



*Via email submission*

**Director Daniel J. McKiernan**

**Division of Marine Fisheries**

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**Subject:**

**Urgent Opposition to Proposed Increase in Biomedical Horseshoe Crab Harvest Quota**

Dear Director McKiernan and Members of the Division,

On behalf of a group of concerned members of the Horseshoe Crab Recovery Coalition – a coalition of over 55 national and local conservation and healthcare organizations – we are writing to oppose the commonwealth’s proposed increase in the biomedical harvest quota, and to urge the DMF to move expeditiously to end the bait harvest entirely.

While the American Horseshoe Crab has survived 450 million years and multiple mass extinctions, it is has failed to appreciably recover from the catastrophic population collapses of the 1990s. The Division’s current proposal does not reflect a strategy for recovery.

**The Myth of "Sustainable" Bleeding**

The narrative that the biomedical harvest is a "no-kill" industry is a fallacy.

- **Rising Mortality:** With wild-harvest bleeding doubling to over one million crabs annually, according to Atlantic States Marine Fisheries Commission data, the industry's footprint is expanding at an unsustainable rate.
- **The 30 Percent Toll:** Research indicates that up to 30 percent of bled crabs die as a result of the bleeding process or suffer significant sub-lethal effects, impairing their ability to spawn.
- **The "Rent-a-Crab" Loophole:** Massachusetts’ unique program – which routes bait-designated crabs to biomedical bleeding labs first – significantly adds to the scale of the blood harvest and undermines overall conservation goals.

**Sustainable Alternatives Exist**

Massachusetts is home to some of the same companies whose research has proven that we no longer need horseshoe crab blood to ensure patient safety. In effect, the bleeding companies are marketing the animal-derived agent side-by-side with the newer animal-free alternatives. [Synthetic endotoxin tests are recognized by the US Pharmacopeia as equivalent](#) and are currently used in at

least 10 FDA approved medicines including treatments for diabetes, obesity, COVID-19 and other sterile medicines and vaccines. Given the strong biopharmaceutical presence in Massachusetts, the state should be working to accelerate the transition – not give the bleeding industry the freedom to operate with relaxed limits.

### **A Regression in Regional Leadership**

While the neighboring states of Connecticut and New York have taken decisive action to ban horseshoe crab harvesting, Massachusetts is moving in the opposite direction. Increasing the blood-harvest quota by more than 80,000 crabs is not just a regulatory oversight, it is a rejection of modern science and regional conservation trends.

### **Our Recommendation**

The Commonwealth prides itself on conservation and scientific leadership. In the spirit of those ideals, and with regulatory equivalence between horseshoe-crab derived LAL and the newer synthetic alternatives fully established in the US, we urge the Division to withdraw the proposed increase in the biomedical harvest quota and instead prioritize the transition to sustainable synthetic equivalents.

Further, while we understand the intent of the proposed reduction in the number of crabs taken for bait, we believe that conservation interests are best served by moving to eliminate the bait harvest altogether. Anything short of that means that we are continuing to use one depleted species to catch another, thus perpetuating an unsustainable cycle of scarcity.

We also recommend that the Commonwealth actively facilitate research into the use of alternative baits, [including an alternative bait made from parts of invasive green crabs and clams](#). This would help to ease the fishing community's transition away from use of horseshoe crabs, protecting an ancient and iconic species so vital to the health of coastal ecosystems.

Thank you for your attention to this critical conservation matter.

Sincerely,

Undersigned Members of the Horseshoe Crab Recovery Coalition

- American Bird Conservancy
- Center for Biological Diversity
- Coastal Expeditions Foundation
- Delaware Riverkeeper
- Group for the East End
- Maryland Ornithological Society
- National Wildlife Federation
- New Jersey Audubon
- One Hundred Miles
- Revive & Restore
- Save Coastal Wildlife
- Shark River Cleanup Coalition
- Southeastern Massachusetts Pine Barrens Alliance
- Wildlife Restoration Partnerships