



Intervention during the Informal Working Group on the Protection and preservation of the Marine Environment – Facilitator’s text (I).

Thank you, Madam facilitator,

DOSI appreciates the work done by the facilitator preparing the present document.

The effective application of the precautionary approach as well as the ecosystem approach, needs to be considered in a wider context. That is, in the context of cumulative impacts, including, but not limited to, climate change, and diffuse and point-source pollution. DOSI would like to express their concern about the lack of consideration for cumulative impacts in the current draft. Deep-sea mining operations will not act alone on the ocean. On the contrary, impacts from climate change and other factors are also present, ever-changing, and cumulative. We recommend that these wider impacts be incorporated into the draft regulations as such considerations are vital for fulfilling the ISA’s environmental mandate. We believe that their incorporation in DR 44 ‘General obligations’ would ensure their application to the entirety of Part IV.

We support the notion expressed by Ghana on behalf of the African Group, Costa Rica, and France today regarding the consistency with Regional Environmental Management Plans which should be added, as well as consistency with the Convention, rules, regulations and procedures, and Standards as already listed.

We support adding a section to the draft regulation concerning knowledge gaps, as expressed by Canada [and other delegations], as existing and potential knowledge gaps will play into impact analyses and assessment.

We also support Micronesia’s proposed amendment of ‘stakeholder engagement’ to ‘stakeholder participation’, which better invokes international law principles of public participation in environmental decision-making, to which states and international organizations are subject.

We further support the suggestion made by Spain and others to clearly set out the obligations of the Authority, Sponsoring States and contractors, which would contribute to clarifying the guidance warranted for these actors to operationalize said obligations.

Finally, DOSI will provide more specific comments and suggestions in other Regulations about adding text regarding uncertainty and management of knowledge gaps, which we look forward to raising later in the week

Thank you, Madam facilitator,