



16<sup>th</sup> July, 2015

Ms. Maylis Salivas &  
Ms. Camille Montiglio  
ACCOBAMS Permanent Secretariat  
Jardin de l'UNESCO  
Les Terrasses de Fontvieille  
MC-98000 Monaco

Re: Marine Mammal Observers and Seismic Guidelines in the ACCOBAMS area

Dear Maylis Salivas and Camille Montiglio,

On behalf of the Marine Section of the Society for Conservation Biology (SCB), I write you regarding the aim of the Agreement on the Conservation of Cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area (ACCOBAMS) to develop Marine Mammal Observer (MMO) and Passive Acoustic Monitoring (PAM) training courses and reporting protocols for the ACCOBAMS area.

MMOs and PAM detect marine mammals and provide real time mitigation advice, such as recommending delays in the commencement of noise producing activities. MMOs also collect data that can increase our understanding of population distributions, as well as acoustic impacts. Thus, MMOs should be highly skilled in detecting and identifying marine mammals at sea, assessing behaviour, and determining distances between animals and noise sources. Additionally, MMOs' ability to effectively communicate and engage with crew members plays a key role in compliance, making MMOs the main entities responsible for the achievement of conservation goals.

It came to our attention that ACCOBAMS, by developing the above mentioned protocols and training courses, aims to become the standard-setting body for MMO conduct in the ACCOBAMS area, much as the Joint Nature Conservation Commission (JNCC) acts in the Atlantic. It is our understanding that ACCOBAMS intends to achieve this in close collaboration with the JNCC. The Marine Section of the SCB welcomes the decision to set regional MMO standards and encourages ACCOBAMS to also approach and collaborate with other organisations and government agencies to that end. However, we believe the current JNCC guidelines, training courses, and reporting protocols suffer several serious drawbacks that should be carefully considered prior to adoption.



For instance, MMOs should "have received formal training on a JNCC recognised course" to become a 'trained MMO'. These JNCC approved courses, however, only last between one and three days and attendees are not required to have even previously seen a marine mammal. Training consists of visual aids (e.g., slide presentations and drawings), and field trips are not always included. As a result, MMOs with little or no experience must train themselves on the job to detect and identify species, as well as to calculate distances, and to assess group size and behaviour, etc. Consequently, both data quality and conservation may be compromised. One way to avoid this is to admit only those with existing field experience into training courses, which should focus exclusively on the relevant regulations and reporting documents. Training can also include role playing and real life situations.

Finally, it must also be acknowledged that reaching high levels of compliance does not necessarily mean achieving conservation goals. Undetected animals and those judged to be further away from the source than they actually are, will suffer the various consequences of exposure to high/dangerous noise levels in much the same way as if the guidelines had not been implemented at all (i.e., the same effects of non-compliance).

Therefore, we would like to encourage ACCOBAMS not only to approach JNCC, but also relevant Government agencies from other countries, such as Germany, Denmark (inc. Greenland), Netherlands and New Zealand that are also improving their acoustic exposure guidelines, or have recently done so. Relying solely on JNCC guidelines risks losing this unique opportunity to develop consistent, high-standard training, reporting and mitigation protocols, both within and outside the ACCOBAMS area, for the protection of marine mammals and wider achievement of conservation goals.

SCB is an international professional organization with a wide and diverse membership. The Society's mission is to advance the science and practice of conserving biological diversity, support the dissemination of conservation science, and increase the application of science to management and policy. SCB, through its membership, offer their expertise and support in any future decisions taken for the benefit of the environment.

Sincerely,

John A. Cigliano, PhD,  
President, Marine Section, Society for Conservation Biology