



March 26, 2021

Rodney Barreto
Chair
Florida Fish and Wildlife
Conservation Commission
620 South Meridian Street
Tallahassee, FL 32399-1600

Re: Shark Feeding in Draft Environmental Impact Statement for Florida Keys National Marine Sanctuary: A Restoration Blueprint.

Dear Commissioner Barreto,

I am writing on behalf of the Diving Equipment and Marketing Association (DEMA)¹, as well as the hundreds of dive-related businesses and the millions of divers in Florida and throughout the United States regarding the current Fish and Wildlife Commission effort to use the Florida Keys National Marine Sanctuary Restoration Blueprint to create a prohibition on divers feeding sharks to observe or photograph them in federal waters near Florida, while allowing the same feeding activity by fishers to attract sharks for the purpose of harvesting them.

This unnecessary FWC effort appears to be designed to prevent thousands of divers each year from actively and [safely engaging in observing sharks to gain a better understanding of this creature](#). Research by independent and credible scientists indicates that “provisioning ecotourism” – introducing small amounts of food in the water to interest sharks for the purpose of observation – does NOT create an increased risk for non-divers and swimmers not directly engaged in provisioning ecotourism activities and does no harm to the sharks.

DEMA has [previously reached out to you and other members of the Florida Fish and Wildlife Commission](#) through public comments during FWC meetings and by letter, providing FWC staff and commissioners with access to the peer-reviewed research, and requesting that this unnecessary action be stopped. We have also reached out to the Superintendent of the Florida Keys National Marine Sanctuary and provided public comments on this unnecessary prohibition. By prohibiting shark feeding for essentially all purposes except harvesting (killing) them, this ill-considered effort will have a detrimental impact on consumers and the shark population in Florida and elsewhere in the U.S. It will also have a detrimental effect on businesses that serve the recreational diving industry, including dive operators, vessels used to transport customers to diving locations, Florida hotels, restaurants, and other transportation services.

¹ DEMA is a non-profit trade association representing the business and consumer interests of the recreational scuba and snorkel diving industries. DEMA’s mission is to bring businesses together to grow the diving industry worldwide, and we are actively engaged in promoting recreational diving of all kinds throughout the US and globally. Inherent in this mission is an ongoing effort to create public awareness of the need to protect the marine environment and marine life, acknowledging that diving depends upon sustainable interaction with the marine environment for its very existence.

While seeming to ignore the peer-reviewed science by proposing to restrict divers from participating in provisioning ecotourism, FWC also seems to be promoting the opinion, often voiced by fishers, that “there are too many sharks,” ignoring the science that sharks are overfished, in support of measures that allow continual harvesting in Florida and in federal waters off Florida, despite the evidence that this is detrimental to the sharks and the ecosystem they support.

In a [recent article appearing in National Geographic Magazine](#), research is presented that oceanic shark and ray populations have collapsed by 70 percent over the last 50 years. We ask you to [review this and other data as part of your ongoing work](#) to protect these marine animals and to reconsider any actions that prohibit divers from participating in provisioning ecotourism, which creates dive industry “shark ambassadors,” while at the same time permitting inappropriate harvesting of shark populations under these enormous population declines.

As we have said repeatedly, I again offer FWC DEMA’s assistance with this issue. We hope you will listen to and respect the science that divers and provisioning ecotourism are not what is wrong with the shark issue in Florida and in federal waters, and we implore you to understand that these animals require continuing protection from harvest.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Tom Ingram", with a stylized, flowing script.

Tom Ingram
President and CEO
tom@dema.org

cc: The Honorable Ron DeSantis, Governor of Florida
The Florida Fish and Wildlife Commission
Eric Sutton, Executive Director, FWC.
Bob L. Harris, Esq., Governmental Consultant, DEMA