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**Priorities for SPRFMO deep-water fisheries and deep-sea ecosystems in a
changing science and policy oceanscape**

DSCC / ECO NZ

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Priorities for SPRFMO deep-water fisheries and deep-sea ecosystems in a changing science and policy oceanscape

Observer Paper

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Priorities for SPRFMO deep-water fisheries and deep-sea ecosystems in a changing science and policy oceanscape

Abstract

There have been two decades of global calls for high seas fishing nations and regional fisheries management organisations (RFMOs) to protect vulnerable marine ecosystems (VMEs) from destructive fishing practices, including bottom trawl fishing. There is clear scientific evidence that bottom trawling on seamounts causes significant adverse impacts (SAIs) on VMEs, and that recovery takes decades or centuries to occur (if at all). However, despite Scientific Committee endorsement and Commission adoption of CMM 03-2023, SPRFMO has failed to implement agreed VME protection measures within its bottom fishing footprint.

The DSCC and ECO recommend that the SPRFMO SC:

- Recognises that the available scientific evidence demonstrates that bottom trawling on seamounts causes SAIs as defined under the FAO Deep-Sea Fisheries Guidelines.
- Notes the overwhelming evidence of non recovery of VMEs, including seamounts, from SAIs of bottom trawling.
- Applies the precautionary approach where evidence is incomplete, recognising that the absence of biological data does not reduce the likelihood of SAIs.
- Incorporates the Greenpeace seamount expedition data into its consideration of VME encounters, with immediate recognition of the Greenpeace expedition data relevant to the 2024 VME encounter by a New Zealand vessel, as best available information on the biodiversity present at the site.
- Recommends the closure of all areas to bottom trawling where VMEs are identified as known or likely to occur.
- Recommend that the VME encounter site continues to be closed.
- Prioritises the agreed SC workplan task [2.4.4: Develop a standard to identify a VME eligible to be listed in Annex 9 of CMM03](#) and use the Greenpeace expedition findings from Central Lord Howe and Northwest Challenger to start populating that Annex.

Introduction

The United Nations General Assembly (UNGA) is reviewing progress by States and RFMOs towards implementing measures to address the impacts of bottom fishing on VMEs and the long-term sustainability of deep sea fish stocks. Noting that available scientific evidence demonstrates that bottom trawling on seamounts causes SAls as defined under the FAO Deep-Sea Fisheries Guidelines, and that the overwhelming evidence of non recovery of VMEs, including seamounts, from SAls of bottom trawling, the DSCC is calling on the 2026 UNGA Sustainable Fisheries resolution to call for a phase-out of bottom trawling on seamounts.

SPRFMO is the only RFMO managing deep-sea fisheries that has not yet implemented any proactive VME closures within its bottom fishing footprint. A 2023 SPRFMO conservation and management measure (CMM 03-2025) to protect 70% of modelled VME habitat was agreed by consensus but was never implemented, having been blocked by New Zealand. In addition, the two temporary 'move-on' closures established under the encounter protocol are at risk of being re-opened and bottom trawling resumed.

The UN Bottom Fisheries review is occurring in a context of growing international calls for the protection of seamounts and similar features from destructive fishing practices. Over the past twelve months significant international recommendations have been adopted at:

- **The Convention on Migratory Species (CMS)** - COP Decision 15.61 on Conserving Seamount Ecosystems (See [CMS 2026](#) and Appendix 1 to this paper)
- **The IUCN** - 2025 World Conservation Congress Resolution [8.032 Protecting seamounts and vulnerable marine ecosystems from destructive practices](#) (Appendix 2).¹

The [Third World Ocean Assessment \(WOA III\)](#) (released on 8 June 2026) identifies bottom trawling as “the most significant human activity on continental margins and in canyons”. This builds on the key finding of WOA II (in 2021) that “fishing, especially bottom trawling constitutes the greatest current threat to seamount ecosystems”.

Since 2004, UNGA resolutions, notably resolution 61/105 in 2006, have mandated global action to protect VMEs from destructive fishing. The landmark 61/105 resolution called on States to “take action immediately...and consistent with the precautionary approach and ecosystem approaches, to sustainably manage fish stocks and protect VMEs including seamounts, hydrothermal vents and cold-water corals, from destructive fishing practices.” The FAO 2009 [International Guidelines for the Management of Deep-sea Fisheries in the High Seas](#) (DSF

¹ The CMS COP decision calls on “*Parties, intergovernmental and non-governmental organizations are encouraged to collaborate in the protection of seamount ecosystems from multiple threats, including but not limited to overfishing and destructive fishing practices*” while the IUCN Resolution (8.032) calls for “the protection of seamounts” and to “transition away from bottom trawling on seamounts”.

Guidelines) were developed to ensure measures adopted by States and RFMOs managing deep sea fisheries on the high seas consistent with the UNGA resolutions.

UNGA Bottom Fishing Workshop

At the UN Bottom Fisheries review workshop (July 2026) the [FAO](#) noted that bottom fishing gear damages cold water corals and sponge habitats that support biodiversity hotspots, with recovery timescales of decades to centuries.

“The impacts are real and they are well documented, and it's precisely for this reason that the Deep Sea Fisheries Guidelines were designed to ensure bottom fishing is conducted within a framework that prevents significant adverse impacts.” (Gutierrez N L, [FAO presentation to UN bottom fishing workshop](#))

In conjunction with the UN bottom fishing workshop, scientists presented evidence from global studies demonstrating that bottom trawling causes SAIs ([Victorero and Goode 2026](#); [Baco-Taylor 2026](#)) further underscoring the impact of bottom trawling on VMEs. The conclusions of this work are that:

- SAIs are common on seamounts subject to bottom fishing, with evidence of SAIs at seamounts with sufficient data;
- There is zero evidence (worldwide) of any seamount community recovering or capable of recovering within 20 years (most will take decades if not centuries);
- It is extremely unlikely that bottom trawling can occur on seamounts without causing SAIs on VMEs.

Priorities for the SC on recommendations to prevent SAIs on VMEs

SPRFMO SC should respond to both the scientific evidence presented at the UNGA Bottom Fisheries Workshop (July 2026) and the expectations set down in UNGA resolutions and the International DSF Guidelines, through undertaking the mandated approaches:

1. As set out in [SC13-Obs06](#), SPRFMO SC should advise on necessary steps to populate Annex 9 under paragraph 49 of CMM 03-2025. That paragraph requires the Commission to register identified VMEs and correspondingly update Bottom Trawl Management Areas (BTMAs), ensuring these ecosystems are excluded from areas open to fishing despite the inclusion of this in the revised SC Multi-Annual Workplan ([COMM14-Doc06_rev2, Annex 4a](#)). The research by Greenpeace (Goddard et al 2025b) presented to the SC meeting shows how accepted video criteria which apply the criteria set out in paragraph 42 of the DSF Guidelines (2009) can be used to identify VMEs (Baco *et al* 2023).
See Goddard *et al* (2026b) and Annex 9 from Table 1 (Potential areas that qualify to be included in Annex 9) in [DSCC and ECO SC13-Obs-06](#).

2. SC-SPRFMO must apply the precautionary approach, as is required by the SPRFMO Convention, CMM 03-2025 and the Encounter Review Standard, and the full set of criteria in the International DSF Guidelines to assess SAIs of VME encounters, and where VMEs are identified, and recommend that the encounter area continue to be closed to prevent significant adverse impacts on VMEs.
3. When reviewing encounters, applying [CMM 03-2025](#) and noting that “Each review must include a detailed description of each encounter, an assessment of whether a VME is known or likely to occur within the encounter area, an evaluation to assess if re-opening the encounter area will expose any VMEs to SAIs, and suggested management actions to prevent significant adverse impacts on VMEs,” (para 32), the SC should apply the [Encounter Review Standard](#), the full set of criteria in the FAO DSF Guidelines and the VME identification framework developed by Baco et al. (2023) in order to ensure the prevention of SAIs on VMEs and should recommend that the area to continue to be closed to prevent SAIs on VMEs.²

Recommendations

The DSCC and ECO recommend that the SPRFMO SC:

- Recognises that the available scientific evidence demonstrates that bottom trawling on seamounts causes SAIs as defined under the FAO Deep-Sea Fisheries Guidelines.
- Notes the overwhelming evidence of non recovery of VMEs, including seamounts, from SAIs of bottom trawling.
- Applies the precautionary approach where evidence is incomplete, recognizing that the absence of biological data does not reduce the likelihood of significant adverse impacts.
- Incorporates the Greenpeace seamount expedition data into its consideration of VME encounters, with immediate recognition of the Greenpeace expedition data relevant to the 2024 VME encounter by a New Zealand vessel, as best available information on the biodiversity present at the site.
- Recommends the closure of all areas to bottom trawling where VMEs are identified as known or likely to occur.
- Recommends that the VME encounter site continues to be closed.
- Prioritises the agreed SC workplan task [2.4.4: Develop a standard to identify a VME eligible to be listed in Annex 9 of CMM03](#) and use the Greenpeace expedition findings
- from Central Lord Howe and Northwest Challenger to start populating that Annex.

² The direct evidence provided by Greenpeace shows that “a VME is known or likely to occur within the encounter area.” Images show the “very large/old-individual” (page 22 Baco *et al* 2023) criterion is met. It also shows that there are reef-forming corals present and density thresholds are exceeded. Note that only one criterion needs to be met (page 23 Baco *et al* 2023). Historic fishing effort shows that the area is likely to suffer further damage from bottom trawling, causing cumulative impacts and SAIs.

References

Baco, A. R. *et al* (2023) Towards a scientific community consensus on designating Vulnerable Marine Ecosystems from imagery. PeerJ. 2023. Vol. 11. DOI: 10.7717/peerj.16024
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DSCC-ECO NZ (2025a) Orange roughy implications for SPRFMO. [SC13 - Obs 05](#). 10p.

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DSCC – ECO NZ (2025c) VME Protection in other relevant Organisations. [SC13 - Obs 09](#). 14p.

FAO 2009 [International Guidelines for the Management of Deep Sea Fisheries in the High Seas](#).

Goddard *et al* (2026a) Expedition Report: Vulnerable Marine Ecosystems identified from direct observations within the Central Lord Howe 2024 temporary suspension of bottom fishing VME Encounter Area. Greenpeace SC-14 Obs05 paper.

Goddard *et al* (2026b) Expedition Report: Vulnerable Marine Ecosystems identified from direct observations within the Northwest Challenger Bottom Trawl Management Area. Greenpeace SC-14 Obs paper.

Greenpeace (2026) [Obs 05 Vulnerable Marine Ecosystems identified from direct observations within the Central Lord Howe 2024 temporary suspension of bottom fishing VME encounter area](#)

Gutierrez, N. L. (2026) [FAO presentation to UN bottom fishing workshop](#), July 2026.

IUCN (2025) [Resolution 8.032 Protecting seamounts and vulnerable marine ecosystems from destructive practices](#)

SPRFMO (2026) COMM14 – Report. [ANNEX 4a Scientific Committee Multi-Annual Workplan](#).

Third World Ocean Assessment (2026) [Third World Ocean Assessment \(WOA III\)](#).

Victorero L. and Goode, S. (2026) Bottom Trawling Causes Significant Adverse Impacts: [Evidence from Global Studies](#) DSCC.4p.

Appendix 1: Decisions adopted at the 15th meeting of the Conference of the Parties to the Convention on Migratory Species COP15, March 2026.

[Conserving Seamount Ecosystems](#) (page 28-29)

UNEP/CMS/COP15/Decisions

15.61	Conserving Seamount Ecosystems	Directed to Parties	Parties are requested to: a) prioritize the protection of seamount ecosystems from multiple threats, including but not limited to overfishing and destructive fishing practices that threaten their conservation and, as necessary, identify and implement appropriate area-based protection measures, including marine protected areas; b) focus research efforts on the role of seamount ecosystems in supporting migratory species throughout their life cycles and habitat ranges; c) strengthen and enhance cooperation with and promote cooperation among relevant legal instruments and frameworks and relevant global, regional, subregional and sectoral bodies in the achievement of the conservation of seamount ecosystems.
15.62		Directed to Parties, intergovernmental and non-governmental organizations	Parties, intergovernmental and non-governmental organizations are encouraged to collaborate in the protection of seamount ecosystems from multiple threats, including but not limited to overfishing and destructive fishing practices.
15.63		Directed to the Scientific Council	The Scientific Council is requested to: a) collaborate with international experts to identify vulnerable seamount ecosystems which should be given priority, considering both the ecological connectivity between these ecosystems and migratory species, and appropriate protection measures, if required; b) review, taking into account best available data and information on impacts and biodiversity, any guidelines and management tools for the conservation, sustainable management, and research of seamount ecosystems developed as foreseen in Decision 15.64.
15.64		Directed to the Secretariat	Where appropriate, the Secretariat shall, in collaboration with Parties and subject to the availability of resources, develop and disseminate guidelines and management tools for the conservation, sustainable management, and research of seamount ecosystems that are particularly important for migratory species, with a focus on maintaining ecological connectivity and migratory pathways.

Appendix 2: IUCN Resolution 8.032, adopted at the IUCN World Conservation Congress, October 2025.

8.032 Protecting seamounts and vulnerable marine ecosystems from destructive practices

RECALLING IUCN Resolution 3.066 *The protection of seamounts, deep-sea corals and other vulnerable deep-sea habitats from destructive fishing practices, including bottom trawling, on the high seas* (Bangkok, 2004);

REMEMBERING that many seamounts are the result of unique geological processes on planet Earth and that they contain a rich geodiversity with a geological heritage that we must acknowledge and conserve;

RECALLING ALSO United Nations General Assembly Resolutions 61/105 (2006) and 64/72 (2009) that committed States to closing areas to bottom fishing in areas beyond national jurisdiction where vulnerable marine ecosystems (VMEs) such as seamounts are known or likely to occur, unless conservation and management measures have been established and effectively implemented to prevent significant adverse impacts on VMEs, acknowledging different regional ecological characteristics, including areas without seamounts or deep-sea features, such as shallow shelf seas and hyper-arid marine environments;

RECOGNISING the progress made since 2004 in protecting VMEs from damage caused by bottom trawling, particularly through the efforts of regional fisheries management organisations and arrangements (RFMO/As), which have closed some seamounts, sections of oceanic ridge systems and other areas where VMEs are known or likely to occur;

NOTING the requirement in Article 194, paragraph 5, of the 1982 United Nations Convention on the Law of the Sea (UNCLOS) to take measures “necessary to protect and preserve rare or fragile ecosystems as well as the habitat of depleted, threatened or endangered species and other forms of marine life”;

NOTING that the United Nations General Assembly, in Resolution 79/145, recognised “the immense importance and value of deep-sea ecosystems and the biodiversity they contain”;

ACKNOWLEDGING the 2021 United Nations Second World Ocean Assessment’s acknowledgement that “fishing, especially bottom trawling, constitutes the greatest current threat to seamount ecosystems”

NOTING that the United Nations General Assembly, in Resolution 79/145, emphasised the need for full and urgent implementation by all States and relevant RFMO/As of their commitments;

RECALLING FURTHER the Leaders’ Pledge for Nature, the Kunming-Montreal Global Biodiversity Framework (KMGBF) adopted by the 15th meeting of the Conference of Parties to the Convention on Biological Diversity (CBD COP15), and the Agreement under UNCLOS on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement) to enter in force in January 2026; and

NOTING ALSO the importance of protecting VMEs, including seamounts, hydrothermal vents and cold-water corals, across all RFMO regulatory areas, the Antarctic Southern Ocean under the Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR), and all areas beyond national jurisdiction;

The IUCN World Conservation Congress 2025, at its session in Abu Dhabi, United Arab Emirates:

1. REQUESTS the Director General and Commissions, in implementing the IUCN Programme 2026–2029, to promote this Resolution in engagement with RFMOs, multilateral agreements and other relevant legal instruments, including CCAMLR and regional seas conventions and frameworks, and relevant global, regional, subregional and sectoral bodies (IFBs) and individual States; and

2. CALLS on all State Members, individually and through relevant RFMO/As and IFBs, to:

a. fully implement United Nations General Assembly resolutions (including 61/105 (2006), 64/72 (2009), 66/68 (2011), 71/123 (2016) and 77/118 (2022) that call for the protection of VMEs, including seamounts, cold-water corals and hydrothermal vents in areas beyond national jurisdiction from significant adverse impacts caused by destructive fishing practices, including bottom trawling, recognising the immense importance and value of deep-sea ecosystems and the biodiversity and geodiversity they contain;

b. support and advocate for the protection of seamounts, based on the best available science, and interconnected seamounts (networks) for species associated with seamounts, such as marine mammals, elasmobranchs, as well as associated VMEs and pelagic fish stocks, at RFMO/As and other relevant IFBs;

c. support and activate a transition away from bottom trawling on seamounts at the United Nations General Assembly bottom fishing review at the end of 2026; and

d. support, generate, share and collate scientific, technical and cultural knowledge on the functions and importance of VMEs to facilitate regionally appropriate conservation and to understand their heritage and to make inventories of seamounts that can support their effective protection.