



Where the Map Says Protected

Field notes on the distance between a designation and an enforced boundary, drawn from the Galápagos Marine Reserve, the Antarctic Peninsula and the polar bear range states

A DRIFTR Insights paper for trustees, family offices and philanthropy advisers
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69%

of illegal longline trips with
AIS switched off

57.5%

of the 2024/25 krill catch
taken in Peninsula waters

88%

fall in industrial fishing after
Hermandad was declared

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Prepared for discussion. Not legal, tax or investment advice.

Protected by Whom, Against What?

Three places, one question

Every conservation proposal that reaches a trustee contains a map. There is a line on it, and inside the line something is described as protected. The question worth asking is narrow and slightly rude: protected by whom, against what, and on what evidence that the protection is still holding?

Three places answer that question from different directions. I have spent years working in polar waters at both ends of the planet, and more than a decade on fisheries enforcement at sea. None of what follows requires a hostile reading of any organisation. The record is public, and the core data in each case comes from the people responsible for managing the place: park rangers, the commission's own fishery reports, the range states' published plans.

Galápagos

One of the strongest designations anywhere, and what it stopped

The Galápagos Islands were the first site ever placed on the World Heritage List, in 1978. The listing was extended in 2001 to take in the marine reserve, and the site spent 2007 to 2010 on the List of World Heritage in Danger. The marine reserve covers more than 130,000 km². In January 2022 Ecuador added the 60,000 km² Hermandad Reserve, half of it fully protected and half closed to longlines. Longlining has been banned inside the original reserve since 2000.

That is about as strong as marine designation gets.

In the month from 13 July 2020, Oceana tracked nearly 300 Chinese vessels fishing off the reserve. Together they logged more than 73,000 hours of apparent fishing, and 99 per cent of the visible fishing activity in that period was by Chinese-flagged vessels. The fleet worked outside Ecuador's waters, where fishing is legal. The boundary is where it got interesting. Over six weeks from mid-July, HawkEye 360's radio-frequency satellites picked up 14 vessels inside Ecuador's exclusive economic zone that were not broadcasting AIS and could not be identified. Six were close to the main fleet. That does not prove illegal fishing, and nobody knows which flags those vessels flew. It does show how little a line on a chart can see. Ecuador's navy watched the fleet from the air and from patrol ships.

The part that gets less coverage happened inside the reserve, among the people who live there. Rangers from the Galápagos National Park Directorate ran monitoring and control operations from 2018 to 2024, and Romero-Cacedo and colleagues published the results in *Frontiers in Marine Science* in September 2025. Illegal longline detections peaked in 2020, with thirty longlines found that year. The authors link the spike to the pandemic, when disrupted supply chains pushed fishers towards the local market. Infractions per unit of patrol effort dipped in 2021 and then rose every year to 2024. The authors suggest growing pressure from the fishing sector to legalise longlining inside the reserve as a likely reason.

The compliance figures are what matter to anyone underwriting a gift:

- 41 vessels were linked to illegal longlines, and seven of them were repeat offenders.

- On 69 per cent of the trips where illegal longlines were recorded, the vessel's AIS was switched off, although artisanal fishers in the reserve are required to keep it on. Repeat offenders had it off 83 per cent of the time.
- About 80 per cent of those trips had no landing recorded when the vessel came back to port.
- The offending vessels made up 17 per cent of the artisanal pelagic fleet but landed about 30 per cent of its reported pelagic catch.
- About a third of the longlines found in the water had already caught at least one protected species. Among them were critically endangered scalloped hammerheads and waved albatross, along with manta rays and green turtles.

Patrols rose from 620 in 2018 to 1,014 in 2022. Infractions per patrol rose anyway, and kept rising after patrol numbers eased.

The argument over the gear has since moved from the docks into the journals. Castrejón and Defeo made the case for reconsidering the ban in *Marine Policy* in 2023 and followed up in 2024. Hearn and Bucaram replied with a commentary in 2025, and a 2026 paper in *Marine Policy* assessed the feasibility and wider impacts of legalisation.

A donor funding shark protection in the Galápagos in 2020 would have seen none of this. The designation was intact the whole time. So was the gear in the water.

The evidence also cuts the other way, and a fair account has to carry both. A study led by Easton White, published in *Marine Policy* in 2026, found an 88 per cent fall in industrial fishing inside the Hermandad Reserve immediately after it was declared, before Ecuador had stepped up enforcement or approved a management plan. Declaration alone changed how the industrial fleet behaved. It did nothing for artisanal fishing inside the older reserve. Telling those two outcomes apart is what due diligence is for.

The Southern Ocean

A treaty system that watched it happen

The waters off the Antarctic Peninsula are managed by CCAMLR, a commission of 26 countries and the European Union whose founding purpose is conservation. It works by consensus, so any one member can stop a decision.

Krill catch across Area 48 is capped at a “trigger level” of 620,000 tonnes. From 2009, Conservation Measure 51-07 also spread that catch across four subareas, so that no more than 25 per cent could come from Subarea 48.1, the Peninsula waters where whales, penguins and seals feed. The measure had been extended a year at a time. In 2024 the Commission could not agree to extend it again, and it expired at the end of that season.

The effect was immediate. In 2024/25 the fishery reached the 620,000 tonne trigger level for the first time in its history and closed early.

Subarea 48.1 produced about 359,000 tonnes of krill in 2024/25, 57.5 per cent of the total and more than double its 2024 catch. Under the lapsed measure its share had been capped at 25 per cent. No rule was broken. The rule had simply run out.

CCAMLR observers first recorded whale deaths in krill trawls in 2021, when three humpbacks were caught. In 2024 two more humpbacks died in nets on vessels operated by Aker BioMarine, the Norwegian company that agreed that year to sell its krill harvesting business to a firm majority-owned by the US private equity group American Industrial Partners. The first was a juvenile found dead aboard the supertrawler *Antarctic Endurance* on 27 January. The second died in May. In late January a third humpback was hauled up alive by the Chilean-flagged *Antarctic Endeavour*. The crew spent forty minutes cutting it free, and it went back into the water bleeding and lethargic. CCAMLR scientists counted it as a likely death. On 25 March 2025 the *Antarctic Endeavour's* crew reported another dead humpback off Coronation Island in the South Orkneys, with Sea Shepherd's *Allankay* watching nearby.

At its October 2025 meeting in Hobart, CCAMLR again failed to agree new marine protected areas or new krill rules, including an EU-led proposal to replace the lapsed measure. China and Russia blocked the protected area proposals. Argentina and Chile first put forward a protected area for the Antarctic Peninsula in 2018. In the forty-three years since its convention came into force, the Commission has created two marine protected areas: the South Orkney Islands southern shelf in 2009 and the Ross Sea region in 2016.

The industry case deserves a fair hearing. A peer-reviewed survey of the South Orkneys estimated fin whale numbers at around 3,400 in 2011 and more than 18,000 in 2023. A 2025 study of krill in the Bransfield Strait found that rising fishing effort had not reduced the size of individual krill. The industry also points out that the 620,000 tonne trigger level is less than 1 per cent of the 62.6 million tonnes of krill estimated in Area 48 by the 2019 survey, and argues that the real pressure on krill is climate. That argument may well be right. It also can't be tested from a donor's office, which is why gaps in monitoring matter more than either side's press releases. Whales are the largest krill predators by volume, and CCAMLR's ecosystem monitoring programme still does not track them.

Plenty of organisations raise money on the strength of protecting Antarctica. The one instrument that actually kept fishing away from the Peninsula's feeding grounds was allowed to lapse in a committee room, and no amount of institutional presence stopped it.

The Arctic

Monitoring is not protection

The polar bear range states have had a conservation agreement since 1973 and a Circumpolar Action Plan since 2015. The implementation plans are published in full, and the pattern in them is hard to miss.

The 2023 to 2025 plan works on four of the action plan's seven objectives through ten actions. They include keeping climate change communications material on the range states' website, forming communications partnerships with organisations that have strong public reach, communicating key messages to the public, defining levels of protective status for essential habitat, developing methods to collate data from harvested bears, reporting human-bear conflicts that end in injury or death each year, and producing a template for site-specific conflict management plans. Published outputs under the conflict objective include a literature review on how well deterrents work and a spreadsheet of studies on human-polar bear conflict up to May 2024.

Each of those is legitimate work. None of it acts on the threat the plan itself ranks first. The range states' own document names human-induced climate change, and its effects on habitat and prey, as the primary threat to polar bears, and no line item in a range-state plan can touch that.

Across my Arctic seasons I have looked for the other kind of work and found little of it. What exists on the ground is scientific study, collaring, aerial surveys, and community programmes that teach people how to avoid being killed by a bear and how to avoid killing one. Those conflict programmes are worth funding, and I would tell any donor so. They are first a human safety measure, with a conservation benefit on the side, and they are often sold as species protection.

Set that beside the harvest and trade running across the same range, which DRIFTR's executive brief for trustees covers in detail. The IUCN Polar Bear Specialist Group puts the annual harvest at 500 to 700 bears, and Canada exported an average of 122 polar bears a year between 2017 and 2021. A donor is asked to fund research and coexistence training for a species that is hunted and traded legally at the same time. Both facts are public. They rarely appear on the same page.

What This Is Evidence Of

The common thread across all three has little to do with corruption or incompetence. The instruments donors are asked to trust (a World Heritage listing, a multilateral commission, a circumpolar action plan) are the ones least able to report their own failure. UNESCO does not tell a donor that illegal longline infractions per patrol inside the site rose every year after 2021. CCAMLR does not put out a statement saying its distribution measure lapsed and the fleet moved straight to where the whales feed. The range states publish their action lists without saying that none of the actions works on the primary threat.

Somebody has to go and look, and then write down what was there.

That is DRIFTR's whole job. Desk diligence establishes what the legal basis, the mapped boundary, the threat model and the money actually are. Field validation checks whether the operation described on paper exists on the water or the ice, and whether the threat it claims to reduce is present, absent or worse than reported. The output is documentation a trustee can put in front of a board.

If you are being asked to fund protection somewhere with a strong designation, treat the designation as the start of the enquiry.

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