



*Ministry of Foreign Affairs  
Nuku'alofa  
Kingdom of Tonga*

F.328/4

**International Seabed Authority,  
14-20 Port Royal Street,  
Kingston, Jamaica  
[strategicplan@isa.org.jm](mailto:strategicplan@isa.org.jm)**

**Thursday, 30<sup>th</sup> May 2019**

Dear Sir/Madam

**Re: DRAFT HIGH-LEVEL ACTION PLAN OF THE INTERNATIONAL SEABED AUTHORITY AND PRIORITIES FOR THE 2019-2023 PERIOD**

Please find enclosed a submission prepared by the Government of the Kingdom of Tonga on the Draft HIGH LEVEL ACTION PLAN OF THE INTERNATIONAL SEABED AUTHORITY AND PRIORITIES FOR THE 2019-2023 as contained in the document published by the International Seabed Authority and dated 3 May 2019.

Sincerely,

**Mr. Mahe 'U. S. Tupouniua  
Secretary for Foreign Affairs**



**WRITTEN COMMENTS OF THE GOVERNMENT OF THE KINGDOM OF TONGA  
ON THE DRAFT HIGH-LEVEL ACTION PLAN OF THE INTERNATIONAL SEABED  
AUTHORITY AND PRIORITIES FOR THE 2019-2023 PERIOD**

**I INTRODUCTION**

- 1 The Government of the Kingdom of Tonga (Tonga), commends the International Seabed Authority for the production of the High-Level Action Plan (“Action Plan”) for the period 2019 to 2023 and the KPIs which are the next steps in the further development of the Strategic Plan, as requested by the Assembly at the 24<sup>th</sup> Session of the Authority and the provision of further guidance and direction for the Authority’s work for the year 2019 to 2023.
- 2 As a member of the Council, a small island developing State surrounded by the Pacific Ocean, a State party to the 1982 United Nations Convention on the Law of the Sea (UNCLOS) and the 1994 Part XI Implementing Agreement, and a Sponsoring State since 2011, Tonga remains committed to ensuring the full evolution of the Authority in accordance with the vision of the drafters on the basis of “common heritage of mankind”.
- 3 The comments on the Action Plan are set out in Section II below. The comments provided are preliminary and are without prejudice to any future position Tonga may have.

**II COMMENTS ON THE ACTION PLAN**

- 4 **Overall**, the Action Plan and the Key Performance Indicators must ensure the Strategic Plan of 2019 to 2023 allows the Authority to:
- (a) Operate and fulfil its mandate as set out under the United Nations Convention on the Law of the Sea 1982 (UNCLOS) and the Part XI Agreement 1994;
  - (b) Administer, organize and control activities in the Area, on behalf of mankind as a whole, as set out under Article 153 of UNCLOS;
  - (c) Ensure the transparent and inclusive engagement of all stakeholders, particularly Small Island States.
- 5 In viewing the Action Plan, it clearly takes the 9 Strategic Directions (SD) under the Strategic Plan of 2019 to 2023 and provides details of the components of each SD and provides High Level Actions (HLA) and key performance indicators (KPIs) for each SD, as set out in the table below:

<b>Strategic Direction (SD)</b>	<b>SD Components</b>	<b>HLA</b>	<b>KPI</b>
1	5	10	7
2	6	7	3
3	5	16	4
4	5	12	3

<b>Strategic Direction (SD)</b>	<b>SD Components</b>	<b>HLA</b>	<b>KPI</b>
5	4	8	8
6	5	6	6
7	1	1	1
8	4	12	6
9	4	8	3
<b>Total</b>	<b>39</b>	<b>80</b>	<b>41</b>

6. Given the inter-related nature of the SD, a clear indication of priority listing of SDs and the related HLA is vital. For example, there might be a temptation to implement those SD which may be considered as ‘low hanging fruit’ initially but these may not be as important as others in terms of sequencing.
7. There should also be a clear pathway for the sequencing of the SD and the related HLA. This means re-ordering the SD so those which form the foundations of other SD are implemented first.
8. Experience suggests that it is not always practicable to roll out all the HLA at the same given that there is usually a need to reallocate resources of personnel and of finance towards the high priority SD.
9. The HLA does not consider the technical and financial resources needed to successfully implement the Strategic Plan. There should be a manpower plan, updated annually, to determine gaps in the technical and other manpower resources available to enable the Secretariat to meet its targets.
10. It might be useful for the Secretariat if a functional review of its operations were to be undertaken in order to confirm alignment with the SD and the HLA to ensure their successful outcome.
11. Similarly, the budget of the ISA ought to be re-assessed in the light of the Strategic Plan in order to ensure alignment of budgetary allocations with the achievements of the Strategic Plan.
12. Some of the HLA and KPI utilize metrics in the KPI to measure outcomes. (see PI 5.3, 5.4, 5.5). The KPI should focus not only on the numbers involved but also on whether or not the trainees utilized the knowledge they had learnt for the benefit of member states.

**Government of the Kingdom of Tonga**

**Thursday, 30<sup>th</sup> May 2019**