



February 20, 2019

Chair Bo Rivard
Florida Fish and Wildlife Conservation Commission
Farris Bryant Building
620 S. Meridian St.
Tallahassee, FL 32399-1600

Dear Commissioner Rivard:

Having read the proposed rules for “shore-based shark fishing,” I am writing to again express the gratitude of the diving industry for your leadership in addressing the issues raised to the FWC by DEMA in April and December 2018. I am asking you to consider two additional rules, as are other citizens concerned with land-based shark fishing.

As you know, sharks are an apex predator and are necessary to maintaining the health of Florida reefs and oceans. Divers are excited to encounter living sharks, and many seek opportunities to dive and observe these creatures. Doing so has engendered in divers the need to protect sharks from activities that are detrimental to these predators; overfishing, shark finning (killing the shark by removing its fins and dumping it back in the ocean alive), and unnecessary landings on the shore for the purpose of photographing or measuring by those who illegally bring these animals out of the water.

The diving industry and DEMA support the rules proposed for prohibiting the landing of sharks, the suggested rules for permits, and the requirement for a Commission-approved education program covering the rules of shore-based shark fishing prior to a permit being issued. We also support the use of special equipment during shore-based shark fishing, particularly the requirement of using non-stainless-steel circle hooks and the fisher having in their possession cutting gear, as outlined in the proposed 68-44.006 3(a) and (b). However, DEMA strongly suggests that the proposed language in section (3) (b) be changed to read (insert underlined text):

(b) Cutting devices. A person targeting or harvesting sharks from Florida Waters must have in his or her possession at least one device capable of quickly cutting either the leader or the hook used. A person catching but not retaining a shark must use such cutting device to quickly remove as much tackle and fishing gear as possible in order to release the shark immediately without unnecessary harm, and without allowing the shark’s gills to be removed from the water.

This suggested language is supported by FWC data, which indicates that releasing by cutting the line or the hook may have fewer consequences for the health of the fish. Please see this page: <https://myfwc.com/research/saltwater/fish/snook/reduce-catch-release-mortality/>.

An additional area remains of concern; as many fishers are using public beaches for their shore-based shark fishing activities, we also strongly suggest the need to include regulations that ban land-based shark fishing within 100 yards of designated public bathing beaches. A ban of any [spear fishing](#) activities within 100 yards of public bathing beaches already exists, and the scope of this ban should include hook and line fishing as well.

Commissioner Rivard, thank you again for your leadership on this issue. Florida remains one of the top diving destinations in the world, and we appreciate your help in keeping it that way. We hope you will continue to support actions that protect the aquatic environment and the animals that make recreational diving one of the top attractions in Florida.

Thank you for your consideration of this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ingram", with a stylized flourish at the end.

Tom Ingram
President and CEO

cc: Eric Sutton, Executive Director, Florida Fish & Wildlife Conservation Commission
Bob L. Harris, Esq., Tallahassee
DEMA Board of Directors



December 11, 2018

Chair Bo Rivard
Florida Fish and Wildlife Conservation Commission
Farris Bryant Building
620 S. Meridian St.
Tallahassee, FL 32399-1600

Dear Commissioner Rivard:

Having read the proposed rules for “shore-based shark fishing,” I am writing to express the gratitude of the diving industry for your leadership in addressing the issues raised by DEMA in April of this year to the FWC, and I am asking you to include an additional rule.

As you are aware, the Diving Equipment and Marketing Association (DEMA) is the international trade association for the recreational scuba diving and snorkeling industry. DEMA has more than 1,400 business members worldwide, more than 300 of which are located in Florida. DEMA represents the interests of diving manufacturers, diver training organizations, the diving-related magazines and media, diving retailers and dive travel and dive charter operators, as well as diving consumers. We are very proud that Florida is home to thousands of certified scuba divers, with thousands more traveling to Florida each year to enjoy its coastal resources. DEMA also produces the annual DEMA trade show which is held in Orlando every other year. DEMA Show brings more than 10,000 diving professionals to the state to conduct business, and many stay after the four-day event to dive in Florida’s ocean, gulf and fresh water springs. DEMA’s mission is to bring businesses together to grow the diving industry worldwide, and our goals include promoting recreational scuba diving and snorkeling, while at the same time protecting the underwater environment and its countless marine species.

Sharks are an apex predator and are necessary to maintaining the health of Florida reefs and oceans. Divers are excited to encounter living sharks, and many seek opportunities to dive and observe these creatures. Doing so has engendered in divers the need to protect sharks from activities that are detrimental to these predators; overfishing, shark finning (killing the shark by removing its fins and dumping it back in the ocean alive), and unnecessary landings on the shore for the purpose of photographing or measuring by those who illegally bring these animals out of the water.

The rules proposed for prohibiting the landing of sharks and the use of special equipment during shore-based shark fishing are helpful and the diving industry supports them. We also support the requirement for a Commission-approved education program covering the rules of shore-based shark fishing prior to a permit being issued.

An additional area remains of concern; as many fishers are using public beaches for their shore-based shark fishing activities, we also strongly suggest the need to include regulations that ban land-based shark fishing in the vicinity of designated public bathing beaches. Such a ban already exists for any [spear fishing](#) activities within 100 yards of public bathing beaches, and the scope of this ban should include hook and line fishing as well.

Commissioner Rivard, thank you for your leadership on this issue. Florida is one of the top destinations in the world for diving tourists, and we certainly want to keep it that way. We hope you will continue to support actions that protect the aquatic environment and the animals that make recreational diving one of the top attractions in Florida.

Thank you for your consideration of this issue.

Sincerely,

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Tom Ingram
President and CEO

cc: Eric Sutton, Executive Director, Florida Fish & Wildlife Conservation Commission
Bob L. Harris, Esq., Tallahassee
DEMA Board of Directors



April 23, 2018

Chair Bo Rivard
Florida Fish and Wildlife Conservation Commission
Farris Bryant Building
620 S. Meridian St.
Tallahassee, FL 32399-1600

Dear Commissioner Rivard:

I am writing to express great concern on behalf of Florida's recreational diving community over the actions taken by a small group of fishers in the state of Florida, who recklessly endanger protected species of sharks by deliberately targeting, and illegally landing them.

The Diving Equipment and Marketing Association (DEMA) is the international trade association for the recreational scuba diving and snorkeling industry. DEMA has more than 1,400 business members worldwide, more than 300 of which are located in Florida. DEMA represents the interests of diving manufacturers, diver training organizations, the diving-related magazines and media, diving retailers and dive travel and dive charter operators, as well as diving consumers. We are very proud that Florida is home to thousands of certified scuba divers, with thousands more traveling to Florida each year to enjoy its coastal resources. DEMA also produces the annual DEMA trade show which is held in Orlando every other year. DEMA Show brings more than 10,000 diving professionals to the state to conduct business, and many stay after the four-day event to dive in Florida's ocean, gulf and fresh water springs. DEMA's mission is to bring businesses together to grow the diving industry worldwide, and our goals include promoting recreational scuba diving and snorkeling, while at the same time protecting the underwater environment and its countless marine species.

Sharks are an apex predator and are necessary to maintaining the health of Florida reefs and oceans. Divers are excited to encounter living sharks, and many seek opportunities to dive and observe these creatures. Doing so has engendered in divers the need to protect sharks from activities that are detrimental to these predators; overfishing, shark finning (killing the shark by removing its fins and dumping it back in the ocean alive), and unnecessary landings on the shore for the purpose of photographing, measuring, and self-aggrandizing those who illegally bring these animals out of the water.

While we know that fishing for some species of sharks is not prohibited in Florida, landing and possessing many of the species that are caught by these various "land-based shark fishing" (LBSF) groups, is not legal, according to **68B-44.008 Prohibited Species; Prohibition of Harvest, Landing, and Sale of the [Florida Salt Water Fishing Regulations](#)**.

Respectfully, we ask the FWC to consider the need for strong enforcement of established and useful regulations that prohibit the landing of sharks by groups and individuals engaged in land-based shark fishing activities. As many of these fishers are using public beaches for their activities, we also strongly suggest the need to include regulations that ban land-based shark fishing in the vicinity of designated public bathing beaches. Such a ban already exists for any [spear fishing](#) activities within 100 yards of public bathing beaches, and the scope of this ban should include hook and line fishing as well.

Commissioner Rivard, the Florida Fish and Wildlife Commission (FWC) is the agency charged with regulating the fishing community and DEMA has encouraged all members of the Florida diving community to contact the FWC and demand that everything within the limits of the law be done to enforce the fishing regulations already designed to protect sharks in the future, including punishing these specific individuals by suspending or revoking their Florida fishing privileges.

Thank you for your leadership on this issue. Florida is one of the top destinations in the world for diving tourists, and we certainly want to keep it that way. We hope you will continue to support actions that protect the aquatic environment and the animals that make recreational diving one of the top attractions in Florida.

Thank you for your consideration of this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ingram", with a stylized flourish at the end.

Tom Ingram
President and CEO

cc: Governor Rick Scott
Eric Sutton, Executive Director, Florida Fish & Wildlife Conservation Commission
Bob L. Harris, Esq., Tallahassee
DEMA Board of Directors