

Pec Direzione

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Oggetto: Transboundary consultations on the Framework Plan and Programme for Exploration and Production of Hydrocarbons in the Adriatic of the Republic of Croatia

Ministero dell'Ambiente e della Tutela del Territorio e del Mare – D.G. Valutazioni e Autorizzazioni Ambientali

E.prot DVA - 2015 - 0010702 del 21/04/2015

Dear Members of the Italian Government

German Dolphin Conservation Society (Gesellschaft zur Rettung der Delphine e.V.) representing thousands of German, Austrian and Swiss citizens concerned about marine and dolphin conservation comments on the Transboundary consultations on the Framework Plan and Programme for Exploration and Production of Hydrocarbons in the Adriatic of the Republic of Croatia as provided for by Directive 2001/42/EC and SEA Protocol to the Espoo Convention on environmental impact assessment in a transboundary context as follows:

In general, we oppose any activity to explore and/or exploit hydrocarbon resources in the Adriatic Sea as a precautionary measure against harmful impacts on the delicate marine environment of the Croatian Sea.

In further support of this imperative, we would like to draw your attention to the recent Convention on Biological Diversity (CBD) Decision XII/22.

Specifically, CBD Decision XII/22 has identified that:

- the Northern Adriatic hosts a bottlenose dolphin (*Tursiops truncatus*) population having one of the highest densities in the Mediterranean, it is one of the most important feeding grounds in the Mediterranean of the loggerhead turtle (*Caretta caretta*). Moreover, it is a nursery area for a number of vulnerable species and is one of the most productive areas in the Mediterranean Sea. It is ranked high for its 'special importance for life-history stages of species', 'importance for threatened, endangered or declining species and/or habitats' and for 'biological productivity';
- the Jabuka/Pomo Pit hosts the largest populations of Norway lobster (*Nephrops norvegicus*) and is important especially for juveniles in the depths over 200 m. It is ranked high for its 'uniqueness or rarity', 'special importance for life-history stages of species', and for 'biological productivity'; and
- the South Adriatic Ionian Strait contains important habitats for Cuvier's beaked whales (*Ziphius cavirostris*), an Annex II species of the Protocol concerning Specially Protected Areas and Biological Diversity in the Mediterranean (SPA/BD Protocol) in the framework of Barcelona Convention, and significant densities of other megafauna such as the giant devil ray (*Mobula mobular*), striped dolphin (*Stenella coeruleoalba*), Mediterranean monk seal (*Monachus monachus*), and loggerhead turtle (*Caretta caretta*), all of which are listed in Annex II of SPA/BD Protocol. It is ranked high for its 'uniqueness or rarity', 'special importance for life-history stages of species', 'importance for threatened, endangered or declining species and/or habitats', 'vulnerability, fragility, sensitivity, or slow recovery' and for 'biological diversity'.

We strongly oppose any exploration and/or exploitation activities in the Adriatic Sea.

Exploration drilling harms the environment because pollutants are dumped in the sea with drill fluids and production water. Despite the heavy use of toxic chemicals in drill fluids, the consequences for the environment are far from being well studied.

It is however clear that they contain endocrine disruptors which have a strong potential to harm organisms in all trophic levels, from benthic invertebrates, plankton, fish to marine mammals and birds (and human seafood consumers!), (e.g., Fossi & Marsili 2003).

Toxic compounds in drill fluids such as alkyl phenoles are harmful in all kinds of marine habitats. These endokrine disruptors have serious consequences for life even in minute concentrations. I fear negative consequences especially for the integrity of the national parks Mljet and Kornati. We doubt that drilling in the vicinity of these national parks is in accordance with the EU Habitats Directive due to the bioaccumulation of substances such as 4-nonyl phenole in biota (Diehl et al. 2012). These substances are genotoxic and carcinogenic. They inhibit cellular communication processes and gene expression (Porte et al. 2006).

Last but not least in case of oil production there is oil contamination from every single production platform even in normal operation mode.

Further, a high risk of catastrophic oil pollution accidents does not justify any oil production in an area of such a high biodiversity and touristic value as the Croatian Adriatic Sea. Oil companies worldwide have shown that they are not able to prevent accidents resulting in deadly consequences for the environment and economic disaster for coastal communities. There is no reason to trust these companies that they do better in Croatia than in the rest of the world.

In addition Croatia has no experience and no logistic infrastructure to adequately react in case of oil spills.

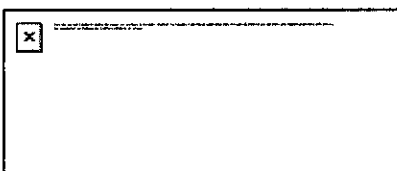
Experience shows, that offshore exploration proposals are often presented to governments with generalized, unsubstantiated information and usually without having conducted basic consultation. Subsequent decision-maker approvals or rejections of such poor Environmental Impact Assessments are being made on the basis of erroneous information and are vulnerable to criticisms of bias or tokenism.

Yours sincerely

Ulrich Karlowski
Biologist / Board of Directors

References

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