Dr Manuel Barange

Assistant Director General and Director of the Fisheries and Aquaculture Division Food and Agriculture Organization of the United Nations

8th October 2026

Dear Dr Barange,

We would like to thank you for your letter of 4th September[1]. In the spirit of open engagement, please rest assured that we have already posted your letter on our website as you suggest.

Arising from your letter we feel that there remain several important issues that would bear further discussion. For ease of reference, we set out the most important in a series of bullet points below.

1. Progress towards better management of the krill fishery has stalled.

It is our understanding that the CAMLR Commission (CCAMLR-41[2], paragraph 4.10) recognises the progress made towards establishing a revised krill fishery management approach, including a krill stock assessment, harvest rate (SC-CAMLR-41[3], paragraphs 3.30 to 3.34) and a risk analysis or spatial overlap assessment (SC-CAMLR-41, paragraphs 3.35 to 3.39). However, unless you can point us to other information, it is our belief that these revisions have not yet been implemented into management. Indeed, divergent views within the Scientific Committee about how to implement the changes as Conservation Measures (SC-CAMLR-41, paragraphs 3.59–3.61), and the inability to provide consensus advice regarding the implementation of revised catch limits (SC-CAMLR-41, paragraphs 3.67–3.69), mean that progress has stalled[4] and in fact little substantive progress in developing the revised krill fishery management approach has been made in recent years.

2. Scientists warn that current krill fishing rules are not safe enough.

We also understand that the Scientific Committee's Working Group on Ecosystem Monitoring and Management (WG-EMM), the group primarily responsible for providing advice on the krill fishery, has previously advised the Scientific Committee that until the lapse of CM 51-07[5], the proportion of the trigger level distributed to Subarea 48.1 had provided an appropriate balance between fishery desirability and reducing the risk for local krill dependent predators (WG-EMM-21[6], paragraph 2.63). Following the lapse of CM 51-07, the situation has clearly changed. In 2025, WG-EMM provided

[1] Open Letter: The Modern Reality of Antarctic krill fishing

[2] Commission for the Conservation of Antarctic Marine Living Resources, Report of the Forty-First Meeting of the Commission Hobart, Australia. https://meetings.ccamlr.org/system/files/meeting-reports/e-cc-41-rep.pdf.

[3] Scientific Committee for the Conservation of Antarctic Marine Living Resources Report of the Forty-First Meeting of the Scientific Committee Hobart, Australia. https://meetings.ccamlr.org/system/files/meeting-reports/e-sc-41-rep.pdf.

[4] The fishery for Antarctic krill – Conflicts between industrial production, protection of biodiversity, and legal governance – ScienceDirect.

[5] Conservation Measure 51-07 (2023). Lapsed. Interim distribution of the trigger level in the fishery for *Euphausia superba* in Statistical Subareas 48.1, 48.2, 48.3 and 48.4. https://cm.ccamlr.org/en/measure-51-07-2023.

[6] Scientific Committee for the Conservation of Antarctic Marine Living Resources Report of the Working Group on Ecosystem Monitoring and Management, 2021. Hobart, Australia. https://meetings.ccamlr.org/system/files/e-sc-40-a6.pdf.

consensus advice to the Scientific Committee that in isolation, the trigger level identified in CM 51-01[7] is not precautionary due to local catch concentration, and so stressed the need to re-instate smaller spatial management units similar to the lapsed CM 51-07 in order to minimise the ecological risk of catch concentration (WG-EMM-2025[8], paragraphs 4.47). Later in 2025, at the most recent meeting of the CAMLR Commission, most Members stated that following the Scientific Committee's consideration, it was clear that the current situation is not precautionary (CCAMLR-44[9], paragraph 4.43). That most Members are of this view highlights the need for additional work to demonstrate the krill fishery is precautionary, allowing a return towards consensus. In the absence of such work, and under the precautionary principle, it is evident that new Conservation Measures are urgently needed to ensure that the krill fishery is precautionary and meets the FAO's global benchmark. We believe that this information was available prior to the publication of the FAO State of the World Fisheries and Aquaculture Report in 2026[10].

3. Growing concerns about the impact of krill fishing on wildlife, particularly at a localised level

We believe that it is also important to recognise the other issues we highlight in our letter of 28 August. Briefly, and to avoid repetition, these include the objections by environmental NGOs to the Marine Stewardship Council re-assessment process for some operators in the krill fishery; the growing number of direct humpback whale mortalities (7) in the krill fishery since 2021, together with one additional entangled humpback whale, which though released alive, was so compromised that it almost certainly did not survive; also, the number of Antarctic fur seal mortalities (39) in the fishery between 2016 and 2025[11]. That the IUCN has categorised the Antarctic fur seal as *Endangered* is particularly concerning given the growing evidence of krill redistribution. Collectively, there is clear growing concern about the management status of the krill fishery.

We would therefore like to iterate our concern that the cumulative impacts of aggregated catches and increased krill fishing pressure (with the fishery closing well before the end of the fishing season in 2025, after reaching the trigger level for the first time), recovering populations of baleen whales, and climate change, are not being properly accounted for in CCAMLR's current management approach.

We posit that management of the krill fishery must be precautionary across a range of spatial and temporal scales, **not just at the large scale. To be precautionary, CCAMLR must implement the revised krill fishery management approach, or agree a substitute for CM 51-07**. Taking account of the ecosystem needs of dependent species, particularly at small scales, is vital to the ecosystem approach to management. The Marine Stewardship Council recertification of the Antarctic krill fishery is currently under challenge following formal objections, including from WWF and ASOC, while CCAMLR-45 is due to commence on the 19th of October, as such, we respectfully ask the FAO to urgently review the Antarctic in the context of current scientific evidence, ahead of the annual CCAMLR-45 meeting.

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[7] Conservation Measure 51-01 (2024). Precautionary catch limitations on *Euphausia superba* in Statistical Subareas 48.1, 48.2, 48.3 and 48.4. https://cm.ccamlr.org/en/measure-51-01-2024.

[8] Scientific Committee for the Conservation of Antarctic Marine Living Resources Report of the Working Group on Ecosystem Monitoring and Management, 2025. Hobart, Australia. https://meetings.ccamlr.org/system/files/meeting-reports/e-sc-44-a6.pdf.

[9] Commission for the Conservation of Antarctic Marine Living Resources, Report of the Forty-Fourth Meeting of the Commission Hobart, Australia. https://meetings.ccamlr.org/system/files/meeting-reports/e-cc-44-rep.pdf.

[10] FAO. 2026. *The State of World Fisheries and Aquaculture 2026 – Blue Transformation: turning vision into impact*. Rome. https://doi.org/10.4060/cd8357en

[11] Fishery Report 2025: *Euphausia superba* in Area 48 CCAMLR Secretariat 02 March 2026. https://fishdocs.ccamlr.org/FishRep_48_KRI_2025.pdf.

We contend that Antarctic areas do not currently constitute a global benchmark for precautionary ecosystem-based management.

Yours Faithfully,

Act4Wildlife
Antarctic Wildlife Alliance
Bertie Gregory, Wildlife Filmmaker and National Geographic Explorer
Blue Marine Foundation
Bob Brown Foundation
Deutsche Stiftung Meeresschutz/DSM
Gallifrey Foundation
Institute for Accountable Ocean Governance
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