Anticipating Cumulative Impacts

ECO read with interest Information Paper 52 on cumulative impact issues which raises many useful points, and offers the following observations on the discussion of cumulative impact in the ATS to date.

While it is useful to monitor cumulative impacts, the more urgent challenge is to better assess the type and scale of cumulative impacts likely to arise from proposed activities. This seems to be where Parties have some difficulties.

Discussion has tended to focus on the supposed technical or methodological complexities of cumulative impacts. This has the effect of justifying postponement of full attention until some point in the future. A secondary consequence is that, despite the mandatory obligation to address cumulative impacts under the Protocol, it is treated in practice as a discretionary matter. This is reinforced by the convenient fiction that we have in every instance to determine WHETHER cumulative impacts arise. The reality – drawing on global precedents – is that cumulative impacts WILL arise and it is merely the form and level that need to be determined.

The discussion has also shown an inclination to regional exceptionalism. Antarctic cumulative impact is considered in isolation – as if cumulative impact experiences and approaches elsewhere were a priori inapplicable here. This means that we overlook the considerable experience gained elsewhere, and risk reinventing the wheel. It also presumes that the relevant expertise only resides in the Antarctic community, a somewhat doubtful presumption. It further raises the spectre of conflict of interest – those charged with advising on cumulative impacts are often the very people for whom it is a further inconvenience. Detachment is sometimes difficult!

Cumulative impact in Antarctica has usually been discussed in a piecemeal manner – cumulative impacts arising from tourist operations OR cumulative impacts arising from national programme activities – whereas if there was ever a concept that required an integrated approach, this is surely it. IAATO’s paper points to the difficulties of acquiring comparable data on some yacht and national programme activities – to which we would add the difficulties of acquiring data about fishing activities. Cumulative impact is indifferent to the jurisdictional boundaries of Antarctic treaties. ECO applauds the decision that the intersessional work on cumulative impacts will consider the issue across a wide range of activities, and suggests that to be effective this must include the contribution arising from fisheries activities.

Whatever the conceptual or methodological difficulties, ECO sees the greatest impediment to the application of cumulative impact is at the level of basic information exchange about proposed activities. A conscientious preparer of an evaluation simply cannot acquire the basic information about who else plans to operate in the area that season (and usually cannot acquire information from past seasons). If even this information is not available, cumulative impacts assessment becomes essentially impossible. Improving the annual information exchange so that the information is available in a timely fashion would help.
ECO recognizes that there are uncertainties associated with addressing cumulative impact, but suggests that by addressing these points the ATS might materially improve its compliance with the obligation to consider such impacts in our environmental impact assessments relatively quickly. If we choose to view cumulative impact as a research agenda, we are in fact postponing compliance with our obligations for some years.

Great Going!
ECO congratulates Russia, Poland and Ecuador on having successfully ratified Protocol Annex V (Rec. XVI/10) – although we note that the former two had in fact completed all domestic procedures some time ago! ECO is encouraged to hear that the Indian delegation expects India’s ratification to follow in the near future. Ratification of Annex V is just the first step. ECO urges all Parties to take the necessary steps to ensure that the Annex is implemented on the ground.

Subglacial Lake Research
Subglacial lake research, and specifically Lake Vostok, is again on the agenda of the ATCM. Ensuring environmental integrity of such special areas is an essential element of the challenges facing those interested in undertaking such research.

The interest in subglacial lakes has coincided with the early stages of implementation of the Protocol. Lake Vostok understandably excites the Antarctic scientific community, and it has quickly became an object of desire for researchers. In September 1999. SCAR convened a conference in Cambridge, England to discuss drilling into the Lake. The Conference identified Lake Vostok as the prime target, and suggested that exploration of subglacial lakes be internationally coordinated, interdisciplinary, based on non-contaminating technologies and sensitive to the implications of lake entry and sample retrieval.

The Antarctic scientific community has recognised the benefits of a staged and careful approach to research in Antarctic subglacial lakes through international cooperation.

ECO supports a cautious and staged approach to the study of the subglacial lakes. If and when the first lake is penetrated, it should only be at the end of a process where scientific objectives have been clearly defined, all drilling and associated technologies tested beforehand, and the potential environmental impacts assessed thoroughly through a CEE.

The CEE should address:

- The purposes of the proposal, and whether these are consistent with the environmental obligations of the Protocol;
- Timing considerations such as whether safer technology is likely to be developed within the next generation;
- Alternative technologies available, including those available outside of the proposing country/s;
- Alternatives for the research itself, such as using a smaller lake, carrying out more targeted projects tailored to the specific needs of different scientific disciplines;
- Consideration of a moratorium on drilling into Lake Vostok for some period; and
- Consideration of the application of protected area status (under Annex V) to Lake Vostok.

The involvement of the international community in all stages of this process is essential. Most critically, the process should not be driven by the agenda of a single Party or agency, but should seek to protect the values of the Antarctic environment.

ECO
Number 3—13 July 2001, St Petersburg

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ECO is published by Friends of the Earth and others at international environmental meetings. This volume is a joint project of the Antarctic and Southern Ocean Coalition, Friends of the Earth International, World Wide Fund for Nature International and The Antarctica Project.

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ECO is financed from non-governmental sources.

ECO’s role is to provide ideas and alternative proposals to the delegates to intergovernmental meetings, report on the meetings, inform the public in order to generate wide-ranging debate, and to clarify the issues for the media. Special thanks to Anonymous, Bear Gulch Fund, CS Fund, Greenpeace International, Greenpeace Netherlands, Humane Society US, Packard Foundation, Tinker Foundation, Turner Foundation, WWF International and WWF USA.