

September 12, 2016

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 elasmobranch 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 elasmobranch populations caused by a lack of science-based fishing quotas and poor compliance with best practices.

Specifically, we urge the US to play a lead role in efforts to secure at the 2016 NAFO annual meeting:

- **Reduction in the skate total allowable catch to no more than the level advised by scientists;**
- **Precautionary reference points and management objectives for thorny skate;**
- **Improved data with respect to shark bycatch;**
- **A prohibition on retention of vulnerable deepsea sharks, particularly the Greenland shark; and**
- **A stronger ban on shark finning (slicing off a shark's fins and discarding the body at sea).**

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
- The 2017 skate catches should not exceed 4,700t (Div. 3LNO), to improve the chances of recovery.

As you know, NAFO Parties have repeatedly failed to heed scientific advice for the skate Total Allowable Catch (TAC). Given its leadership in skate fishery management and science, the US has an important role to play in negotiation of the TAC. Moreover, adherence to scientific advice is at the core of US fisheries policy principles. It seems clear that precautionary reference points and management objectives are not only warranted for skates, but also may be key to getting long-awaited recovery on track and ensuring the sustainability of associated fisheries.

Protection for Deepsea Sharks

As you are likely aware, deepsea sharks are exceptionally slow-growing and therefore susceptible to overexploitation; around the world, there are numerous examples of serious population depletion from overfishing. Last month, scientists estimated that Greenland sharks (*Somniosus microcephalus*) mature at 150 years of age and may live nearly 400 years, leading to widespread conservation concern. This species, and smaller deepsea sharks, are taken as bycatch in NAFO fisheries, yet data on catches and discards are lacking. We are hopeful that the recent exciting, broadly communicated news about the Greenland shark will spark interest in a precautionary prohibition on fishing and/or landing at least this incredibly long-lived species, along with greater commitment to improving needed information on incidental catches of all deepsea sharks.

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 best practice 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 in 2014 by the North East Atlantic Fisheries Organization.

Numerous experts have demonstrated that, under such a "fins-attached" policy:

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

We respectfully urge you to continue US efforts to jointly propose and actively promote such a change for NAFO, without exception.

Conclusion

Setting the world's first RFMO elasmobranch TAC for 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 safeguarding other biologically vulnerable species and to strengthening the NAFO finning ban.

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, Programs
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Katie Schleit
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