



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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Jessica McCawley, Chair | Mel Bell, Vice Chair
Gregg T. Waugh, Executive Director

May 16, 2019
LN#: 201901

Alan Risenhoover, Director of the Office of Sustainable Fisheries
NOAA Fisheries Headquarters
1315 East-West Highway
Silver Spring, MD 20910

RE: Concern over the impact of large coastal sharks on fisheries managed by the South Atlantic Fishery Management Council

Dear Mr. Risenhoover,

At the December 2018 and March 2019 meetings, the South Atlantic Fishery Management Council (Council) discussed ongoing public comments consistently expressed by recreational and commercial fishermen from throughout the South Atlantic Region regarding increasing negative interactions with several large coastal shark (LCS) species. The LCS species that have been of particular focus are bull, blacktip, silky, lemon, spinner, tiger, sandbar, and dusky sharks. The Council's Snapper Grouper Advisory Panel have also discussed negative interactions with scalloped hammerhead, smooth hammerhead, great hammerhead, and great white sharks. Cumulatively, these shark species are causing devastating consequences for many fishermen using hook and line, spear, bottom longline, and trawl gear in the South Atlantic Region and are seemingly producing notable negative impacts to the conservation of Council-managed species.

As many LCS species have recoveredⁱ, fishermen are increasingly relying to the Council concerns over expanded mortality of Council-managed species, particularly in regards to snapper grouper and coastal migratory pelagic species, that is occurring due to LCS species consuming hooked fish before they can be boated or upon being released. It has been noted that there are observed changes in shark behavior involving increased instances of targeted circling or lurking around fishing and dive vessels that result in predation on hooked or speared fish and damage to gear. Gear damage has been particularly noted in the shrimp fishery when sharks destroy the tail-bag of trawl nets while attempting to feed on the contents of the net. In addition to the notable negative economic implications and frustration from losing marketable or desired target species as well as damage to fishing tackle and gear, there is apprehension over the additional mortality being caused by LCS species. These concerns largely center around negative impacts

to the long-term sustainability and conservation of Council-managed species due to increasing shark predation.

While we recognize and appreciate that NOAA Highly Migratory Species (HMS) must abide by provisions within the Magnuson-Stevens Fishery Conservation and Management Act and agreements under the International Commission for the Conservation of Atlantic Tunas in regards to the conservation of federally-managed LCS species, the Council strongly shares the above-stated concerns. In addition, it appears that HMS has noted an increase in shark predation as well with the recent regulatory changes to the size limits for yellowfin and bigeye tuna to accommodate the possession of shark-damaged tunasⁱⁱ.

There is a clear need to develop a better balance between the conservation of sharks and other federally managed species. Overall, improved coordination between the councils, HMS, the science centers, and the public is necessary to help better understand the magnitude of this emerging issue and achieve solutions. One potential avenue to pursue is more of an ecosystem approach to fisheries management in the region that accounts for both HMS and Council-managed species, particularly in regards to predator-prey interactions and how increasing shark predation may be affecting other federally-managed stocks.

Additionally, based on anecdotal information that the Council has received from fishermen, predation on other federally-managed species from sharks can noticeably decrease after sharks are commercially targeted in an area. While many LCS species are seeing improvements in abundance through successful management by HMS, the Aggregated Large Coastal Sharks (ALCS) commercial quota is not being met in the Atlantic Regionⁱⁱⁱ. Step-ups in the retention limit throughout the year, as seen in July and November of 2018 are welcomed; however, we ask that HMS continues to work to allow commercial fishermen to better fulfill the ALCS quota so as to potentially minimize incidences of LCS consuming Council-managed species or damaging fishing gear. Also, the Council and HMS could work together to time step-ups in retention limits for LCS to coincide with regional peak fishing effort of Council-managed fisheries that are being negatively affected by LCS interactions, such as those for snapper grouper and coastal migratory pelagic species, to help address mortality caused by LCS consuming these species while hooked or after being released. Finally, the Council suggests a review of the prohibition on recreational harvest of silky sharks. It is our understanding that recreational harvest of silky sharks was closed due to apprehensions regarding misidentification of the species with other ridgeback sharks (sandbar and dusky) rather than concerns directly related to the conservation of silky sharks. Removal of this prohibition could help alleviate overprotection of one of the sharks species that are of concern in relation to increased predation on Council-managed species.

The Council appreciates the opportunity to provide our comments and express our concern over the ever growing number of negative interactions with LCS species in Council-managed fisheries. We would like to request that HMS staff attend a future Council meeting to provide a presentation on efforts to increase access to ALCS quota, the potential to increase and improve stock assessments to better track the recovery of LCS species, and discuss potential solutions for moving forward with improved coordination in management of relevant HMS and Council-managed species. We look forward to continuing to work with HMS in the future to help implement actions with mutually beneficial outcomes for our managed fisheries. If further

information or follow-up to this letter is desired, please do not hesitate to contact Gregg Waugh, Executive Director of the South Atlantic Fishery Management Council.

Sincerely,



Jessica McCawley
Council Chair

cc: SAFMC Members & Staff
Sam Rauch, NMFS Office of the Assistant Administrator
Monica Smit-Brunello, NOAA GC
John McGovern and Rick DeVictor, NMFS SERO
Clay Porch, Theo Brainerd, & Peter Thompson, SEFSC Miami
Erik Williams, SEFSC Beaufort

ⁱ Peterson, C.D., C.N. Belcher, D.M. Bethea, W.B. Driggers III, B.S. Frazier, R.J. Latour. 2017. *Preliminary recovery of coastal sharks in the south-east United States*. Fish and Fisheries. 18(5): 845-859.

ⁱⁱ Atlantic Highly Migratory Species; Atlantic Bluefin Tuna and Northern Albacore Tuna Quotas; Atlantic Bigeye and Yellowfin Tuna Size Limit Regulations, Vol. 83, No 197 (October 11, 2018), Federal Register: The Daily Journal of the United States. Web. 19 April 2019. <https://www.govinfo.gov/content/pkg/FR-2018-10-11/pdf/2018-22034.pdf>

ⁱⁱⁱ NOAA HMS. 2018 *Atlantic Shark Commercial Fishery Landings Retention Limit Update*. Available at: <https://www.fisheries.noaa.gov/atlantic-highly-migratory-species/2018-atlantic-shark-commercial-fishery-landings-and-retention>