Preliminary responses to comments on the draft Comprehensive Environmental Evaluation (CEE) for the renovation of Petrel Base, Dundee Island, Antarctica

English version provided by the author

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**Information Paper submitted by Argentina**

***Summary***

The National Directorate of the Antarctic of the Argentine Republic, in its capacity as competent authority of the Protocol to the Antarctic Treaty on Environmental Protection (Environmental Protocol), prepared a draft Comprehensive Environmental Evaluation (CEE) with the purpose of renovating the Petrel Antarctic base while the scientific and operational activities of the Argentine Antarctic Program (AAP) are maintained at that base, both in places on the ground and in the facilities that the base provides support. The draft received comments and suggestions from the Parties that participated in the ICG coordinated by New Zealand. Argentina thanks the Parties for their contributions to improve the Petrel Draft CEE in accordance with the circulation mechanisms required by Annex I to the Environmental Protocol.

***Background***

Argentina prepared and submitted the Draft CEE regarding the renovation of the Petrel Base on Dundee Island, with the purpose of modernizing it, eliminating the present environmental risks and making the activities of the Argentine Antarctic Program in the north of the Antarctic Peninsula more efficient. The Draft CEE was prepared according to the relevant provisions established in Annex I, Article 3 of the *Environmental Protocol* (1991) and in the *Revised Guidelines for Environmental Impact Assessment in Antarctica* (2016).

The Antarctic Treaty Secretariat distributed the notification on the availability of the CEE to all Parties through Secretariat Circular 4 (January 30, 2023). In turn, the Presidency of the Committee for Environmental Protection (CPE) reported it through CPE Circular 3 (January 31, 2023). Also, the Secretariat made available to CEP members, on the workspace of its website (https://www.ats.aq/devAS/EP/CEPWorkspace), both the Non-Technical Summary and the full package of files that make up the Draft CEE, in the four official languages of the Antarctic Treaty.

According to the Procedures for the Consideration Procedures for intersessional CEP consideration of draft CEEs (Appendix 3 to the Final Report of the XX Meeting of the CEP), an Intersessional Contact Group (ICG) was established, coordinated by New Zealand, to carry out the review of the draft CEE. The texts with the comments made within the framework of the GCI are available to CEP Members and Observers through the CEP discussion forum, which also provided the Non-Technical Summary (NTS) translated into the official languages of the Treaty.

***General comments***

For Argentina, this is the first experience of comprehensive renewal of one of its Antarctic bases. It is also the first time that a draft CEE has been prepared to be presented to the Parties, through a great effort of all the actors that participate in the Argentine Antarctic Program.

As this is the first CEE of Argentina for an activity in Antarctica, the availability in the database of the Secretariat of the Antarctic Treaty of the CEEs previously carried out by other National Programs constituted an invaluable reference source for obtaining information on procedures of this type, in relation to the various types of activities carried out and the levels of impact assessment required. Likewise, in the preparation of the Draft CEE, the best available science was used, making use of the main studies and surveys on the area that exist to date.

The product of that work was turned into the draft submitted to the Parties last January, which has received comments and suggestions in the GCI created for that purpose. Argentina considers this stage of the process extremely valuable, since it can use the opinion of the Parties to enrich its CEE. Therefore, thanks the effort made by the ICG participants to provide substantive and constructive feedback on this project , and in particular to New Zealand for coordinating the ICG and producing an excellent summary of the responses (Working Paper 32, *Report of the intersessional open-ended contact group [ICG] to Review the Draft Comprehensive Environmental Evaluation prepared by Argentina for the ‘Redevelopment of Petrel Station, Dundee Island, Antarctica*, from ATCM XLV). Argentina will also take into account for the preparation of the final version of the CEE the debates generated during the CPE meeting.

It should be remembered that the Petrel Base renovation project will represent the largest investment made in the Argentine Antarctic Program in many years, with the purpose of recovering a base that now a days does not have the appropriate logistical capacity to support current scientific needs. It should be noted that in addition to the investment planned for this remodeling, Argentina has invested a large sum in scientific instruments and new laboratories for its bases and ships, for which it needs logistical support to sustain the growth in science that this investment in equipment and laboratories implies. This will result in increased research opportunities not only for Argentine research projects but also for research projects of all Parties.

The implementation of this project will allow a better use of the resources of the Argentine Antarctic Program. Activities that are currently carried out from the Marambio base can be carried out from the Petrel base, thanks to the favorable climatic and geographical conditions that it presents, generating a complementarity between both bases that will result in a more efficient use of resources.

Likewise, it will allow continuing to remedy the environmental passive that Petrel currently presents, by proceeding with the removal of historical waste from the Base and replacing obsolete infrastructures with functional ones. Part of the historical garbage removal tasks have already begun with the project "Repair and Maintenance Works at Petrel Base, Dundee Island. Summer and Winter Antarctic Campaign 2021-2022”, whose Initial Environmental Assessment is available in the information exchange system.

***Initial responses to comments from GCI participants***

1. ***The extent to which the CEE meets the requirements of Article 3 of Annex I of the Environmental Protocol***

The participants of the GCI stated that the mentioned project complies in general terms with these requirements, but that it would be necessary to include some additional information and clarifications. The additional details required by Parties are well developed in WP32 prepared by New Zealand. These will be considered by Argentina when preparing the final version of the CEE for the renewal of the Petrel Base.

1. ***Whether the CEE : i) has identified all environmental impacts of the proposed activity; and ii) suggests appropriate methods to mitigate (reduce or avoid) those impacts***

The participants of the ICG noted that the CEE draft submitted by Argentina generally identifies most of the environmental impacts of the proposed activity and presents mitigation measures to address those impacts. However, they requested to provide more information on possible impacts not clearly identified in the CEE, and a clearer presentation of the mitigation measures in the body of the document, among other issues. Argentina will modify the project to explain in more detail and with the best available science the expected environmental impacts and the proposed mitigation measures.

1. ***Draft CEE are adequately supported by the information contained in the document***

The Parties agreed with Argentina that due to the scale and complexity of the activities proposed for the renovation of the Petrel Base, described in the CEE, it is likely that they will have a greater than minimal or transitory impact on the Antarctic environment. Therefore, a CEE is the appropriate level of environmental impact assessment for the proposed activity.

On the other hand, the Parties indicated that an improvement of the environmental impact assessment and a more detailed description and consideration of mitigation measures are needed, in order to support more clearly the conclusion of the CEE. Argentina will carry out this task, especially by further developing mitigation measures to assess their effectiveness and to support more clearly the conclusions reached by our CEE.

1. ***The clarity, format and presentation of the Draft CEE***

We appreciate the comments of the GCI participants who mentioned that the CEE draft is a complete document. We also value suggestions to improve the structure and clarity of the document, which will be taken into account. As an example, key information found in the Annexes will be included in the main document. On the other hand, unnecessary references related to the Port will be eliminated, a construction that is not expected to be carried out. Efforts will be made to reduce the length of the document and synthesize its content, in order to facilitate its reading.

***Conclusion***

Argentina appreciates the valuable and constructive suggestions of the Parties that exhaustively analyzed the Draft CEE for the renovation of the Petrel Base on Dundee Island, Antarctica. In particular, the work of New Zealand as coordinator of the GCI stands out, which prepared a Working Document that very clearly summarizes the comments made in the group by the participants. This document, as well as the individual contributions of each Party, will be the basis on which Argentina will work to present the final CEE.

Argentina is convinced that this project will substantially improve the logistics of its National Antarctic Program. In this way, it will be able to continue contributing to the strengthening of the Antarctic Treaty System through international cooperation, providing more scientific information for the management and conservation of the Antarctic continent.

The proposed activities are considered acceptable, taking into account that the benefits that they will bring in terms of improvements to safety, environmental protection and the ability to support science, outweigh the negative impacts associated with such activities.