

Great British Oceans remarks to GSGSSI MPA Review Panel – 11.06.18

- Great British Oceans (GBO) continues to support full protection of the South Sandwich Islands. The scientific rationale for this is clear. Primarily SSI is a global biodiversity hotspot worthy of protection. In addition, overwhelming scientific evidence exists detailing both the declining health of the world's oceans and the efficacy of large scale marine reserves in both arresting this decline and future proofing near-pristine areas. It should be recognized that the UK has already contributed a great deal toward the 10% global target of 2020, but that should not impede continued ambition. The UK is in a privileged position to make a globally significant contribution.
- GBO is not anti-fishing. GBO has publicly recognized the high standards to which the South Georgia fisheries operate relative to some other Southern Ocean operations. Many of GBOs' member organizations also work within an extensive range of other marine fora concerned with sustainable management of fisheries – not solely MPAs.
- The South Georgia and South Sandwich Islands Government has claimed ever since the MPA was designated in 2012 that it is a Category VI Marine Protected Area, as defined by IUCN (with small closed areas classified as Category Ia). Independent experts have reviewed that claim and concluded that 98 per cent of SGSSI waters "do not qualify" as an MPA, for two reasons: 1) the objective of the management plan is not conservation, and 2) the MPA includes industrial fishing in all but 2% of its waters. GBO have asked the same IUCN experts what would make the MPA compliant with the guidelines. These IUCN experts have said that large areas of full protection, for example around the South Sandwich Islands, would compensate for industrial fishing in the South Georgia part. Full protection of SSI would be a clear means of achieving that aim – and winning international recognition. This expert opinion is shared by GBO.
- GBO has publicly recognized the leading role that the UK delegation – including foreign office officials and BAS scientists – play in CCAMLR. SSI waters sit predominantly within CCAMLR management area 48.4. This area is allocated 15% of the CCAMLR krill quota (which totals 130% of TAC). However, nobody has fished for krill in SSI waters or the remaining part of area 48.4 for over 25 years.
- Krill catch distributions will be re-negotiated within CCAMLR in 2021. Closure of SSI prior to 2021 would not automatically lead to re-negotiation of krill catch. Regardless of any decision taken to fully protect SSI waters within domestic legislation in 2018, we understand that it is likely that some CCAMLR members with fishing interests will advocate to increase krill quotas in some regions of the Southern Ocean during the 2021 negotiation. This happened previously in 2016, but was discounted by the CCAMLR Scientific Committee on grounds of sustainability. There therefore appears no immediate procedural means, or

scientific rationale, for the closure of SSI to be used as justification to increase fishing effort in other areas.

- Many GBO organizations are already working within CCAMLR toward the same end as the UK Government's stated aim – a more sustainable distribution of krill quota in 2021. We want the same things, but UK decision makers should not miss the opportunity to protect 500,000km² of near pristine Antarctic environment around SSI today on account of technical dialogues on krill management in 2021.
- GBO would finally express its frustration with the means by which this Review has been conducted. GBO entered in to the Review in good faith, including many organizations contributing significant amounts of research to the Review process. GBO has not questioned the integrity of the scientific opinions offered by all review panel members. We have however raised concerns as to the representivity of the scientific opinions formally appointed to the Review Panel – in particular, the heavy emphasis on sustainable fisheries science. We have also raised concerns regarding the blurriness of the lines between providing scientific advice, and policy recommendations.