

**FOR THE ATTENTION OF  
THE DIRECTOR OF INDUSTRY & ENERGY**

**DELEGACIÓN DEL GOBIERNO EN ILLES BALEARS**  
Ciudad de Querétaro s/n - 07007 Palma de Mallorca

**Subject:** allegations against the **Environmental Impact Study** of the seismic surveys that the oil company Capricorn Spain plans to undertake in the coastal waters of the Gulf of Valencia. between Ibiza and Formentera and the Levante.

Mr./Mrs/Ms \_\_\_\_\_,  
holder of Passport N°/NIE \_\_\_\_\_ domiciled in \_\_\_\_\_ (country)  
with the following address (for notifications):  
\_\_\_\_\_  
\_\_\_\_\_

Postal code: \_\_\_\_\_ Country: \_\_\_\_\_

**STATE**

1.- That, having seen the announcement of the opening of the public information process relating to the **Environmental Impact Report of the seismic surveys that the oil company Cairn Energy plans to undertake via its subsidiary Capricorn Spain Ltd**, called "Campaña de Adquisición Sísmica 3D en los permisos B, G, AM-1 y AM-2 en el Golfo de Valencia", in the official Balearic bulletin (BOIB) on the 24<sup>th</sup> of December 2013 (also published in the State Bulletin (BOE) on the 14<sup>th</sup> of December, in the BOP of Alicante on 30<sup>th</sup> of December and the BOP of Castellón de la Plana on the 4<sup>th</sup> of January 2014).

2.- That, being directly concerned by this Project due to the negative impacts it will have on the environment and the economy of the Balearic Islands and the Autonomous Community of Valencia, I wish to make known the negative impacts in the form of

**ALLEGATIONS**

1.- The aim of the seismic reports or acoustic surveys is mapping the sea floor to reveal the potential existence of geological formations likely to contain hydrocarbons, in order to continue to the next stage - the drilling of the sea floor and testing of the oil deposits, known as exploratory surveys-, and if oil were to be found, to proceed with the commercial exploitation of the reservoir.

The three phases (acoustic surveys, exploratory surveys and commercial exploitation of the reservoir) are an **indivisible part of the same project**, and the effects should not be considered separately, since they could be cumulative. Any one of these three phases could have serious environmental and economic impacts for the Balearic Islands and the Autonomous Community of Valencia, with negative effects on strategic economic sectors, such as the tourism and the fishing industry.

**However, the Environmental Impact Study (EsIA) does not assess nor does it take into account these related phases which follow on from the seismic survey. This results in a fragmentation of the Project which means that a number of environmental and economic impacts are underestimated.**

Thus, by not including the phases following the seismic reports, the **EsIA does not assess**:

- Impacts on the benthic communities, and in particular, the meadows of sea grass *Posidonia oceanica* and Marl beds. Both these habitats are protected by European Directives.
- Impacts on birdlife and fauna in general due to the bioaccumulation of toxic products used in the exploratory surveys and in the commercial exploitation.
- Social and economic impacts caused by the activities, which affect the fishing and tourist industries.

**2.- There is strong social resistance to the Project in Ibiza and Formentera, supported by both local businesses and institutions.** This has led to the creation of an alliance *Mar Blava*, currently comprising a total of 50 organizations representing a cross-section of the community: public administrations (both *Consells Insulars*, town halls); economic sectors such as fishing communities, the tourist and nautical sectors; social organizations, including environmentalists, trade unions and institutions (both public and private).. This diverse structure gives *Alianza Mar Blava* an unusual level of representation and demonstrates undeniably, the opposition generated by the Project.

.- The environmental impact of the Project is critical, affecting the survival of many marine species -fish, cephalopods, turtles and cetaceans-, and is thus unacceptable. The sound waves emitted during the campaign of acoustic surveys have an acoustic level of 249 to 265 decibels (dB), a frequency of between 10 and 250 Hz, and are capable of penetrating up to 7.000 meters in the sea floor. They are between 10.000 and 100.000 times louder than the engines of a jet plane, which emit a sound of about 140 dB. The sound waves would be emitted continuously for 24 hours a day, 7 days a week, during a period of almost 3 months.

There is wide scientific consensus regarding the effect of the sound waves on the echolocation systems (bio sonar) of cetaceans, showing behaviour changes which negatively affect their capacity to orientate and feed themselves, and breed. It has also been shown that the sound waves produce devastating effects on fish stocks (causing irreversible damage to eggs and the larva of a majority of species) resulting in an important reduction in catches during long periods (this has been documented in several cases in Norway, Argentina, etc.).

Other negative effects caused by the sound waves on marine species have also been confirmed: loss of equilibrium, disorientation, internal hemorrhages, destruction of inner hearing systems, respiratory decompression, air bubbles in organs and the circulatory system and cerebral haemorrhage.

The corrective measures and preventive proposals intended to avoid or reduce these effects are not effective since they do not prevent the sound waves reaching a damaging level of intensity. Neither are these measures effective in achieving an avoidance response by the living creatures concerned.

**4.- The (EsIA) does not assess certain environmental impacts of great significance, presumably in order to avoid acknowledging the unfeasibility of the Project. For example:**

- a) **It does not assess the impacts on SPA (Special Protection areas for birds)** on the islands of Ibiza and Formentera, considering them to be far from the area where the acoustic surveys would be carried out. However, survey areas are feeding grounds for many communities of marine birds, so that the distance from the SPA is irrelevant since the acoustic surveys would affect a vital part of their life cycle.
- b) **It does not assess the impacts on the combined populations of marine birds which nest in the islands of Ibiza and Formentera** (which use the survey area for foraging, whereby it is of vital importance in their life cycle), and in particular the impacts on one of the most threatened and protected species: the Balearic Shearwater (*Puffinus mauretanicus*).
- c) **The (EsIA) underestimates the impacts on the biological corridor of cetaceans and in particular the migratory paths of the fin whale**, in danger of extinction. The area coincides completely with the migratory corridor for cetaceans and also partially with the cetacean migratory Spring and Autumn route from the Western part of the Mediterranean, vital for the survival of the populations of the common dolphin, the striped dolphin, the long-finned pilot whale, Risso's dolphin, the sperm whale and the fin whale.
- d) **The EsIA underestimates the impacts on many marine species, in particular: cetaceans, marine turtles and fish populations, both bony and cartilaginous.**

**5.- A Strategic Environmental Impact Study** should be carried out, assessing jointly all the projects of similar characteristics, including all those which are planned in the same area and with the same objectives: **in addition to the project in the Gulf of Valencia, there is another in the Gulf of Leon (between Mallorca and Gerona), a third on the coast of Tarragona, and a fourth to the North of Menorca, the Northeast of Mallorca and all the area south of the Balearic archipelago.**

The procedure which is presently being followed is insufficient and it makes no sense to separately assess the social, environmental and economic impacts of these projects, given that they all affect the same geographic area (with similar environmental economic and social assets) and they would cause potentially synergic effects.

Given all the arguments previously expressed, I REQUEST:

1.- That a **negative environmental impact** be declared for the Project known as "Campaña de Adquisición Sísmica 3D en los permisos B, G, AM-1 y AM-2 en el Golfo de Valencia", promoted by the oil company *Capricorn Spain Limited*, due to the significant environmental, social and economic costs which the Project will cause and given the unanimous social rejection which the Project has generated, as these allegations document.

In \_\_\_\_\_, on the \_\_\_\_\_ of \_\_\_\_\_ 2014

Signed