

September 18, 2015



John Bullard
Regional Administrator
NOAA Fisheries Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930-2276

Dear Mr. Bullard:

On behalf of our organizations, we are writing to encourage continued efforts by the United States to ensure that next week's annual meeting of the Northwest Atlantic Fisheries Organization (NAFO) results in more responsible fisheries management for the region's elasmobranchs (sharks, skates, and rays).

Our organizations maintain a special focus on shark, skate, and ray conservation due in large part to the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We are deeply concerned about the precarious status of elasmobranchs caused by a lack of science-based fishing quotas and poor compliance with best practices.

Specifically, we greatly appreciate and urge continuation of US leadership with respect to proposing that NAFO strengthen its ban on shark finning (slicing off a shark's fins and discarding the body at sea) through a requirement that sharks be landed with fins still naturally attached. We also urge the US to continue to actively promote reduction in the 2016 NAFO skate total allowable catch (TAC) to the level advised by the NAFO Scientific Council (5,000t), as well as the establishment of precautionary reference points and management objectives for thorny skate, in particular.

Given the important roles that elasmobranchs play in marine food webs, such actions also serve to support the application of an ecosystem approach as required in the amended NAFO Convention and Article 5 of the United Nations Fish Stocks Agreement.

A Science-Based Skate Quota

We remain seriously concerned about the status and management of thorny skate (*Amblyraja radiata*). This species has been classified by the International Union for Conservation of Nature (IUCN) as *Vulnerable* globally and *Critically Endangered* off the US east coast.

The NAFO Scientific Council has demonstrated that:

- Thorny skates have low resilience to fishing pressure due to low population growth rates;
- The Division 3LNO thorny skate population remains low and has shown little improvement under the NAFO management regime; and
- To improve the chances of recovery, 2016 skate catches should not exceed 5,000t (Div. 3LNO).

As you know, NAFO Parties have repeatedly failed to heed scientific advice for the skate TAC. Given its leadership in skate fishery management and science, the US has an important role to play in negotiation of the TAC, as well as an important responsibility to work to ensure the sustainability of this vulnerable species. Moreover, adherence to scientific advice is at the core of US fisheries policy principles.

An Enforceable Shark Finning Ban

We are pleased that the US has been collaborating with the EU in promoting prohibitions on at-sea shark fin removal at Regional Fishery Management Organizations (RFMOs) around the world. Adoption of this preferred method for finning ban enforcement at NAFO would significantly strengthen this region's only international safeguard for sharks and would underscore the strong precedent for other RFMOs set last year by the North East Atlantic Fisheries Organization (NEAFC). We respectfully urge you continue US efforts to jointly propose and actively promote such a change at NAFO, without exception.

As detailed in the 2010 expert report from the IUCN Shark Specialist Group and the European Elasmobranch Association¹, under such a "fins-attached" policy:

- Enforcement burden is greatly reduced;
- Information on species and quantities of sharks landed is vastly improved; and
- "High-grading" (mixing bodies and fins from different animals) is impossible.

Conclusion

Setting the world's first RFMO TAC for a shark or ray was a major accomplishment for NAFO, and yet we maintain that this limit must be in line with scientific advice in order to ensure population rebuilding and reflect sound principles for fisheries management. We believe active engagement by the US is key to realizing that goal, as it is to strengthening of the NAFO finning ban through best practice enforcement standards.

We are hopeful that, with your leadership, these important steps toward responsible elasmobranch fisheries management will be taken next week.

Thank you for your consideration.

Sincerely,



Sonja Fordham
President
Shark Advocates International



Ali Hood
Director of Conservation
Shark Trust



Ania Budziak
Associate Director, Science and Policy
Project AWARE

¹ Fowler, S. and Séret, B. 2010. *Shark fins in Europe: Implications for reforming the EU finning ban*. European Elasmobranch Association and IUCN Shark Specialist Group.