

October 22, 2015

Russell Smith
Deputy Assistant Secretary for International Fisheries
National Oceanic and Atmospheric Administration
Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230



Dear Mr. Smith:

We greatly appreciate the work of the Presidential Task Force on IUU fishing and Seafood Fraud and are pleased that sharks have been included in the draft list of “at-risk” species. We write in hopes of clarifying that the term “shark” is defined in this context as it has been in multiple international policy arenas and fundamental documents, most notably, the United Nations Food and Agriculture Organization (FAO) International Plan of Action (IPOA) for the Conservation and Management of Sharks: *“taken to include all species of sharks, skates, rays and chimaeras (Class Chondrichthyes).”*

To underscore comments made at the recent ICCAT Advisory Committee meeting, skates, sawfish, and other rays of Superorder Batoidea (Subclass Elasmobranchii) fit the relevant criteria for “at-risk species” in that:

- Rays have accounted for more than half of global chondrichthyan landings over the past four decades;
- A recent FAO report¹ stresses the strong yet often overlooked presence of rays in global markets for chondrichthyan meat and fins;
- Most fishing for rays is unregulated, and related commerce is poorly monitored;
- Aggregation of elasmobranch landings data and the lack of differentiation of products in trade allows for species substitutions and product mislabeling for both rays and sharks;
- US trade (imports + exports) in rays were on par with that of sharks in 2014 (4.7 million kg vs. 4.9 million kg);
- NOAA reports the value of US ray trade in 2014 at more than \$15 million (compared to \$22 million for sharks);
- Various rays yield high value products, such as gill plates and fins that can sell for hundreds of dollars/kg;
- Some of the most valuable “shark fins” come from the world’s most threatened elasmobranchs: sawfish, guitarfish, and wedgetfish;
- Species identification is a significant challenge in ray fisheries and trade, and there are many more species of rays than sharks.

As you know, rays share sharks’ inherent vulnerability to overfishing. In fact, the most threatened chondrichthyan families are made up of rays². We believe that both sharks and rays would benefit from inclusion in the at-risk species list, and that separating them would be problematic and inconsistent with many international standards. As such, we are hopeful for clarification that the final version of this list reflect the FAO IPOA definition of “shark.”

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonja Fordham".

Sonja Fordham
Shark Advocates International

A handwritten signature in black ink, appearing to read "Ania Budziak".

Ania Budziak
Project AWARE

¹ Dent, F. & Clarke, S. 2015. State of the global market for shark products. FAO Technical Paper No. 590. Rome, FAO.

² Dulvy, *et al.* 2014. Extinction risk and conservation of the world’s sharks and rays. *eLife*, 2014;3:e00590 [online].