

**SCIENTIFIC COUNCIL COMMENTS**  
(arising from ScC-SC2)

**IMPORTANT MARINE MAMMAL AREAS**  
**UNEP/CMS/COP12/DOC.24.2.1**

**GENERAL COMMENTS ON THE DOCUMENT**

- The work on IMMAs relates also to other work streams within the CMS Family, such as the IOSEA Marine Turtle MOU Site Network, and the ACCOBAMS Cetacean Critical Sites, as well as to ongoing efforts to develop networks of Marine Protected Areas.

**COMMENTS ON SPECIFIC SECTIONS/ INCLUDING POSSIBLE PROPOSALS FOR TEXT REVISION**

- Page 6, preamble
  - Add a reference in the Preamble to the ongoing effort by ACCOBAMS on Cetacean Critical Habitats (CCH) which apply a threat-based approach to identifying important areas for cetaceans (ref. ACCOBAMS Resolution 6.24).
  - Add a reference in the Preamble to the ongoing liaison with the International Whaling Commission (IWC) on using IMMAs to mitigate threats, such as ship strikes, by jointly approaching IMO and presenting selected IMMAs (ref. IWC/67/Rep01(2017) Annex J).
  - Add a reference in the Preamble to CBD/COP/DEC/XIII/2 on *Progress towards the achievement of Aichi Biodiversity Targets 11 and 12*, which in paragraph 5 b) *inter alia* invites Parties, in establishing new and/or expanding existing protected areas, or taking other effective area-based conservation measures, to give due consideration to areas that protect the habitats of species, in particular threatened, endemic and migratory species, including through such mechanisms as important bird and marine mammal areas;
- Page 7, para. 4
  - Add a reference to the IWC
- Page 10, para. 12.AA
  - Add a request to the Council to consider ways to look at the applicability of the concept and process for other taxa.

**RECOMMENDATIONS TO COP12**

- Recommended for adoption