

Subject: Request for Scientific Research Exemption to Proposed Bait Deployment Restrictions

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From: dewan@sharkrf.org

To: HearingComments, DNREC (MailBox Resources)

The Shark Research Foundation respectfully urges DNREC to reconsider any blanket prohibition on the use of kayaks, remote-controlled boats, drones, or similar deployment methods when they are used for permitted scientific research, conservation, tagging, sampling, or data collection. While we understand and support the Department's goal of improving public safety and reducing reckless bait deployment, a broad restriction could unintentionally harm legitimate shark research efforts. Researchers often use kayaks or remote-controlled vessels to place bait safely and precisely in areas where target species are already moving, while keeping the line away from swimmers, beachgoers, and other anglers.

For shark research, controlled offshore bait deployment is not simply a convenience; it can be an important animal-welfare and conservation tool. When a shark is hooked closer to the proper strike zone and fought with appropriate conventional tackle, researchers can often reduce excessive fight time, reduce handling time, and release the animal more quickly. Scientific literature and fisheries best practices recognize that capture stress, including elevated physiological stress markers such as lactate and acidosis, can affect post-release survival in sharks. For that reason, responsible research methods should focus on shortening the capture event, minimizing stress, and improving the condition of the shark at release.

We therefore ask DNREC to consider a research, conservation, or permitted-use exemption rather than a total ban. Such an exemption could require prior authorization, proof of research affiliation, safety protocols, gear requirements, and restrictions on time, location, and public-beach conditions. This would allow DNREC to address legitimate safety concerns while still supporting important conservation work, including shark tagging, biological sampling, diet studies, movement tracking, and population-monitoring efforts. Delaware's coastal waters are valuable habitat for sharks, and responsible research helps generate the data needed to protect both marine life and the public.

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