

CAPE COD COMMERCIAL  
**FISHERMEN'S  
ALLIANCE**

Small Boats. Big Ideas.

May 4, 2022

U.S. Fish and Wildlife Service  
Public Comments Processing  
Attn: Docket No. FWS-HQ-IA-2021-0008  
MS: PRB (JAO/3W)  
5275 Leesburg Pike; MS: BPHC;  
Falls Church, VA 22041

Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>

Re: Docket No. FWS-HQ-IA-2021-0008; Opposition to adding spiny dogfish (*Squalus acanthias*) and winter skate (*Leucoraja ocellata*) to CITES

Dear Sir/Madam:

Cape Cod Commercial Fishermen's Alliance submits the following comments in opposition to adding spiny dogfish (*Squalus acanthias*) to Appendix I or II and/or winter skate (*Leucoraja ocellata*) to Appendix I at the 19th Meeting of the Conference of the Parties ("CoP19") to the Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES").

Cape Cod Commercial Fishermen's Alliance is a member-based, nonprofit organization that works to build lasting solutions to protect our ecosystem and the future of our fisheries. Fishermen's Alliance represents 150 fishing businesses and more than 300 fishing families, making our organization the leading voice for commercial fishermen on Cape Cod. We are deeply invested in the scientific assessments and public policies that impact our communities.

The following comments are made in response to the April 26, 2022 [Notice](#) by the U.S. Fish and Wildlife Service ("Service") inviting the public to provide information and recommendations concerning proposed amendments to the CITES Appendices (species proposals) that the United States might submit for consideration at CoP19.

Our members have been involved in the spiny dogfish and winter skate fisheries for decades and have a unique perspective of these fisheries. Both the spiny dogfish and winter skate fisheries are prime examples of successful wild-caught fisheries that are not overfished, overfishing is not occurring and the fisheries are sustainably managed in compliance with the 10 National Standards of the *Magnuson-Stevens Fishery Conservation and Management Act*. (16 U.S.C. §§ 1801 et seq.). Neither spiny dogfish nor winter skate fit CITES criteria of being species "that are affected by trade and are now, or potentially may become, threatened with extinction." See NOAA Fisheries <https://www.fishwatch.gov/profiles/atlantic-spiny-dogfish> and <https://www.fishwatch.gov/profiles/winter-skate>.

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1566 Main Street, Chatham, MA 02633 (508) 945-2432 [info@capecodfishermen.org](mailto:info@capecodfishermen.org) [www.capecodfishermen.org](http://www.capecodfishermen.org)

In federal waters, the spiny dogfish fishery is managed jointly by the Mid-Atlantic and New England Fishery Management Councils under a single fishery management plan. In state waters, the spiny dogfish fishery is managed by the Atlantic States Marine Fisheries Commission under an interstate fishery management plan that complements the federal plan. In federal waters, the winter skate fishery is managed by the New England Fishery Management Council as part of the Northeast Skate Complex Fishery Management Plan ("Skate FMP"). In state waters, the winter skate fishery is managed by individual states with plans that complement the Skate FMP.

Additionally, both the spiny dogfish and winter skate fisheries are considered sustainable by the Marine Stewardship Council. <https://fisheries.msc.org/en/fisheries/us-atlantic-spiny-dogfish-winter-skate-and-little-skate/@@view>

Cape Cod Commercial Fishermen's Alliance greatly appreciates the opportunity to provide these comments to the Service. We respectfully request that you take these comments into full consideration and not submit a proposal to list either spiny dogfish or winter skate in the CITES Appendices at CoP19.

Sincerely,

A handwritten signature in black ink, appearing to read "John Pappalardo". The signature is fluid and cursive, written over a white background.

John Pappalardo  
CEO

