



8TH MEETING OF THE SPRFMO COMMISSION

Port Vila, Vanuatu, 14 to 18 February 2020

COMM 8 – Report ANNEX 11d HSFG Statement on Proposed Amendment of CMM 03-2019 Bottom Fishing

The HSG would express their deep concern at EU sponsored measure to introduce amendments to CMM 03-2019 to make the bottom fishing framework more precautionary for the protection of VMEs. The proposal seeks to lower the weight thresholds for triggering the VME encounter protocol in any one tow for a single VME indicator taxa (Annex 6A).

The HSG views the current thresholds expressed in the CMM as hyper precautionary, given that:

- Unlike other RFMOs, where selected areas are closed to fishing in a much larger open area, in excess of 99% of the SPRFMO Convention area is closed to bottom fishing ; and
- Within the remaining footprint – despite advice from the Scientific Committee, this commission sought to adopt a more precautionary approach and apply a move on rule to the remaining footprint.
- The current threshold levels, are set by the commission and are not anchored back to clear science on the actual impact on VMEs;
- The current thresholds are out of step with thresholds set in other RFMOs.

By way of examples:

- a) In the North Pacific Fisheries Commission An encounter is triggered by more than 50 kg of live cold water corals being encountered in one gear retrieval in the western part of the area;
- b) In the Northwest Atlantic Fisheries Organisation, an encounter is triggered by the capture of more than 7 kg of sea pens, and/or 60 kg of “other live corals” (the meaning of which is not clear to us), and/or 300 kg of sponges (Article 22.1, page 36). Captures of other VME indicator taxa do not trigger an encounter.
- c) In the North-East Atlantic Fisheries Commission an encounter is triggered more than 30 kg of live coral and/or 400 kg of live sponge “of VME indicators” (the meaning of which is unclear to us) (specified in Article 9a of Rec.19.2014 as amended). Captures of other VME indicator taxa (e.g., sea pens, tube-dwelling anemones, bryozoan patches) do not appear to trigger an encounter;
- d) SEAFO, South East Atlantic Fisheries Organisation: Encounter thresholds - An encounter is triggered (as specified in Article 8 and Annex 6.2 of CM30-15) by:
 - For a trawl tow in an existing fishing area: more than 600 kg of live sponges and/or 60 kg of live coral;
 - For a trawl tow in a new fishing area: more than 400 kg of live sponges and/or 60 kg of live coral;
 - For a longline set i
- e) SIOFA, Southern Indian Ocean Fisheries Agreement: VME Encounter thresholds - An encounter is triggered (as specified in Article 12 of CMM 2019-01) by:
 - For a trawl tow: more than 60 kg of live coral and 300 kg of live sponges in any one tow.



In their comprehensive review, Bell et al. (2018) concluded that the use of closed areas was the most effective management tool for avoiding significant adverse impacts on VMEs.

Similar to most other RFMOs, SPRFMO has a VME encounter protocol based on threshold weights, but this was envisaged as a “backstop” to complement the spatial management approach rather than a primary tool.

The HSG has repeatedly noted its objection to the weight thresholds and overzealous application of the move on rule and notes that should the commission adopt the reduced thresholds proposed by the EU (with the support of Australia), this **will** result in the progressive closure of the few remaining areas open to fishing to the point that the operators may no longer take the risk of sending their vessels to these fishing grounds, which may result in vessels being tied up and job losses.

The HSG respectfully suggests that this outcome will not achieve the purpose of the convention expressed in Article 2 to ensure the long term conservation **and** sustainable use of fishery resources in the convention area.

The HSG members have responded to the measures set out in CMM 03–2019 and have adjusted their fishing practises in order not to trigger the weight or biodiversity thresholds and to minimise impacts on VMEs. By way of an example on the Louisville Ridge (which is some 900km East of New Zealand) one of our member vessels carried out 37 trawls during the 8 days it fished there. The tow duration ranged from six to twenty two minutes, with an average of thirteen minutes actual fishing time on the bottom. Please consider the actual impact of this very short bottom time.

The HSG suggests that it is premature to be proposing to modify the threshold weights, and note the SC’s comment yesterday that there is substantial work that needs to be done to establish the actual impacts including socio economic impacts.

In conclusion, the effect of the implementation of the EU proposal, would be to end bottom fishing on the high seas in the Convention area.

I urge members especially the EU to consider other high seas fisheries where their vessels operate and ask yourselves, whether your industry would be prepared to accept similar limits.

And finally could your vessels operate in your RFMO areas if the thresholds are as low as proposed and biodiversity score were 1 to 5 kgs?

THANK YOU