

From: Sven Koschinski [sk@meereszoologie.de]

Sent: vendredi 20 mai 2011 11:40

To: ENER CONSULT OFFSHORE

Subject: Improving offshore safety in Europe; Public consultation, reply from a citizen

Dear Sirs,

thank you for giving me the opportunity to comment on your consultation document on offshore safety.

I want to comment only on a few points because as a citizen I do not have the expertise to comment on all points. I fear that due to input from the oil and gas industry the outcome of this consultation will not be balanced. Environmental organisations do not have the manpower to reply to the recent inflation of EU consultations. And for citizens they are mostly too technical.

Here are my comments:

Authorisation of permits

Regarding exploration the existing regulations to protect marine mammals from seismic underwater noise are too weak. Exploration companies use the JNCC guidelines as a standard. These are by no means adequate to protect mammals from hearing deficiency and disturbance. EU regulations must make other methods than air gun arrays mandatory (e. g. passive seismic and electromagnetic methods). If exploration companies want to use methods emitting sound over 200 dB re 1µPa they must prove that alternative methods are not suited. If a permit for airgun arrays is granted, companies must at the same time research on alternative methods on the same project in order to improve low noise methods!

Prevention of accidents

Has the Gulf of Mexico accident ever happened? Today we see business as usual because bad TV pictures are lacking thanks to harmful oil dispersants. Big Oil pushes even harder into remote areas which are the last strongholds of biodiversity on this planet.

Oil companies have the money to install highest safety level to protect the environment from oil spills and gas blowouts. Please make the use of the highest standard equipment mandatory in EU regulations. Old platforms must be adopted to the best environmental standards or stop production.

Verification of compliance and liability for damages

I am happy that the EU legislation defines the "polluter pays" principle for the 12 nm zone. Only 99.9 % of all platforms are outside this zone. This principle must be adopted for all EU waters (200 nm or more where possible)! Immediately!!! And for all platforms and pipelines, even existing ones!!!!

Polluters must also pay for damaging the atmosphere (not only marine ecosystems), e. g. from methane gas leaks. I just learned that a methane gas leak in the North Sea which was caused by Exxon Mobil in 1990 140 km off Scotland emits 1000 liters methane per second (at least 1/3 go into the atmosphere!) and contribute to greenhouse gases in the atmosphere http://de.wikipedia.org/wiki/Erdgas-Leck_in_der_Nordsee. The global warming potential of this is in excess of greenhouse gases emitted by all cars in Germany - and this is happening for more than the last 20 years now.

Exxon Mobil does not do anything illegal when not acting. Indeed they gave the drill hole back to the British Government. This is an absolutely intolerable situation and shows that EU legislation must make provisions that companies are fined for such incidents. Further, legislation must be adopted to make Exxon Mobil pay for their 20 year old disaster now! As a citizen who is fined for peeing into a lake I do not at all understand this intolerable legislation made in favour of Big Oil!

Please take my comments into consideration.

Sincerely,

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