

**TO THE GENERAL DIRECTORATE FOR INTERNATIONAL ECONOMIC RELATIONS
MINISTRY OF EXTERNAL AFFAIRS AND COOPERATION
C/ Serrano Galvache, 26, Torre Sur, planta 10ª - 28033 Madrid**

SUBJECT: Allegations relating to the project "*Uncovering the Mediterranean Salt Giant (MEDSALT-2)*"

Warning: We have been notified that the Spanish Government will not accept allegations in English given that these languages are not official languages in Spain. We would therefore ask you to read the allegations in your own language, but to sign and register the Spanish or Catalan version of the text. Many thanks for your help and sorry for the inconveniences, due to Government requirements. Signed allegations already sent to Alianza Mar Blava in English or German will be submitted to the Spanish Government together with a certified translation of the text into Spanish, thus ensuring their validity.

PUT FORWARD

That given the announcement published in the Official Bulletin (BOE) by the Ministry of External Affairs and Cooperation, initiating the public consultation procedure relating to the acoustic soundings (seismic obtainment) project using the dangerous technique of high pressure compressed air guns, known as "*Uncovering the Mediterranean Salt Giant (MEDSALT-2)*", the promoter of which is the International Institute of Oceanography and Geophysical Experimentation - **INOGS** of Trieste Italy, a project which affects the area of the Balearic Sea between the islands of Ibiza and Majorca and the southeast of Ibiza and Formentera. And being directly affected by the project due to the negative impacts which it will have on the environment and the economy of the Balearic Islands, I wish to personally present a complaint about these impacts within this public consultation procedure, based on the following

ALLEGATIONS

1. The environmental impact of this seismic obtainment project is critical, negatively affecting the survival of numerous marine species: cetaceans, turtles, fish, birds and invertebrates, and thus is inadmissible. The corrective and preventive measures to avoid or reduce these impacts are not effective, neither are they, in many cases, realistic.

The Ministry of Agriculture, Food and Environment already recognised in a Resolution of the 29 of July 2016 ⁽¹⁾ that the **project MEDSALT-2** could produce significant environmental adverse effects. For this reason, the declaration of simplified environmental impact which was asked for in March 2016, was not granted.

As is shown in the report issued on the 11 of November 2014 by the General Directorate for the Sustainability of Coast and Sea of the **Ministry of Agriculture, Food and Environment**, in relation to another seismic obtainment project using the same technology, the **Balearic Sea is a hotspot of marine biodiversity.**

The zone in which INOGS plans to carry out their prospecting harbours critical habitats of great value for the conservation of an important number of threatened species: cetaceans (sperm whale, pilot whale, grey pilot whale, Cuvier's beaked whale, fin whale, common dolphin, striped dolphin and bottlenose dolphin) **marine turtles** (loggerhead, leatherback and green turtle) as well as **marine birds:** (Balearic Shearwater, Mediterranean Shearwater, Corys Shearwater, European Storm-petrel and Audouin's Gull).

It is scientifically demonstrated that the underwater noise of seismic guns is a potential threat to all those species cited above, being able to disturb and cause injury and even death. At the same time, the effects on fish include changes in both their distribution and abundance (with a reduction in the commercial catch) especially affecting large fishes at distances greater than 30 km. Thus, the **MEDSALT-2 project could have a very negative effect for fishing industries**, including those of economic importance, like the red tuna, since the zone where the soundings would be carried out is a spawning area for this species of great economic international importance.

¹ <http://www.boe.es/boe/dias/2016/08/17/pdfs/BOE-A-2016-7937.pdf>

All cetacean species, turtles and marine birds found in the geographic scope of the Project are protected by different international conventions and agreements of which Spain is a full member under European law.

2. For all the above, it is considered that the potential negative impacts on the environment and in particular the marina fauna found in the area of the operation, is of sufficient magnitude so as to advise against the carry out of the project.

3. In addition, the project is not compatible with the objectives established in the biodiversity legislation nor with the objectives of the Law 41/2010, of the 29 of December, relating to the protection of the environment and marine strategy.

4. On the other hand, the MEDSALT-2 project is directly related to the interests of petroleum companies. In spite of the announcement published in the Official Bulletin (BOE) which only make reference to the scientific nature of the MEDSALT-2 project, the published documents show clearly the interest expressed by several companies belonging to the oil sector about the possibilities opened up by the project to explore for hydrocarbons in this area in the future, given that the geological saline formations which this project studies are frequently linked to the presence of oil and gas deposits.

Thus, in the document "*Memorandum of Understanding for the implementation of the COST Action "Uncovering the Mediterranean salt giant" (MEDSALT) CA15103*" ⁽²⁾, which is the basis of the COST/MEDSALT (COST Action CA15103) ⁽³⁾ project, among many references of this kind, point 2.1.1 (page 8 of the document) reads: "***In the short term, the action [COST/MEDSALT] will improve industrial exploration of deep hydrocarbon resources in the sensitive environment of the Mediterranean Sea.***"

In addition, in point 2.2.1 (page 9 of the document) one finds a key phrase:

"2.2.1. Plan to involve the relevant partners

(...) seven oil & gas and service companies active in the Mediterranean have expressed in written form their interest in the Action [COST/ MEDSALT] (...)"

It is obvious that the MEDSALT-2 project is the antechamber for future oil exploration and mining projects in a Mediterranean zone which is highly sensitive, both environmentally and socioeconomically, thus it is clearly unacceptable.

5. Apart from the link with the interests of the oil sector, the MedSalt-2 project involves the use of compressed air guns, which should not be authorized, whatever be the objective, given that the environmental impact is unacceptable.

6. In the Balearic Islands, there is a resounding social rejection of the project, both on an institutional as well as business level, based on the potential harm to the environment and the local economy, which centres on tourism and fishing.

For all of the above, I ASK:

1.- That the Environmental Impact Declaration of the project "***Uncovering the Mediterranean Salt Giant (MEDSALT-2)***" be negative, given the high environmental impacts and socioeconomic costs the unanimous rejection on the part of all sectors of society, detailed in these allegations, and that the corresponding case file be permanently closed.

² <https://alianzamarblava.org/wp-content/uploads/2018/04/Medsalt-COST-MoU-CA15103-e-ocr-hl.pdf>

³ More information about the COST action: <http://www.cost.eu/>