Lest We Forget...

Article II:

"...3. Any harvesting...shall be conducted in accordance with...the following principles of conservation:

"(a) prevention of decrease in the size of any harvested population to levels below those which ensure its stable recruitment...

"(b) maintenance of the ecological relationships between harvested, dependent and related populations...and restoration of depleted populations...

"(c) prevention of changes...which are not potentially reversible over two or three decades...with the aim of making possible the sustained conservation of Antarctic Marine Living Resources."

The CCAMLR states were loud in their self-congratulation at having developed the "ecosystem" approach to the management of Antarctic marine living resources when the regime was concluded in Canberra in May 1980. The regime was widely hailed as a breakthrough which other fisheries agreements should emulate.

The sad reality is that, despite the brave words of 1980, CCAMLR has not demonstrated itself to be of any value at all in the protection of the Southern Ocean ecosystem. The fanfare which greeted the first measures which the Commission brought down last year was totally unjustified. The measures were clearly an attempt to deceive the world at large that all was well with CCAMLR. As a deception, they were a very crude attempt. That Antarctic diplomats all over the world should have reported back to their respective publics that there had been substantial progress made was fundamentally dishonest.

How much longer can the facade be maintained?

Last year, ECO warned that a crisis of credibility faced the Commission if it failed to act immediately to protect the fish stocks of the Southern Ocean. The situation even then was seen as so serious that nothing short of a total moratorium on fin fishing in the Southern Ocean was required, both to protect the stocks and to restore a measure of credibility to the Commission.

The crisis of credibility has not gone away. The excuse for inactivity is consistently given as a desire not to "upset" the fishing states by forcing them to submit to management procedures faster that they are prepared to accept them, and in this way "destabilising" the CCAMLR regime. As ECO stated last year, if member states engaged in fishing had no intention of accepting regulation of their activities, then it was pointless for them to have signed the regime in the first instance.

The question of data is also paramount at this time. There is still insufficient data for the Commission to make sensible judgments on conservation measures, according to some of the leading fishing states. However, it is noteworthy that these same states are also dragging their feet in the provision of historical data which would be of great importance in assisting the Commission in its judgments. From an outsider's point of view, such actions smack of self-interest.

This year, the Commission has the opportunity to refute the criticisms of the past in the most effective way possible - to implement regulations that are not only timely but also very necessary. The situation requires that such steps be urgently taken.
Krill Harvesting:
THE UNCERTAINTIES MULTIPLY

The past decade has seen a substantial increase in the krill catch in the Southern Ocean. This has provided some compensation for the fishing fleets operating in the area, following the decline in catches of finfish caused by overfishing. Reported krill catches rose from about 20,000 tonnes in 1973/74 to 529,505 tonnes in 1981/82.

Krill catches have declined from this peak, however, and current indications are that there was a total catch of 128,000 tonnes for the 1983/84 season.

In the absence of any effort data from the Soviet Union, the major krill fishing nation, it is impossible to know the reasons for this sharp decline, but ECO suggests that the following factors may have been influential:

i) Krill abundance was substantially reduced during 1983/84, due to climatic conditions. Research cruises by several different nations in different areas reported that krill swarms were much harder to find than in previous years.

ii) The failure of fishing nations to develop sufficiently lucrative markets may have proved an economic restraint to continued expansion of catches.

iii) Technical problems in processing may have caused a reduction in effort. Poland, however, has recently claimed a major breakthrough in processing krill, and is predicting a major expansion in its fishing effort in the future.

The lack of reliable estimates of biomass and replacement rates brings with it the danger of uncontrolled harvesting. Current estimates of biomass and annual production rates can only be seen as crude approximations because of the very wide confidence intervals that accompany them. Moreover, there is an even wider variation between estimates mentioned by different authors. For example, estimates of total krill biomass vary by a factor of more than 100, from the 500 to 750 million tonnes reported by Laws in American Scientist to the FIBEX estimate of only 7 million tonnes. Estimates of annual production rates are even more variable.

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Estimates of the sustainable yield of krill, which range from 10 to 150 million tonnes, cannot be substantiated with the current level of knowledge. Far more research needs to be carried out on the biomass, longevity and reproductive potential of krill. Until we know more about the basic life history of krill, and the interactions with and ramifications for the rest of the ecosystem, no substantial expansion of exploitation should be allowed.

ECO is also calling for improved reporting by the major krill fishing nation. Enormous gaps exist in the Commission's records for Soviet effort data. Trends in catch per effort for the fishery cannot therefore be estimated, yet the USSR has not indicated any willingness to co-operate by supplying data in sufficient detail to be of any value.

This disgraceful state of affairs must not be allowed to continue. As the largest exploiter of krill, the Soviet Union must not hinder CCAMLR's ability to effectively manage the resource.
Antarctic Fisheries: 
THE COLLAPSE IS COMPLETE

Information presented at this year's CCAMLR meeting confirms that the previously abundant stocks of commercial fish have now been decimated as a result of unregulated overfishing. Total Antarctic fish catches have been declining steadily since the initial catch of over 400,000 tonnes in 1969/70, and ECO has now learnt that the reported finfish catch for the season 1983/84 plummeted to an all-time low of 11,150 tonnes.

Despite this appalling state of affairs, the Commission has failed to implement any meaningful controls on fishing effort.

Last year, ECO drew the delegates' attention to the severely depleted state of fish stocks. The Commission's so-called conservation measures, adopted in 1984 to provide protection for over-exploited stocks, were as follows:

1) A ban on fishing (except for scientific purposes) within 12 miles of South Georgia.
2) Mesh size limits for trawlers.

These measures are totally inadequate! Within 12 miles of South Georgia the fishing grounds are poor because the rocky bottom is covered with kelp and harbours only juvenile fish. Since such grounds are plainly unattractive to commercial trawling anyway; a ban on fishing within a 200-mile radius of South Georgia would have been more appropriate as a conservation measure.

Furthermore, limiting mesh sizes is only partially effective as a fisheries conservation measure, because small fish which are able to pass through the meshes of a trawl net are often damaged by abrasion and are more vulnerable to bacterial and fungal infection as a result.

The Commission last year made two further requests to fishing nations:
- to refrain from any directed fishery for N. rossii;
- to ensure that by-catch of N. rossii in directed fishing for other species be avoided.

These cannot be considered to seriously address the overfishing problem. Firstly, it is unlikely that fishing efforts would be directed at a stock known to be as depleted as the stocks of N. rossii. Second, it is unclear how fishing vessels are expected to distinguish between schools of N. rossii and those of other fish species.

The conclusion must be that no appropriate steps have been taken to implement Article 11 with respect to finfish. Data submitted this year confirms that both the spawning stock and recruitment rate of N. rossii have been reduced to a small fraction of their pre-1970 levels. It is likely that the level of fishing effort has been so high that even small incidental catches of N. rossii, of the order of a few hundred tonnes, could be sufficient to prevent recovery of the stocks. Yet only 15 years ago, the same species was providing 98% of the catch of 403,000 tonnes taken by Soviet trawlers in the South Georgia area.

A complete and immediate ban on bottom trawling in the South Georgia area is urgently required. Target fishing for other species (for example C. gunnari) by other methods, such as mid-water trawling, must not be allowed until it can be demonstrated that no substantial by-catches of other species will be taken.

Similar measures are required in Kerguelen waters where fish stocks have continued to decline despite "conservation measures" initiated by the French government.

The rapid decline of the commercially exploited fish stocks in the CCAMLR area has been compounded by the fact that Antarctic fish species tend to be slower-growing, less fertile, and reach maturity at a greater age than fish from temperate or tropical waters. They are thus far more vulnerable to overfishing and will take much longer to recover from over-exploitation. Furthermore, trawling is itself an environmentally undesirable method of fishing. It is widely accepted that bottom trawling may seriously disrupt bottom-dwelling animals and plants. The intensive fishing around South Georgia and Kerguelen, as well as virtually eliminating many fish species, may also have inflicted long term damage on those benthic communities, and hence further jeopardised the recovery of the depleted fish stocks.

Examination of the catches by country shows that the Soviet Union has been responsible for the great majority of the...
It is totally unacceptable that effort data for the Soviet fishing fleet for most of that period has not been provided to the Commission and may, again, not be available for this year’s meeting. Last year, some countries did not provide the data that the Working Group on Fish Stock Assessment required, and then claimed that the recommendations for protection of stocks which the Working Group put forward were not valid because they were not based on enough data. This must not be repeated this year.

It is clear that overfishing has caused an enormous decline in abundance of the major commercially exploited species within the Convention area, with South Georgia the most heavily affected area.

The Commission is obliged, under the conditions of Article II, to initiate urgent remedial action. The Conservation Measures adopted at last year's meeting, are clearly not sufficient. A minimum of ten years will be required to allow fish stocks to build up again to ensure a healthy population of spawning fish. Once again we call upon this year’s meeting to institute a 10 year ban on all Antarctic fishing, as a first step towards the introduction of a fisheries regime which would satisfy the provisions of Article II of the Convention.

NGO Observer Status?

The Antarctic and Southern Ocean Coalition has supplied further information as requested by the Commission to support its application for observer status at CCAMLR meetings. Greenpeace has also applied for observer status despite having last year's application turned down. Greenpeace feels it is in an excellent position to promote an understanding of the Commission's objectives to the general public, but that it is very difficult to do so from the outside.

ECO believes that the inclusion of NGO organisations as observers would be a major step forward in ensuring the credibility of the Commission as a body which has the best interests of the Antarctic marine ecosystem at heart, and ask that delegates support these applications.

NGO Office.

NGO groups involved in lobbying at CCAMLR again have an office in the Wrest Point hotel and can be contacted at any time there (Room 30 in the Wellington suite, phone extension 1364). They extend an open invitation to any delegate who wishes to speak with them.