

May 23, 2016

Rachael Wadsworth
National Marine Fisheries Service
West Coast Region Long Beach Office
501 West Ocean Boulevard, Suite 4200
Long Beach, CA 90802



Dear Ms. Wadsworth:

On behalf of our organizations, we appreciate this opportunity to comment on the National Marine Fisheries Service (NMFS) proposed rule to implement the 2015 Resolution on Mobulid Rays (Manta and Devil Rays of the subfamily Mobulinae) adopted by the Inter-American Tropical Tuna Commission (IATTC).

Our organizations maintain a special focus on shark and ray conservation due in large part to these species' inherent susceptibility to overexploitation. We are particularly concerned about the precarious status of mobulid rays, given the lack of fishing limits coupled with the exceptionally low reproductive potential (usually just one pup every one to three years) that leaves these species among the oceans' most vulnerable. As such, along with our partners, we actively promoted adoption of IATTC *Resolution C-15-04 on the Conservation of Mobulid Rays*, and appreciate the proposal for timely implementation with respect to U.S. commercial vessels fishing in the IATTC Convention Area.

Specifically, we strongly support the measures proposed by NMFS to:

- prohibit any part or whole carcass of a mobulid ray caught by U.S. vessels owners or operators in the IATTC Convention Area from being retained on board, transshipped, landed, stored, sold, or offered for sale; and
- require that the crew, operator, and owner of a U.S. commercial fishing vessel promptly release unharmed, to the extent practicable, any mobulid ray (whether live or dead) caught in the IATTC Convention Area as soon as it is seen in fishing gear or on deck, while following the requirements for release described in the Resolution for any mobulid rays caught alive.

We understand that NMFS may provide exemptions for storing and landing (but not selling or bartering) mobulid rays that are caught but not spotted during observed purse seine fishing operations and inadvertently placed into the vessel hold, provided that the vessel owner or operator shows them (in whole form) to the observer at the point of landing, and promptly turns them over to the responsible government authorities.

We remain concerned about broader exceptions allowed under the Resolution that exempt small scale fisheries from mobulid ray retention bans. We urge the U.S. to work to close these loopholes and otherwise improve mobulid ray protection, data collection, and related capacity building at future meetings of the IATTC.

Thank you for your consideration.

Sincerely,

Handwritten signature of Sonja Fordham in black ink.

Sonja Fordham
President
Shark Advocates International

Handwritten signature of Ania Budziak in black ink.

Ania Budziak
Associate Director, Programs
Project AWARE

Handwritten signature of Ali Hood in black ink.

Ali Hood
Director of Conservation
Shark Trust