



Regulation 51 - Compliance with Environmental Management and Monitoring Plan (delivered 25 July 2022)

Thank you Madame Facilitator.

The Deep Ocean Stewardship Initiative recommends modification of DR 51 Para c to cross-reference the specific sections of the regulations regarding the ongoing evaluation of the EMMP, improving clarity.

DOSI welcomes the inclusion of “continuous” in reference to monitoring frequency in DR 51 Para a. We again make a recommendation that monitoring data should be made available in real time to all stakeholders, in addition to the annual report, to facilitate independent analyses of the data and enhance transparency of this industry. We also encourage the determination of a specific time frame over which the monitoring should continue, that is based on the ecological characteristics and consequent recovery times of the ecological communities in the contract area.

Regarding DR 51 Para c topic of maintaining the currency and adequacy of the EMMP, we remind our colleagues that deep-seabed mining impacts will occur in combination with climate change impacts. Therefore climate change impacts should be taken into consideration throughout monitoring of compliance with an EMMP.

Thank you Madame Facilitator.