

May 15, 2015

International Seabed Authority
14-20 Port Royal Street
Kingston
Jamaica

Re: Report to Stakeholders (ISBA/Cons/2015/1)

Dear members of the International Seabed Authority:

I'm writing on behalf of Whale and Dolphin Conservation (WDC), the largest international NGO dedicated to the conservation and protection of cetaceans and their living environments. WDC operates worldwide with offices in Germany, Australia, Argentina, Great Britain and the USA, to defend whales, dolphins and porpoises against the many threats they face through campaigns, lobbying, advising governments, conservation projects, field research and rescue.

WDC firmly believes that seabed mining activities shouldn't be conducted before a thorough understanding of adverse impacts on marine environments is obtained and measures to adequately mitigate impacts and protect marine habitats are put in force.

We welcome the opportunity to submit comments on the document "Developing a Regulatory Framework for Mineral Exploitation in the Area. Report to Members of the Authority and all stakeholders". We provide the following comments below to substantiate our views and concerns.

- Regarding 'the need to draw on existing best practices' stated in the report:

WDC believes that alternatives to seabed mining such as a more efficient use of natural resources and increasing mineral recycling should be promoted.

- Related to the 'effective protection for the marine environment from harmful effects' mentioned in the report as a high level issue:

WDC considers it a matter of urgency to fill gaps in knowledge about the potential impacts of such activities in the marine environment. Environmental Impact Assessment (EIA) with public participation should be undertaken prior to any activity that may have harmful effects. The draft template EIS¹ mentioned in this report requires a description of ambient noise, influence of ongoing exploration and maritime activity in the

EIA. WDC considers that EIA should also include modelling of sound transmission in the area taking into consideration local propagation features (depth, thermal stratification, spherical and cylindrical spreading, etc) to be able to identify adequate exclusion and safety zones.

Over recent decades an increase in anthropogenic noise in the ocean has become a major concern among the scientific community and relevant international forums because of the range of potential impacts it may impose to marine organisms, especially marine mammals. Underwater noise can travel hundreds of kilometres, depending on physical parameters. Cetaceans have evolved to exploit the extremely efficient sound propagation through the oceans and use sound as a primary means for underwater communication and sensing. Thus they are expected to be particularly vulnerable to increased background noise in the oceans, as well as injury and disturbance impacts that may result from more localized impacts.

Noise monitoring programs should be implemented before, during and after operations in order to verify predictions of propagation models in the EIA.

Visual and acoustic monitoring of marine mammals in the area before, during and after operations should be implemented and a written report should be requested at the end of operations within a specified timeframe to be available online in order to promote transparency on impact data.

- Regarding 'size and location of exploitation areas':

Modelling of sound transmission should be taken into consideration at the time to assess the proximity of the exploration/exploitation areas to marine protected areas and other vulnerable marine ecosystems, and also the cumulative impacts of other anthropogenic activities on the marine environment should be considered.

Finally, I express my consent to make my personal details and submission publicly available and my interest in future contact by the Authority.

Yours sincerely,



Vanesa Reyes
Acoustics and Research Analyst
Whale and Dolphin Conservation

¹ *Environmental Management Needs for Exploration and Exploitation of Deep Sea Minerals*, ISA Technical Study No. 10 (2012) at 17.