



SPRFMO
South Pacific Regional Fisheries Management Organisation

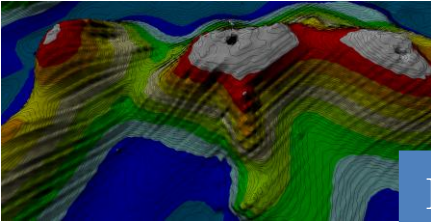
14TH MEETING OF THE SPRFMO COMMISSION

Panama City, Panama, 2 to 6 March 2026

COMM 14 – Obs 06

HSFG position on the management of deepwater fisheries to COMM14

High Seas Fisheries Group



High Seas Fisheries Group on the management of SPRFMO deepwater fisheries

January 2026

Statements on the principles of sustainable fisheries management.

- Measures that do not in fact improve fishery or environmental sustainability but are known to reduce fishing effort due to increased compliance and/or operational costs are contrary to the dual objectives of the Convention: “...to ensure the long-term conservation **and sustainable use of fishery resources...**”
- Respecting the dual objectives of the Convention requires that SPRFMO consider the commercial consequences of a proposed management intervention. If a possible outcome is the end of utilisation of the fishery it is beholden on managers to look for another way to achieve that conservation goal.

Move on Rule

HSFG does not support move on rules as an effective measure to reduce SAI on VME

- In 2017, the Scientific Committee recognised that move-on rules should only be used to complement well-designed spatial closures. SC5 Report par 121
- The vast majority of the Convention Area is currently closed to bottom trawling, with less than 1% of the SPRFMO area open to bottom fishing activities.
- Catchability of indicator species is low and highly variable. At the low incidence rates in the established SPRFMO fishing areas an encounter is best recognised as a rare stochastic event rather than data on which to base compliance and management.
- Move-on rules are known to be inappropriate for steep slope or seamount areas (ICES, 2012, cited in MSC 2021). This description characterises most of the orange roughly bottom trawl locations in the SPRFMO region.
- Forcing fishers away from favoured grounds may ultimately result in additional impacts on the seabed, either because their effort will be spread more widely, or through forcing fishers to target sub-optimal areas for longer ((Rijnsdorp et al. 2017)

- A non-controversial impact of targeting fresh areas that are sub-optimal for catching the target species is that more ground will be covered and more fuel will be used to get the same amount of commercial catch. HSFG note the urging of FAO, the CCTT and other organisations to consider climate change in fisheries management, we suggest that removing the move-on rule is consistent with this goal.
- The encounter review process is cumbersome, expensive and unlikely to yield meaningful sustainability outcomes.
- The modern bottom fishery in SPRFMO operates in the areas of highest target species abundance within the historical footprint. The likelihood that overlooked VMEs will be encountered adjacent to current trawl lines is vanishingly low.
- Greenpeace have successfully demonstrated in their recent research voyage to Lord Howe Rise that even camera surveys are not effective for confirming presence/absence of VMEs.

HSFG does support the NZ proposal to increase encounter thresholds.

- This move is consistent with our position that move-on rules are ineffective and conflict with the stated aim of SPRFMO.
- SPRFMO SC concluded that move-on rules could act as a rapid response mechanism to unexpectedly high bycatch events outside of closed areas, therefore, threshold levels were set high (SPRFMO, 2017). Although SPRFMO have implemented these “high” threshold levels to complement their spatial management strategy, the thresholds are lower than those used by other RFMOs

Orange roughy catch limits

HSFG supports the NZ proposal to maintain ORH catch limits for the next 3 years.

- The most recent stock assessment was conducted in 2022 for all regions excluding South Tasman Rise and the Westpac Bank straddling stock. The study examined the previous assessment and found the integrated assessment models to be unreliable. Instead, a precautionary approach using B_{min} as a proxy for B_0 was used. TACs were halved.
- The stock assessment team recommended the current catch limits noting that: “...from a scientific perspective this represents a precautionary approach to setting catch limits.” [SC10-DW01_rev1](#)
- Three-year average catches have been at or below the current low TACC (and F_{MSY}) for 20 years. HSFG submits that that, operationally, we are utilising this fishery with a high degree of precaution (figure 1).

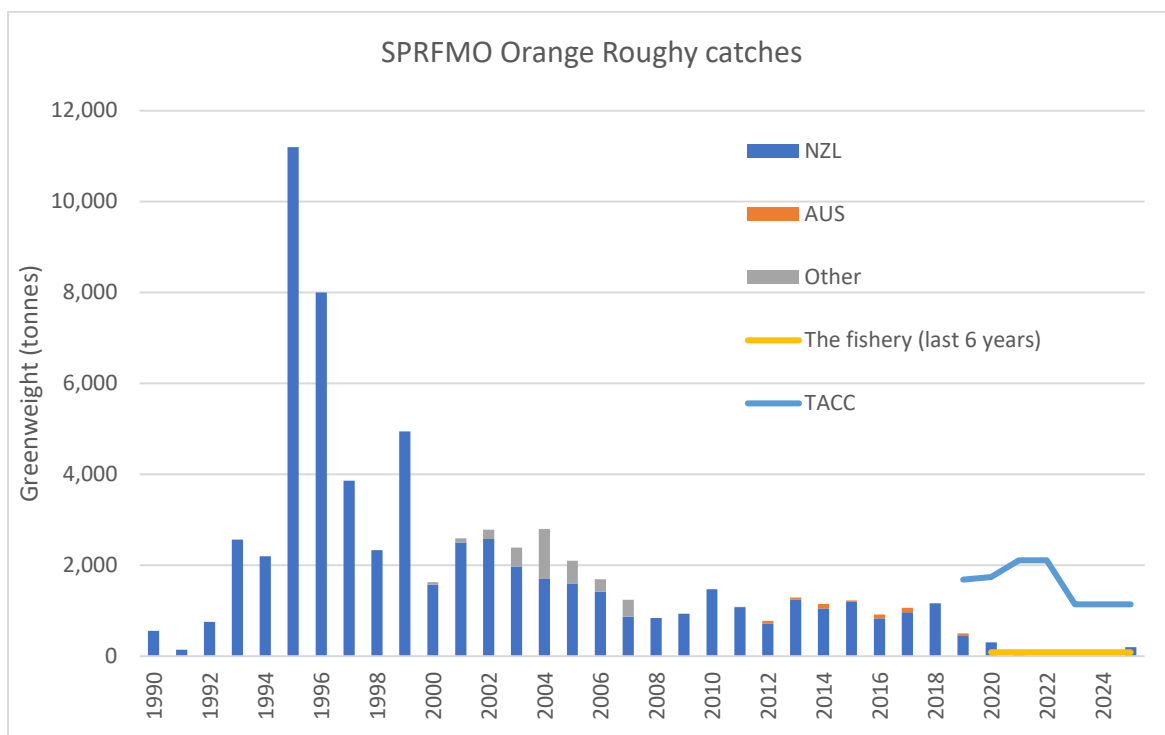


Figure 1: Reported orange roughy landings from the SPRFMO region. Data to 2020 is from SPRFMO public domain data repository. The average annual catch since 2020 is from personal communications with New Zealand fishing companies.

HSFG does not support the current approach to management on the Westpac Bank straddling stock.

- The current catch limit is based on the 2019 decision (based on catches before this time) that 12.5% of the Challenger Plateau stock is to be found at Westpac Bank.
- Assuming the same proportion of the straddling stock at Westpac is contingent on orange roughy not moving between spawning areas. All recent characterisations of New Zealand ORY stocks are finding that the proportion of a fishstock in any one spawning aggregation is variable and is influenced by fishing effort in prior years.
- Based on recent catch rates the current proportion the Challenger stock outside the NZ EEZ is far more than 12.5%.
- Disproportionate fishing effort on this single stock divided by the EEZ line – initially due to commercial/social factors (COVID) and now from incorrect management settings – is causing Challenger orange roughy aggregations to move away from where fishing is allowed.
- HSFG recommends that, considering the under exploitation of the Westpac Bank in recent years, the catch limits should revert to the original catch limit of 245 tonnes. This quantum will continue to be subtracted from the total allowable catch from the assessed Northwest Challenger biological stock.

Spatial management of bottom fishing

HSFG does not support further shrinkage of areas permitted for fishing.

- 99% of the SPRFMO region has been closed to bottom contact fishing through the application of CMMs which implement the directives of UNGA resolution 61/105 and the FAO guidelines.
- The modern SPRFMO orange roughy fishery is limited by TACs – in each BTMA only a few tows are required each year. Fishers are not looking to “open up” new tow lines – we just need to be able to access the established fishing footprint and allow for fish movement within it.
- We note that early management measures, that resulted in the current bottom fishing management areas, were initially designed to limit fishing effort on orange roughy. They were not necessarily designed to achieve benthic protection goals.
- Last year the Scientific Committee endorsed the validation of the South Pacific VME Bioregionalization, confirming it provides an ecologically meaningful spatial scale for assessing benthic management measures.
- This year HSFG commissioned a study looking at the intersection of the bioregions and the Bottom Trawl Management Areas (BTMAs).
- The table below compares the aggregate area of each bioregion contained within the BTMAs to the area of the bioregion in the SPRFMO administered region.
 - For Bioregions 1,2,4, 5 and 6, the 70% threshold of protection is achieved by the currently approved Bottom Trawl Management Areas.
 - The remaining bioregions were found to have a high level of protection in the areas outside the BTMAs. We expect that when the bottom trawl footprint is overlaid on the bioregions it will be apparent that the actual fishery does not adversely impact SPRFMO conservation goals.

Table 1: Intersection of bioregions with SPRFMO BTMAs

Bioregion	B1	B2	B3	B4	B5	B6	B7
Area of Bioregion in SPRFMO km ²	7,274	25,2513	88,572	269,680	531,513	4,295	3,565
Area of Bioregion Inside BTMAs km ²	21	954	25,919	14,475	6,621	466	1,692
Protected outside BTMAs	99.7%	96.2%	69.7%	94.6%	98.7%	88.1%	52.5%

- HSFG submits that this bioregions approach could be preferable to the proposed FMA% approach. An approach that will halve the amount of fishable space (BTMAs) if implemented.

- The bioregions are an actual ecological concept and ensuring that a high proportion is protected, as they are now, is important. This stands in stark contrast to the previous method which attempted to manage impacts by comparing the areas of two recently manufactured constructs – BTMA & FMA.
- The second review panel concurs with HSFG thinking and recommends investigating alternate approaches:
 - “CMM 03 is not fit for purpose, considering its complexity and the unintended consequences on the relevant fishing industry. This measure could be constructed in alternative ways that meet the Convention’s objectives.” (Second performance review report, COMM13)

Concluding comments

The High Seas Fisheries Group considers that the appropriate way of managing the bottom fishing in the SPRFMO area is one of common sense, that balances utilisation of fishery resources with effective conservation objectives.

We encourage SPRFMO to proceed with implementing management measures based on the actual fishery – not the unmanaged bottom fisheries of the past nor an imaginary unconstrained future.

HSFG encourages SPRFMO to consider the total impact, including operationalisation, of management measures. When they are likely to close access to the fishery, and that is not the intended goal, then they are poor management measures.

References:

Bennion, M., Rowden, A., Anderson, O., Moore, B., Stephenson, F., Tablada, J., Geange, S., & Arkhipkin, A. (2024). Development of a bioregionalisation for VME indicator taxa. SC 12 – DW 11_rev1, 51 p.

Middleton, D. A. J. (2025). Bioregion areas by bottom trawl management areas. Draft report for HSFG. 20 p.

Rijnsdorp, A. D., O. Eigaard, A. Kenny, J. Hiddink, K. Hamon, G. Piet, A. Sala, R. Nielsen, J. Rasmus; H. Polet, P. Laffargue, M. Zengin and Ó Gregersen (2017). Assessing and mitigating of bottom trawling. Final BENTHIS project Report (Benthic Ecosystem Fisheries Impact Study).

Vulnerable Marine Ecosystems and Fishery Move-on-Rules - Best Practice Review. Final Report to the Marine Stewardship Council, June 2021