



North Pacific Fisheries Commission

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**Observer paper submitted by The Pew Charitable Trusts & The Deep Sea Conservation
Coalition on Behalf of the Undersigned Scientists**

Joint Scientists' Letter to NPFC Members Regarding the Emperor Seamount Chain



February 21, 2025

**Joint scientists' letter to the North Pacific Fisheries Commission in support of a bottom fishing closure
of the Emperor Seamounts**

To the North Pacific Fisheries Commission:

We, the undersigned scientists - from Australia, Canada, Chile, Chinese Taipei, the European Union (Finland, Germany, Italy, Netherlands, Portugal, & Spain), the Republic of Korea, Trinidad and Tobago, the United Kingdom, and the United States of America - are writing RFMOs to take steps for greater protection and conservation of Ecologically or Biologically Significant Marine Areas (EBSA) within their Convention Areas' and management jurisdiction. Collectively, we have spent hundreds of hours investigating the extremely vulnerable marine species, habitats, and ecosystems of the North Pacific Ocean, or of the world's seamounts. As formally recognized by the United Nations Convention on Biological Diversity (CBD)ⁱ and as noted at the 10th CBD Conference of Parties, EBSAs may require enhanced conservation and management measures, as well as cooperation by intergovernmental organizations, to support effective policy action for increased protection and sustainable management.ⁱⁱ

The World Commission on Protected Areas and many others have called for the Emperor Seamounts to receive priority protectionⁱⁱⁱ and based on our experience and our knowledge of the best available scientific evidence, we conclude that:

- vulnerable marine ecosystems (VMEs), comprised of vulnerable habitats and species, including deep sea coral gardens, scleractinian coral reefs, and sponge fields, occur or are likely to occur over most of the NW Hawaiian Ridge and the Emperor Seamount Chain seamounts,^{iv}
- significant adverse impacts on VMEs in the region have occurred and are likely to continue to occur and,^v
- coral ecosystems damaged by bottom fishing can recover over time if protected from such fishing.^{vi}

Given the significant advances in the scientific understanding of the occurrence, vulnerability, and the long-standing impacts of bottom fishing on VMEs in the region, which have accrued over several decades,^{vii} we believe -- at minimum -- a precautionary, temporary closure of all fishing using gear that may contact the seafloor is warranted. Such a closure would allow additional conservation and management measures to be considered and adopted to ensure that bottom fishing does not cause further significant adverse impacts on vulnerable marine ecosystems in the region.

Sincerely,

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ⁱ UN Environment, and Convention on Biological Diversity. "Emperor Seamount Chain and Northern Hawaiian Ridge," August 16,

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ⁱⁱ CBD Secretariat. "Background on the EBSA Process." Ecologically or Biologically Significant Marine Areas (EBSAs). Accessed August 5, 2024.

<https://www.cbd.int/ebsa/about>.

ⁱⁱⁱ IUCN. "IUCN World Commission on Protected Areas 2021-2025." IUCN. Accessed August 5, 2024. <https://iucn.org/our-union/commissions/iucn-world-commission-protected-areas-2021-2025>.

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^v North Pacific Fisheries Commission. 2023.4th Meeting of the Small Scientific Committee on Bottom Fish and Marine Ecosystems Report. Accessed August 19, 2024.

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^{vii} Rogers, A.D., Gianni, M. (2010) The Implementation of UNGA Resolutions 61/105 and 64/72 in the Management of Deep-Sea Fisheries on the High Seas. Report prepared for the Deep-Sea Conservation Coalition. International Programme on the State of the Ocean, London, United Kingdom, 97pp.

^{viii} Signature does not necessarily represent endorsement by former employer, NOAA, or the U.S. government.