



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

Thank you Madam Facilitator,

DOSI supports the proposal of Germany on the requirement of test mining prior to the start of the exploitation phase of operations. Test mining is an opportunity to evaluate mining machinery and operations, but also, importantly, to better understand the potential impacts on the environment. The current gaps in our scientific knowledge regarding biodiversity loss, ecosystem recovery rates, and thresholds on ecosystem services, to take just a few examples, mean it is difficult to properly evaluate potential mining impacts. Without test-mining, the data upon which an application for mining will be based will largely come from predictive models and small-scale experiments - and this gives a higher degree of uncertainty to the predictions about likely impacts from mining.

We caution, however, that long-term impacts of mining, such as the re-generation of nodules, the abundance of nodule-dependent biomass, and the recovery of natural sediment habitats - among other currently unknown impacts - will not be apparent on test mining timescales.

We thus believe that test mining should be subject to EIA, EIS, and subsequent monitoring plans.

Thank you