



November 3, 2025

Representative Chrstine P. Barber, House Chair
Senator Rebecca L. Rausch, Senate Chair
Joint Committee on Environment & Natural Resources
State House, Room 167 and Room 215
Boston, MA 0233

Dear Chair Barber, Chair Rausch, and members of the Joint Committee on Environment and Natural Resources:

Thank you for the opportunity to provide written testimony in strong support of H.898, *An Act to end the taking of horseshoe crabs for bait*.

With 160,000 members and supporters, Mass Audubon is the largest nature-based conservation organization in New England. We protect wildlife, conserve and restore resilient land, advocate for impactful environmental policies, offer nationally recognized education programs for adults and children, and provide opportunities to experience the outdoors.

Mass Audubon also partners with the state Division of Marine Fisheries (DMF) as it works to assess and manage the horseshoe crab fishery. At our own expense, we provide 50% of the spawning survey data that DMF's regulators rely on to manage the fishery, and we have held this partnership for over 20 years. We see very low numbers of horseshoe crabs continuing at sites where they are not protected from harvest, especially in Cape Cod Bay.

The Horseshoe Crab Bait Fishery

In Massachusetts, horseshoe crabs are caught and sold as bait to harvesters of whelk (a type of edible marine snail sold for human consumption in Japan and Europe). This practice disproportionately targets spawning females and keeps horseshoe crab populations low. DMF classifies the whelk fishery as "depleted and overfished, with overfishing continuing".

In 2025, DMF set harvest limits of horseshoe crabs for bait at 140,000 individuals. We are killing hundreds of thousands of these prehistoric creatures in order to prop up a dying and unsustainable industry while alternative baits are available, including the invasive green crab.

Horseshoe Crabs are a species with Global Impact

Horseshoe crabs are a keystone species in our coastal ecosystems, as well as with migratory shorebirds making hemispheric migrations. Horseshoe crab eggs provide an essential food source for long-distance migratory shorebirds such as Red Knots and Short-billed Dowitchers. These birds undertake roundtrip trans-hemispheric migrations up to 30,000 kilometers and rely on critical Massachusetts stopover sites to refuel, ensuring their successful migration and reproduction.

Shorebird populations, especially long-distance migratory shorebirds, are rapidly declining in North America, with some species losing more than 90% of their population in the past four decades (Smith et al. 2023, *Ornithological Applications*). The decline in food resources during migration, such as horseshoe crab eggs, are in part responsible for these observed declines.

These declines have led to the listing of the Red Knot as a federally threatened species, and the categorization of more than a dozen shorebirds as vulnerable or near threatened by the International Union for the Conservation of Nature. At Chatham's Monomoy National Wildlife Refuge, where horseshoe crab harvest is prohibited, Red Knots and other shorebirds still gather to feed on horseshoe crab eggs – something not seen elsewhere in the region. Monomoy shows that harvest closures work. This is the future we can create along our entire coast.

Public Support and Regional Leadership

Last year, Mass Audubon petitioned DMF to ban the harvest of horseshoe crabs during spawning season. More than 3,500 residents weighed in during the regulatory proceedings, far more than any other fishery recommendation the department had made.

The message was clear: Massachusetts residents want stronger protections for horseshoe crabs. New Jersey, Connecticut, and South Carolina have ended bait harvest entirely. In the Delaware Bay, female harvest is prohibited to ensure there are enough eggs for Red Knots. The New York legislature has recently and overwhelmingly passed a complete ban on horseshoe crab harvest.

Bleeding Industry and Synthetic Alternatives

Ending horseshoe crab bait harvest will not harm the biomedical industry. DMF is already working with biomedical companies to secure a supply of crabs separate from the bait fishery. Meanwhile, the industry is transitioning to synthetic endotoxin testing, which eliminates the need for horseshoe crab blood – both biomedical horseshoe crab bleeding firms in Massachusetts already sell their own synthetic versions of the test.

Mass Audubon urges the Committee to report H.898 favorably. Eliminating the outdated, unnecessary, and deeply unpopular bait harvest of this ecologically important and beloved species will put horseshoe crab populations on the path to recovery and free up the regulators to focus on the important biomedical fishery.

This bill reflects sound science, has strong public support, and provides a practical path forward for Massachusetts to lead on coastal conservation. Thank you for your consideration.

Appreciatively,



Sam Anderson
Director of Legislative & Government Affairs