

Comments on the draft High-Level Action Plan and draft Key Performance Indicators for the International Seabed Authority for the 2019-2023 period¹

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1. Does the high-Level Action Plan (HLAP) reflect accurately the actions and outputs that the authority needs to undertake to meet the expected outcomes set out in the Strategic Plan of the Authority for the 2019-2023 period?

First, the content of the high-Level Action Plan (HLAP) demonstrates certain degree of completeness, while being in need of more flexibility. Considering that the Regulations on Exploitation of Mineral Resources in the Area is under negotiation, and the legal system related to seabed exploitation is under discussion, flexibility is necessary for the HLAP to reflect actions and outputs that ISA needs to undertake to meet the expected outcomes listed in the Strategic Plan of the Authority for the 2019-2023 period.

Second, HLAP is a measure to implement the Strategic Directions, which shall be more specific in its language compared to the Strategic Directions. Take examples as Strategic Direction 1.3 and High-level Action 1.31, Strategic Direction 6.5 and High-level Action 6.51, improper situations exist in the current HLAP, where action plans are more simplified than the strategic directions.

Third, certain action plans are in need of improvements. For instance, Strategic Direction 2.6 requires “a study of the potential impact of mineral production from the Area on the economies of developing land-based producers of those minerals that are likely to be most seriously affected”, however, its corresponding HLAP content merely includes “identifying the potential impact of mineral production from the Area on the economies of developing land-based producers”, in absence of more important solutions. There are similar problems with the HLAP. Strategic direction 7 has a similar problem.

Furthermore, certain columns in the HLAP are vacant, for example, the

¹ The Chinese version is the original and English is the translation.

Strategic Direction 6.2 and 6.4. We suggest the HLAs be completed, otherwise the Strategic Directions are difficult to be implemented effectively.

2. Are the Key Performance Indicators (KPIs) sufficiently clear and precise to assess the performance of the Authority towards achieving the strategic directions set out in the Strategic Plan of the Authority for the 2019-2023 period?

The Strategic Directions, HLAP, and Key Performance Indicators (KPIs) constitute a unified whole, where HLAP implements the Strategic Directions displayed by KPIs. From the technical point of view, these three elements are supposed to be corresponding with each other. However, KPIs are being improperly referred to the Strategic Directions instead of HLAP from the current documents of KPIs. Hence, we suggest ISA present these three elements in a systematic way, through matching the numbers and contents of KPIs and HLAP for the distinct comparisons among these three elements.

