

3rd February 2021

Dear Minister,

Back in 2008, EU member states agreed the Marine Strategy Framework Directive (MSFD). In doing so, they committed themselves to achieving “Good Environmental Status” for our seas by 2020. However, member states have conspicuously failed to do so, as recent assessments by the European Commission and the European Environment Agency show.

We, the undersigned environmental organisations, are in particular concerned about the weak measures member states have taken to significantly reduce underwater noise (descriptor 11 of the MSFD), one of the most wide-spread but hidden threats to marine life. With this letter, we want to urge you to adopt and implement much more effective reduction measures for underwater noise and to work towards a structural EU-wide joint strategy.

Over the past 12 years, member states have focused primarily on establishing monitoring systems for measuring noise levels from the various sources of continuous and pulsed noise. Such systems are essential for planning and evaluation purposes but do not in themselves constitute noise reduction measures, as the European Commission recently confirmed¹.

In the attached report "Underwater Noise – The neglected threat to marine life"², published in conjunction with other experts in November, our organisations identified member states' shortcomings in underwater noise management. The report proposes the following urgently recommended actions:

1. Ongoing financing for long-term noise-monitoring stations along with the creation and maintenance of an international noise register to facilitate the location of noise sources and the proper implementation of appropriate measures.
2. Reduction of noise at source via
 - a. a ban on the use of air guns in fossil fuel exploration; these are one of the loudest sources of man-made underwater noise. Additionally, a ban on fossil fuel extraction would help meet the goals of the Paris climate agreement.
 - b. a reduction in ship speeds, something that is proven to reduce noise levels. This would also have other environmental benefits, such as reductions in CO₂ and soot emissions.
 - c. limits on the avoidable use of active sonar systems by navies and by recreational vessels.
3. Europe-wide noise reduction strategies wherever underwater noise cannot be avoided, via
 - a. the mandatory use of adequate bubble curtains to counter pulsed noise from sources such as pile-driving or explosions caused by the detonation of unexploded munitions, as well as of other noise-reducing measures and/or technologies.
 - b. the rerouting of shipping in order to avoid marine conservation areas and important habitats for noise-sensitive wildlife.

¹ COMMISSION STAFF WORKING DOCUMENT Review of the status of the marine environment in the European Union Towards clean, healthy and productive oceans and seas Accompanying the Report from the Commission to the European Parliament and the Council on the implementation of the Marine Strategy Framework Directive (Directive 2008/56/EC) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020SC0061>

² <https://www.bund.net/meere/unterwasserlaerm/>

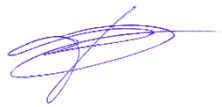
Given the failure to meet the MSFD's 2020 goal, EU member states need to take bold and progressive action now aiming at a quantifiable reduction in underwater noise. An ambitious implementation of the MSFD would set a benchmark in marine conservation policy and show the way for other states and regions around the world. The proposed measures would be as well a significant contribution to the EU Biodiversity Strategy and a win-win for the climate.

Dear Minister, we ask you to urgently implement the above underwater-noise reduction measures and to work with your European colleagues to adopt these EU wide. We would be happy to discuss these issues in more detail at any time.

Yours sincerely,



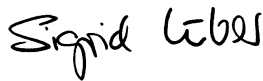
BUND
Olaf Bandt
Chairman



CCB
Mikhail Durkin
Executive Secretary



IFAW
Staci McLennan
Office Director
European Union



OceanCare
Sigrid Lüber
President and Founder



Seas at Risk
Monica Verbeek
Executive Director