



11TH ANNUAL MEETING OF THE SPRFMO COMMISSION

Manta, Ecuador, 13 to 17 February 2023

COMM 11 – Report ANNEX 9d

Deep Sea Conservation Coalition's intervention on Bottom Fishing

DSCC Intervention on CMM 03 Bottom Fishing Amendments (Prop 8):

Mr. Chairman and fellow delegates, we are convinced that if those 3 rather uncontroversial precepts were implemented, SPRFMO will do 4 things:

Abandon the efforts to protect only a stated percentage of vulnerable marine ecosystems (VMEs) such as deepwater coral and sponges. This means not only declining to decide to protect only 70%, and for example adopting a higher figure of 80 or 90%, but instead following the UNGA resolutions, applying international law, good science and the precautionary and ecosystem approaches.

Such an approach would also work to protect rare and cryptic species.

Decline to follow the suggestion to investigate Total Allowable Catches to be carried over into later years. This is an effort to boost industry following an annual catch of only 20 tonnes of orange roughy, and would result in intensive pressure on VMEs, and is based on an inappropriate and unlawful intention to 'trade-off' between fishing and environmental protection.

Allied to this, TACs need to be set to sustainable levels. In practical terms, this means adopting the lowest of the catch limits derived from the latest Bmin model for each of the orange roughy stocks set out in SC10 report, including subdividing the catch limit for Louisville Ridge into the three stocks - North, Central, and South.

Assess significant adverse impacts (SAI) on VMEs at the scale of the Encounter Area, and decide that the encounter area remain closed, with the Encounter Area being confirmed as 5 NM from the encounter, consistent with the precautionary approach.

We suggest that the SC should be requested to review all taxa thresholds with a view to ensuring the levels are precautionary, taking into account the current knowledge of catchability, and ensuring that research does not damage VMEs.

For the Salas y Gomez Ridge area SPRFMO should not accept any proposals for exploratory bottom fishing in the area of the two ridges as such activity is likely to irrevocably harm these extremely unique and fragile ecosystems. We suggest that SPRFMO should welcome Chile's biodiversity research proposal.

The DSCC suggests that the Commission takes note of the growing impacts of climate change on the marine environment and request the SC establish an intersessional working group to review existing CMMs and to make recommendations to the Commission, and we welcome the United States paper in this regard.

Finally, with respect to amendment of the bottom fishing measure, we welcome the proposal in paragraph 42 bis to establish a register of areas closed as VME.

In closing, we would be remiss if we did not emphasise that closing all seamounts and similar features in the SPRFMO area to bottom fishing is the desired way forward. It encompasses our obligations under the Convention and obligations to protect biodiversity, implements the ecosystem and precautionary approaches, is aligned with the decision of NAFO to close all seamounts to bottom fishing, and has the support of over 100+ NGOs, and over 80,000 people who have signed a petition to the New Zealand government, calling for this.