



North Pacific Fisheries Commission

NPFC-2026-COM10-OP02

Submitted by the Natural Resources Defense Council, Pew Charitable Trusts & Deep Sea Conservation Coalition on Behalf of the Undersigned Scientists

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

The 122 undersigned scientists from 24 countries - including experts from Members of the North Pacific Fisheries Commission (Canada, China, Chinese Taipei, the European Union, Japan, Korea, and the United States) - reiterate their call for the Commission to take steps towards greater protection of the Emperor Seamount Chain based on the best available science and understanding of the long-term impacts of bottom fishing in the region.

This letter builds upon the version submitted to COM09 ([NPFC-2025-COM09-OP06 Pew Scientists' Letter.pdf](#)), which has since gained more than twice the number of signatories, underscoring the growing scientific consensus on the need for urgent and effective conservation measures for this Ecologically or Biologically Significant Marine Area under the Convention on Biological Diversity.

March 14, 2026

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, Brazil, Canada, Chile, China, Chinese Taipei, Costa Rica, Ecuador, the European Union (Finland, Germany, Ireland, Italy, Netherlands, Portugal, & Spain), Ghana, India, the Republic of Korea, Japan, Mexico, New Zealand, Trinidad and Tobago, the United Kingdom, and the United States of America - are writing to 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 thousands 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)¹ 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.²

The World Commission on Protected Areas and many others have called for the Emperor Seamounts to receive priority protection³ 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,⁴
- significant adverse impacts on VMEs in the region have occurred and are likely to continue to occur and,⁵
- coral ecosystems damaged by bottom fishing can recover over time if protected from such fishing.⁶

Given the significant advances in 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,⁷ 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,

Lailah Gifty Akita, Ph.D.

Senior Lecturer
University of Ghana

Louise Allcock, Ph.D., F.L.S., M.R.I.A.

Professor of Zoology
University of Galway

Diva Amon, Ph.D.

Director and Founder, SpeSeas
Scientific Advisor, Benioff Ocean Science Laboratory, University of California Santa Barbara

Laura Anthony

Researcher
Florida State University

Steven Auscavitch, Ph.D.

Visiting Researcher
Boston University

Peter J. Auster, Ph.D.

Research Professor Emeritus of Marine Sciences
University of Connecticut

Amy Baco-Taylor, Ph.D.

Professor
Florida State University

Maria Baker, Ph.D.

Principal Enterprise Fellow
University of Southampton

Kelsey Archer Barnhill, Ph.D.

Deep Sea Coordinator
Towards International Panel for Ocean Sustainability (IPOS)

Narissa Bax, Ph.D.

Benthic Ecologist
Pinngortitaleriffik, Greenland Institute of Natural Resources

Angelo Bernardino, Ph.D.

Associate Professor of Oceanography
Universidade Federal do Espirito Santo

Melissa Betters, Ph.D.

Biological Researcher
Smithsonian Institution

Virginia Biede, M.Res.

Deep-Sea Ecologist & Ph.D. Candidate
Florida State University

Meri Bilan, Ph.D.

Researcher
Dalhousie University

Angelika Brandt, Ph.D.

Professor
Senckenberg Research Institute and Natural History Museum

Amelia E.H. Bridges, Ph.D.

Postdoctoral Research Fellow
University of Plymouth

Sergio Cambroner

Ph.D. Candidate, Laboratoire d'Océanographie de Villefranche
Associate Researcher, Universidad Nacional, Costa Rica

Stephen Cairns, Ph.D.

Research Zoologist, Emeritus
Smithsonian National Museum of Natural History

Chong Chen, D.Phil

Senior Scientist with Tenure
Japan Agency for Marine-Earth Science and Technology

Jack Chi-Ho IP, Ph.D.

Assistant Professor
Lingnan University, Hong Kong SAR

Joong Ki Choi, Ph.D.

Professor Emeritus
Inha University

Ana Colaço, Ph.D.

Senior Researcher
Okeanos Institute of Marine Sciences, University of the Azores

Erik Cordes, Ph.D.

Professor & Chair in the Department of Biology
Temple University

Andrew J. Davies, Ph.D.

Professor
University of Rhode Island

Jaime Davies, Ph.D.

Senior Lecturer
University of Gibraltar

Isabel De Block

Research Technician
Royal Netherlands Institute for Sea Research (NIOZ)

Rachel Downey, M.Sc.

Deep-sea Taxonomist and Biogeographer
Australian National University

Henrietta Dulai, Ph.D.

Professor
University of Hawai'i at Mānoa

Erin E. Easton, Ph.D.

Assistant Professor
The University of Texas Rio Grande Valley

Elva Escobar Briones, Prof. Ph.D.

Director of Studies and Analysis, CRIPU
Senior Scientist
Instituto de Ciencias del Mar y Limnología UNAM

André Freiwald, Ph.D.

Professor

Senckenberg Society for Nature Research

Alan Friedlander, Ph.D.

Researcher

Hawai'i Institute of Marine Biology, University of Hawai'i at Mānoa

Martina Gaglioti, Ph.D.

Researcher and Educator IUCN Commission on Education and Communication (CEC) & Climate Crisis Commission (CCC)

Large-scale Ecosystem Restoration Section, Society for Ecological Restoration

Patricia Esquete Garrote, Ph.D.

Assistant Researcher

Centro de Estudos do Ambiente e do Mar, Universidade de Aveiro

Samuel Georgian, Ph.D.

Research Fellow

Marine Conservation Institute

Brendan Godley, Ph.D.

Professor of Conservation Science

University of Exeter

Savannah Goode, Ph.D.

Marine Ecologist

Independent Consultant

Fanny Girard, Ph.D.

Assistant Professor

University of Hawai'i at Mānoa

David Gruber, Ph.D.

Distinguished Professor of Biology

City University of New York

Baruch College and the CUNY Graduate Center

Colleen Hansel, Ph.D.

Senior Scientist and Department Chair

Woods Hole Oceanographic Institution

Ellycia Harrould-Kolieb, Ph.D.

University of Melbourne

Vreni Häussermann, Ph.D.

Associate Researcher

Pontifical Catholic University of Valparaíso

Alex Hearn, Ph.D.

Research Professor

Universidad San Francisco de Quito

Santiago Herrera, Ph.D.

F. Hook Associate Professor
Lehigh Oceans Research Center & Department of Biological Sciences, Lehigh University

Hsuan-Ching Ho, Ph.D.

Associate Professor
Department of Aquaculture, National Kaohsiung University of Science and Technology

Jeremy Horowitz, Ph.D.

Postdoctoral Researcher
Smithsonian Institution, National Museum of Natural History

Tammy Horton, Ph.D.

Research Scientist & Discovery Collections Manager
National Oceanography Centre, Southampton, UK

Thomas F. Hourigan, Ph.D. (Retired)⁷

Former Chief Scientist, Deep Sea Coral Research & Technology Program
NOAA Fisheries - Office of Habitat Conservation

Henk-Jan Hoving, Ph.D.

Researcher
GEOMAR Helmholtz Centre for Ocean Research Kiel

Ilysa Iglesias, PhD.

Postdoctoral Research Fellow
Scripps Institution of Oceanography

Soojin Jang, Ph.D.

Founder/Director
Marine Animal Research and Conservation (MARC)

Kristen Johannes, Ph.D.

Project Scientist
Benioff Ocean Science Laboratory, University of California Santa Barbara

Jinho Jung, Ph.D.

Professor
Division of Environmental Science and Ecological Engineering, Korea University

Sean Jungbluth, Ph.D.

Research Professor
San Francisco State University

Laura Kaikkonen, Ph.D.

Senior Research Scientist
Finnish Environment Institute & University of Helsinki, Finland

Christopher Kelley, Ph.D.

Researcher
University of Hawai'i at Mānoa

Brian R.C. Kennedy, Ph.D.

Chief Scientist
Ocean Discovery League

Byung-Yeob Kim, Ph.D.
Professor
College of Ocean Sciences, Jeju National University

Eunhee Kim, Ph.D.
Executive Director
Climate Ocean Research Institute

Mi Yeon Kim, Ph.D.
Vice Director
Marine Animal Research and Conservation (MARC)

Suam Kim, Ph.D.
Professor Emeritus
Pukyong National University

Taewon Kim, Ph.D.
Associate Professor
Department of Ocean Sciences, Inha University

Selvaraj Kumaralingam, Ph.D.
Assistant Professor (Research)
Centre for Ocean Research, Sathyabama Institute of Science and Technology

Elena Kupriyanova, Ph.D.
Research Scientist
Australian Museum, Sydney

Sierra Landreth, M.S.
Graduate Assistant
Florida State University

Dongwoo Lee, Ph.D.
Director
Kilzee Institute

Lisa A. Levin, Ph.D.
Professor Emerita
Scripps Institution of Oceanography, University of California San Diego

Dhugal John Lindsay, Ph.D.
Senior Staff Scientist
Japan Agency for Marine-Earth Science and Technology (JAMSTEC)

Liliana Pardo López, Ph.D.
Senior Research Scientist
Biotechnology Institute
Universidad Nacional Autónoma de México

Jeffrey Marlow, Ph.D.

Assistant Professor
Boston University

Gerrit Meiners
Research Technician
Senckenberg am Meer

Beatriz E. Mejia-Mercado, Ph.D.
Quantitative Ecologist
Florida State University Coastal and Marine Lab

Anna Metaxas, Ph.D.
Killam Professor, Department of Oceanography
Dalhousie University

Rosanna Milligan, Ph.D.
Assistant Professor
Nova Southeastern University

Hyo-Bang Moon, Ph.D.
Professor
Department of Marine Science & Convergence Engineering, Hanyang University

Lance Morgan, Ph.D.
President
Marine Conservation Institute

Beatriz Naranjo Elizondo, B.Sc.
Researcher
Centro de Investigación en Ciencias del Mar y Limnología, Universidad de Costa Rica

Jenny Neuhaus, Ph.D.
Postdoctoral Researcher
Senckenberg Society for Nature Research

Ed Parnell, Ph.D.
Research Oceanographer
Scripps Institution of Oceanography, University of California San Diego

Aaron Pietruszka, Ph.D.
Associate Professor
University of Hawai'i at Mānoa

Covadonga Orejas Saco del Valle, Ph.D.
Senior Researcher
Spanish Institute of Oceanography (IEO-CSIC)

Maria Rakka, Ph.D.
Postdoctoral Fellow
Dalhousie University

Gustavo A. Ramírez, Ph.D.
Assistant Professor

Department of Biological Sciences, California State University, Los Angeles

Marcel Regelous, Ph.D.

Researcher
Universität Erlangen-Nürnberg

James Davis Reimer, Ph.D.

Professor & Head of Department
Faculty of Science, University of the Ryukyus

Lauren N. Rice, Ph.D.

Postdoctoral Researcher
Florida State University

E. Brendan Roark, Ph.D.

Associate Vice President for Research & Professor
Department of Geography, Texas A&M University

J. Murray Roberts, Ph.D.

Professor of Applied Marine Biology & Ecology
University of Edinburgh

Jason Roberts

Associate in Research
Duke University Marine Laboratory

Craig Robertson Ph.D.

Lecturer in Marine Biology
Bangor University

Alex Rogers, Ph.D.

Deputy Director, Strategic Science Programmes and Partnerships
National Oceanography Centre Southampton

Randi D. Rotjan, Ph.D.

Research Associate Professor, Department of Biology and BU Marine Program
Boston University

Sonia J. Rowley, Ph.D.

Assistant Researcher
University of Hawai'i at Mānoa

Javier Sellanes, Ph.D.

Professor
Universidad Católica del Norte

Kathryn E. F. Shamberger, Ph.D.

Associate Professor, Department of Oceanography
Texas A&M University

Kwang-Tsao Shao, Ph.D.

Emeritus Research Fellow/Ex-Acting Director & Executive Officer, Biodiversity Research Center, Academia Sinica
Emeritus Chair Professor, Institute of Marine Biology, National Taiwan Ocean University

John R. Smith Jr, Ph.D.

Oceanographer
University of Hawai'i at Mānoa

Eulogio Soto, PhD.

Director
Centro de Observación y Análisis del Océano Costero (COSTAR), Universidad de Valparaíso

Derek Sowers, Ph.D.

Affiliate Assistant Professor
University of New Hampshire

Heather Spalding, Ph.D.,

Associate Professor, Department of Biology
College of Charleston

Angela Stevenson, Ph.D.

Associate Professor, University of Plymouth
Guest Professor, GEOMAR

Giuseppe Suaria, Ph.D.

Senior Scientist
CNR-ISMAR, Istituto di Scienze Marine

Tracey T. Sutton, Ph.D.

Professor and Director, DEEPEND Research Consortium
Nova Southeastern University

Andrew K. Sweetman, Ph.D.

Professor and Chair of Seafloor Ecology and Biogeochemistry
Scottish Association for Marine Science

Andrew Thaler, Ph.D.

CEO
Blackbeard Biologic: Science and Environmental Advisors

Elin Thomas, Ph.D.

Adjunct Research Fellow
University of Western Australia

Brian Tissot, Ph.D.

Professor Emeritus of Biology
Cal Poly Humboldt

Derek Tittensor, Ph.D.

Professor and Jarislowsky Chair, Department of Biology
Dalhousie University

Dianne M. Tracey, Ph.D.

Scientist Emerita
National Institute of Water and Atmospheric Research

Verena Tunnicliffe, Ph.D.

Professor Emeritus
University of Victoria

Lisette Victorero, Ph.D.

Science Advisor
Deep Sea Conservation Coalition

Beatriz Vinha, Ph.D.

Postdoctoral Researcher
University of Barcelona

Daniel Wagner, Ph.D.

Former Director
Coral Reefs of the High Seas Coalition

Daniel Wangpraseurt, Ph.D.

Associate Researcher
Scripps Institution of Oceanography,
UC San Diego

Les Watling, Ph.D.

Professor Emeritus
University of Hawai'i at Mānoa

Celeste Weidemann

Researcher
University of Rhode Island

Martin White, Ph.D.

Lecturer
University of Galway

Claudia Wienberg, Ph.D.

Senior Researcher
MARUM Center for Marine Environmental Sciences, Universität Bremen

George Wolff, Ph.D.

Emeritus Professor, School of Environmental Sciences
University of Liverpool

Boris Worm, Ph.D.

Killam Research Professor, Department of Biology
Dalhousie University

Ana Belén Yáñez Suárez

Ph.D. Candidate
Memorial University of Newfoundland

Chris Yesson, Ph.D.

Senior Research Fellow
ZSL Institute of Zoology

Chang-Ik Zhang, Ph.D.
Professor Emeritus
Pukyong National University

Citations

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³ 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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⁵ North Pacific Fisheries Commission. 2023.4th Meeting of the Small Scientific Committee on Bottom Fish and Marine Ecosystems Report. Accessed August 19, 2024. <https://www.npfc.int/sites/default/files/2024-02/SSC%20BF-ME04%20report.pdf>; Baco, A.R., Morgan, N.B., Roark, E. B. 2020. Observations of Vulnerable Marine Ecosystems and Significant Adverse Impacts on High Seas Seamounts of the Northwestern Hawaiian Islands and Emperor Seamount Chain. *Marine Policy*. 115: 103834. <https://doi.org/10.1016/j.marpol.2020.103834>; Baco, A.R., et al., 2023. Bottom-contact fisheries disturbance and signs of recovery of precious corals in the Northwestern Hawaiian Islands and Emperor Seamount Chain. *Ecological Indicators*. 148: 110010. <https://doi.org/10.1016/j.ecolind.2023.110010>.

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⁷ 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.

⁸ Signature does not necessarily represent endorsement by former employer, NOAA, or the U.S. government.