

## **Pew France: Contribution to the public consultation on the marine reserve of the Sub Antarctic islands**

The French government committed to create a large fully protected marine reserve in the waters of the French Sub Antarctic Islands. This project could enable France to join the network of countries that have created large, highly protected marine areas in the world. A [public consultation](#) is currently underway on this project to invite the civil society to comment on the proposal. Pew congratulates the French Government for this major commitment and presents here its contribution to the public consultation.

Considering that:

**- The French Sub Antarctic Islands are home to an exceptional biodiversity.**

These waters host a big concentration of birds and marine mammals, and a large diversity of marine habitats. But, these ecosystems are threatened. Climate change is a major challenge for many species which see their natural breeding and feeding grounds and waters changing. Internationally, about 90% of fish stocks are exploited to their maximum or overexploited ([FAO 2016](#)). And the waters of the Southern Territories contain the most important stock in the world of Patagonian toothfish (Chilean seabass), a species of deep water fish, particularly vulnerable to overexploitation because of its late maturity and its high commercial value. Overfishing has had a significant impact on the populations of toothfish in the past, leading to the closure of certain fishing areas ([Seaweb Europe 2016](#)).

**- Highly protected marine reserves have proved their efficiency to maintain a healthy ocean:**

Marine protected areas (MPAs) contribute to the conservation of endangered species and help regenerating fish stocks through the spill-over effect, where over time the area around the reserve profits from the growing population of fish. They are also an effective way to fight against climate change, especially because preserved ecosystems have greater resilience to human disturbance ([NOAA 2013](#)). According to science, the most effective MPAs for the maintenance of biodiversity and fish stocks are the MPAs that are: 1) highly protected with no extractive activities, 2) well monitored, 3) long lasting, 4) large, and 5) isolated ([Nature 2014](#)).

**- Several countries in the world have already created large highly protected marine reserves:**

In the last ten years, a network of large marine reserves was established in 7 countries, covering a total area of about 8 million km<sup>2</sup> with no extraction ([Pew 2016](#)). The 3 biggest marine reserves were recently created in Hawaii (1.5 million km<sup>2</sup>), Pitcairn (830 000 km<sup>2</sup>) and Chagos (640 000 km<sup>2</sup>). Marine reserves with no industrial fishing contribute significantly to the regeneration of threatened fish stocks.

**- Ambitious political commitments were made to protect the ocean:**

States (including France) and non-governmental organizations which are members of IUCN (International Union for Conservation of Nature) recommended at the World Conservation Congress in September 2016 in Hawaii to incorporate at least 30% of each marine habitat in a network of fully protected MPAs with no extractive activities by 2030 ([IUCN 2016](#)). Moreover, during the Grenelle de la Mer in 2009, France committed to develop marine protected areas in 20% of French waters by 2020, half of them (10% in total) as no fishing reserves ([Grenelle 2009](#)). France is now approaching 20% of its waters designated as MPAs, but only 0.22% of these waters are fully protected, where there is no fishing. This is a far stretch from the 10% target.

Based on this information, Pew submits the following comments to the public consultation on the proposed marine reserve of the French Sub Antarctic Islands:

**- Extend the fully protected areas:**

The current project presented proposes the establishment of a fully protected zone of 120 000 km<sup>2</sup> divided into 7 distinct areas. Pew proposes to increase the fully protected area without extractive activities over an area of one third of the total EEZ of the Sub Antarctic islands, which is 550 000km<sup>2</sup>. This surface would ensure effective and sustainable protection of the exceptional marine biodiversity of the Sub Antartics and enhance their natural resilience to the adverse impacts of climate change. This would also be in line with the recommendation of IUCN to create reserves representing at least 30% their waters in MPAs with no extractive industry by 2030, and enable France to enter the global network of large and highly protected marine reserves. With a marine reserve of this magnitude, France would approach its goal of Grenelle de la mer, moving from 0.22% to 4.9% of waters with full protection. Finally, this figure would respect the commitment made by Minister Segolène Royal before United Nations Framework on Climate Change, 21<sup>st</sup> Conference of Parties to create a 550 000 km<sup>2</sup> integral marine reserve as a key adaptation measure in the face of climate change ([Press release](#)).

**- Respect the international definition of a Marine Protected Area:**

The current draft for the marine reserve maintains industrial fishing in 67% of the area of the reserve, with boats over 50 meters and non-selective trawling. According to the IUCN definition, Marine Protected Areas at the international level can allow a moderate use of natural resources, which is "non-industrial and compatible with nature conservation" ([IUCN 2012](#)). Moreover, a "marine reserve" is the most restrictive category of MPA in French law to protect natural areas of particular importance and should avoid "any artificial intervention that may degrade them" ([Code de l'environnement 2016](#)). So, to be consistent with the international definition of an MPA and the definition of a French marine reserve, and to be in line with international practice, Pew would recommended that no industrial activity, industrial fishing or mining, is allowed in the whole surface of the marine reserve of the Sub Antartics.

**- Simplify the zoning for better monitoring:**

The zoning of the proposed reserve has a complex and irregular shape that it seems difficult to define and monitor. A simpler and more compact form, that would cover the high biodiversity areas, would allow a better delineation of the reserve area by users and a more effective surveillance. For example, the reserve could cover a 250 km circle around each island group or else it could range from 44.5 ° S to 47.5 ° S in Crozet, or 47 ° S to 51 ° S Kerguelen. Also an aggregation of the fully protected zones, currently divided into seven distinct areas, would allow a better control of these areas. Moreover, a compact area would allow for species that migrate long distances to do so through a protected area, supporting their population regrowth in the face of a changing climate.

**- Protect the waters of Saint-Paul and Amsterdam:**

The proposed project provides only limited protection in terms of area, in St. Paul and Amsterdam, with no full protection from industrial activities). This marine area is however very important for biodiversity, especially for the critically endangered Amsterdam albatross. It is also a feeding ground for 3 species of tuna. The precautionary principle (including allowing for the impacts of climate change) on one hand and the difficulty to change the zoning in the future on the other hand, should encourage the designation of a highly protected area in that zone. Fishing is currently very limited around this area, and concentrated in a radius of about 16 nautical around the islands, thus a greater protection of this zone would have limited economic impact and would provide a long term protection to these waters. For example a ring-shaped fully protected marine reserve around the fishing area could increase the surface of the full protection of the reserve of up to 400 000 km<sup>2</sup>, with no impact on the current fisheries.

Access the public consultation [here](#)