



15 September 2011

Maria Damanaki
 European Commissioner
 Maritime Affairs & Fisheries
 European Commission
 B - 1049 Brussels

Dear Ms. Damanaki:

On behalf of our organizations, we are writing to encourage European Union (EU) support for science-based limits on threatened thorny skates at next week's annual meeting of the Northwest Atlantic Fisheries Organization (NAFO). Specifically, we urge the European Commission to work to secure a reduction in the NAFO thorny skate (Division 3LNO) total allowable catch (TAC) from 12,000 metric tons (t) to no more than the level recommended by the NAFO Scientific Council (5,000t).

We are seriously concerned about the status and management of thorny skate (*Amblyraja radiata*), classified by the IUCN as *Vulnerable* globally and *Critically Endangered* off the U.S. east coast. Whereas setting the world's first Regional Fishery Management Organization TAC for a shark or ray was a major accomplishment for NAFO, we maintain that this limit must be in line with scientific advice in order for it to be effective in rebuilding the population.

In the report from their June 2011 meeting, the NAFO Scientific Council states that:

- thorny skates have very low reproductive capacity due to slow growth and few offspring
- the Division 3LNO thorny skate population is still at a low level despite several years of reduced fishing mortality
- to promote recovery, 2012 skate catches should not exceed 5000 t in NAFO Division 3LNO
- the EU-Spain Division 3NO index has been declining since 2006
- there is no indication of healthy, robust recruitment into the population
- thorny skate density in Division 3LNO is still predominately on the southern Grand Bank while, historically, thorny skate had been widely distributed throughout the Grand Bank.

As you may recall, NAFO Parties failed to heed similar skate advice at the 2010 annual meeting and instead pledged to adopt measures in line with the Scientific Council recommendations in 2011.

Given that Spain is the main player in the NAFO thorny skate fishery, the EU has a key role in negotiation of the TAC as well as an important responsibility to work to ensure sustainable fisheries for this vulnerable species. Moreover, adherence to scientific advice is integral to the European *Community Plan of Action for Sharks* and Article 4 of the Commission's proposal for the reform of the Common Fisheries Policy, both of which we strongly support.

Thank you for your consideration. We look forward to hearing about the outcomes of the meeting.

Sincerely,



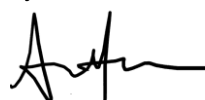
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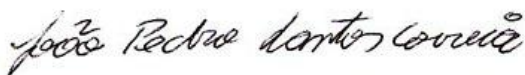
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