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DRAFT DMAC 12 Revision 2 *Safe diving distance from seismic surveying operations*

Jameson White

IAGC

Telephone: 713-957-8080

E-mail: Jameson.white@iagc.org

| N° | Paragraph N°/Annex (e.g. 3.1) | Figure/Table/ Note (e.g. Table 1) | Type of comment ¹ | Proposed change | Comments (justification for change) | Secretariat observations (IMCA use only) |
|----|-------------------------------|-----------------------------------|------------------------------|-----------------------|--|--|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| 1 | Guidance #2 | | Ge | Remove section | The guidance notes “all parties should be made aware of the planned activity”. Who is responsible to notify? The Seismic operator or the diving operators? 60 km also is a very long distance to notify all diving operators of planned activities should the responsibility fall on the seismic operators. The current simultaneous seismic operations limit is 30 km and as hydrophones are very sensitive to external sound, we do not believe any set distance should exceed this. Could you please provide me the data used to rationalize the change? Is this due to a risk of direct effect of the sound or discomfort of the divers? | |
| 2 | Guidance #3 | | Ge | Change 30 km to 10 km | Scientific data is needed to support an increase from 10 to 30 km. Prior to such a drastic increase in distance, scientific data should be collected to support the increase. | |

¹ Type of comment: **ge** = general **te** = technical **ed** = editorial

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| 3 | Guidance, #4 | | Ge | <p>Replace “constant communication” with “coordinated/predetermined communication plan”</p> <p>Ramp-ups are not an industry standard and the standard ramp-up used, when necessary, is not relevant to divers.</p> | <p>Maintaining constant communication is not necessarily practical in every situation. Coordinating a communication plan would allow the flexibility to make these guidelines achievable and establishes the mechanism for how the parties will notify one another.</p> <p>Additionally, ramp-ups are not industry standard in all situations and the inclusion is misleading. Furthermore, the ramp-up that is used is not a non-specific ‘gradual’ approach to the divers while communicating with them but is a set 20-40 minute stepped increase in array volume achieved by incrementally adding more and more elements until the full array is operational within 20-40 minutes. This is done as the vessel is on its normal survey track line. Ramp-up proceeds as long no animals are seen within 500 meters (this distance may vary in some regulatory contexts but is typically 500-1000 m, if there is any stand-off stipulated at all).</p> <p>So the ramp-up for marine mammals is designed to be compatible with normal operations, provides sufficient time for a marine mammal to swim some distance away if it wants, is exercised at a much shorter range from the marine mammal (or diver) of concern, and is of a fixed and reasonable duration. As such it is hardly a compatible rationale for calling for a much longer ramp-up at greater distance, with the implication that if the divers are not on the trackline, some deviation in course might be required to achieve the gradually increasing exposure called for in the DMAC recommendations.</p> | |
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| 4 | Guidance #12 | | Ge | Clarify responsibilities | Who is the responsible party for “consent” for seismic operations? Is this proposed for regulators? The requirement for monitoring the area for new diving activity is also vague in context. If the responsibility falls on the seismic operator to notify ongoing diving operations prior to startup, any new diving activities starting after the seismic operations have begun should have the responsibility of notifying the seismic operators prior to any diving. | |
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