



Atlantic States Marine Fisheries Commission

1050 N. Highland Street • Suite 200A-N • Arlington, VA 22201
703.842.0740 • 703.842.0741 (fax) • www.asafc.org

MEMORANDUM

TO: Horseshoe Crab Plan Development Team
FROM: Horseshoe Crab Technical Committee
DATE: July 25, 2022
SUBJECT: Technical Committee Recommendations to PDT on Best Management Practices for Handling Biomedical Collections

Background

In October 2021, the Board assigned the following task to the Plan Development Team (PDT): review the threshold for biomedical mortality to develop biological based options for the threshold and to develop options for action when the threshold is exceeded; also, review the best management practices (BMPs) for handling biomedical catch and suggest options for updating and implementing BMPs. The PDT tasked the Technical Committee (TC) with reviewing available information to address this task and recommending potential methods for developing biologically based options for the biomedical mortality threshold. They also requested the TC review the BMPs and recommend any updates.

The TC met in July to continue their discussion on the second part of the task relating to the BMPs. At this time, the TC agrees that more information would be needed to make any recommendations for updating the BMPs or potential requirements for biomedical collection practices. **If the Board wishes to pursue modifying the BMPs or considering new requirements, the TC recommends forming a Work Group to collect additional information and develop recommendations.**

Technical Committee Discussion on Biomedical BMPs

At the TC's June meeting, state representatives were requested to provide information on how their state incorporates the BMPs into their permitting process for biomedical collections and facilities. For each of the BMPs listed in the 2011 document, the state TC representatives indicated whether the practice was required by their state, practiced by the industry but not required, not required nor practiced, not applicable, or unknown. The responses varied widely across the states, with some states requiring few if any of the BMPs and others requiring many of them. However, it was noted by many states that the practices in each state vary greatly, and consequently so does the applicability of some of the BMPs. For example, some states do not allow trawling as a biomedical collection method while others do; to address these differences the TC thinks the BMPs could be further grouped by collection method or other relevant categories. Other issues the TC would like to discuss further are BMPs specific to horseshoe crab holding pens and seasonality of biomedical collections.

The TC agreed that a much more in-depth process is needed to review biomedical practices and permitting in each state. The TC recommends the following next steps:

- Form a Work Group comprised of TC representatives from each of the states that permit biomedical collections and/or facilities, as well as Advisory Panel representatives from the biomedical industry.

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- The Work Group should expand on the information collected thus far by the TC. Specifically, it should identify the following:
 - Differences in biomedical practices across the states (from collection to return to sea)
 - Which BMPs are incorporated into practices or not (and why)
 - Which if any of the BMPs are required by the state
 - Enforceability of the BMPs
 - In text references or documents encompassing state permits or agreements with biomedical facilities and/or collectors.
- The Work Group should compile this information into a report including recommendations for potential actions the Board could consider (e.g., recommended changes to the BMPs, recommended coastwide requirements).

The TC believes this process would be beneficial for improving existing BMPs to inform management of the collection of horseshoe crabs for biomedical use by states through permitting or other mechanisms. It could also help identify areas in which mortality and sub-lethal impacts on horseshoe crabs collected for the biomedical industry could be reduced.