

June 20, 2014

Tobey Curtis
National Marine Fisheries Service
Fishery Policy Analyst
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930



Dear Mr. Curtis:

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 proposed rule for Framework Adjustment 2 to the Northeast Skate Complex Fishery Management Plan (FMP), which would:

- reduce skate catch limits for the 2014 & 2015 fishing years to prevent overfishing, and
- modify reporting requirements to improve species-specific skate catch data.

Skate Catch Limits

We strongly support reducing the Acceptable Biological Catch (ABC) for skates by *at least* the 30% level proposed by NMFS and recommended by the Council's Scientific and Statistical Committee (SSC), in order to address (primarily) overfishing of winter skate. We take this opportunity to urge NMFS leadership in ensuring that the Council promptly takes additional action to end overfishing of thorny skates, which has continued despite the prohibition on retention – and to rebuild this severely depleted population.

Catch Reporting Requirements

As you know, despite much industry encouragement and multiple identification guides, the vast majority of skate landings in the Northeast U.S. continue to be recorded as “unclassified skate,” which hampers population assessment and effective fisheries management. We have long been dismayed by this significant failing with respect to the Skate FMP goal of species-specific skate catch information. As discussed in the last Skate Advisory Committee meeting, we therefore strongly support the proposed removal of the “unclassified skate” reporting option for both vessels and dealers.

We oppose, however, the proposed removal of rosette, smooth, and little skates as wing fishery reporting options. While we recognize that these species currently do not reach a marketable size for this fishery, we stress the rather obvious point that markets can and often do change. In addition, climate change may well affect skate distribution, perhaps resulting in a shift of Mid-Atlantic skates northward. We also view accurate identification and reporting of skates (and other fish) to the species level as a key responsibility associated with the privilege of fishing public resources. Certainly, ample resources for achieving these goals have been provided for many years. For these reasons, we urge NMFS to include all seven skate species as reporting options, and to address any discrepancies, errors, and/or illegal landings directly, as they arise.

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While we appreciate that NMFS port sampling data reveal that winter and little skates dominate the wing and bait fisheries, respectively, we feel that mechanisms for detecting unusual and/or illegal landings, even if rare, are key to responsibly managing this fishery.

To underpin improved management on all fronts, we strongly support expansion of NMFS outreach, education, and catch monitoring programs associated with skate fisheries.

Thank you for considering our views. We look forward to working with NMFS and the Council toward continued skate fishery management improvement.

Sincerely,



Sonja Fordham
President