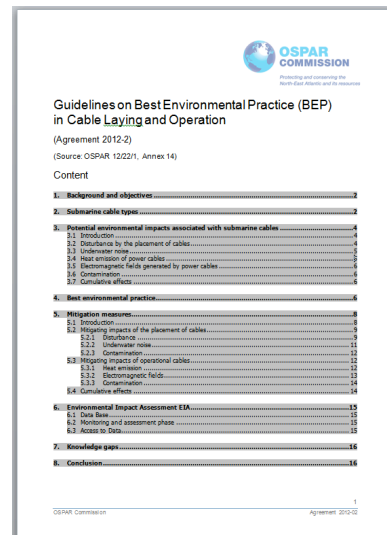
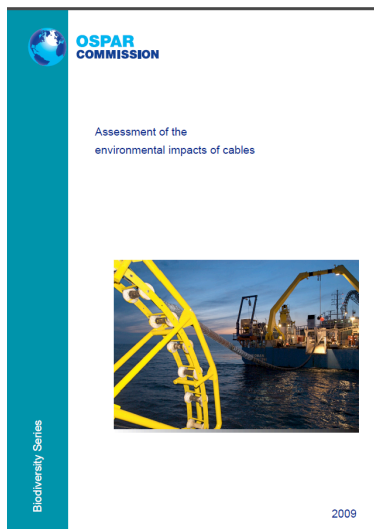


European Subsea Cables Association position statement on OSPAR publication

“Guidelines on Best Environmental Practice (BEP) in Cable Laying and Operation”

The European Subsea Cables Association (“ESCA”) is the industry trade association for power and telecommunication cables for the North East Atlantic region.

Guidelines of Best Environmental Practice (BEP) in Cable Laying and Operation is a document published by the OSPAR commission in 2012 (“the BEP Document”). The Document is based on the 2009 OSPAR document **Assessment of the environmental impacts of cables** by Messrs Merck and Wasserthal.



It is ESCA’s belief that both documents were produced with limited, if any, industry engagement and therefore the BEP Document contains statements, presumptions and speculation that have not had the benefit of being challenged fully by the submarine cable industry.

In the opinion of ESCA, the authors do not appear to have a sound current understanding of the submarine cable industry, modern cable design/construction and modern installation/maintenance techniques.

ESCA has identified in the BEP Document numerous errors including, but not limited, to EMF fields, heat emission, burial methods/impacts, environmental impact, and route selection. (A comprehensive ESCA appraisal of the BEP Document is available on request).

The BEP Document concludes with the simplistic and “catch all” statement that the “precautionary principle” should be applied to cable operations. This statement further reinforces ESCA’s position that the authors do not appear to have a thorough understanding of the submarine cable industry. ESCA does not recognise the validity of these guidelines and the recommendation to its membership is to refute these guidelines in their current iteration.

It is ESCA's position that the BEP Document should be reviewed in partnership with industry and updated and amended accordingly. ESCA would be willing to participate in such a review.

Peter Jamieson
Chairman