

Twelfth of November 2018

To: British Petroleum
Mark Johnston,
Group Ecologist & Technical Advisor
S&OR, Environment, Social Responsibility & HSSE
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Subject: Environmental Assessment Tortue/Ahmeyim project off the Mauritanian and Senegalese coast

Dear Mr. Johnston,

As established scientists with extensive knowledge of the Mauritanian Upwelling Ecosystem, we would like to express our deep concerns about the quality of your Environmental and Social Impact Assessment (ESIA) for the proposed Grand Tortue / Ahmeyim gas project, off the Mauritanian and Senegalese coast.

We have strong evidence that the infrastructures coincide with vulnerable ecological habitats. Although our work is included in your reference list, you ignore its most critical contents. Therefore, your conclusions about expected impacts are fundamentally wrong, and must be corrected.

Furthermore, you misinterpreted information gathered by your own baseline study in the future pipeline/flowline area. The photos taken with a Remotely Operated Vehicle clearly show living *Lophelia pertusa*, which you fail to recognise. *Lophelia* is categorised by the European Commission's Habitats Directive (92/43/EEC) as a reef-forming coral species creating critical habitat for fishery resources - the main pillar for long-term development of the West African societies. A recent UK court ruling found that the British Government should designate deep-sea areas with *Lophelia* as special areas of conservation. Mauritanian waters are home to the largest cold-water coral reef in the world, which most probably extend into Senegalese waters as well.

We regret the ESIA's poor analysis of the pelagic ecosystem as well. The IUCN "Red List" is a poor indicator to measure vulnerability on a project scale and a deviation from international protocols to measure the sensitivity of marine areas to surface pollutants such as oil or condensates. The importance of the region for the survival of vulnerable species would be more appropriate. For instance, the area is a prime wintering ground for large populations of shore birds and seabirds alike. In the event of a spill, the survival of several species may be put at risk. For example, more than 30 percent of the world population of northern gannets *Morus bassanus*, a seabird nesting on the British Isles in summer, is found off the Mauritanian coast in winter. Recent research showed that the area hosts significant populations of seabirds from the Palearctic, Nearctic, Arctic and Antarctic regions. These migratory species use the upwelling waters along the Mauritanian shelf-break as a seasonal feeding ground or as a major stop-over site – this is the exact area now chosen for the FPSO and pipeline/flowlines.

The ESIA's poorly elaborated ecosystem-based approach is particularly disappointing given the fact that the consortium of companies involved in this gas project, financed part of the latest research on seabirds and cetaceans. These studies also include georeferenced information on foraging interactions between seabirds and marine predators, allowing fine-tuning the analysis of ecological vulnerability further. Such research enables you to propose *state-of-the-art* spill contingency planning as applied in the North Sea. However, you ignore the most critical information of these studies in the ESIA.

Furthermore, we reject your eco-toxicological work and conclusions. The method you used is obsolete and does not comply with OSPAR standards. These will soon become mandatory for member countries of the Abidjan Convention as well.

Finally, we would like to point out the advanced degradation of this marine ecoregion due to unsustainable fisheries, rampant development on the coastal zone and climate change. Your ESIA does not adequately address the cumulative impacts of the proposed project in context with these other environmental stressors.

We therefore urge you to review the Assessment by including a thorough Biodiversity analysis and study of the main drivers for change. Experts with scientific authority should carry out this review to objectively evaluate your impacts.

You are required by law to apply *Best Available Techniques*. This can only be achieved when you assimilate the best environmental knowledge available. Only then, you can evaluate the measures and techniques needed to *avoid* and *mitigate* impacts effectively. A full recognition of the specific vulnerability of this productive ecosystem would also allow you to identify projects to *restore* and *offset* residual impacts.

We would be most willing to assist your company in fulfilling your commitment to management, aimed at making a *net positive* impact on biodiversity. Even though the history of oil and gas in Africa is fraught with corruption and environmental disaster, nurturing theories such as the "*paradox of plenty*" or "*curse of oil*", Mauritania and Senegal provide you with great potential to prove these wrong. Structures for financial transparency were put in place and Mauritania's marine biodiversity belongs to one of the best-studied in the world, allowing you to apply the highest environmental standards.

By planning your operations with care and attention that is more serious towards ecological science, you will strengthen the host governments to impose science-based standards for environmental management to other sea uses as well, for instance fisheries.

Until then, we ask that this ESIA be withdrawn and rewritten according to the best knowledge available. We also recommend that the governments not further consider the proposed project unless and until these failures of the ESIA are corrected.

Yours faithfully,

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