



Guidance for Marine Life Visual Observers

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This document applies to 3rd party visual monitoring personnel such as Marine Mammal Observers (MMO)/Marine Wildlife Observers (MWO) onboard vessels conducting marine seismic surveys. In the absence of any national regulations or guidelines that specify visual observer responsibility, experience and reporting requirements, the measures in this guidance document are recommended by IAGC.

Role and Responsibilities of MMO/MWO:

The role of MMOs/MWOs is to coordinate monitoring efforts with the survey operation (through survey personnel and vessel bridge crew), conduct visual observations for marine animals during marine seismic surveys, advise on and monitor compliance with applicable regulations, guidelines, permits or Notice to Lessees and Operators (NLT) as stipulated by the country or specific region of operation. In the absence of specific regulations or operation-specific risk assessment, IAGC recommends implementing the mitigation measures as described in the document *IAGC Recommended Mitigation Measures for Cetaceans during Geophysical Operations*.

MMOs/MWOs performing this role are expected to be impartial and unbiased. If a team of monitoring personnel are mobilized, a lead MMO should be clearly established with overall responsibility for MMO/MWO activities and reporting.

Role and Responsibilities of the Permit Holder Company

The Permit Holder entity; which can be either a Client Company (typically an oil/gas exploration and production company) or a Geophysical Contractor, has the ultimate responsibility to ensure compliance with applicable regulations. The Permit Holder is responsible for implementing and overseeing the procedures used by the MMOs/MWOs and survey personnel while onboard the vessel during marine seismic survey operations.

At the outset of a project, 3rd party personnel will be made aware of the company (Client and Geophysical Contractor) rules and expectations for personal behavior whilst onboard a vessel and adherence to operational Health, Safety, Environment (HSE) and Security rules and wildlife monitoring/mitigation requirements of the project. Clear lines of communication will be established between the lead MMO/MWO and the survey operation, via the Party Chief and Permit Holder representative, identifying any actions to be taken in the event of a marine mammal being observed in the vicinity of the survey operation.

Reporting:

The MMO/MWO will provide the Party Chief and Permit Holder Representative with a daily report of animal sightings and monitoring effort (such as duration of watch periods) for HSE reporting purposes.

Additional weekly or monthly reports may be provided as agreed with the MMO/MWO Service Provider. The Permit Holder Representative aboard will be responsible for ensuring the completion of monitoring reports by MMOs/MWOs and for submitting the necessary reports to the appropriate regulatory government agency. In any circumstance where the MMO/MWO is required to submit the monitoring reports directly to the government agency, a copy of those reports will be provided simultaneously to the Permit Holder organization and Party Chief (when contractually permitted).

Conflict Management:

Aspects of the planning and execution of seismic surveys may not always be clear to 3rd party personnel onboard a vessel or may change unexpectedly. It will always be the intention to

keep MMO/MWOs fully informed of the situation but there is the potential for miscommunication. In any situation where the MMO/MWO is uncertain about operational plans or decisions, they should seek clarification with the Permit Holder Representative and/or as applicable, with the Party Chief.

If there is a conflict or a dispute that cannot be resolved onboard, the Permit Holder Representative and/or Party Chief will implement the process outlined in the either Survey Project Contract (between Client Company and Geophysical Contractor) or the Survey Project Plan to seek conflict resolution.

If not resolved between Companies, then the Permit Holder will seek clarification with the relevant permitting authority.

HSE Aspects:

Safety is always first and paramount; therefore, all policies, equipment and procedures have safety as a foundation for their use and implementation. With regard to safety aboard the vessel, the Captain has overriding authority. MMOs/MWOs must comply with all Health, Safety, Environment and Security requirements and instructions as provided by appropriate shipboard personnel.

Standards of Conduct for 3rd party visual monitoring personnel:

- Conduct themselves in a professional and safe manner, both on and off duty.
- Adopt vessel rules, Client and/or Geophysical Contractor Company rules and requirements, including Drug & Alcohol policies.

Integrity:

- Provide reliable data promptly in Reporting.
- Report honestly and not falsify any observer data.
- Not use, reproduce, distribute or publish any monitoring data or pictures collected whilst under contract to the Client or Geophysical Company for purposes other than the performance of this contract or as agreed in writing with the Permit Holder company.

Authority:

- MMO/MWOs on duty have the authority to call for a shut-down or delay to operations only when specific species protected by the applicable regulations, permits or Notice to Lessees and Operators (NTL) enters the defined Exclusion Zone.
- The shut-down or delay must be immediate. Any discussion or disagreement will follow the shut-down.
- The vessel Captain, Party Chief or Permit Holder Representative does NOT have the authority to override the MMO/MWOs decision to shut-down or delay survey operations.
- The MMO/MWOs will advise when to resume operations only after clearance of the exclusion zone has been completed as defined by applicable regulations, permits or Notice to Lessees and Operators (NTL).

Definitions:

- *Marine Seismic Surveys* – Either towed streamer, ocean bottom or VSP survey programs conducted offshore where marine mammal monitoring activities are implemented.
- *Marine Seismic Survey Operations* – Activities onboard a vessel related to conducting survey programs offshore where marine mammal monitoring activities are implemented.
- *Permit holder entity* – Company which has a license from the appropriate governing authority to conduct the marine geophysical survey activity; this may be an oil & gas exploration and production company or a geophysical contractor.
- *Permit Holder Representative* – Onboard representative of the company which has a license from the appropriate governing authority to conduct the marine geophysical survey activity.
- *Client Company* - Typically an oil/gas exploration and production company
- *Client Company Representative* – Onboard representative of the company which has hired the Geophysical Company and/or third party MMOs/MFOs
- *Geophysical Contractor* – Typically a geophysical company that owns, manages and/or operates the vessel conducting the geophysical survey.
- *Captain* – Person responsible for all activities onboard the vessel.
- *Party Chief* – Onboard geophysical contractor manager
- *MMO/MWO Service provider* – Company providing personnel conducting monitoring activities onboard the vessel.
- *Survey Project Contract* – Contract agreement between Client Company and Geophysical Contractor
- *Survey Project Plan* – Survey project specific operational plan prepared by Geophysical Contractor