

Office of the Commissioner
Government House
Stanley
Falkland Islands

September 2017

Dear James

South Georgia Marine Protected area review - Public Consultation

Argos Froyanes Ltd is a partnership between the British company Argos Georgia Ltd and the Norwegian company Ervik Havfiske AS. Ervik Havfiske group is one of the largest fishing companies in Norway and Argos has been operating in South Georgia waters for over twenty years

The Argos Froyanes partnership operates the vessels MV Argos Georgia and MV Argos Froyanes in the MSC Certified Fisheries of South Georgia and the Ross/Amundsen Seas. We have directly contributed to the science behind the creation of Marine protected areas in both South Georgia and the Ross Sea.

The creation of the South Georgia MPA was an important step in creating a representative network of circum-Polar MPA stated by the creation of the first MPA in the South Orkneys in 2009.

We believe that the creation of a network of MPAs is essential for sustainable management of fish stocks and the conservation of marine and coastal ecosystems. We believe that a partnership between the scientific, fishing, and NGO communities is the best vehicle to deliver some of the key objectives of the MPA, namely to:

- conserve marine biodiversity, habitats and critical ecosystem function;
- ensure that fisheries are managed sustainably, with minimal impact on associated and dependent ecosystems;
- protect the benthic fauna from the destructive effects of bottom trawling;
- facilitate recovery of previously over-exploited marine species;
- increase the resilience of the marine environment to the effects of climate change;

We support the creation of a network of 'sustainable use' MPAs rather than simple 'no-take' areas. We believe that sustainable-use MPAs are the best vehicle to deliver the data that will enhance the understanding of the ecosystem and monitor the long-term effects of climate change.

Protection for particularly sensitive communities can be provided for in 'closed' and 'reduced impact' areas. Stand-alone no-take MPAs provide a data vacuum in the understanding and management of the Southern Ocean. Areas like South Georgia and the South Sandwich Islands



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cannot be considered in isolation as early evidence from South Sandwich indicates a wider relationship in fish populations between 48.3, 48.4 and 48.2 . Further ties with adjacent areas such as 48.6 are looking more likely and with increased research fishing in adjacent CCAMLR areas being sanctioned, further data collection is needed to assist CCAMLR in its role to preserve, protect and manage Southern Ocean marine resources.

The Fishing Industry's involvement in the MPA

Without the involvement of the fishing industry the Gvt and scientific community will not be able to deliver the objectives of this, and future, MPA reviews. The fishing industry that operates around South Georgia and the South Sandwich Islands provides a considerable scientific platform for research that provides the evidence for the effectiveness of current management of the ecosystem and generates the understanding that will drive future changes to management of the area. All fishing vessels operating in the area carry scientific observers whilst at sea and this comprehensive coverage and data collection could not realistically be provided by scientific research cruises alone.

In South Georgia the small fishing fleet for Toothfish, Icefish and Krill must provide something approaching 1,000 observer days of data collection per year which is beyond the capability of the Gvt to deliver on its own.

We welcome the objective to 'review, and assess the effectiveness of, existing monitoring measures for evaluating the extent to which the objectives of the sustainable use MPA are met' We cannot assume that the current management measures are perfect nor that 'no-take' and 'reduced impact' areas are ideally sited. With 5 years of monitoring data available we believe that the time is right for an initial review of the management system

We have seen in other MPAs an initial drive to concentrate on the delivery of scientific research rather than the establishment of an evidence-based approach to measuring the appropriateness and effectiveness of management measures. We note the creation of an advisory panel to meet in November 2017 and the fishing industry will encourage efforts to develop an effective monitoring regime.

Yours sincerely

Peter Thomson

Argos Froyanes Ltd