



Kyriakos Mitsotakis
Prime Minister of the Hellenic Republic
&
Konstantinos Skrekas
Minister of the Environment and Energy of the Hellenic Republic

By email: pm@primeminister.gr
CC: secmin@ypen.gr

23rd February 2022

Dear Mr. Prime Minister Mitsotakis,
Dear Mr. Minister of the Environment and Energy Skrekas,

With this letter OceanCare would like to take the opportunity to express our grave concerns over seismic exploration activities in Greek waters. The most recent atypical stranding events of three Cuvier's beaked whales (*Ziphius cavirostris*) on the west coast of the Island of Corfu on the 20th and 21st of February 2022 coincided with hydrocarbon exploration activities, although these do not reflect the entire devastating effects of such activities on marine life in the region.

Preliminary reports and Maritime Traffic data suggests that the vessel 'SW Cook' has been conducting seismic exploration activities in the Hellenic Trench which is identified as Important Marine Mammal Area, in or nearby the IMMA of the Ionian Archipelago and the candidate IMMA of the North East Ionian Sea based on the work by the Marine Mammal Protected Areas Task Force. Already in 2010, by way of ACCOBAMS Resolution 4.15, these waters have been recommended to be declared as MPAs for marine mammal species. The Hellenic Trench is a core habitat for the endangered Mediterranean sperm whale subpopulation and a core habitat for the vulnerable Mediterranean Cuvier's beaked whale, which is moreover listed in [Appendix I](#) of the Convention on the Conservation of Migratory Species of Wild Animals (CMS), to which Greece is a Party.

OceanCare is extremely worried by the fact that seismic surveys involving airguns emitting intense sound pulses of up to 260 decibels every 10 to 15 seconds for several weeks and which are among the loudest and most prominent sources of anthropogenic underwater noise pollution, are permitted in such areas. It is well known that such activities pose a threat to ecosystems and have potential negative impacts on marine species, causing habitat displacement, reduced reproduction and feeding opportunities and physical harm, including even death.

The devastating impacts of underwater noise pollution have long been recognised by relevant European legislation and international frameworks, which Greece has helped design and subsequently adopted. Specifically, EU legislation obliges Member States to achieving Good Environmental Status (GES) by reducing underwater noise pollution (see Descriptor 11 of the [Marine Strategy Framework Directive](#)) and to protect marine species from disturbance, as required by the [EU's Habitats Directive](#) for example.

Furthermore, we unfortunately have had to acknowledge that there are indications that no proper environmental impact assessment (EIA) has been undertaken prior to the most recent seismic exploration activities, despite requirements under [EU law](#) and according to Greece's international commitments, including the need to apply [CMS Family Guidelines on Environmental Impact Assessments](#) annexed to CMS Resolution 12.14 prior to noise generating activities and the ACCOBAMS Noise Guidelines annexed to ACCOBAMS Resolution 7.13.

With this in mind, we urge to immediately suspend the on-going seismic surveys until having determined the exact cause of these stranding events and to avoid further risk of new ones. Doing so, would conform with the need to apply the precautionary principle – a cornerstone of EU nature conservation law- and would be in line with ACCOBAMS Guidelines annexed to Resolution 7.13, which explicitly notes that "[i]n

the case of strandings possibly related with the operations, any acoustic emission should be stopped, and maximum effort devoted to understanding the causes of the deaths”.

Furthermore, OceanCare encourages the Greek government to reconsider granting hydrocarbon exploration activities in the future and consider emulating steps taken by Denmark, France, and Spain, which imposed a ban on new exploration activities in their waters. Such a step would also put Greece in line with its commitments of Paris Agreement and EU-specific legislation, such as the European Green Deal and the Biodiversity Strategy for 2030. In this respect, we wish to highlight most recent Report by United Nation’s Intergovernmental Panel on Climate Change (IPCC), the foremost scientific body and international authority on climate change. The drafting scientist were very clear in their warning that urgent and decisive action is needed to curb global warming and that “unless deep reductions in carbon dioxide (CO₂) and other greenhouse gas emissions occur in the coming decades” global warming will exceed 1.5°C and 2°C.

We hope that you take our appeal into consideration and if appropriate forward this letter to the relevant ministries and bodies so that immediate action can be taken to suspend current seismic exploration activities to reduce the risk of further atypical strandings.

We would also like to make the most of this occasion and express our willingness to work with you in addressing our climate and environmental emergency. OceanCare remains at your disposal if you require any further information or if we can be of any further assistance.

Thank you for your kind attention.

Sincerely,



Fabienne Mclellan
Managing Director



Nicolas Entrup
Director International Relations

About OceanCare:

OceanCare is a Swiss non-profit organisation. It was founded in 1989 and has a strong commitment to realistic and cooperative initiatives. The organisation works at national and international level in the areas of marine pollution, environmental changes, fisheries, whaling, sealing, captivity of marine mammals and public education.

OceanCare holds Special Consultative Status with the Economic and Social Council of the United Nations (ECOSOC) and is a partner of the General Fisheries Commission for the Mediterranean (GFCM), the Convention on Migratory Species (CMS), and the UNEP/CMS Agreement on the Conservation of Cetaceans in the Black Sea, Mediterranean Sea and Contiguous Atlantic Area (ACCOBAMS), as well as UNEP/MAP. OceanCare is accredited observer at the Convention on Biological Diversity (CBD). OceanCare has also been accredited as a Major Group to the United Nations Environment Assembly (UNEA), which is the governing body of UNEP and is a part of the UNEP Global Partnership on Marine Litter.