



February 5, 2025

John Carmichael, Executive Director
South Atlantic Fisheries Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: Comments on Snapper Grouper Amendment 56, Black Sea Bass Catch Levels and Management Measures

Dear Mr. Carmichael,

Thank you for the opportunity to provide comments on the proposed amendment to black sea bass catch levels and management measures.

The International Fund for Animal Welfare (IFAW) is a global nonprofit helping animals and people thrive together. We work across the world to rescue, rehabilitate, and release animals, and protect their natural habitats. Our Marine Mammal Rescue (MMR) team, located on Cape Cod, is a world leader in marine stranding response. Our MMR experts provide on-the-ground expertise in marine mammal necropsy, managing the critically endangered North Atlantic right whale necropsy database to evaluate causes of mortality. IFAW-led research revealed that between 2003 and 2018, nearly 90% of determinable right whale deaths were caused by vessel strikes and entanglement. Realizing the need for long term solutions, IFAW's campaign to protect and save North Atlantic right whales seeks out collaborative, pragmatic solutions that bring together diverse stakeholders in pursuit of meaningful change on the water. It is with this collective experience that we advocate for stronger protective measures for this critically endangered species.

IFAW strongly supports the allowance of on-demand fishing gear in closed areas, including in the seasonal closures to nearshore areas for on-demand black sea bass pots. On-demand fishing gear is a proven solution that protects marine mammals, including the critically endangered North Atlantic right whale and the iconic Humpback whale, among other species, from entanglement, while allowing fishers the ability to harvest year-round. The black sea bass fishery intersects with the right whale's migratory path and calving and nursery grounds. Entanglement in vertical rope used in trap and pot fishing is the leading cause of mortality and serious injury to this species. On-demand fishing gear eliminates vertical rope until the moment of retrieval, reducing the risk of entanglement, while supporting the continued livelihoods of fishermen affected by closures. Allowing and promoting the use of on-demand fishing gear in areas seasonally closed to trap and pot fishing will help to increase exposure to and adoption of alternative gear, to protect North Atlantic right whales when they are present in the region.

We want to thank the South Atlantic Fisheries Management Council for the care and attention you are giving to the conservation of this species. Allowing the use of on-demand fishing gear in closed areas in Amendment 56 provides an important opportunity to steward innovation and conservation leadership toward a better future for right whales, fishermen and our coastal economy. IFAW scientists and experts would be pleased to engage with you and your staff in whatever ways would be helpful.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Reilly".

Greg Reilly
Southeast Marine Campaigner, IFAW Marine Campaigns