

29 October 2006

The Secretary
Ministry of Environment & Forests, Government of India
Paryavaran Bhavan, CGO Complex, Lodhi Road
New Delhi - 110 003
INDIA

RE: Potential impacts on the Ganges River dolphins of the proposed seismic surveys of Brahmaputra River, Assam by Oil India, Ltd.

Dear Sir:

I am writing to express concern about the proposed Oil India, Ltd. seismic surveys of the Brahmaputra River in Assam, India, scheduled to begin next month. The endangered Ganges River dolphins are resident in the area of the proposed seismic operations and the effects on them are potentially disastrous.

This situation was brought to my attention by the Species Survival Commission's Cetacean Specialist Group (CSG), an international network of experts who provide scientific and technical advice to IUCN – The World Conservation Union. In addition to their advice, which I will highlight below, I would also draw to your attention to the fact that several other international scientific and management authorities (including the International Whaling Commission) have conducted recent reviews of the effects of seismic surveys on cetaceans, and expressed serious concerns regarding their potential impacts.

Both the South Asian River dolphin species (*Platanista gangetica*) and the subspecies that inhabits the Brahmaputra River system (*P. g. gangetica*) are listed by IUCN as Endangered, meaning they face a high risk of extinction, in this case due in large part to the deterioration of their habitat as a result of human activities. These dolphins are protected under the Indian Wildlife Protection Act of 1972. The Brahmaputra population is of special conservation significance because its habitat is, thus far, less disturbed than the habitat in the Ganges system, where dolphin numbers and range have been declining rapidly.

Despite repeated efforts, our CSG experts have not been able to obtain and review the Environmental Impact Assessment for the proposed seismic surveys. This means that they have had no opportunity to consider the measures taken by the oil company to assess potential effects on dolphins or the opportunity to offer advice on the efficacy of any mitigation approaches proposed. They have learned and reported to me, however, that both airguns and explosives are to be used. In general, high-energy underwater sounds generated by airguns and explosives are dangerous for dolphins. In fact, recently published studies indicate that the effects may be more severe than were previously thought.

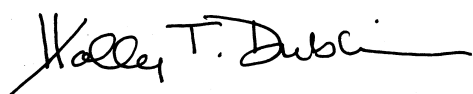
Our experts are especially concerned that a seismic survey conducted in the comparatively narrow, shallow, and confined waterways of the Brahmaputra River could have a devastating

impact on river dolphins. The restricted area of river channels makes fleeing from the sound source difficult, if not impossible, for the animals. Further concern has been expressed that one typical technique used in these environments to mitigate the effects of seismic surveys, commonly known as "soft start" or "ramp up", could be counterproductive if applied in this instance. That is, the animals might not be alarmed as expected and so may stay in the area longer as the sound level increases, with the result that they could get a larger rather than smaller overall exposure. Numerous other technical details, such as the size and number of airguns to be used, the substrate in the river, and the amount of high-frequency energy emitted by the airguns, also need to be considered for a rigorous assessment of potential impact and for design of appropriate mitigation measures.

The use of explosives is particularly worrisome because the shock wave generated by an explosion could severely injure or even kill dolphins. One of the factors pushing another species of river dolphin, the Critically Endangered Yangtze River dolphin, towards extinction has been mortality caused by engineering explosions to maintain navigation channels. Presumably, the proposed Brahmaputra seismic surveys will involve multiple blasts over a large area but, again, the technical details and proposed approaches to mitigation would benefit from expert review by cetacean specialists before proceeding. It is important to note that relatively 'benign' technology may be available as an alternative to the use of explosives for achieving the desired geological profiling. In our experience, all potential mitigation measures deserve appropriate consideration when dealing with endangered species.

On behalf of IUCN and the Species Survival Commission, I respectfully request that you delay issuing a permit for the Brahmaputra seismic surveys until a more rigorous Environmental Impact Assessment, which explicitly considers the potential impacts on dolphins and articulates the intended mitigation measures in detail, has been completed. IUCN's cetacean experts stand ready to examine the details of the intended surveys and to offer further scientific and technical advice concerning both impact assessment and preferred mitigation.

Sincerely,



Dr. Holly T. Dublin, Chair
IUCN Species Survival Commission
Cape Town, South Africa

cc:

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