Kretlow@wigov 608-261-6410 |

Initial Visit: Circle yes or no if location was compliant, education was performed or display material handed out, and if invasive species were found was DNR contacted with-in 4 days of find.

After initial visit (V2 or V3) Date and sign when the action was performed. Circle yes or no if compliant and if DNR was contacted, with-in 4 days of visit.

| (V1) Initial Visit | | After Initial Visit | Date | Name and Contact Information | Compliant | Department Contacted |
|----------------------|-----------------|----------------------------|------|------------------------------|-----------|----------------------|
| Compliant | Yes / No | (V2) First follow-up Visit | | | Yes / No | Yes / No |
| Educated | Yes / No | (V3) Follow up after NOC | | | Yes / No | Yes / No |
| Department Contacted | Yes / No | Snail Sample collected... | | | | |

-  Invasive Aquatic Plants and Their Other Names
-  Make the Right Choice About Elodea
-  Not in our Backyard_ Fish PUB
-  Selected AIS PUB
-  Snail_Crayfish Publication
-  Species Lists and Resources for Pet and Aquarium Stores
-  Wisconsin NR40 Full List. 2015

Prosecution



- ❑ 163 charges
 - ❑ 149 convictions
 - ❑ 14 dismissals (all plea deals)
 - ❑ Citations only to a few businesses (uncooperative; history; egregious)
 - ❑ Many hundreds of warnings
- ❑ \$42,631 in penalties

https://commons.wikimedia.org/wiki/File:Scales_of_Justice_and_Wreath.svg

What we learned from *Operation Crusty Crab* . . .

- AIS in trade is occurring EVERYWHERE
 - LE should have been looking at this industry all along
 - I should have been looking into and educating staff about this industry
- Each agency needs a Point of Contact within LE for AIS in trade
 - LE staff should relay complaints of AIS in trade to Point of Contact
 - Field officer should NOT deal with it by themselves . . . There's a bigger picture here . . . Immediate citation for violation doesn't fix the larger distribution problem.
 - Non-LE staff should be routed to LE Point of Contact
- Communicate across division/program lines
 - Regular, recurring – Not just during a case
 - Remove SILOS!
- Invasive species staff documentation
 - They need to know WHAT to document (visits to stores, educational efforts, people contacted, etc.)
 - LE should teach them
 - They need to store the documentation
- Regulatory programs NEED a counterpart LE program
 - This is a joint effort . . . No SILOS!
 - Cycle is educate, violate, educate, violate, educate . . . And it never ends with some companies.









Case Study:

Li Fish Farm - Asian Carp Distribution

(Industries: Commercial Fish, Wholesale Fish Dealing, Fish Farming, and Invasive Species as Food)





- 7 covert purchases – 19 bighead, grass, and silver carp
- Began surveillance on suspected delivery dates
- Observed deliveries by many Wisconsin-licensed Wholesale Fish Dealers; not matching up to invasive carp deliveries





- Arrival of white van; operated by Ping Li
- Ping Li owned Li Fish Farm and was a licensed WFD
- Delivery of bighead and grass carp; covert officers made contact during delivery
- Immediate call from store manager telling me my order arrived; I was in Florida (for work)
- Investigator came from hours away; purchased fish

