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## **Open Letter on Threats Posed by Sakhalin Shelf Oil and Gas development to Western Gray Whales**

The western (or Korean-Okhotsk) population of gray whales that feeds in summer in Russian waters is listed in the Red Data Book of the Russian Federation and protected by international conventions. It has a high risk of extinction and therefore is listed as critically endangered by the International Union for Conservation of Nature (IUCN). For the conservation of this population, immediate further action by several parties, including the government of the Russian Federation, oil and gas companies, and civil society, is needed.

Only about 130 individuals remain in this population, of which about 25 are breeding females. Oil and gas development projects threaten these whales' principal feeding areas, including the only known feeding area for mothers and calves located close along the coast of northeastern Sakhalin Island. On the Sakhalin shelf, risks to the population arise from acoustic disturbance (seismic surveys, platform and pipeline construction, drilling and vessel traffic), collisions with vessels and the contamination of whale prey communities by oil spills.

We write as members of the Western Gray Whale Advisory Panel (WGWAP). This group of eleven independent scientists from six countries (Russian Federation, Canada, Germany, Ireland, UK and USA) has been convened by IUCN to provide guidance to the oil and gas industry in order to minimize the risks to gray whales and their habitat on the northeastern Sakhalin shelf. Information on the IUCN initiative can be found at [www.iucn.org/themes/marine/sakhalin/index.htm](http://www.iucn.org/themes/marine/sakhalin/index.htm)

At present, the focus of our work is limited to the offshore development project known as Sakhalin II, operated by the Sakhalin Energy Investment Company Ltd. (SEIC). Sakhalin II is near to the principal feeding areas of western gray whales. Other offshore development projects, especially Sakhalin I, are active in the region, and most importantly are adjacent to the near-shore (Piltun) feeding area used by nursing females and their calves.

Our panel's focus on Sakhalin II stems from the unfortunate fact that, although several companies were invited to join the WGWAP process, SEIC is the only one thus far to participate in this independent, international and transparent effort to conserve western gray whales. As a panel, we have expressed great disappointment with and anxiety about this situation. We have become increasingly aware that a number of companies, such as Exxon Neftegas Ltd. (ENL), Rosneft (Lebedinskoe field) and Elvary Neftegas (Sakhalin V, a joint venture of British Petroleum – Russia and Rosneft), are adding environmental disturbances without providing timely access to information about their operations. For example, in April we were informed (indirectly) of the worrying news that a seismic survey may be undertaken in 2008 for the Sakhalin V project, just north of the Piltun feeding area. This general lack of timely and full disclosure greatly compromises our ability to anticipate and assess the consequences of oil and gas activities in

the region and thus provide comprehensive scientific and technical advice on effective mitigation measures.

Of particular concern to us is the lack of co-operation from ENL, operator of the Sakhalin I project, situated in close proximity to areas crucial to the survival and recovery of gray whales. As the publicly available reports of our work illustrate, on a number of occasions we have been hampered by the unwillingness of ENL to allow open consideration of gray whale data collected under its partnership arrangement with SEIC.

Our role in the WGWAP is to provide objective advice based on the best scientific data and information available, and we value the cooperation shown by SEIC in this regard. However, we also recognize that the best advice requires the best data and it is extremely disappointing that our panel has not been given access to much of the valuable data and relevant information that we know exists. We believe that the Russian Federation, the oil and gas industry, civil society and, most importantly, western gray whales all deserve better. A much greater degree of coordination and cooperation is needed if our shared goal of protecting this, one of the smallest and most vulnerable whale populations in the world, is to be achieved.

Sincerely,

Randall R. Reeves, Chair, WGWAP

WGWAP members:

Robert L. Brownell, Jr., United States  
Justin Cooke, Germany  
Brian Dicks, United Kingdom  
Greg Donovan, Ireland  
Douglas Nowacek, United States  
Randall R. Reeves, Canada  
Grigory Tsidulko, Russian Federation  
Glenn R. VanBlaricom, United States  
Alexander Vedenev, Russian Federation  
David Weller, United States  
Alexey Yablokov, Russian Federation