



**Argos Froyanes**

The Director of Fisheries  
Government of South Georgia & the South Sandwich Islands  
Government House  
Stanley  
Falklands Islands

13<sup>th</sup> of July 2018

Dear Sue/Mark,

**Great British Oceans remarks to GSGSSI MPA Review Panel – 11.06.18**

You have invited us to comment upon the written statement presented by Great British Oceans after the recent second workshop on the SGSSI MPA review.

We will leave others more qualified to comment on CCAMLR and GSGSSI Management of Krill populations, but we do wish to comment on GBO's assertions surrounding the status of the SGSSI MPA.

We do not accept GBO's/some IUCN Members assertion that SGSSI does not qualify as a Category VI sustainable use MPA.

It is claimed that the objective of the MPA's Management Plan is not Conservation and that this automatically excludes the SGSSI MPA from categorisation. The Management Plan is the tool used to communicate and implement the Marine Protected Areas Order 2013 and management Plans are described in the Wildlife and Protected Areas Ordinance 2011 as being schemes for conserving, protecting or preserving:

- (a) marine flora or fauna;
- (b) any species dependent on the marine environment;
- (c) marine habitats or types of marine habitat;
- (d) features of scientific interest, including those of geological, geomorphological or oceanographic interest.

The Marine Protected Areas Order 2013 goes further and sets out the objective of the SGSSI MPA set up under the WPA Ordinance 2011:

4 (4)

The purpose of designating the SGSSI MPA is for the conservation of —

- (a) the seabed and its overlying waters; and
- (b) their associated organisms.

(5) The principal conservation objectives for the SGSSI MPA are to —

- (a) conserve marine biodiversity, habitats and critical ecosystem function;

- (b) ensure that fisheries are managed sustainably, with minimal impact on associated and dependent ecosystems;
- (c) manage other human activities including shipping and scientific research, to minimise environmental impacts on the marine environment;
- (d) protect the benthic marine organisms from the destructive effects of bottom trawling;
- (e) facilitate recovery of previously over-exploited marine species;
- (f) increase the resilience of the marine environment to the effects of climate change; and
- (g) prevent the introduction of non-native marine species.

We believe that the SGSSI Legislation is quite clear in setting Conservation as the primary objective for the establishment and management of the MPA.

We have reviewed the World Commission on Protected Areas 'Statements of Compliance' for the SGSSI MPA against the Legislation in force mentioned above. We do not agree with WCPA's points 2,3,5 & 6 and we believe that the network of spatial and temporal closures provide clear intention to maintain or increase the naturalness of the protected ecosystem.

We believe that the current review process and study of the reduced impact and closed areas provide an excellent mechanism to quantify the effectiveness of the MPA against its conservation goals. We would regard the SGSSI MPA as an exemplar Category VI MPA

Regards



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**Peter Thomson**