



North Pacific Fisheries Commission

NPFC-2026-COM10-OP01

Submitted by the Natural Resources Defense Council

Statement to the 10th Annual Session of the North Pacific Fisheries Commission

Abstract: An observer statement from the Natural Resources Defense Council with recommendations for actions by Members at the upcoming Commission meeting.





The Natural Resources Defense Council's Statement to the 10th Annual Session of the North Pacific Fisheries Commission Osaka, Japan

The Natural Resources Defense Council (NRDC) welcomes the opportunity to participate as a new observer to the 10th Annual Session of the North Pacific Fisheries Commission (NPFC). As this is our first formal attendance at an NPFC meeting, we'd like to take the opportunity to provide participants with information about NRDC and recommendations for members to consider at COM10.

Background on NRDC

Founded in 1970, [NRDC](#) is a non-profit environmental organization headquartered in the United States, with [offices](#) in New York City, Washington, D.C., San Francisco, Santa Monica, Chicago, as well as New Delhi, India and Beijing, China. NRDC is comprised of over 700 scientists, lawyers, and other environmental specialists who work on a broad range of environmental and [ocean conservation](#) issues, including [climate adaptation](#) and [sustainable fisheries](#). NRDC's mission is to safeguard the earth – its people, its plants and animals, and the natural systems on which all life depends. Through our participation in international treaty negotiations and in other policy-focused fora, NRDC works to help ensure strong, durable actions necessary to protect critical marine ecosystems and threatened species, rebuild fisheries, and uplift vulnerable coastal communities. This includes strengthening the current legal regime governing fishing and other human activities on the high seas, and rooting out the human rights abuses and destructive [illegal, unreported, and unregulated fishing](#) practices.

Recommendations for COM10

With respect to the agenda, we urge members to:

[Address overfishing and impacts on the Emperor Seamount Chain & Northwestern Hawaiian Ridge](#)

As noted at the [10th Scientific Committee meeting](#), there continues to be no stock status advice for Splendid Alfonsino (SA) or North Pacific Armorhead (NPA); however, the SSC BF-ME noted that there is a continued high likelihood of growth overfishing occurring and recommended that members reduce harvest rates as much as possible for those respective fisheries. Beyond the health of those stocks, there is strong evidence of significant adverse impacts (SAIs) from bottom fishing on [Koko Guyot](#) which are likely to continue to occur on potential vulnerable marine ecosystems (VMEs) along the Emperor Seamount Chain.

Given these circumstances, **the Commission should temporarily suspend the NPA and SA fisheries** until:

- formal stock assessments are completed;
- recovery plans are established;
- there is evidence that the NPA and SA stocks are firmly on the path to being rebuilt; and,
- comprehensive environmental impact assessments - consistent with the BBNJ Agreement, UNGA resolutions, and relevant provisions of international law - have been conducted and confirm that continuous bottom fishing on the Emperor Seamount Chain is not causing SAIs to VMEs.

[Bolster cooperation with the United Nation's Biodiversity Beyond National Jurisdiction \(BBNJ\) Agreement](#)

We commend the NPFC for proactively discussing the impact of the [BBNJ Agreement](#) at past meetings. While many of the implementation details of the BBNJ Agreement are still being negotiated, the NPFC has an opportunity to share its perspectives and help shape the process. Given the BBNJ Agreement's recent entry into force this past January, the NPFC should specifically:

- **Task the NPFC Secretariat to respond to calls for input by the [interim and future BBNJ Agreement Secretariat](#) and where appropriate, attend relevant BBNJ Agreement meetings;** and,
- **Establish a mechanism to promote and facilitate consultation, cooperation, and collaboration between both organizations on matters of mutual interest** (i.e. memorandum of understanding, resolution).

NATURAL RESOURCES DEFENSE COUNCIL

40 W 20TH STREET | NEW YORK, NY | 10011 | T 212.727.2700 | F 212.727.1773 | NRDC.ORG