

28 June 2017

Dear Secretariat,

Thank you for the opportunity to provide input on the Ministerial Outcome Document for the 2017 UN Environment Assembly.

The International Fund for Animal Welfare (IFAW) is a non-governmental organisation in consultative status with the United Nations Economic and Social Council since 2002 and contributor to the Major Groups and Stakeholders of the United Nations Environment Programme (UNEP) and UN Environment Assembly. IFAW also regularly engages with a number of other United Nations Multilateral Environmental Agreements (MEAs) to further IFAW's mission, which is to rescue and protect animals around the world. These include the Convention on International Trade in Endangered Species (CITES), the Convention on Biological Diversity (CBD), and the Convention on Migratory Species (CMS). To achieve our mission, IFAW works to rescue individuals, safeguard populations, and preserve habitat. With projects in more than 40 countries, IFAW provides hands-on assistance to animals in need and advocates saving populations from cruelty and depletion. As part of this work IFAW has a marine conservation programme. As such our input focuses specifically on the issue of marine pollution.

IFAW wishes to note that Sustainable Development Goal target 14.1 requires UN Member States to prevent and significantly reduce marine pollution of all kinds by 2025 (emphasis added). While IFAW welcomes the focus to date in UNEP and in the recent UN Ocean Conference on plastic pollution, this is not the only form of marine pollution and we urge consideration of other forms, in particular, underwater noise pollution, which has so far been overlooked. The draft Ministerial Outcome Document contains only a reference to marine litter and not other forms of marine pollution. IFAW believes it would be better to explicitly recognise SDG target 14.1 in the Ministerial Outcome Document, and its application to all forms of marine pollution, including an explicit recognition in addition to marine litter of these other forms of marine pollution, including underwater noise pollution.

Article 1(4) of UNCLOS defines pollution as "the introduction by man, directly or indirectly, of substances or energy into the marine environment, including estuaries, which results or is likely to result in such deleterious effects as harm to living resources and marine life..." (emphasis added). It is clear from any plain language reading of the convention, pursuant to the Vienna Law of Treaties, that "energy" includes acoustic energy, or noise.

Underwater noise pollution, generated by a variety of human activities, including military, shipping traffic, coastal and offshore construction work and the oil and gas industry among others, is a significant threat to marine ecosystems, marine animals and the future sustainability of our oceans. While the majority of research to date has focused on the harmful impacts to marine mammals, there is increasing recognition that underwater noise pollution has detrimental impacts on fish and marine invertebrates that are important to fisheries. The detrimental effects of ocean noise on fish, and therefore fisheries, undermines global efforts to restore fish stocks and to tackle nutrition and livelihoods issues for communities heavily reliant on fisheries. Impacts on marine mammals may also impact the viability of coastal tourism reliant on the presence of these animals.

Given the global scale and documented impacts of direct mortality and acoustic habitat loss on a wide range of marine species, including endangered and protected species, and species important to fisheries and tourism industries, it is critical to incorporate addressing noise pollution into the work of the 2017 UN Environment Assembly and into the framework for delivery of the SDG14 targets.

Thank you again for the opportunity to provide input.

Kind regards,

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