

April 22, 2014

Marin Hawk  
FMP Coordinator  
Atlantic States Marine Fisheries Commission  
1050 N. Highland Street  
Suite 200 A-N  
Arlington, VA 22201



Dear Marin:

Thank you for taking the time to address our questions and concerns about Atlantic state and Atlantic State Marine Fisheries Commission (ASMFC) spiny dogfish regulations with respect to finning (slicing off a shark's fins and discarding the body at sea).

As mentioned, it has recently come to our attention that at least one Atlantic state (Maryland) has maintained a 5% fin to carcass ratio as the method for enforcing the ban on finning spiny dogfish. Pursuant to the Shark Conservation Act (SCA), the National Marine Fisheries Service (NMFS) has revised federal spiny dogfish regulations to reflect the best practice for finning ban enforcement: requiring that sharks be landed with fins still naturally attached. Any state measures still allowing spiny dogfish fins to be removed at sea would therefore be in conflict with federal rules for this species.

We recall and appreciate the Commissioners' desire to ensure state and federal shark finning rules are consistent. We stress that the SCA text that suggests exceptions to the fins-attached standard refers to smooth but not spiny dogfish.

**Accordingly, we request that the ASMFC and individual states take immediate steps to ensure that at-sea removal of spiny dogfish fins is prohibited (i.e. replace any remaining fin-to-carcass ratio limits with requirements that spiny dogfish sharks be landed with fins still naturally attached).**

We take this opportunity to reiterate that spiny dogfish fins, while not preferred, do have value for use in shark fin soup, and do enter international trade in substantial quantities. While there is little incentive for widespread finning of dogfish, we strongly support the consistent use of best practices across jurisdictions to ensure proper enforcement and to safeguard all shark species from the wasteful practice of finning.

We thank you and the ASMFC Shark Board for considering our views. We look forward to learning more about this situation in other states and how inconsistencies might be remedied.

Sincerely,

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

Sonja Fordham  
President