

STATE OF HAWAI‘I KĀNE‘OHE BAY REGIONAL COUNCIL

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June [], 2026

Chairperson Dawn N. S. Chang
Department of Land and Natural Resources Kalanimoku Building
1151 Punchbowl Street
Honolulu, HI 96813

RE: BLNR Agenda Item [], Support for Statewide Administrative Rules Permanently Prohibiting Commercial Aquarium Collection

Aloha Chair Chang and Members of the Board of Land and Natural Resources,

The Kāne‘ohe Bay Regional Council (“Council”) stands in solidarity with communities across Hawai‘i pae ‘āina that oppose the commercial aquarium collection trade, and strongly urges the Board of Land and Natural Resources (“BLNR”) to adopt administrative rules permanently prohibiting the commercial harvesting of reef wildlife for the aquarium pet trade statewide.

The Council has been tasked with, among other things, (1) serving as the public advocate for Kāne‘ohe Bay, (2) making recommendations to the state and county on matters regarding the use of Kāne‘ohe Bay by the public and commercial ocean users, and (3) helping implement the Kāne‘ohe Bay Master Plan, which establishes a framework for the sustainable management and protection of the Bay’s natural resources while accommodating compatible uses.

Consistent with this kuleana, the Council urges BLNR to adopt rules permanently banning commercial aquarium collection in Kāne‘ohe Bay and statewide. Restricting collection in only certain geographic areas will merely shift collection pressure and ecological harm onto neighboring communities and reefs. Reef fish populations are highly interconnected across O‘ahu and between islands,¹ and aquarium collection must therefore be evaluated on a statewide ecological scale rather than through piecemeal regional management.

Our community remains firm in its position that the commercial extraction of reef wildlife for ornamental purposes is fundamentally incompatible with the cultural values, stewardship practices, and way of life of Hawai‘i’s people and host culture. For decades, community members throughout Ko‘olaupoko and across Hawai‘i have fought to end the commercial aquarium trade, including many past and present members of this Council.

Numerous boards and committees in our community have adopted resolutions calling for an end to commercial aquarium collection in our State, including but not limited to the Kahalu‘u

¹ See Coleman, R. R., Kraft, D.W., Hoban, M.L., Toonen, R.J., & Bowen, B.W. (2003). Genomic assessment of larval odyssey: self-recruitment and biased settlement in the Hawaiian surgeonfish *Acanthurus triostegus sandvicensis*. *Journal of Fish Biology*, 1-5. <https://doi.org/10.1111/jfb.15294>

Neighborhood Board, Kāneʻohe Neighborhood Board, Kailua Neighborhood Board, Waimānalo Neighborhood Board, the Koʻolaupoko Hawaiian Civic Club, Koʻolaupoko Hawaiian Civic Club, Koʻolau Foundation, and the Association of Hawaiian Civic Clubs, among others. On July 28, 2021, the Kāneʻohe Bay Regional Council likewise formally called for action banning commercial aquarium collection.²

Importantly, in 2023, BLNR unanimously approved a community-led petition requesting statewide rulemaking to prohibit aquarium collection. That action reflected the overwhelming and longstanding public opposition to reopening Hawaiʻi's reefs to extraction for the aquarium pet trade and recognized the Board's authority to act proactively to protect Hawaiʻi's marine resources and public trust obligations. Additionally, Hawaiʻi courts have now confirmed that BLNR possesses the legal authority to prohibit aquarium collection through rulemaking. Any suggestion that BLNR lacks authority to adopt a statewide prohibition has been rejected. The Board therefore has both the authority and responsibility to act decisively to protect Hawaiʻi's reefs and the constitutional rights and interests tied to those resources.

Coral reefs and reef wildlife are public trust resources protected under Article XI, Section 1 of the Hawaiʻi Constitution and held in trust by the State for the benefit of present and future generations. These resources are inseparable from Native Hawaiian traditional and customary practices protected under Article XII, Section 7, including subsistence, ʻike, mālama kai, and cultural relationships with marine ecosystems.

The commercial aquarium trade prioritizes private commercial extraction over the long-term health and resilience of Hawaiʻi's reef ecosystems and the rights of the people who depend upon them. Particularly in light of accelerating coral bleaching, marine heatwaves, declining reef resilience, and other climate-related stressors affecting reefs throughout Hawaiʻi, reopening aquarium collection would place additional and unnecessary pressure on already vulnerable ecosystems.

The Kāneʻohe Bay Master Plan recognized decades ago that increasing commercial intensity adversely impacts Bay resources and emphasized that priority protection must be given to preserving natural resources for future generations. The Plan also acknowledged declines in fishery resources, underenforcement of existing regulations, and the need for stronger protective management measures. Commercial aquarium collection directly conflicts with these management goals.

The issuance of even a single aquarium collection permit risks reopening the door to expanded extraction, poaching, enforcement difficulties, and further degradation of Hawaiʻi's reefs. A small number of commercial collectors and mainland pet industry interests should not outweigh the clearly expressed cultural, environmental, and community interests of the people of Hawaiʻi. Special interests, consisting of seven collectors in West Hawaiʻi and 15 collectors on Oʻahu, who represent the profit-driven motives of mainland wildlife and pet trade dealers should not take priority over the people of Hawaiʻi.

BLNR now has both a clear public mandate and confirmed legal authority to adopt permanent statewide protections. The Council respectfully urges the Board to move forward with rulemaking that permanently prohibits commercial aquarium collection statewide and

² Resolution Supporting Legislative Action to End the Commercial Harvesting of Reef Wildlife for the Aquarium Pet Trade, Kāneʻohe Bay Regional Council (2021) *available at*: https://dlnr.hawaii.gov/dar/files/2021/10/Kaneohe_Reso_AQ_Ban_amended.pdf

prioritizes the protection and recovery of Hawai‘i’s reef ecosystems and public trust resources over private commercial exploitation.

Mahalo for your consideration and for your continued stewardship of Hawai‘i’s marine resources.

Me ke aloha ‘āina,

Elena Bryant
Legislative Chair
Kāne‘ohe Bay Regional Council

NOTE: This is a draft letter and is subject to revisions consistent with the positions expressed herein upon further Council review and discussion. Depending on the BLNR’s agenda item and staff submittal on this item, this letter may be revised further (consistent with the positions expressed herein) and may include additional sections to address impacts of the aquarium pet trade in Kāne‘ohe Bay, O‘ahu, and across Hawai‘i pae ‘āina as discussed by the Council at the June 3, 2026 meeting.