

Consultation response to the Government of South Georgia & the South Sandwich Islands

A values driven approach to the stewardship of South Georgia & the South Sandwich Islands: 2021 – 2025

Details about you

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Your feedback

To warm up we have a few minor points, mainly grammatical, and the odd factual. These are minor points, but a government publication can lose credibility if it does not give the impression of having been written by a 100% literate author.

Section	Page	Nit-picks
	Cover	'Values driven' is a compound adjective and should be hyphenated.
1.4	1	The pipit is not the southern-most songbird. Cape Horn, where there are songbirds, is further south than Cape Disappointment. Surprising but true!
1.6	1	km ² – the 2 should be superscript (km ²)
1.7	1	"globally significant" should have a hyphen.
4.7	4	"EVIDENCE BASED" also needs a hyphen.
12.1	12	"The Government of South Georgia & the South Sandwich Islands are a small government". Is – GSGSSI is a single organisation so is not plural.
12.6	12	Section 12.6 needs a little work to get the formatting consistent – there is no para. 12.6.1 numbering

Section reference	Feedback
<p>General Observations (and see 'any other comments' section at the end)</p>	<p>We are glad of the opportunity to contribute to this consultation.</p> <p>This more open-ended document can be seen as a much more sensible approach from earlier 5-year plans published by GSGSSI as it lays out their philosophy but does not set them up to fail from lack of resources for ambitious plans. On the other hand, some of us note the lack of clear, measurable objectives that would be the means of measuring progress against the strategy, both during its life and when the time comes to draw up the next iteration.</p> <p>To make such a strategy effective, we feel that it should include a set of Key Performance Indicators that can be used to demonstrate effectiveness of its implementation. Regular monitoring of progress during the five-year life of the strategy can encourage focused activity within its framework. A final check can also provide useful information to inform the production of its successor. This should not be seen as a stick with which to beat a less-than-100% successful implementation, but a constructive means of directing limited resources.</p> <p>The inclusion of the 'Future South Georgia Competition' at the end of the document is sweet, but does not sit with the serious nature of such a document. It ticks the 'outreach and engagement with erstwhile occupying states' box though. It probably has no place in the final version of this document.</p>
<p>1. South Georgia & the South Sandwich Islands</p>	<p>There is no mention of the Environment Charter, signed by the UK Government and GSGSSI in 2001 and introduced as underpinning the second five-year environmental management plan – the 'Plan for Progress'. Does this declaration between the UK and GSGSSI continue to underpin the management of the environment of SGSSI? It is still on the GSGSSI website.</p> <p>See https://www.gov.gs/environment/environmental-charter/</p> <p>As we said in our response five years ago,:</p> <p><i>"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</i></p>

	<p><i>in the Strategy."</i></p> <p>There is no mention of the National Biodiversity Management Plan adopted in 2016. While this was designed to cover the period 2016-21, and thus not expected to cover the period of the new strategy, it would be worth examining the measures in it to determine the extent to which its objectives were achieved, and to build on that. Is the intention to extend this?</p> <p>1.5 It is an important point that South Georgia is on an environmental boundary, so especially sensitive to environmental change and acts as a bellwether.</p> <p>1.7: We suggest the first sentence include an indication of what it is about South Georgia that gives it is value. Something about it being a bellwether for climate change on a regional and global scale, given its location.</p>
2. Inspire. Protect. Manage	The 'vision wheel' gives a nice indication of the structure of the strategy throughout the document
3. The Vision	3.1 There is a danger in being over-cautious, for instance when lack of resources means that proposals for an activity cannot be addressed in a reasonable time. This can lead to a policy of nothing happening because nobody has time to assess a perfectly reasonable project.
4. The Guiding Values	<p>4.1 It is good to see that activities only need to show that they will not impede the objectives of the plan, rather than be required to positively contribute to it. A recent expedition felt that they were being asked to do more than have a neutral impact, and come up with justification for how their kayak trip would promote the government's policies, thus adding to the already onerous administrative burden of an expedition application.</p> <p>4.2 This document, and indeed government policy to date, falls into a common trap of considering the environment to mean just the natural environment. The environment is actually that which is around us, the sphere in which we operate, and so should include by definition the human and cultural environment too. An Environmental Impact Assessment should take into account built, intangible heritage, landscape, cultural memory and so on.</p>

4.2 It is not clear whether GSGSSI still has an Environmental Advisory Committee. Who is it that assesses the EIAs that GSGSSI requires? Where is the opportunity for stakeholder input?

4.7 'EVIDENCE BASED DECISION MAKING'. Decisions by a government have to be political and economic, as well as based on good scientific evidence. Recognizing this, and allowing for trade-offs, in the plan could head off criticism later on when other pressures preclude a simpler environmental-science-only-based policy.

4.8 It would be helpful if some of the science were elaborated further. It could also clarify what is meant by i) 'domestic' – this could mean either UK or SGSSI - and ii) international policy.

4.11 Such laudable aims could lead to a policy of refusing licences to extract krill for the production of dubious pharmaceuticals with no proven benefit – that would reduce the carbon footprint of the fishery with no detrimental effect. Likewise tourism. This is not as easy an aim to implement as it might appear. It would be nice to see some clear criteria as to how environmental impact will be measured, so perhaps undertaking to make 'best endeavours' would be more realistic.

4.16 We are pleased to see a commitment to openness and consultation with stakeholders. There is a widely held impression that GSGSSI does not consult widely until late in the process, when this can lead only to minor tweaks and not a deeper re-assessment of the underlying structure at the design stage. This consultation is an example of this.

We would encourage GSGSSI to respond in detail to the responses they receive, point-by-point. This would go some way to alleviating the feeling that the consultations are paying lip-service to the principle of openness and consultation.

4.19 Openness is two-way. The legislative framework must be discussed and supported by stakeholders in an equally open environment. If it is simply imposed there will be little buy-in.

5. Biosecurity

<p>6. Building Future Resilience</p>	<p>6.2 As this strategy covers the whole territory, this section should include policy for building activity at Bird Island as well. Bird Island is mentioned later, but otherwise 6.2 implies there is no modern built infrastructure anywhere else on the island and no thought as to future development at BI.</p> <p>6.5 The consideration of climate change when carrying out building works should take into account the likelihood of King Edward Point being subject to flooding as sea levels rise in the foreseeable future. Perhaps it is time to start considering a move to slightly higher ground than the immediate shoreline of KEP.</p> <p>6.5 This is an opportunity for GSGSSI to set itself a target for carbon reduction. Without a target it will not be easy to judge how well it is doing and these become just empty words.</p> <p>6.6 As well as reducing local single-use plastic use (the easy bit), more usefully surveys of plastics and similar problem substances arriving on the island should be made and reported. South Georgia can act as a sensitive indicator of such pollution in the South Atlantic. Such work might well already be underway, for instance the CEMP study site on Bird Island, and better publication of the science plans for the island would help us know. Keeping a 'what we are doing' section of the GSGSSI website regularly updated could help here, as could engaging with the SGA, who are keen to widely promote interest in the territory.</p> <p>A wider review of waste generated on the island (arguably none – it is all brought in in the first place), and its removal should be built into all projects regardless of cost and inconvenience. Legislating for such high standards will go a long way to ensuring that everybody, even government agencies, keep to the high standards.</p> <p>6.8 This is understandable as a general principle. However, sound heritage site prioritisation principles might point to a justification for intervening on specific structures from time to time.</p>
<p>7. Local Science, Global Impact</p>	<p>7.1 We could not find a copy of the KEP science plan on the GSGSSI website so we are not in a position to comment on it. It would chime with the principle of openness for it to be available for</p>

scrutiny. The SGA has a number of eminent scientists among our worldwide membership. They would be delighted to contribute their expertise beyond the UK state-backed science establishment, which is not the only science organisation that can contribute usefully to the world's knowledge.

7.1 Likewise it would be good to see a Bird Island science plan, if one exists, and for it to be made clear whether the two are part of an overall SGSSI science plan or are operating in separate spheres.

7.2 Anyone who has tried to get a Regulated Activity Permit will wish for a less cumbersome system. It took over a year to get the SGAP permit – and even then it contained a restrictive clause which had never been mentioned in discussions. Similar frustrations have been voiced over the years from other agencies.

7.3 KEP is stated to be the only laboratory space available to external scientists and researchers. As a general principle this seems reasonable, but it would be worth keeping the door open for projects where Bird Island would be a much more suitable site, as long as BAS were content to host it. Additionally some excellent science has been done over the years at the Managers Villa at Husvik, which has recently been refurbished. It is suitable as a medium-term base for science fieldwork with the advantage that its use need not impinge on day-to-day operations at KEP/Grytviken.

It is good to hear that the science labs will continue to be promoted to be available to non-BAS/GSGSSI employees, but uptake will continue to be constrained by the logistical problems of such people getting to and from the island, and the continued considerable problems with modern communications.

7.5.6 Study of the glaciers: The changes occurring to them, and changes to the environment in the wake of those changes is all worthy of more study, but it is not clear what benefit is to be gained from studying whether glacial retreats could have been predicted. It seems rather fanciful if not framed within a modelling and predictive capability. What in the context of SG does hind-

	<p>casting achieve for this strategy?</p> <p>7.5.7 The interrogative first sentence is anodyne.</p> <p>7.5.7 Over 20 years GSGSSI has shown no interest in archaeological sites, except whaling stations, so how are they going to answer these questions? Are they the right questions? It's been up to private individuals/teams to record and interpret sites and artefacts.</p> <p>7.5.8 This is a big ask and unless there is more focus on detailed questions of future change the proposition will remain unfulfilled.</p>
<p>8. Marine Protection</p>	<p>This section seems pretty logical and well-intentioned</p> <p>8.7 We are heartened by the very strong statement of point 8.7 "Human Lives at Sea" and the commitment to looking at safety and welfare standards for fishers, the target of ILO188. Perhaps this should be extended to all vessels such as support vessels such as reefers and tankers, cruise ships, and possibly others too.</p>
<p>9. Creating Sustainable Visits</p>	<p>There is no mention of mountaineering-type expeditions, or indeed other potential specialist interest visits, as a separate form of visitation compared to the popular expedition cruise ship-based tourism. The work of the Expeditions Advisory Panel in ensuring that expeditions can operate, and be treated, appropriately in a regime designed for the cruise ships is worth a mention in the strategy, and should be continued.</p> <p>9.2 The creation of an on-island Tourism Officer post is welcomed. As GSGSSI has taken tighter control of the activities of visitors over the years, the tasking of the Government Officers has grown more onerous and the creation of more specialist roles, where there is sufficient work to justify it, is to be applauded. They might be more relevantly employed in observing tourism activity, and any impact it might have, around the island rather than looking for ways to spend the income. The tourism 'department' is not necessarily best placed to decide how the tourism income is to be spent, if this is to be spent outside their area of expertise.</p>

The Tourism Officer will gain credibility, and be able to perform most usefully, by knowing the tourism industry well, particularly the way the range of expedition cruise ships operates. They should be encouraged to join as many ships from different companies as they can for a number of days, including the ocean passages, so as to get a realistic idea of how responsibly the industry works, and dispel uninformed assumptions based on stereotypes of cruise ship tourism.

9.3 This is an excellent suggestion. Through various mechanisms it will be possible reach out to wider and more numerous audiences to enthuse and educate them about South Georgia.

9.4 It would help to define what is meant by 'sustainable tourism'. Apart from the smallest wind-powered yachts, visits to the island are not carbon-neutral or conservative in their use of resources. For some, 'sustainable' could mean ensuring that cruise operators make sufficient money to stay in business!

9.4 Working with IAATO (and it would be good to explain what an IAATO is) is wise. However, it should be recognised that this an industry body with associated priorities, and also that tourism in the Antarctic peninsula region is different from South Georgia in a few respects – remoteness, exposure to weather, robustness of wildlife, distance between sites, pressure on visits, and more – so that what counts in one area does not necessarily hold in the other.

9.6 We have yet to see what the 'Terrestrial Protection plans', which are presumably being developed following the consultation a while back on Terrestrial Protected Areas, which we have heard nothing of since. We would welcome an update on this.

9.6 GSGSSI should consider working with more than just industry leaders in setting out visitor management proposals. Some visitors are not in the commercial tourism industry and merit different treatment.

9.6 This could be a considerable and costly task.

9.7 Another difficult and costly task, but one that should be pursued.

	<p>9.7 The use of the concept of 'visitor sites' in this section promotes a debatable assumption that visitors should be restricted to a limited number of 'approved sites'. This is a management strategy that crept into existence fairly recently, without consultation. It was partly justified by the need to prevent rodents being spread into rodent-free area, a justification that happily no longer holds. The existing list was not based on any evidence-based science, but rather a list of sites that ships had happened to visit over a couple of seasons at the end of the last century, drawn up to ensure that the correct names were used when completing the Post-Visit Reports.</p> <p>Developing these plans should be taken as an opportunity to open up the island, while protecting particularly sensitive areas using where there is a demonstrable justification.</p> <p>9.7 Allowing visits to a wider range of sites would allow for pressure to be reduced on the more popular or sensitive sites, and allow safer decision-making in marginal weather conditions. This is particularly true if visitor numbers are to return to the increasing trend, pre-Covid-19.</p> <p>9.7 Promise of a comprehensive visitor site monitoring programme is a welcome development. This important step towards managing visitor sites seems to have been underperformed so far, which weakens GSGSSI claims of visitor and site management.</p> <p>9.8 It is not necessarily the role of GSGSSI to make a blanket decision like this on operational grounds. There will be times when safe landings are possible and the decision to make a landing on the South Sandwich Islands can be left to the ship's captain and the operators, who are best placed to make safety-based decisions. Wildlife, while abundant, is not any more sensitive or prone to disturbance than anywhere else in the territory, and the area's pristine nature will be protected by the excellent biosecurity procedures that are the norm in the tourism industry these days (driven by the recent excellent work by GSGSSI). Southern Thule is not pristine, with the ruins of the Argentine Corbeta Uruguay base standing there. It is a site of historic interest with the ruined base and the earlier (1955) Teniente Esquivel refuge hut that still stands there.</p>
10. Cultural Heritage	There is no mention of the Heritage Advisory Panel here. We hope that the panel of experts is still consulted. Its position is formalised in the Heritage policy so perhaps this is just a by-product

of keeping this strategy short, sweet, and to the point.

10.2 It would be good to be able to see the Grytviken Conservation Management Plan. It is not on the GSGSSI website. There is a draft copy in the consultation documents but no obvious final copy.

10.4/10.5 GSGSSI commissioned Sally Poncet to create list of 'heritage assets' [These range in size from a whaling station to a rusty nail.] which includes categorisation for management and protection. Sally based this almost solely on her very extensive knowledge – we would know very little about SG heritage without her pioneering initiatives. This list is, and can never be, exhaustive and does not include the recent South Georgia Archaeology Project data, for instance.

There does not seem to be a mechanism for updating the data. The writing of the current Heritage Framework & Strategy and Policy for Removing Artefacts did not involve input from archaeologists and so is not as good as it could be.

The assumption in the wording of this section is that the entire physical heritage is to be allowed to decline. Surely a heritage policy should allow for all sites and artifacts to be examined and have management plans drawn up according to the merits of each, taking into account the costs, available resources, historical importance etc. This is an area for specialist and consideration should be given to delegating responsibility for overseeing this to an expert organisation, as happens in most countries (eg Historic England). GSGSSI is to be applauded for appointing a Heritage Advisory Panel to recognise the specialist nature of this subject.

The intention to create an online 'Living Heritage Record', to enable a modern-style two-way information flow is good. Whether this should be limited to 'principal sites' or complete is a matter for debate. Understandably some details might be justifiably kept quiet to deter treasure-hunters, say, but easily-available information about every historic site will help when planning other activities, such as building and construction works, or installing scientific project equipment. Such a data set should be designed to current heritage data standards such as set

	<p>out by CIDOC, so that the information can be stored and presented in a format relevant to the subject.</p> <p>10.6 The statement that “Sir Ernest Shackleton’s heroic crossing of South Georgia, and his final resting place at Grytviken form a key part of our early history” is debatable. While the story is remarkable, it is not particularly early in the (human) history in SG; it is quite modern history really! The history of research and discovery extends considerably back beyond the ‘heroic’ achievements of Shackleton and the specific projects of the Discovery Investigations and this paragraph misses that (eg. Cook 1775, the German transit of Venus investigations of 1885). Arguably CA Larsen is the most significant figure in the territory’s exploration and activities, in addition to his part in setting up the exploitation.</p> <p>10.7 ‘ravaged’ is somewhat histrionic</p> <p>10.7 This is a bit of a puzzle. Whaling stations have been digitised but there are limits to the information this technique can provide. The SGAP is looking into the use of drones for surveying ‘small sites’ e.g. sealers’ camps. They produce useful aerial images of known sites as an adjunct to surveying and they will hopefully prove useful for finding new sites. But they will not remove the need for visits. They won’t record objects currently buried or in caves and they can’t take samples of wood/charcoal/soil/etc.</p>
<p>11. South Sandwich Islands</p>	<p>11.3 Slightly nannying. Volcanic islands have indeed dangerous aspects but SSI are no more dangerous than many volcanic provinces around the world. One should not over-egg their uniqueness.</p> <p>11.4 It should be remembered that ‘experience and expertise’ arises by visiting and carrying out activities onsite. Reducing the activity in a place will eventually lead to a loss of such knowledge. Much of the knowledge that we have of the territory has come about through longer visits by small private yachts in the days of unrestricted (and mostly harmless) visits. We are already losing the opportunity for the next generation to build up such expertise.</p>

	<p>11.6 Assuming that this refers to the remains of the Argentine meteorological station at Hewison Point, this should be made clear.</p>
<p>12. Building Relationships</p>	<p>12.1 A rather unctuous paragraph especially in regard to relations with FCDO!</p> <p>12.2 We look forward to the stakeholder engagement being improved further. In particular, as we mention elsewhere, we encourage earlier engagement so as to feel more fully involved. Perhaps more frequent online meetings would allow wider two-way engagement than an annual physical meeting. South Georgia has a worldwide constituency.</p>
<p>Any other comments</p>	<p>Some of the language used in the draft lacks transparency and plain language (an exhortation by HMG in its current guidance for official documents) with the use of a 'buzzwords' and 'burospeak'. This does not inspire confidence in many readers.</p> <p>Overall this strategy reads as a highly ambitious programme of objectives. How will all of this be funded? The initiatives in it would seem to far exceed the resources of the GSGSSI? It would be helpful to see how particular projects would be prioritised.</p> <p>How will the Strategy be evaluated in terms of its success or otherwise? There are no KPIs associated with most of the key objectives. Who will independently monitor performance against this strategy?</p> <p>We suggest GSGSSI should re-read our response to the 2016-20 consultation. Many of the issues raised at that but were not addressed.</p> <p>It does seem that GSGSSI have already "baked" their plan and the request for comment is cosmetic. Is there a genuine desire to take on board and re-frame the strategy in then light of stakeholder input?</p> <p>The Heritage and Expeditions advisory panels (plus any others that we have missed) are not referred to in this document.</p> <p>We are pleased to see the continuation of the series of medium-term plans to try and promote</p>

	some continuity of approach in a small government that suffers from high staff turnover. Sudden changes in approach can be frustrating for people trying to organise activities.
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Please could your comments be returned to ceo@gov.gs on or before Monday 16th November 2020.

Thank you for helping shape the stewardship of South Georgia & the South Sandwich Islands.

Yours sincerely,

Helen Havercroft