



To: João Aguiar Machado  
European Commission, Director-General for Maritime Affairs and Fisheries  
Anders Jessen,  
European Commission, Law of the Sea and Regional Fisheries Organisations, DG-MARE

September 23, 2019

Re: Closing seamounts to bottom fisheries and unregulated fishing in the NAFO Regulatory Area

Dear Mr. Machado, Mr. Jessen,

As you know, the 41<sup>st</sup> Annual Meeting of the Northwest Atlantic Fisheries Organization (NAFO) takes place this week in Bordeaux. One of the priority issues of concern to us is the protection of seamounts from the impacts of trawl fisheries in the NAFO Regulatory Area. The Scientific Council has recommended closure of the last remaining seamount fishery in the NAFO Regulatory Area – a fishery targeting alfoncino by a vessel flagged to an EU Member State. We urge the EU to maintain its ocean governance leadership and support the protection of vulnerable marine ecosystems (VMEs) through closing all remaining unprotected seamounts at fishable depths in the NAFO Regulatory Area to bottom fishing.

NAFO first began closing seamounts to protect vulnerable marine ecosystems (VMEs) in 2006 in response to UN General Assembly (UNGA) resolutions committing states and RFMOs to protect seamounts from destructive fishing activities.<sup>1</sup> NAFO identified seamounts as 'VME elements' (i.e. areas likely to harbor VMEs) in 2008 and periodically adopted further closures of seamounts to bottom fisheries over the ensuing years, most recently in 2017 to complete the New England seamount chain protection measures. While NAFO has made considerable progress in protecting seamounts at fishable depths there remain seamounts at < 2000m depth that are unprotected (see below).

Moreover, the only remaining trawl fishery on seamounts in the NAFO Regulatory Area is conducted by a vessel flagged to an EU Member State targeting alfoncino on the Corner Rise Seamounts. The Scientific Council of NAFO, in its assessment of the fishery in 2018, stated that the stock status was "unknown"; that the stock was "unregulated"; and that the fishery "can produce significant adverse impacts (SAI) on VME communities, as per information provided by the Scientific Council in 2010 and further addressed by the Scientific Council in 2015". This year the Scientific Council has advised closure of the fishery. In our view the fishery is not only in contravention of the commitments to protect VMEs that States have undertaken through the adoption of the UNGA resolutions, but it fits the definition of an IUU fishery.

In August 2020, the UNGA will begin a review of progress by States and RFMOs in the implementation of bottom fishing measures adopted in Sustainable Fisheries Resolutions 61/105 (2006), 64/72 (2009), 66/68 (2011) and 71/123 (2016). While NAFO will review all existing bottom fishing measures in 2020 and complete updated impact assessments in 2021, NAFO can make significant progress this year by closing the remaining seamounts at fishable depths to bottom fishing to protect VMEs. Not only would this demonstrate the continued commitment by the EU and other NAFO Contracting Parties to implement the UNGA resolutions in time for the 2020 review, it would also demonstrate NAFO's commitment and capacity to deliver on key international biodiversity commitments related to conserving biodiversity in areas beyond national jurisdiction in the context of the ongoing UNGA BBNJ negotiations, to the CBD marine Aichi targets, and to the implementation of Sustainable Development Goal 14 on oceans, in particular target 14.2 which commits States to "sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order to achieve healthy and productive oceans" in time for the UN Oceans & SDG 14 Conference in June 2020.

**We urge the European Union to support the closure of all remaining seamounts at fishable depths in the NAFO Regulatory Area to bottom fishing – the seamounts in the Corner Rise area and the seamounts on the slope of the Grand Banks which are not yet within existing VME closed areas. We also urge the European Union to agree to the closure of the splendid alfoncino fishery in the Corner Rise Seamount area.**

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<sup>1</sup> UNGA resolution 59/25 (2004), paragraph 66

Kind regards,



**Matthew Gianni**  
Co-founder  
Deep Sea Conservation Coalition



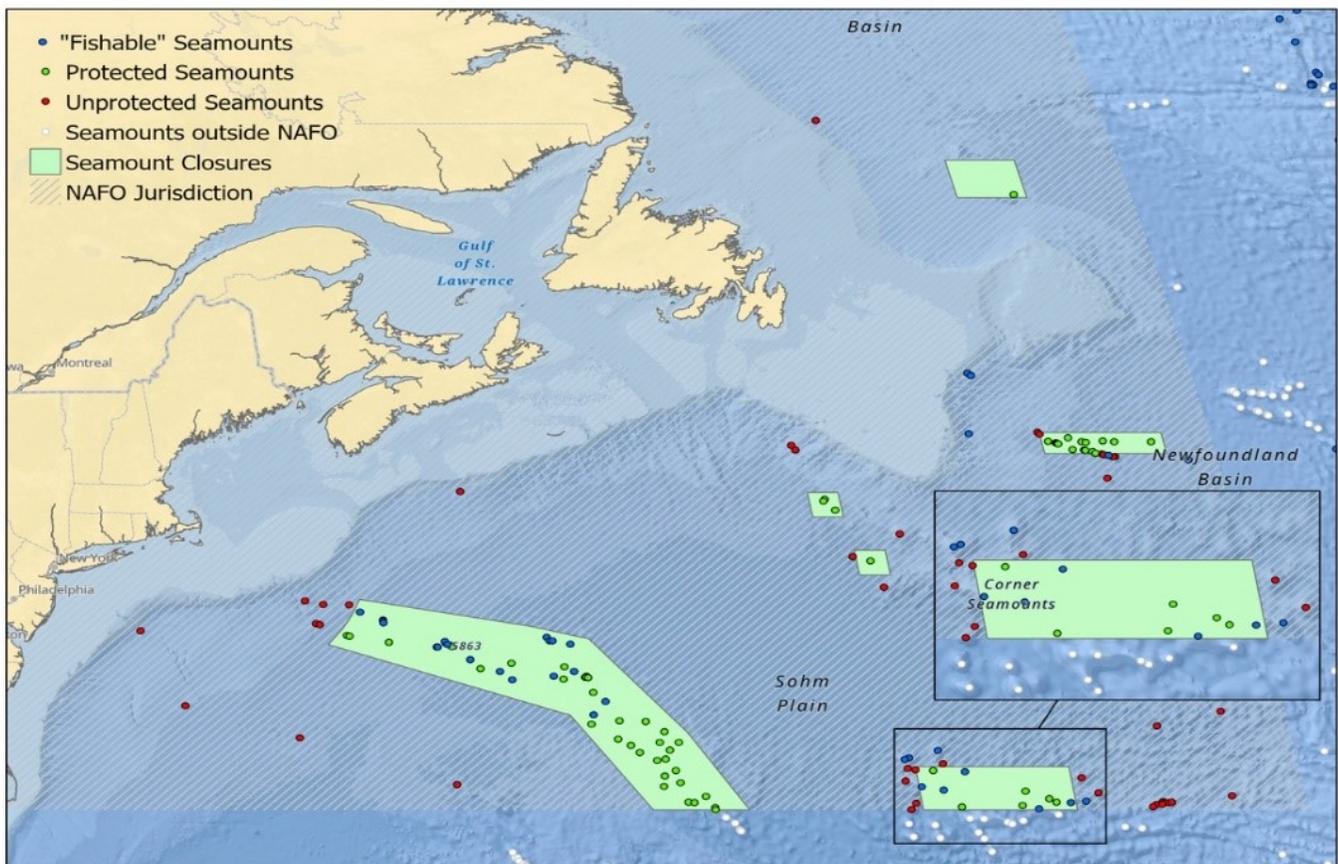
**Monica Verbeek, PhD**  
Executive Director  
Seas At Risk



**Samantha Burgess, PhD**  
Head, European Marine Policy  
WWF EU

cc: Karmenu Vella, Commissioner for Environment, Maritime Affairs and Fisheries

Supporting Information: NAFO Seamount protections as of September 2019 in the NAFO regulatory area. (Map produced by Marine Conservation Institute, seamount data as per Kim & Wessel 2011).<sup>2</sup>



*“Deep-sea ecosystems associated with seamounts, ridges, and other topographic features are now and will increasingly be subjected to multiple stressors from habitat disturbance, pollutants, climate change, acidification and deoxygenation. Studies to date on these impacts have been limited and considered in isolation. The scientific understanding of how these stressors may interact to affect marine ecosystems remains particularly poorly developed...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. The synergistic influence of these factors is unknown at present.” UN 1st World Ocean Assessment, Chapter 51 - Biological communities on seamounts and other submarine features potentially threatened by disturbance.*

<sup>2</sup> Kim, S.-S., and P. Wessel (2011), New global seamount census from the altimetry-derived gravity data, *Geophys. J. Int.*, 186, 615-631. [KWSMTS v0.1 is downloadable in either ASCII or KML format.](#)