

**Deep-Ocean Stewardship Initiative (DOSI)  
Statements to the 25<sup>th</sup> Session of the ISA Council (Part I)**

<http://dosi-project.org>

**27<sup>th</sup> February 2019**

**Agenda Item 11:** Draft Regulations for exploitation of mineral resources in the Area.

- Consideration of a mechanism and process for the independent review of environmental plans and performance assessments under the regulations on exploitation of mineral resources in the Area (ISBA/25/C/10)

Thank you for allowing us the floor, Madam President.

The Deep Ocean Stewardship Initiative would like to commend the Secretariat for initiating a mechanism for the independent review of environmental plans and performance assessments. We would like to make six brief points:

First, DOSI hopes that the review of environmental plans by independent experts is viewed not as a 'bureaucratic process', but rather, as a mechanism to help both the ISA and Contractors to achieve their environmental objectives.

Second, it will be important that "Independent review" does not involve the Contractor, so as to avoid conflicts of interest.

Third, regarding the process of developing a roster of experts, we suggest utilising existing rosters, such as under the 2<sup>nd</sup> World Ocean Assessment that forms part of the United Nations' Regular Process for reporting on the state of the ocean.

Fourth, regarding the template for the Environmental Impact Statement, a standardized protocol to measure abiotic and biotic environmental variables is missing. Without a standardized protocol, data from individual Contractors may not be comparable, even within a region. Independent expert review could develop these standardized environmental protocols for polymetallic nodules, polymetallic sulphides and cobalt-rich crusts. These protocols should be integrated into the Draft Exploitation Regulations and cover methods as well as spatial and temporal scales of environmental investigations.

Fifth, the EMMP should receive stringent review by independent experts. Thought should also be given to how independent assessments of compliance with Environmental Management and Monitoring Plans be undertaken. For instance, will these be based solely on data provided by the Contractor?

Last but not least, the adequacy of Environmental Baseline Data provided by the contractor should be independently assessed. Baseline data must be of the highest quality as it characterises the deep-sea ecosystem against which **all** potential impacts from deep-sea mining will be assessed.

Thank you, Madam President.