

Ms. Elaine Kendall
Head of International Species Conservation Team
Department for Environment, Food and Rural Affairs (DEFRA)
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Thursday, 19 October 2017

RE: CMS Family Guidelines on Environmental Impact Assessments for Marine Noise-generating Activities

To Whom It May Concern,

We are contacting you as you as the designated National Focal Point for the Convention on the Conservation of Migratory Species (CMS) for the United Kingdom. It is our understanding that you will be present at the 12th Meeting of the Conference of the Parties (COP12), this October in the Philippines.

On February 15th of this year, comments were submitted to the CMS Secretariat in response to the consultation on the above-mentioned document by the International Association of Geophysical Contractors (IAGC). Our understanding is that the document was presented to the 2nd Meeting of the Scientific Council this July in Bonn, and is now being recommended for potential adoption at the COP12 meeting. The IAGC response on behalf of its members made clear a number of concerns regarding both the main guidance document and the accompanying technical support document. It is noted that the guidance and technical support documents were re-drafted, incorporating many of the comments put forward by those responding to the consultation. However, the IAGC feels that this re-draft does not go far enough to address the concerns previously highlighted.

As neither the IAGC nor individual member companies are able to have any representation at the aforementioned meetings of either the Scientific Council or the Conference of the Parties, we would like to take this opportunity to reiterate those concerns already raised. We feel that it is important that as our representative at the COP12 meeting, you are fully aware of the extent of our reservations in these guidelines being recommended for adoption. To that end, we include both parts of that original submission for your reference: a letter to the CMS Secretariat providing an overview of the concerns with the documentation, as well as a more detailed list of comments that relate to specific sections of the guideline and technical support documents.

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of Geophysical Contractors**

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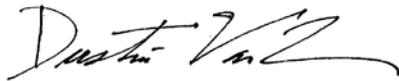
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Our primary concern is that this guidance and its technical support documentation remain not fit for adoption due to serious shortcomings relating to their lack of balance of authorship, inclusion of factual errors as highlighted by the IAGC feedback and strong bias toward conclusions that are not the basis of substantive scientific evidence regarding the potential impacts of underwater sound upon marine life.

We feel that the guidance and technical support documentation requires further revision and would benefit from the full engagement of stakeholders such as the IAGC, its member companies, and others from those sectors involved with noise generating activities so that the technologies and methods employed and the extent of underwater sound input are explained correctly.

We would welcome the opportunity to discuss this in further detail with you as appropriate, and thank you for your time.

Sincerely,



Dustin Van Liew
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International Association of Geophysical Contractors
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