

DOSI Intervention regarding item 10: Draft Regulations on exploitation of mineral resources in the Area: Fourth meeting of the Informal Working Group on the Protection and Preservation of the Marine Environment

DR 48 paragraph 3 – Environmental Management and Monitoring Plan

Delivered 21 March 2023

Thank you, Madame Facilitator. The Deep Ocean Stewardship Initiative supports many elements of the revised text. Regarding DR 48 Paragraph 3f, DOSI recommends that the EMMP also include details of the entities involved in monitoring, along with information about their organizational structure. This is an important part of objectively understanding the methodology that will be used to determine whether environmental objectives are being met, and whether the proposed monitoring entities are suited to the methods assigned to them.

In addition, with regards to paragraph 3bis, DOSI wishes again to seek clarification on the supplementary monitoring programme. If this is an additional programme, run by a third party, seeking to verify the data that is being reported by the Contractor, this could be a good idea. Particularly because the ISA's monitoring regime may rely extensively on contractor self-reporting, independent audit of that data can help the ISA and other stakeholders confirm that the ISA is receiving accurate reports from contractors on important environmental parameters. But we are concerned that the drafting should not suggest setting a time limit for monitoring that is shorter than the duration of mining impacts or biological processes in the deep ocean, which can be decadal or longer.

Thank you, Madame Facilitator.