



Coastal & Marine Resources Centre,
ERI, University College Cork,
Naval Base, Haulbowline,
Cobh,
County Cork.
Ireland.
Ph: +353 21 4703100
Fax: +353 21 4703132
<http://cmrc.ucc.ie>
Email: v.cummins@ucc.ie

The Chairman,
SEA Steering Group,
Petroleum Affairs Division,
Department of Communications, Marine and Natural Resources.

Re : SEA Draft report - comments

Dear Sir/Madam,

We are delighted to see that significant progress has been made in the development of a coherent environmental assessment strategy for Ireland's offshore waters and exploration activities therein, culminating in the recent publication of the draft SEA report.

With the assistance of PAD- and industry-sponsored initiatives under the Petroleum Infrastructure Programme, RSG/PSG and ISPSG, the Marine Mammal and Seabirds Group in CMRC, University College Cork has contributed very significantly to the knowledge of cetacean, seal & seabird distribution and abundance in the Atlantic Margin and elsewhere around the island of Ireland. We have developed national capacity, expertise and international recognition in this field and have been actively involved in ground-breaking acoustic programmes both in confined inshore and expansive offshore waters. We have also conducted research on numerous seismic exploration and drilling vessels off the coast of Ireland since 1999.

In reviewing the SEA document, our scientific team has some concerns regarding some information presented and measures proposed therein. These are summarised very briefly overleaf.

We would welcome the opportunity to discuss these issues with the Steering Group and all relevant parties as soon as possible, such that an improved workable solution can be provided which will deliver effective at-sea monitoring, data optimisation and prudent environmental management.

Yours sincerely,

Valerie Cummins
Manager





Coastal & Marine Resources Centre,
ERI, University College Cork,
Naval Base, Haulbowline,
Cobh,
County Cork.
Ireland.
Ph: +353 21 4703100
Fax: +353 21 4703132
<http://cmrc.ucc.ie>
Email: v.cummins@ucc.ie

Summary of CMRC comments regarding the Draft SEA report

Informational concerns

- It is unclear if use has been made of the Petroleum Infrastructure Programme's Cetacean and Seabirds at Sea (CSS) Programme (1999-2002) in evaluating potential **areas and species of importance** along Ireland's Atlantic Margin and in evaluating the possibility of impacts in documented 'hot-spots' along Ireland's western shelf.
- In addition to the **frequency** at which sound is transmitted underwater, the **intensity of sound pulses** is critical to any assessment of impact on these animals, whose ear structures may be damaged at frequencies outside their auditory capacity. This has been largely overlooked.
- **Toothed cetaceans** (odontocetes) and the potential impacts thereon have not been adequately included in the draft report. Considering the distributions, rarity and sensitivity of some Irish odontocete species to anthropogenic sounds this is a matter for consideration.
- The area proposed for exploration lies adjacent to Ireland's largest breeding colonies for **Atlantic grey seals** in Galway, Mayo Donegal and adjacent to important haul-out sites for harbour seals. The potential impact on these wide-ranging species warrants greater attention, since they tend to concentrate foraging in chosen habitats within 200km of haul-out sites. The current Marine Institute RTDI seal-tagging project, undertaken by Michelle Cronin in CMRC, should provide relevant research results to enlighten this debate.
- The scarcity of scientific data is acknowledged in the report. It is unclear how the proposed MMO approach will deliver **objective data** or provide appropriate **environmental monitoring**. CMRC wish to highlight the need for a more strategic, professional and co-ordinated programme building on a refined scientific approach in parallel with an effective cross-party MMO service.

Measures proposed in the document

- Existing mitigation measures (e.g. 'soft start') adopted in the UK and Ireland lack **hard data supporting their use**. An evaluation of their effectiveness was proposed by CMRC in 2005 to GSI, Marine Institute, NPWS and others. This scientific approach should be reconsidered.



Coastal & Marine Resources Centre

— *Ionad Acmhainní Cósta is Mara* —



Coastal & Marine Resources Centre,
ERI, University College Cork,
Naval Base, Haulbowline,
Cobh,
County Cork,
Ireland.
Ph: +353 21 4703100
Fax: +353 21 4703132
<http://cmrc.ucc.ie>
Email: v.cummins@ucc.ie

- Sighting success rates of Marine Mammal Observers (MMO) have never been measured and animals do pass unnoticed by vessels beginning or even carrying out seismic work. The incident management response is dependent on **MMO success** in sighting and estimating distances to marine mammals, both of which are critical and require highly trained independent observers. CMRC support strategic approach to developing an MMO service for industry and statutory requirements in Ireland. A recent proposal has been suggested to ISPSG on the subject.
- The use of **remote acoustic devices** may assist in monitoring cetacean activity but this approach also has its flaws in delivering accurate data from which to assess impact mitigation. A **combination of techniques** should be employed to fill future information and knowledge gaps, including a **new offshore study**, building on the lessons learned from the previous CSS work. Such an approach should utilise a strategic MMO system, dedicated surveys targeted towards previously identified 'hotspots', acoustic monitoring and integrated predictive modelling. (Recommendations on the potential of predictive modelling were made in the recent desktop report – draft submitted by CMRC to ISPSG in March 2006).

