

Comments on Draft SGSSI Strategy 2016–20

The South Georgia Association welcomes the opportunity to comment on the SGSSI Draft Strategy 2016–20. We have only commented on substantive issues and have not made editorial suggestions. However, we believe you may have received some of the latter from SGA members directly.

It is hoped that GSGSSI will meet good consultation practice, and publish all comments and responses received on the SGSSI Strategy 2016–2020 on the SGSSI website.

Headline Strategy for 2016–2020

The SGA agrees with the headline strategic objectives and supports the consistency of these with the previous SGSSI Strategy. We note, however, that prudent management of government finances as a specific point has been dropped. Effective and transparent governance is a key issue and we are pleased to see this has been retained in the first objective.

We also note that the FCO no longer intends to present a separate UK SGSSI Strategy but this does not represent to the SGA any lack of vision, provided the key UK Headline Objectives are carried over into SGSSI Strategy 2016–20. It is our view that this has largely been achieved.

Environmental Management

Establishing the SGSSI Marine Protected Area in 2012 was a major step that was strongly supported by stakeholders and others. SGA welcomes the commitment for a review the MPA in 2018.

The rat and mouse eradication project by SGHT, and the associated reindeer eradication by GSGSSI, were strongly supported by SGA and we are impressed by the apparent success to date. Longer term studies will demonstrate whether rats and mice have finally been eradicated from the island. There have been encouraging reports from the 2014–15 season that plants and birds are already showing signs of recovery, post-rodent removal.

GSGSSI adopted an Environment Charter in September 2001 and it is surprising that no specific mention of the charter is made in the Strategy. SGA does recognise, however, that the Guiding Principles from the Charter are integral to many of the key objectives in the Strategy.

It is our opinion that an area under represented in the Strategy is Charter Guiding Principle No. 3: To identify environmental opportunities, cost and risks in all policies and strategies

SGA supports GSGSSI's commitment to protecting biodiversity (page 5) and the extension of the Convention on Biological Diversity to SGSSI shows a strong commitment to this area. We note "...plans to initiate a series of surveys to better quantify the marine and terrestrial biodiversity of the Territory..." (page 5), however the Strategy does not provide any details about how biodiversity is to be quantified and who will undertake this work.

In developing plans for quantifying biodiversity, has GSGSSI considered the outcomes of The Monaco Assessment (www.scar.org/otherorganisations/monaco-assessment), in particular, references to the Southern Ocean?

The SGA believes strict biosecurity measures against potential introductions of non-indigenous species need to be developed and promulgated. The focus on this in the Strategy is welcome. The discussion of gateway ports should extend to all gateways, including those in South America.

There is an urgent need to develop plans for the future management of alien plant species together with practical methods for their control/elimination and the SGA supports the development of a weed management strategy. However, we feel “alien flora” may be a better term to use than “weeds”. Linking to the section on Scientific Research, we feel there is scope for valuable research studies concerning alien flora species and their eradication.

The Strategy does not develop plans for continued monitoring of the impact of alien land invertebrates on community dynamics, especially in lowland areas dominated by tussock grass. An example is the introduced carabid beetle predator *Trechisibus antarcticus* which has seriously affected the distribution and biology of an indigenous herbivorous beetle in tussock areas in Stromness Bay.

We note in Governance that a legislative review has been given high priority, which we welcome. However, The SGA hopes that this will not delay the designation of any terrestrial Specially Protected Areas, as noted in Key Objectives. The document does not really lay out a strategy showing how GSGSSI’s resources and skills will lead to SPAs being delimited.

Fisheries Management

The management of the fishery in the SGSSI MZ has been a great success story, as has the MSC certification of the South Georgia Patagonian toothfish fishery.

SGA encourages GSGSSI to continue to take a conservative approach to the fishery. But we note the a growing interest in krill fishery resulting from the proposed health benefits from Omega3 and fatty acids. A strategy for the management of a potential krill fishery, not seen for many years in this region, should be included. Linked to the section on Scientific Research is the potential effect of ocean acidification on any krill fishery.

Tourism Management

The document rightly points out that tourists and expeditions are a key target for education and outreach (c.f. Outreach and Publications section). Tourists bring not only income to the island but return home as strong advocates for SGSSI, its protection and conservation. Should the SGSSI fishery fail for any reason, visitation will become a key income, and will certainly need careful management. Surprisingly, to all who have been there, South Georgia is relatively hard to market and we are concerned that visitor fees do not become a disincentive.

We would be interested to see further details of the analysis that has led to the statement “...there is a limit to the number [of visitors] that South Georgia can accept without causing significant disturbance to wildlife and damage to the environment.” Monitoring Antarctic tourism has shown that numbers alone are not a good correlation of likely disturbance to wildlife. There are seasonality, site sensitivity and a range of other factors, and the SGA would like to see greater depth to this area of Tourism Management than is currently in the Strategy.

The proposed new visitor legislation is welcome, however, this should not delay the approval of visitor landing sites. The process, management, review and style of Site Guideline as developed by IAATO and the ATS, is well understood by the industry and we suggest this process should be followed at SGSSI so that Expedition Leaders see a common standard across the board (see www.ats.aq/e/ats_other_siteguidelines.htm).

Subjecting each potential visitor landing site to an EIA is laudable but is likely to slow the process. SGA supports the use of EIAs for vulnerable terrestrial and inshore marine environments. However, more important is identifying key visitor landing sites, compiling management plans and monitoring the result. The last point will help inform future site management, and should be a key part of any EIA process. SGA would like to see a strategy for monitoring visitor landing sites.

The visitor landing site approval processes in the Strategy does not appear to include areas used during land activities by expeditions. These groups are not restricted to specific sites, however, SGA would like to see a strategy for monitoring areas visited by expeditions developed in the document.

The new categories for visitor management includes expeditions under 3. Special Visitors. It is not clear where adventure tourism, such as kayaking and diving will fall. There is reference to this activity supported by cruise ships but there are also expedition based adventurous activities that may fall outside IAATO and for which IAATO has no adequate guidelines.

Independent and self-sufficient adventure tourism, both land and marine, does not appear to be covered sufficiently in the Strategy. Lumping independent expeditions in the same group as other special visitors, such as media, and requiring their justification may result in the removal of all sense of adventure from expeditions. The SGA does not believe this is the intention of GSGSSI. Independent expeditions, in particular, should be a focus of the Outreach section of the Strategy.

SGA supports the focus on biosecurity in the Strategy document, however, statements, such as “GSGSSI will be reviewing biosecurity arrangements to ensure the risk of re-introduction by tourists is negligible.” (Page 18 para 5), give the impression that tourists are the most likely vector for re-introductions. Clearly, biosecurity management of tourist visits is an important step but the strategy on biosecurity should include all visitors to the islands, from whatever source: scientific; government, military, etc. Alien species have already been introduced with cargo; the COMNAP Biosecurity checklist would be a useful document to reference in the Strategy even though it is designed for Antarctic supply chain managers, primarily (see <https://comnap.aq/Shared%20Documents/checklistsbrochure.pdf>).

Cultural Heritage

There has been considerable progress over the past five years in recording and protecting the island's cultural heritage. But the emphasis has been on recording and protecting whaling stations and limited attention has been paid to small sites—sealing, expeditions and lesser items of the whaling industry outside the stations (e.g. lights & beacons). The first two categories reflect 19th century SGSSI history, as whaling does for the 20th century. These small sites are in danger of damage and disappearance through a combination of erosion, fur seal action and looting. The statement “...(former whaling stations and King Edward Point, including maritime hulks)” (page 22) gives the impression is that these other sites may be overlooked.

The SGA supports the Key Objective to develop a list of all heritage sites because the lack of such a list has hampered decisions over what to protect, restore or maintain in the past. We assume that such a list will include artefacts as well as significant sites, and that the data will be available publically. Further, collation and surveys will be required not only to ensure a database for research and education but also to make adequate provision for protection.

We note the formation of the Heritage Advisory Panel (HAP) but are not clear on the overlap between work by the HAP and that by the SGHT. Perhaps this could be clarified in the Strategy. The collation and survey of cultural sites discussed in the Strategy will be necessary to “...develop a

graded list..) (Key objective 2). Without this, the HAP will be unable to advise GSGSSI under which grade each heritage site should be included.

We do not agree with the blanket policy of prohibiting access to whaling stations other than Grytviken because we believe that specific sites, such as the 'Villa' at Husvik, should be maintained for use by visitors. The SGA does accept, however, that these sites will continue to have restricted access until they are cleared of asbestos. SGHT has proposed making the Stromness Villa available to visitors, which the SGA supports, but this will require clearance of a significant surrounding area.

The SGA supports the proposal to encourage the return of artefacts to the Museum and, perhaps, the announcement of an 'amnesty' might help. Calls for return through BAS Club & SGA have been successful in the past.

Scientific Research

This part of the Strategy has a clear focus on science related to the SGSSI fishery, which is not surprising as this is a primary income source for the government. The priority areas on invasive species and biodiversity are also welcome.

What appears to be missing from the Strategy is consideration of the wider scientific focus on the region and how this might drive a more visionary approach to research at SGSSI. The SGA believes there should be an emphasis on encouraging as wide a range of fundamental scientific activities from as many different individuals and organisations as possible. SGSSI is an attractive laboratory for investigation of important regional and global questions.

For example, has the recent horizon scan undertaken by SCAR been considered in setting the science strategy? The *SCAR Antarctic and Southern Ocean Science Horizon Scan* identified the most important scientific questions that should be addressed over the next two decades and beyond (see www.scar.org/horizonscanning) and has a number of points relevant to Southern Ocean research.

An Action Group on Integrated Science for the Sub-Antarctic (ISSA) was formed by SCAR in 2014 with a number of objectives that would seem to be helpful in developing a scientific strategy for SGSSI (www.scar.org/ssg/life-sciences/issa). A further area that should be referenced in the Strategy, and which has particular relevance to the fishery, is ocean acidification and its potential effect on krill and other marine invertebrates.

The Strategy gives the impression that GSGSSI's scientific objectives are largely driven by the limited funds available within GSGSSI and a desire to use the facilities at KEP. Although the SGA would like to see increased research at KEP, the costs and access issues highlighted in the Strategy do seem to mitigate against this. This raises the question of whether GSGSSI has the capacity to develop a science strategy to meet current research trends. The work by the South Atlantic Environmental Research Institute is helpful here to bring a wider focus.

Clearly, GSGSSI has limits to what scientific projects it can fund directly but a strong strategy that ties into wider scientific objectives may allow GSGSSI to provide seed funding for projects to seek funding elsewhere.

Governance

The headline strategy of the GSGSSI to provide "*...good, efficient, transparent and effective government*" is strongly supported by SGA and the progress to achieve this under previous strategies and plans is acknowledged.

The slow pace of legislative review is reported in the Strategy and the SGA welcomes the greater focus to move this forward, particularly the appointment of a full time legal advisor. Never-the-less the SGA encourages GSGSSI to keep up the pressure in this area to bring in modern legislation and financial accounting practices to the benefit of all concerned, and to be able to implement many of the Key Objectives outlined elsewhere in the Strategy.

Progress at the IMO on the Polar Code Regulations does not feature in the Strategy and the SGA would like to see GSGSSI intentions on adopting the Polar Code included. There is scope for GSGSSI to take the lead among administrations of Sub-Antarctic Islands over adoption of the Polar Code. All vessels entering the SGSSI MZ should have a ballast water management plan.

Biosecurity and the prevention of the re-introduction of rats and mice is included elsewhere in the Strategy. However, key to this is the legislative framework and SGA feels that repetition of biosecurity issues in the governance section would be valid.

The Key Objective on risk management and contingency planning is also an important area. It is hoped that this will be managed to meet the current standards in ISO 31000.

Outreach and Publications

Outreach by GSGSSI is clearly an important area, particularly if objectives under scientific research are to be met. As the Strategy points out, key to this is making visitors "...aware of the status and excellent management of the Territory." If this becomes a mandatory presentation, the SGA believes it will lose impact. The mandatory briefing given to visitors on arrival should be about environmental and safety issues. Tourists, perhaps alone among other visitors, are usually reasonably well informed. They will often be aware of the excellent management at SGSSI, or will become aware of it through the course of their visit and through interaction with Government Officers.

The independent expedition and yacht sectors are a good focus for outreach work. IAATO has invested resources in outreach to the yacht sector, in particular (see bit.ly/1M0sSCb), that has proved to be very successful.

SGSSI is an unique, self-contained geographical entity and there is a large archive of scientific work held by BAS and SPRI that could form the basis of visitor outreach about SGSSI research. Many tourists, particularly those from North America, are keen to support scientific research. Funds are often raised on tour ships for the benefit of SGSSI, and there are examples of tourists supporting scientific research and equipment at Antarctic stations. There are some excellent scientific websites that help to make research accessible to the general reader (see <https://icecube.wisc.edu/outreach>). This area may be a fruitful extension to the final Key Objective.