

To: Kyriakos Mitsotakis, Prime Minister  
of the Hellenic Republic,  
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Konstantinos Skrekas, Minister of the  
Environment and Energy of the  
Hellenic Republic, [secmin@ypen.gr](mailto:secmin@ypen.gr)

George Amyras, Deputy Minister of  
the Environment and Energy of the  
Hellenic Republic,  
[secdepmin.envr@ypen.gr](mailto:secdepmin.envr@ypen.gr)

Prot. No.: 466

March 9, 2022

Dear Prime Minister,  
Dear Minister of the Environment and Energy,

On behalf of the undersigned scientists, non-governmental organizations and local associations, we are writing to you to express our deep concerns about the ongoing seismic exploration activities in Greek waters and, in particular, that these activities pose a threat to marine species.

We note the recent highly atypical stranding of three live Cuvier's beaked whales (*Ziphius cavirostris*) in the Northwest of Corfu island on the 20<sup>th</sup> and 21<sup>st</sup> of February and that this coincided with ongoing seismic surveys in 'Block 3' (the Ionian Block) conducted on behalf of the "Hellenic Petroleum SA" oil company.<sup>i</sup> These latest surveys followed soon after the recent exploration activities in the Gulf of Kyparissia ("Block 10"), an area of high ecological value, which has been designated as a globally Important Marine Mammal Area<sup>ii</sup> and which is adjacent to Protected Areas of Notia Messinia and Kyparissia Bay, both Natura 2000 sites.

The globally important presence of protected Cuvier's beaked whales and other rare and endangered cetaceans, for which the Hellenic Trench is a critical habitat, confirms the importance of the Ionian archipelago for these species. There is ample evidence that these marine mammals are particularly vulnerable to loud underwater noise, including that produced by seismic surveys. Potential negative impacts on marine species include disruption of normal behaviour, exclusion from habitat, prey depletion and physical harm, including resulting in death.

Unfortunately to our knowledge, the Strategic Environmental Assessment (SEA) was considered insufficient by experts and environmental NGOs, especially regarding the activities' impact on vulnerable cetacean species. More so, a proper and thorough Environmental Impact Assessment (EIA) before approving the recent seismic exploration activities mentioned above is lacking. This is worrying considering clear EIA requirements prior to the approval of noise generating activities under EU and international obligations, including the EU's [Directive 2014/52/EU](#) on the assessment of the effects of certain public and private projects on the environment, the [CMS Family Guidelines on Environmental Impact Assessments annexed to CMS Resolution 12.14](#) and the [ACCOBAMS Noise Guidelines annexed to ACCOBAMS](#)

[Resolution 7.13](#). The lack of adequate impact assessments consequently runs counter to Greece's obligations to conform to EU law and international commitments.

The potential devastating impacts of underwater noise have been recognized by various [UN Resolutions](#) and by European Union law. EU legislation obliges Member States to achieve Good Environmental Status (GES) by reducing underwater noise pollution (see Descriptor 11 of the [Marine Strategy Framework Directive](#)) and to protect marine species from disturbance, as required by the [EU's Habitats Directive 92/43/EEC](#). Several multilateral environmental agreements ratified by Greece, such as the Convention on the Conservation of Migratory Species (CMS) and ACCOBAMS, explicitly urge Parties to control the impact of noise within the habitats of vulnerable marine species.<sup>iii</sup>

We are aware that we live in a very particular moment in which the availability of energy at the national level is undergoing a state of high political sensitivity. Nevertheless, we stand firm in our conviction that continuing seismic exploration activities is inappropriate also because of its environmental unsustainability. There is little doubt that climate change and biodiversity loss are some of the most pressing issues facing current and future generations. In this respect it may be timely to recall the most recent Report by United Nation's Intergovernmental Panel on Climate Change (IPCC). This made it abundantly clear that urgent and decisive action is needed to reduce greenhouse gas emissions if we want to keep the world on a 1.5°C pathway, as agreed by the Paris Agreement in 2015. The continued exploration for new oil and gas deposits runs counter to the Paris Agreement and ignores the warning of the IPCC. Taking this into account, we therefore, urge you to reconsider Greece's oil and gas licensing activities, and given the concerns outlined above especially in the Hellenic Trench all along from the northern Ionian Sea to South Crete.

Thank you for your consideration of this matter.

Yours sincerely,

THE UNDERSIGNED

iSea, Environmental Organisation for the protection of the aquatic ecosystems

OceanCare

European Cetacean Society

Tethys Research Institute

Alkyoni Aegean Wildlife Hospital

Alnilam Research and Conservation

Alnitak Research Institute

Animal Action Greece / Greek Animal Welfare Fund

Archipelagos- environment and development

Argolic Environment Foundation

ARION-Cetacean Rescue and Rehabilitation Research Center

Arktouros

ASOCIACION DE NATURALISTAS DEL SURESTE (ANSE)

Associação Para as Ciências do Mar- APCM

Association Tunisienne de Taxonomie

Associazione Marecamp ODV

Blue World Institute of Marine Research and Conservation

CALLISTO Wildlife and Nature Conservation Society

DMAD-Marine Mammals Research Association

Ente Fauna Marina Mediterranea

Fondazione Sea Shepherd Italia Onlus

GREC

Green Balkans NGO

Hellenic Society for the Protection of Nature

International Fund for Animal Welfare (IFAW)

Ionian Environment Foundation

KATELIOS GROUP FOR THE RESEARCH AND PROTECTION OF THE MARINE  
AND TERRESTRIAL LIFE

KYMA sea conservation & research

Lefkogaia

Mare Nostrum NGO

Marine and Environmental Research (MER) Lab

MEDASSET

MedINA

Mediterranean Information Office for Environment, Culture and Sustainable Development  
(MIO-ECSDE)

Menkab

## MESSOLONGHI BY LOCALS

Morigenos - Slovenian Marine Mammal Society

Museu da Baleia da Madeira

Nature Trust Malta

Naturefriends Greece

Naxos Wildlife Protection

Oceanomare Delphis

Pelagos Cetacean Research Institute

Sea Shepherd Greece

SOS Κυπαρισσιακός - Πρωτοβουλία Τριφυλίας ενάντια στις εξορύξεις Υ/Α

Swiss Cetacean Society - SCS

Syrian Society for the Conservation of Wildlife (SSCW)

The Dolphin's Voice

The Green Tank

Union for the protection of natural and cultural environment of Corinthian and Patraian Gulfs "NIREAS"

Wildlife Sense

WWF Greece

WWF Mediterranean

ANIMA - Σύλλογος Προστασίας και Περίθαλψης Άγριας Ζωής

Δράση για την άγρια ζωή

Επαγγελματικός Αλιευτικός Σύλλογος Βόρειας Κερκύρας

ΕΡΗΜΙΤΗΣ Πλους Περιβαλλοντική Προστασία Ακτίων Βορείου Στενού Κέρκυρας

Μαμαγαία / Mamagea

ΣΥΛΛΟΓΟΣ "ΤΟΥΛΙΠΑ ΓΟΥΛΙΜΗ"

Σύλλογος φίλων και προστασία περιοχών Natura νότιας Κέρκυρας

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<sup>i</sup> The surveys by the vessel ‘SW COOK’ are confirmed by NAVTEX no. 20/22 091100 UTC February 2022 of NAVTEX Corfu station and by Marine Traffic tracking. The ‘SW COOK’ research vessel has been active in the area since February 10<sup>th</sup> and its NAVTEXT is indicated to last until the 12<sup>th</sup> of March.

<sup>ii</sup> <https://www.marinemammalhabitat.org/portfolio-item/hellenic-trench/>

<sup>iii</sup> [https://www.cms.int/sites/default/files/document/cms\\_cop12\\_res.12.14\\_marine-noise\\_e.pdf](https://www.cms.int/sites/default/files/document/cms_cop12_res.12.14_marine-noise_e.pdf)