## Suggestion for the latest Management Plan for East Svalbard

Organised tourism is one of the cornerstone activities in Svalbard. In Stortingsmelding (The Norwegian parliamentary newsletter) no. 50 (1990-91), the government made it clear that conditions should be made suitable for the evolution of tourism. Stortingsmelding no. 22 (2008-09) states that tourism, along with coal mining, research and education, is one of the basic industries of Svalbard.

A couple of years ago, authorities wanted to, on behalf of certain special interest groups, impose exaggerated limitations on tourist visits to East Svalbard. Organised tourism then successfully argued against some of the plans.

It is with a bittersweet taste in the mouth that we the undersigned now read the Governor's new proposal for a Management Plan for East Svalbard. We are writing as concerned private individuals, but we also are all professional guides and expedition leaders with a total of more than 250 seasons of field experience between us. We are trained in public rules and guidelines and are especially cautious when in the field. We ensure that our guests, more than any other groups, limit their impact, that they show the greatest possible care and respect, and that they develop a true empathy for the environment and the natural and cultural heritage.

We appreciate that the new plan is somewhat more nuanced than previously, but we are disappointed that the planned limitations are exaggerated, poorly argued and in some areas far too general. Unfortunately the plan is based on strongly biased opinions. It operates with 5 management zones. Our greatest difficulties with the plan have to do with the unclear premises for Zone A, and with the generalisations and doubtful prerequisites for Zone B. We have no problems with Zone E, we only have minor adjustment suggestions for Zone D, and we applaud the introduction of Zone C – we would even suggest it could be expanded.

Zone A, a "reference area for science", is to consist of more than half of the geographical area of eastern Nordaustlandet as well as approximately three-quarters of Edgeøya. This Zone will (according to Svalbardposten no. 49, Dec 16, 2011) in principle be open to all, but only with a duty to report visits before and after.

We have great difficulty understanding the arguments behind these artificial lines on the map. We call for a precise definition of "reference area for science"? What exactly are the needs of the science, and where is the documentation for those needs? Where are the scientific arguments that precisely those two sections of Eastern Svalbard are different from the other parts of the area? And to what extent will defining these areas as planned, influence others parties' possibilities to visit within the areas? Since Zone A areas are already today in principle open to all, with a duty to report activities before and after, how will the management in fact be different in the future? Why introduce the zoning at all if nothing is to change? Is there something we are not being told?

Zone B is a complex issue and in our minds represents an over-simplification of matters. It is suggested that the whole area of Tusenøyane, and the north and west sides of Lågøya will be closed to all traffic from May 15 – August 15 to protect vulnerable species. In effect, regulations stricter than those that apply to the already existing bird reserves in Svalbard are to be implemented.

In Tusenøyane, there are certainly sensitive hotspots for birds and mammals. Among these specifically Ækongen and Bölschøya can be considered vulnerable, and there is good reason to consider introducing detailed guidelines for visits to these places. But to draw a red line around the entire archipelago is a gross exaggeration. It seems like an attempt to oversimplify a complex reality. Such a management step would rob the public of an opportunity to visit with awe, respect and care a unique part of Svalbard's natural heritage.

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The case of Lågøya is even worse. This is the third-most visited site by organised cruise tourism in all of East Svalbard. The island can be reached in a few days from Longyearbyen. It is often ice-free at times when most of East Svalbard is still closed off by ice. The walrus haul-out is the main attraction, and practically all visits are concentrated on a very small area right at the tip of the island in order to see these animals. From the tip, it is also often possible to view a good selection of relatively uncommon Svalbard birds, and this is the only location offering a fair chance of spotting a Sabine's gull.

Lågøya thus is of considerable importance to the business we work in. Without access here, and particularly on short trips early in the season, our guests will loose the opportunity to encounter walrus. They will also miss interesting bird viewing, unless we seek out other, perhaps more vulnerable but hitherto open, sites. The same can be said to be true for local Svalbard inhabitants, who have few chances to visit the easternmost ice-covered areas during the summer.

The plan to close off the north tip of Lågøya is based on an assumed need to protect the birdlife from tourists. But there is absolutely no documentation, nor any indication that organised tourism has had any detrimental effect on the birdlife here. On the contrary, the continued presence of species such as Sabine's gull and various waders demonstrates that the local birds and the tourists – led by experienced guides – have been able to co-exist for years.

As a matter of fact, the northern tip of Lågøya is not particularly vulnerable at all. One must tread carefully and with respect there, yes, but that is no different from everywhere else we visit. The closing of the area serves no constructive purpose and is simply a bureaucratic overreaction. Instead, we recommend the implementation of detailed guidelines for visits, as in Zone C

Zone C is such a good idea! We firmly support and highly recommend that site-specific guidelines are created and implemented for a string of locations around Svalbard. AECO has recently publicised the first such, and we applaud this step. Site-specific guidelines have been a strong, useful and effective management tool in sensitive wilderness areas around the World for quite a while. Antarctica and the Galapagos Islands are outstanding examples of areas with site-specific guidelines that really work. Let's have them in Svalbard too! We will not argue against site-specific guidelines for any of the five suggested Zone C locations. On the contrary, we would like to suggest the inclusion of more sites – such as important Lågøya, Ækongen and Bölschøya. There is nothing to hinder detailed site-specific guidelines for all parties.

Finally, we would like to note that Delitschøya, Zieglerøya and Halvmåneøya were closed in 2010 without any kind of public hearing. These islands represent an important part of public cultural heritage, but are today only accessible for scientists. There should be site-specific guidelines for visits to these islands too.

Sven Achtermann Robin Aiello Piero Bosco Axel Broman Olle Carlsson Arjen Drost Jörg Ehrlich Martin Enckell Anja Fleig Mats Forsberg Josef Friedhuber

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Chris Gilbert Shoshanah Jacobs Troels Jacobsen Morten Jørgensen Christian Katlein Arne Kertelhein Hannah Lawson Elke Lindner Adam Rheborg Jason Roberts Tim Soper Chris Srigley Rolf Stange Andreas Umbreit Michelle van Dijk Rinie van Meurs Tomasz Zadrozny