

21 October 2021

IOGP Explanatory Note to Response to the consultation on review of the Marine Strategy Framework Directive

The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 70% of the oil and gas produced in Europe. IOGP shares the world's ambition to reach the Paris Agreement's goals and supports the EU's objective of climate neutrality by 2050 upon the implementation of enabling measures.

We would like to draw attention to the below supplementary information supporting IOGP response to the consultation on review of the Marine Strategy Framework Directive:

Part I: Your perception about Europe's seas

Question: What are you ready to do to improve the health of the marine environment?

There are various industry initiatives aimed at improving the health of the marine environment, such as the [E&P Sound & Marine Life Joint Industry Programme](#), for example. Further, the industry supports risk-based approach to chemical management and several other approaches to protect the EU marine environment.

A further example is the [INSITE](#) project, in respect of which we would be happy to share additional information if useful.

Other projects, such as those below, forming part of the Ocean Decade Programme, have also been recognised as contributing to ocean health.

The [EDNA JIP](#) project has brought oil and gas companies and industry associations together to better characterise the sounds that our industry produces and determine the potential impacts of these sounds on marine life and thereby to improve risk assessments and mitigation.

The [Sound & Marine Life](#) initiative represents a further example.

Question: How important are, in your opinion, the following aspects when considering if the marine environment is in a good state?

Key points

Science-based, robust monitoring and assessment is important, along with the sharing of data, and this can be used to inform about potential changes of impacts of activities and status.

Mature marine ecosystems have developed around much of the man-made infrastructure in European seas. The future removal of this infrastructure put those ecosystems at risk. The European Seas are at the centre of Blue Economy and Renewable Energy developments plans. WindEurope estimates offshore wind turbines will grow from approx. 1,300 offshore turbines today to 20,000 in 2050. Other new industries - hydrogen, CCS and Geothermal may explore opportunities to develop offshore.

Encouraged by the launch of the INSITE Programme in 2014, there now exists a significant body of evidence (including peer reviewed literature) that demonstrates the value of ecosystems associated with man-made structures and their role in the marine environment. Recent research under the [INSITE](#)

[programme](#) and with CEFAS indicates that removal of these man-made structures would be likely to fragment this network of connectivity. For further information, please consult the [Final report on the Assessment of Ecological connectivity between man-made structure in the North Seas and its presentation](#).

The recommendation is for the utilisation of robust science to support high quality decision-making around the ultimate fate of such structures at decommissioning, and on the influence of large numbers of wind energy structures being installed in coming decades. The science can already assist in determining the potential contributions of oil and gas installations in a conservation or restoration context in support of the EU Green Deal, Blue Economy and Biodiversity Strategy 2030.

Regarding pollutants, a risk-based approach should be employed in terms of assessment, based on their effects, and founded on scientific evidence.

Oil spills

As illustrated through annual reports on spills and discharges, and confirmed through OSPAR assessments, there is clear evidence that the trend has been improving in this regard.

A robust regulatory framework is already in place in respect of marine protection and pollution prevention, supported by several sector guidelines and regional specific regulations.

Harmonization across Europe is challenging, and the most pragmatic, stable and efficient way to address this is to build on the existing frameworks as provided by the Regional Seas Conventions.

There are many discussions currently ongoing as to the definition of ‘significant’ oil spills, and consensus has not yet been reached. Therefore, it would be premature as of yet to draw conclusions based on the current unfinished discussions.

There are robust and established systems in place that have delivered improvements in tanker safety and environmental protection; these need to be maintained and implemented effectively:

Prevention: this includes improved safety of navigation, ship construction, training and risk reduction, and has successfully reduced both the number and volume of oil spills over the past decades.

Preparedness and Response: these have continued to evolve as both awareness and technology have advanced and practical experience has led to a better response to spills when they occur.

Underwater Noise

Clarity of definitions and key concepts is essential, so that all the relevant stakeholders have the same understanding of terms such as “exposure” to sound and “impact” due to exposure to sound. Threshold values associated with duration and extent of maritime activities that generate underwater sound will not fully represent GES defined in terms of ‘adverse impacts to marine mammal populations. Establishing threshold values to avoid adverse impacts at a population level should be based on current scientific understanding and available data through evaluation of population consequences.

Availability of data can represent a challenge, and it is important to ensure that the threshold values are based on fully informed decisions. Even after threshold values have been set, it is key that TG Noise should continue to maintain a scientific overview of the developments in this context as they continue to evolve.

Part II: Specific questions

Good Environmental Status:

D11: Underwater Sound:

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