

May 31, 2007

Todd Willens
Deputy Assistant Secretary
Fish and Wildlife and Parks
Department of the Interior
1849 C Street, N.W.
Washington DC 20240



Dear Mr. Willens:

On behalf of our organizations, we are writing to express our grave concern for the fate of sound proposals to list sharks and sawfish under the Convention on International Trade in Endangered Species (CITES). We urge the US to safeguard sharks and the nation's solid conservation record by supporting the European Union's proposals to list spiny dogfish and porbeagle sharks under Appendix II, and to resist attempts by Australia to weaken the US proposal to include all sawfish on Appendix I. We have commented previously on the merits and urgency of the proposals; we aim here to address misconceptions about North Atlantic dogfish and porbeagle management and the "health" of Australian sawfish populations.



The US Atlantic fishery for spiny dogfish is neither under control nor restricted to bycatch.

US projections and FAO conclusions for Northwest Atlantic spiny dogfish assume catches will remain at the low, bycatch levels taken just prior to the last assessment. Atlantic states have since raised their quota to 50% above the federal limit and have ramped up trip limits 500% to allow targeted fishing. Landings skyrocketed from 1,637,790 to 6,230,636 pounds (156% of the federal quota) over the last two years. Virginia's catch increased 1000 times in one year. A full 7% of the current quota was taken just this month, compared to 1% at this time last year. By curbing exports, CITES listing offers a much needed backstop to prevent further depletion of this population and other under-protected, increasingly targeted dogfish stocks around the world.



EU management of these species is moving in the right direction and under increasing scrutiny.

We share your concern over the lacking EU shark limits. It is important to recognize, however, that spiny dogfish are subject to EU quotas that have been reduced steadily and substantially in recent years. Although a Commission proposal for an EU porbeagle limit was rejected last year by the Council of Ministers, we are hopeful that such a quota will be established this December and that dogfish limits will be further reduced. The Shark Alliance, a new conservation coalition with 36 members, is focused on improving EU shark fisheries management with particular emphasis on these species. We welcome your assistance in this effort.



All the world's sawfish are *Critically Endangered* and warrant strong, consistent action by CITES.

As you know, sawfish are among the most vulnerable ocean animals. Australian populations may be further from the brink of extinction than others, but they are still considered *Critically Endangered* by the IUCN and qualify for CITES strongest protection. Exceptions for trade in live specimens from Australia would create loopholes that could seriously undermine this urgently needed protection. We therefore find Australian proposals to weaken or downgrade the US proposal unacceptable. We pledge our support in defending the original US sawfish proposal and urge you to stand firm on this critical initiative.



Thank you for considering our views.



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Ocean Conservancy

Rebecca Regnery
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cc: William Hogarth, US Department of Commerce; David Balton, US Department of State