May 23, 2014

John K. Bullard
Regional Administrator
National Marine Fisheries Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

Dear Mr. Bullard:

Shark Advocates International appreciates the opportunity to be represented on the New England Fishery Management Council's Skate Advisory Committee, and to comment on the proposal to issue Exempted Fishing Permits (EFPs) to allow certain commercial fishing vessels to possess and land barndoor skate (*Dipturus laevis*) in order to investigate a "premium market" for seafood products, *inter alia*. In short, we oppose lifting the current prohibited status for this exceptionally vulnerable yet poorly understood species, particularly before its population has been fully rebuilt from previous severe overfishing.

As you are likely aware, the barndoor skate – the largest skate species in the Northwest Atlantic -- is highly vulnerable to overexploitation because of its size as well as its relatively slow growth rate and late maturity. Experts with the International Union for Conservation of Nature (IUCN) Shark Specialist Group, as part of the assessment that led to the species' classification as *Endangered* on the IUCN Red List™, assert that skate body size is a good general predictor of susceptibility to overfishing, and therefore that the barndoor skate is among the most vulnerable of all skate species (Dulvy *et al*. 2000, Dulvy and Reynolds 2002, Frisk *et al.* 2002, Frisk *et al.* 2001).

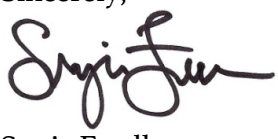
Whereas the ongoing recovery from serious depletion estimated for the barndoor skate off New England is encouraging, the paucity of species-specific catch and discard information with respect to this and other regional skate species (despite much industry encouragement and multiple identification guides) is widely recognized, as are the uncertainties that surround the positive population trends. The IUCN notes that catch-ability of this species may well change over time with skate density, changing gears, and/or technological creep. In addition, more information on the population's age structure is needed to ensure that comparison between current and historic catch rates (on which reference points are based) is reliable, as the growth rate and resilience of a population associated with 1.22 kg of mostly adults per tow would be quite different than that associated with the same catch rate of mostly juveniles.

We also find it highly inadvisable to encourage market demand (and associated political pressure for increased catches) before the population is fully rebuilt and healthy.

For these reasons, we view the proposal to allow landings and promote consumption of highly vulnerable barndoor skates as premature and risk prone, and accordingly encourage its rejection. At the very least, we urge the agency to ensure data accuracy and proper handling by requiring that *any and all* vessels authorized to take barndoor skates have on board an *independent, NOAA-trained observer*, rather than the proposed "technician" to "accompany some of the trips."

Thank you for considering our views.

Sincerely,



Sonja Fordham
President

References:

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