



Society for Conservation Biology

Commissioners of the Florida Fish and Wildlife Conservation Commission
620 S Meridian Street
Tallahassee, FL 32399

Dear Chair Rivard, Vice Chair Spottswood, and Commissioners Kellam, Lester, Nicklaus, Rood, and Sole,

On behalf of the Marine Section of the Society for Conservation Biology (SCB), and the North America section of SCB we are writing you to ask that you consider adopting the following suggestions into proposed new FWC regulations governing land-based shark fishing in the state of Florida.

There is increasing scientific recognition that recreational angling activities can be a significant conservation threat to imperiled species. Over the last several years, more large (non-dogfish) sharks in U.S. waters have been killed by recreational anglers than by commercial shark fishermen, according to NOAA's State of US Fisheries report. Research published by Florida shark researcher Austin Gallagher has shown that species like hammerhead sharks are extremely vulnerable to physiological stress associated with long fight times, and often die even if released if they are fought for too long. And research conducted at the University of Miami by SCB-Marine Board Member David Shiffman showed that many common land-based shark fishing practices in Florida, including overly long fight times, rough handling practices, and removal from the water, raise serious conservation concerns.

This is a serious issue that affects the survival and recovery of threatened species in Florida waters, and we were glad to see that FWC is taking steps to address it. Your decision at the April 25th meeting to consider new regulations is a welcome one. The revised regulations should include the following considerations to reflect the best available science:

- All prohibited shark species should be required to be kept in deep enough water that their gills remain at least partially submerged at all times during handling.
- Fight times must be limited, particularly for physiological vulnerable species like hammerhead sharks—explicitly require that the line be cut after a certain amount of time has passed.
- Removing all categories for prohibited shark species from Florida fishing tournaments (it's already illegal to land them or to delay their release to measure or pose for a photograph).
- FWC law enforcement must consider photos and videos showing violations that are posted to social media as evidence of violations during investigations.
- Certain gear requirements, including higher-powered rods that can reduce fight time and circle hooks that reduce gut-hooking, should be considered.

Regulations like these would go a long way towards protecting species of conservation concern in Florida waters, and they would not infringe on the rights of rule-following anglers. Florida has a reputation as a leader in shark conservation regulations, and taking these steps can help ensure that this reputation continues. Thank you for your consideration of this important issue.

SCB is an international professional organization whose mission is to advance the science and practice of conserving the Earth's biological diversity, support the dissemination of conservation science, and increase the application of science to management and policy. Numbering in the thousands worldwide, the Society's membership comprises of a wide range of people interested in the conservation and study of biological ecosystems, including but not limited to, resource managers, educators, government and private conservation workers, and students. SCB, through its membership, is capable of engaging diverse constituents and providing many resources necessary for a positive change towards sustainability, from developing new applied methods and techniques for conservation, to advocacy efforts, to science and conservation education.

Sincerely,

Kathryn Matthews, Ph.D.
President, Marine Section, Society for Conservation Biology