



HUMANE SOCIETY  
INTERNATIONAL

September 16, 2011



**TRAFFIC**  
the wildlife trade monitoring network



Dean Swanson  
Chief, International Fisheries Division  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, Maryland 20910

Dear Mr. Swanson:

On behalf of our organizations, we are writing to encourage the United States government to propose and actively promote, as a matter of priority, elasmobranch conservation action by the Northwest Atlantic Fisheries Organization (NAFO) at next week's annual meeting in Halifax. Specifically, we urge the US NAFO delegation to work to secure a reduction in the NAFO thorny skate total allowable catch (TAC) from 12,000 metric tonnes (t) to no more than the level recommended by the NAFO Scientific Council (5,000t) and to propose strengthening the NAFO ban on shark finning by replacing the fin-to-carass weight ratio limit with the requirement that sharks be landed with their fins still naturally attached.

### **Skate TAC**

We are seriously concerned about the status and management of thorny skate (*Amblyraja radiata*). This species has been classified by IUCN as *Vulnerable* globally and *Critically Endangered* off the U.S. east coast, and is the subject of two Endangered Species Act listing proposals filed last month.

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 5000t in 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 predominantly on the southern Grand Bank while, historically, thorny skate had been widely distributed throughout the Grand Bank.

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

The establishment of the world's first Regional Fishery Management Organization (RFMO) TAC for a shark or ray was a major accomplishment for the United States and NAFO. Nevertheless, we maintain that this limit must be in line with scientific advice in order to rebuild the population and set a sound precedent for other RFMOs.

## Shark Finning Ban

As you are aware, the National Marine Fisheries Service 2008 regulations banning at-sea shark fin removal and the Shark Conservation Act of 2010 have positioned the US as a leader in use of the most reliable method for finning ban enforcement: requiring that sharks are landed with all fins still naturally attached. The Shark Conservation Act also brings commitments to encourage other countries to adopt this best practice. In short, under a "fins-naturally-attached" policy:

- The enforcement burden is greatly reduced
- Information on species and quantities of sharks landed is vastly improved
- High-grading is impossible, and
- The value of the finished product can be increased.

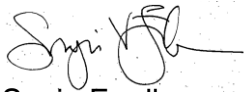
We strongly support US efforts to amend in this manner the finning ban in place under the International Commission for Conservation of Atlantic Tunas (ICCAT), and believe that, although NAFO vessels land fewer sharks than those engaged in ICCAT fisheries, such a proposal (to prohibit at-sea shark fin removal) at this year's NAFO meeting would be timely, wholly appropriate, meaningful, and contribute greatly to global efforts to control shark finning.

## Conclusion

Our organizations are deeply grateful for the US government's continuing interest in securing elasmobranch data collection and conservation requirements through NAFO. We are hopeful that, with your leadership, these two groundbreaking steps can be taken next week in Halifax.

Thank you for your consideration.

Sincerely,



Sonja Fordham  
President  
Shark Advocates International



Jenny Miller Garmendia  
Executive Director  
Project AWARE Foundation



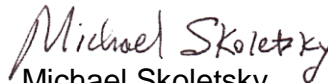
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cc: Deirdre Warner-Kramer, US Department of State