



Opening Statement from Seas At Risk and the Deep Sea Conservation Coalition  
to the 39th Annual Meeting of the North-East Atlantic Fisheries Commission

10-13 November 2020

First we were pleased to see that the Heads of State of Iceland, Norway, the UK, Denmark, Spain, France, Portugal, Ireland, the Netherlands and many other EU member states and the President of the European Commission signed The Leader's Pledge to reverse biodiversity loss by 2030 at the UN Biodiversity Summit in September. We would expect to see that this pledge will inform the positions of the Contracting Parties (CPs) concerned regarding the measures adopted for the management of fisheries in the NEAFC Regulatory Area this week. With this in mind we would like to raise the following issues and recommendations:

**Total allowable catches (TACs) set to zero for three deep-sea species**

We urge that NEAFC adopt zero TACs for **orange roughy** and **beaked redfish in the Irminger Sea** consistent with ICES advice. For **roundnose grenadier** however, the 'precautionary' TACs advised by ICES are hardly precautionary in any meaningful sense of the word in our view. Rather we have been calling for a zero TAC on the fishery for roundnose grenadier (RNG) for some time and continue to do so this year for the following reasons: The stock(s) or populations of RNG are depleted; this species is long lived and vulnerable (RNG live to up to 80 years of age); the UN General Assembly resolutions, beginning with UNGA resolution 64/72 (paragraph 119(d)), have committed states to rebuild depleted deep-sea fish stocks; the TACs recommended by ICES and adopted by NEAFC and/or Contracting Parties over the past two years appear to have been substantially higher than actual catches in 2018 and 2019; and last but not least roundnose grenadier in the North Atlantic are listed as critically endangered on the IUCN Red List. At a minimum we recommend suspending the fishery for 2021-2022 and requesting ICES to review all available information and options for management of this fishery and that Contracting Parties adopt management measures consistent with the commitments made under the UNGA resolutions, The Leaders Pledge to reverse the loss of biodiversity and other related commitments and obligations, in particular, the precautionary approach provisions of the 1995 UN Fish Stocks Agreement.

**Past advice from ICES regarding areas where VMEs are known or likely to occur but which haven't been closed or only partially closed by NEAFC**

We appreciated the agreement to review this issue at the conclusion of the five-year review of the bottom fisheries regulation (Recommendation 19:2014) last year. We hope to see further progress

on this at the Annual Meeting this year and that the meeting of PECMAS2 provide recommendations to the Commission. In our view, there are a number of areas which ICES has in the past has advised are likely to contain VMEs – **for example along the Mid-Atlantic Ridge (MAR) and on seamounts**, in particular but not limited to the Josephine Seamount complex – still require action by NEAFC. (A paper has been submitted to the meeting of PECMAS2 on this: PECMAS\_2020-11\_ICES-advice-and-past-NEAFC-closures-not-acted-on.pdf)

### **Deep sea sharks**

Notwithstanding the NEAFC prohibition on targeted fisheries for deep-sea sharks, **urgent progress is required to ensure the conservation of deep-sea sharks** and we hope to see recommendations for management measures to address bycatch of these species from ICES soon. The status of the OSPAR/NEAFC request to ICES regarding the management of impacts on deep-sea sharks is of concern to us as it has been two years now since the request was made. We urge Contracting Parties to provide all relevant information on deep-sea sharks, including information on bycatch by species, area, quantity and dates to ICES to expedite the formulation of recommendations, namely on bycatch avoidance measures.

### **Monitoring compliance with NEAFC area-based management measures for deep-sea fisheries**

The mechanisms NEAFC has put into place to monitor compliance with the area based elements of the NEAFC bottom fisheries measures are amongst the best we've seen established by all of the RFMOs with the legal competence to manage deep-sea fisheries. We urge NEAFC to continue to improve monitoring and specifically to **address evidence of bottom fishing outside of areas where bottom fishing is permitted and the regulation of deep midwater trawl fisheries under the bottom fisheries regulation where the gear is likely to touch the bottom.**

### **Prohibit bottom trawl fishing on seamounts and other submarine features**

We reiterate our recommendation from 2019 that all seamounts should be closed to bottom trawl fishing. Recognizing that isolated seamounts have been designated as VME elements in Recommendation 19:2014, Annex 5 and that bottom trawling on seamounts will likely cause significant adverse impacts on VMEs, NEAFC should prohibit the practice through closing all seamounts and related underwater features to bottom trawling and manage fisheries in these area with static gear on a highly precautionary basis. Scientific information has made it clear that it is not possible to manage bottom trawl fishing on seamounts to prevent significant adverse impacts on VMEs, for example, by use of a move-on rule given that encounters with VMEs are likely to occur again if a vessel moves from one area of a seamount to another in response to the application of the move-on rule. This is in fact the gist of ICES advice in 2012 (ICES 2012 General advice: Review of NEAFC bottom fisheries regulations. Special request, Advice June 2012) which stated that a strategy for the regulation of bottom fisheries in areas of steep slopes, seamounts, and in new fishing areas should require the fishery to demonstrate that it does

not cause adverse impacts on VMEs as opposed to allowing bottom trawl fishing on these features and trying to manage impacts with a move-on rule.

It is worth noting that Chapter 51 *Biological communities on seamounts and other submarine features potentially threatened by disturbance* (pages 15-17) of the UN's 1st World Ocean Assessment published in 2015, stated the following regarding bottom fishing and its impact on seamounts and other submarine features:

*"The documented widespread extent of deep-water trawl fisheries has led to pervasive concern for the conservation of fragile benthic habitats...The vast majority of deep-water fisheries have been carried out unsustainably, or at least without satisfactory assessments of impacts and sustainability. This has led to the serial depletion of dozens of stocks...Severe impacts have been reported for by-catch species, including other fishes... The extent of benthic impacts has been described for local fishing grounds but has not been assessed globally; however, if the impacts of these regional studies are generalized, we can extrapolate that fishing, and in particular deep-water trawling, has caused severe, widespread, long-term destruction of these environments globally."*

*"Deep-sea ecosystems...are now and will increasingly be subjected to multiple stressors from habitat disturbance, pollutants, climate change, acidification and deoxygenation...The scientific understanding of how these stressors may interact to affect marine ecosystems remains particularly poorly developed. For example, the widespread destruction of deep-water benthic communities due to trawling has presumably reduced their ecological and evolutionary resilience as a result of reduced reproductive potential and loss of genetic diversity and ecological connectivity."*

### **Pelagic Stocks**

Finally, we recommend that **ICES Fmsy advice is followed for mackerel, blue whiting and atlanto-scandian herring** and that the NEAFC CPs urgently **develop sharing arrangements that ensure that the scientific advice isn't exceeded.**

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