

Argentina  
Patagonia Coastal Contamination Prevention and Sustainable Fisheries

**STAP REVIEWER COMMENTS**

**Review of Argentina: Patagonia Coastal Contamination Prevention and Sustainable Fisheries Project.**

17 January 1998.

**Overview.**

The Project Concept is well conceived. The proposed GEF Project in its interaction with the associated projects funded by others will have the potential to contribute significantly to global biodiversity and to sustainable development if they are effectively managed and coordinated.

The concentration on capacity building, coordination, linkage and compatibility with policies and programs of the Government of Argentina (GOA) is strongly endorsed, as are the lessons learned from other projects in Argentina and quoted in the Proposal. No doubt there are other lessons that have been learned in countries other than Argentina which also should be embedded in the project design. These lessons will form part of the benefit to flow from the involvement of the World Bank and UNDP in this and associated projects.

One of the major objectives of the Project is to achieve sustainable fishing of migratory species including hake. Such species commonly travel beyond a country's EEZ, both into international waters and into the EEZs of other countries. Effective control of fishing effort will require the cooperation of all relevant countries and this should be addressed in the Concept Document.

**Recommendations**

1. The involvement of all relevant countries should be specified in relation to achieving sustainable fishing of migratory transboundary fish species.
2. The endorsement for the Project by the Operational Focal Point should be obtained before the Concept Document is submitted for approval.
3. The Objective statement should recognise that improved fisheries management should contribute to marine biodiversity maintenance, (as well as to prevent overharvesting). This particularly refers to bottom trawling and by-catch.
4. Any effective system of maintaining sustainable fishing levels will require virtually continuous monitoring of stocks and the development of reactive measures to limit fish catch accordingly. This will be an expensive procedure that will have to be continued after the end of this project. To be successful, full participation of the fishing industry in this system, including in decisions relating to effort, fishing methods and establishment of fishery reserves (MPAs), will be essential.
5. The lessons learned in other projects which will be applied in this one should not be limited to projects which were carried out in Argentina.
6. This project should also consider the risks of introducing exotic species and develop methods of minimising such risks.
7. The potential contribution of marine protected areas (MPAs) to sustainable fishing (and maintenance of biodiversity) should be investigated.
8. The possibility might be considered of requiring all fishing vessels to carry permanently operational position fixing transmitters, so that surveillance by satellite and aircraft can determine whether fishing is occurring in reserves.

## Detailed comments and recommendations

The paragraph and section numbers used below are the same, and in the same sequence, as those used in the relevant part of the Documents.

### Proposal for Review.

**2. Summary.** It would be more accurate to reword (b) to read "improve fisheries management to eliminate and prevent overharvesting in the project region", since some fisheries are already over-exploited (FAO).

**4. Institutional ---arrangements.** The list of representatives on the inter-agency commission implies more than 8 such representatives (7 government plus private sector).. If the private sector is to be properly represented, I should expect that representatives will be desirable of commercial fishers, conservation organisations, farmer organisations (several), manufacturing industries (several) plus others. Careful design of the structure of this commission will be necessary to prevent it being unmanageable with so many representatives.

**5.** It seems desirable that the endorsement for the Project by the Operational Focal Point should be obtained before the Concept Document is submitted for approval.

### Project Concept Document.

**General-** for people who are unfamiliar with the history of this project, this Document could more clearly distinguish between the project under review and the associated projects. Annex 2 makes the distinction much more clearly.

**1.(b)** The Objective statement should recognise that improved fisheries management should contribute to marine biodiversity maintenance, (as well as to eliminate and prevent overharvesting). This particularly refers to bottom trawling and by-catch. The objective statement (b) should include "to eliminate" overharvesting.

**2.II.** See above. Marine biodiversity is also threatened by habitat change and by-catch from bottom trawling. I think that reference to unsustainable use of open sea fisheries needs amplification to indicate that the concern is not limited to excessive catch, but refers also to destructive methods.

**2.II.** It would be surprising if introduction of exotic species does not constitute a potential threat to the diversity and productivity of this coastline which is "one of the world's most biologically productive coastal ecosystems, and one of the most complex —." It is recommended that this project also consider the risks of introducing exotic species and develops methods of minimising such risks.

**2.II.B.** The potential contribution of marine protected areas (MPAs) to sustainable fishing (and maintenance of biodiversity) should be investigated. Fishery reserves are mentioned on p.11 under Section 5, but they should be given greater emphasis.

**2.II.B.i).** The phraseology used "(i.e. taxing those participating in the highly remunerative fisheries on recovered and well-managed stocks)" suggests that those participating in poorly remunerative fisheries on depleted and badly managed stocks will not be taxed. This implication was clearly not intended, since it is these latter fisheries that are most in need of measures, such as taxing users, designed to reduce fishing effort.

**2.II.B.i).** The possibility might be considered of requiring all fishing vessels to carry permanently operational position fixing transmitters, so that surveillance by satellite and aircraft can determine whether fishing is occurring in reserves and monitor fishing effort geographically as part of a formal Vessel Monitoring System.

**2.II.B.ii).** Any effective system of maintaining sustainable fishing levels will require virtually continuous monitoring of stocks and the development of reactive measures to limit fish catch accordingly. This will be an expensive procedure that will have to be continued after the end of this project. To be successful, full participation of the fishing industry in this system, including in decisions relating to effort, fishing methods and establishment of fishery reserves (MPAs) will be essential. The likelihood of the Argentine Government being able to continue this system after the completion of this project is questionable in the light of the statement that "the amount of updated hard evidence on the assessment and management of fish stocks and fisheries for the area has diminished in recent years." (See 6. Main sector issues.)

9. The lessons learned in other projects which will be applied in this one should not be limited to projects which were carried out in Argentina.

13. Should I be listed as a consultant here?

15. Is it correct to maintain that this project will have minimal effects on government budgets? The cost of such activities as buy-back of fishing licences and maintaining management and monitoring regimes after the end of the project could be quite significant.

23. Are you being too optimistic in maintaining that the political risk is "Low"? This comment reflects the recent relevant institutional events in Argentina, including the decision not to proceed with the Fisheries Secretariat.

24.-Effectiveness Conditions. I am surprised that none are anticipated. The challenges for this project will be considerable. e.g. reducing fish catch, controlling remotely generated pollution from agriculture etc.

Block 5. 25. Does not this project involve indigenous people?

After 27. A list of acronyms would help people reading this document.

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