

**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**

**DR52 - Review of the performance assessments of the Environmental Management and Monitoring Plan**

Delivered 21 March 2023

Thank you Madame Facilitator.

For DR 52 Para 1, the Deep-Ocean Stewardship Initiative supports the proposed amendments and suggests that the “competent and independent” auditor needs to be hired by the Commission and paid by the contractor, not hired by Contractor. In our opinion, an auditor hired by the contractor presents a potential conflict of interest, as raised by Spain, and creates dependency of the auditor on the contractor.

DOSI suggests the addition of a section 3bis that specifies that the report should be published, stakeholder comments should be invited, and that stakeholder comments and the contractor’s response to the stakeholders’ comments should be published. All of these should also be presented to the Commission for review.

As deep-sea environmental scientists, we know how time-intensive proper review of environmental documents is and how many different types of expertise are required. DOSI stands ready to assist the ISA in accessing the wide ranging scientific collective expertise that could assist with these tasks.

Thank you Madame Facilitator.