

ACTION ALERT

Speak Up for Horseshoe Crabs!

Dear Leslie,

Now is the time to speak up—before the Massachusetts Division of Marine Fisheries (DMF) sets horseshoe crab quotas for 2026.

DMF's proposal expands biomedical exploitation, maintains bait quotas that exceed actual need, puts Massachusetts out of step with neighboring states, and ignores unresolved concerns about population recovery.

What DMF Is Proposing

DMF proposes to:

- **Reduce the bait quota from 140,000 to 100,000** horseshoe crabs
- **Increase the biomedical quota from 200,000 to 280,000.**

Under Massachusetts' **Rent-A-Crab program**, biomedical companies would also be permitted to **bleed up to 100,000 bait-designated crabs** before they are used as bait.

This is despite DMF's own proposal stating that "the current local bait crab demand approximates 75,000–90,000 horseshoe crabs annually," —an explicit acknowledgment that the proposed bait quota **exceeds actual bait needs**.

Review DMF's proposal and stated rationale: [Public Hearing Proposal on Horseshoe Crab Quota Management](#).

Why This Proposal Is Wrong for Horseshoe Crabs

DMF's proposal would **deliver 80,000 more crabs for bleeding under the biomedical permit.** And, Under the rent-a-crab program—**unique to Massachusetts**—most, if not all, bait-designated crabs would be routed to biomedical companies for bleeding **before they are sold for bait adding an additional 100,000 to the biomedical total.**

This management decision comes at a time when bait demand is declining due to the collapse of the whelk fishery, and biomedical companies are increasingly transitioning to a synthetic alternative to horseshoe crab blood. Rather than using this moment to reduce pressure and rebuild horseshoe crab populations statewide, DMF's proposal moves in the opposite direction—prioritizing private commercial interests over long-term population recovery, ecosystem health, and resilience.

In 2023, DMF capped the biomedical horseshoe crab quota at 200,000 and split that quota evenly between the two existing processors. That decision was intended to prevent a “derby” fishery—a rush to grab as many crabs as possible—and to discourage a third firm from relocating to Massachusetts.

See [**Proposal to Adjust Commercial Horseshoe Crab Limits for 2023.**](#)

What has changed to justify allowing biomedical companies to bleed up to 380,000 horseshoe crabs?

And ultimately, what is driving this decision—science and conservation, or private industry interests?

Whose crabs are these, anyway?

We need to speak up now. Massachusetts is likely to face increased regional pressure following the passage of legislation in New York ending the use of horseshoe crabs for both bait and biomedical purposes—potentially increasing industry demand toward the Commonwealth. Continued harvesting at these levels undermines long-term population recovery, ecosystem function, and the Commonwealth's public trust responsibilities.

It is time for Massachusetts to join New York and Connecticut in conserving horseshoe crabs rather than intensifying their exploitation.

See:

- [**New York Bans Commercial Horseshoe Crab Harvests**](#) Center for Biological Diversity, 2025. “New York has taken bold action to save these ancient creatures and the many other species that depend on them.”
 - [**New Law Aims to Increase Horseshoe Crab Populations**](#) National Audubon Society, 2023. “This law says that we need to take a break and let this species regenerate and get back to a state of good health. I strongly urge our neighboring states to join this growing coalition and enact similar laws to protect the population in their waters,” the Governor added.”
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DMF Public Hearing and Comment Opportunities

1. In-Person Public Hearing

Tuesday, February 24, 2026

6:00–9:00 PM

Admiral’s Hall

[101 Academy Drive](#)

[Buzzards Bay, MA](#)

(Massachusetts Maritime Academy campus)

[DMF Public Hearing Notice](#)

2. Public Hearing Zoom Registration (listen-in only)

Register here: [2026 \(Omnibus\) Public Hearing Webinar Registration Form](#)

Note: A recording will be posted to DMF's YouTube channel on Wednesday, February 25, 2026

3. Written Public Comments

Written public comments accepted through 5:00 PM Friday, February 27, 2026

by email to:

Attention: Daniel McKiernan

Email: dan.mckiernan@mass.gov

Talking Points — Use Any or All (or Write Your Own)

1. **Horseshoe Crabs Are a Public Trust Resource**— Horseshoe crabs are a public trust resource, not a private commodity. Management should prioritize the public interest, ecosystem health, and long-term sustainability—not private commercial convenience.
2. **Horseshoe Crabs Are a Keystone Species**— Horseshoe crabs are a keystone species, supporting migratory shorebirds, fisheries productivity, and coastal ecosystem health. Their decline impacts the coastal food web, harming wildlife and fisheries alike. Protecting horseshoe crabs directly advances Governor Healey’s biodiversity order by safeguarding a species essential to ecosystem resilience and food-web stability.
3. **Removing Crabs from Spawning Beaches Undermines Reproduction**— When a horseshoe crab is removed from a spawning beach before it spawns, there is no guarantee it will successfully reproduce, even if it is later returned during the same spawning season. Disrupting spawning undermines population recovery.
4. **Massachusetts Should End the Use of Horseshoe Crabs**— Massachusetts should end the use of horseshoe crabs for bait. Horseshoe crabs are far too ecologically and medically valuable to be killed for a depleted whelk fishery. Ending the bait fishery would immediately reduce overall mortality, simplify management, and allow the Commonwealth to focus on recovery and conservation.
5. **DMF’s Proposal Expands Exploitation Instead of Reducing It**— The proposed management changes convert bait quota into biomedical take through the Rent-A-Crab program. Rather than reducing pressure on horseshoe crabs, this proposal expands exploitation at a time when conservation should be the priority.
6. **Biomedical Quota Increase**— In 2023, the Massachusetts Division of Marine Fisheries capped the biomedical horseshoe crab quota at 200,000 and split that quota evenly between the two existing processors. Now, DMF is proposing to raise the biomedical quota to 280,000 crabs, plus routing an additional 100,000 bait crabs through the rent-a-crab program. to the bleeding facilities. Ask why!
7. **Horseshoe Crabs Belong to the Public**— These animals are a public resource, not a private supply. Management decisions should prioritize long-term conservation and healthy coastal ecosystems—not expand access for private companies.
8. **Cruelty to Animals**— Some believe horseshoe crabs are incapable of feeling pain, even after repeated bleeding where needles pierce their hearts and 1/3 of their blood is drained. Animal rights organizations such as [Humane World for Animals](#) and [Doctors Against Animal Experiments](#) disagree.

9. **Lack of Transparency Limits Public Oversight**— The so-called “rule of three,” derived from G.L. c. 130, §21, prevents disclosure of fisheries data unless at least three reporting entities are involved. Under the statute, such reports are held “strictly confidential by the director and shall not be disclosed except in compliance with a valid court order.” This policy limits transparency, obscures the true scale and impacts of horseshoe crab harvest and prevents meaningful public oversight of management decisions involving a public resource. We need to ask DMF to evaluate this non-public data as if horseshoe crab recovery were the first priority—and to explain how current harvest levels are consistent with conservation and the Commonwealth’s public trust responsibilities.
10. **Massachusetts Is Falling Behind Neighboring States**— Neighboring states are moving away from horseshoe crab exploitation. New York and Connecticut have taken stronger conservation action. Massachusetts should follow their lead and conserve horseshoe crabs before further declines become irreversible.
11. **There Is a Better Way**— As highlighted by The Boston Globe (Feb. 10, 2026), [Massachusetts wants to bleed more horseshoe crabs. What if there was a better way.](#) "Massachusetts is moving backward." **Synthetic alternatives exist, bait demand is declining, and conservation-first management is achievable—if Massachusetts chooses to lead rather than lag behind,.**

Need help writing your comments?

You're welcome to copy and use the template below to get started—please feel free to personalize it.

If you'd like, you may copy sharl@horseshoecrabs.org.

Dan McKiernan
Director, Massachusetts Division of Marine Fisheries

Dear Director McKiernan,

I am writing as a Massachusetts resident to comment on the Division of Marine Fisheries' current proposal to change horseshoe crab quotas.

Given that DMF's own proposal acknowledges declining bait demand while expanding the number of horseshoe crabs used for biomedical purposes, and that horseshoe crabs have not fully recovered statewide, this is an appropriate moment to end the use of horseshoe crabs for bait and maintain the existing 200,000 biomedical quota, rather than expand overall harvest pressure.

Horseshoe crabs are a public trust resource with critical ecological value, and management decisions should prioritize conservation, transparency, and long-term population recovery.

Thank you for considering my comments.

Sincerely,

[Your Name]

[City or Town, MA]