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It is very encouraging that the Falkland Islands Government are looking for an approach to best manage our valuable marine environment. This consultation presents the single most important opportunity for developing a credible framework to safeguard our pristine inshore environment and wider marine zones.

We do not support the current MMA proposal as it stands. Although a good start, the proposal does not offer a clear overall plan or strategy. It fails to allow us to adapt to climate change and any new knowledge. Currently, we do not believe it would protect our distinctive biodiversity and allow for long-term sustainable development and therefore the needs of the community.

Using tiered zoning, as proposed, is a common approach and can work well if developed properly. This would require:

- **A clear rationale for selecting National Marine Nature Reserves (NMNRs) and Sustainable Multi-use Zones (SMZs).** There is no clear set of reasons for choosing where NMNRs are and what area they should cover. Having these reasons will make it possible to meaningfully manage areas for potential threats. Critical areas, such as the seas around New Island and Key Biodiversity Areas, have been left out. We believe clear criteria for how these zones are chosen is a prerequisite to make the whole MMA system work for the long-term and should not be left to later on in the process. As climate change alters our ecosystem it is important our MMAs can adapt. [Q.1 and 2]
- **An ecosystem sized approach.** Carving up the highly connected marine environment into jigsaw pieces does not work and often causes overall ecosystem deterioration. We welcome identifying ecosystems, such as the Burdwood Bank and the inshore environment SMZs, where large-scale interconnected processes are critical to their continuing health. Management of these areas therefore needs to be defined as strong enough to maintain overall functioning of the ecosystem. [Q.4]
- **International standards, as defined by the International Union for the Conservation of Nature.** International standards can ensure strong management of the Sustainable Multi-use Zones and the National Marine Nature Reserves. The current SMZ proposal is not sufficiently defined and does not provide enough confidence that damaging processes will be prevented, as would happen under international standards. The application of international standards would not prevent appropriate day-to-day activities of responsible industries. [Q.2]



- **The inshore SMZ should exclude risky open pen salmon farming.** Industrial salmon farming should be explicitly excluded to enact the FIG position, or else the decision will risk lacking credibility and will undermine the whole SMZ designation. [Q.4]
- **More MMA tiers.** Additional categories are needed as the proposed two zone approach could be either far too restrictive or too permissive. Areas which are important for nature but are often used for activities, such as tourism, need more tailored management. Examples could include areas around New Island, the Twins, Elephant Cays, Kelp Forests or other special wildlife and spawning hotspots. [Q.4]

We have put numbers in brackets corresponding to which questions these points are relevant to in FIG's [consultation on Marine Managed Areas](#).

We welcome discussion of our ideas and hope members of the community will bring their own thoughts and ideas to the consultation.