

Bula Madam facilitator and delegates

Firstly, Madam Facilitator, we are very happy to see you back in the facilitation role.

This is a very important working group and we look forward to the discussion

Madam facilitator, We speak on behalf of DSCC and WWF on this part of the intervention on the stakeholder consultation.

We welcome the initiative of the informal group discussing Standardisation of Stakeholder consultation, and, as Stakeholders ourselves, we would be glad to be involved in such discussions in the future in order to support this important effort.

We would like to take this opportunity to ask that States take this one step further and provide not only for consultation but also public participation which goes further than consultation. For example, in any environmental impact assessment, stakeholders should have the opportunity to introduce independent scientific advice and advisers to contribute to the EIA process. When we are contributing here in Council, this is public participation, not consultation.

It is worthwhile noting that the Aarhus **Convention** on Access to Information, **Public Participation** in Decision-making and Access to Justice in Environmental Matters rests on three pillars: access to information, public participation, and access to justice. All three go hand in hand: the information pillar to ensure that the public can participate in an informed fashion, and the access to justice pillar to ensure that participation happens in reality and not just on paper. It can be traced back to Principle 10 of the Rio Declaration.

Public participation also entails access to relevant documents, the ability to speak, to circulate written documents, including reasonable timeframes to participate effectively. In brief, it involves effective notice, adequate information, proper procedures, and appropriately taking account of the outcome of the public participation.

It is far more than just commenting, and, under Article 6 para. 7 of the Aarhus Convention, requires allowing the public to submit, in writing or, as appropriate, at a public hearing or inquiry with the applicant, any comments, information, analyses or opinions that it considers relevant to the proposed activity.

So in the context of the ISA, this means not just commenting on documents on a website, but meaningfully participating in the Legal and Technical Commission, the Council or any other body.

Regarding the identification of Stakeholders to be directly notified of participatory processes, firstly we urge the systemic involvement of independent scientists, indigenous people, coastal communities, youth, and environmental groups.

We agree it would be useful to have a list of types of Stakeholders that should be reviewed and updated on a regular basis, with contact information.

We suggest that Stakeholders themselves should be invited to contribute to these lists.

In order to ensure that this is not left as 'Guidance' alone, we would urge a definition of 'key Stakeholders' in the regulations, but one that remains sufficiently broad to allow for the rapidly growing and evolving interest in the common heritage of humankind.