

February 25, 2026

Dear Director McKiernan,

We write to express our concern about the Division of Marine Fisheries proposal regarding the allowed take of horseshoe crabs for use as bait in commercial fishing and for the biomedical industry in Massachusetts.



International Conservation Fund
for nature

Board of Directors

Molly Bartlett
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The International Conservation Fund (ICF), which is based in Boston, is focused on protecting biodiversity and endangered species where they are most imperilled, and one of our programs is dedicated to protecting shorebirds. Shorebird populations are currently suffering steep declines at migratory staging sites along the Atlantic coast. Shorebirds, like the Red Knot, have relied on specific flyways for millennia, with their migration paths finely tuned to the rhythm of nature. For a mere 200-gram bird like the Red Knot to navigate a 15,000-kilometer flight, numerous factors must align. Any disruption along these flyways poses a severe threat, potentially leading to a collapse in the population of these incredible birds.

Horseshoe crabs play a foundational role in coastal ecosystems. Their eggs are a vital food source for local shorebirds, and migratory shorebirds such as the federally threatened Red Knot, as well as for numerous marine species of ecological and commercial importance. Horseshoe crabs are on the brink of functional extinction in Massachusetts. **To restore biodiversity along our shores, we must take immediate action to significantly reduce unnecessary mortality—starting with ending their use as bait and for bleeding by the pharmaceutical industry.**

DMF's proposal to reduce the harvest of these crabs for bait from 140,000 to 100,000 may seem like a step in the right direction, but in fact the reduction should instead be a complete ban. Even DMF has acknowledged that there are alternatives that could and should be used in this fishery, such as green crabs and surfclam bellies – resources that would otherwise go to waste.

There should also be no increase in the allowed take of these crabs for the biomedical industry. With widely available, more effective synthetic alternatives accepted by the by the US and European Pharmaceopeias, there is no longer any reason to bleed horseshoe crabs to make assays to test for endotoxin contamination in injected drugs and vaccines. The DMF's proposal to increase take for this industry from 200,000 to 280,000 just makes no sense, particularly as neighboring states such as New York and Connecticut are taking much stronger action to protect this species.

I write to you as a Director of ICF and also as a resident of Gurnet Point, Plymouth.

Sincerely,

A handwritten signature in black ink, appearing to read 'Molly Bartlett'.

Molly Bartlett

internationalconservationfund.org

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