



## **Statement re Draft Regulation 31 ISBA/28/C/WOW/CRP.1 30 March 2023**

The ICPC supports the inclusion of item 20. bis in Annex I and aligns itself with the statements of Australia, Norway, Singapore, the United Kingdom, and the United States. Given that Plan of Work is developed in a closed setting with the Commission, which precludes submarine cable operators themselves from initiating coordination before the Plan of Work is approved, absent action by the contractor, and consistent with proposed language in Regulation 31 requiring consideration of protection of submarine cables in any review and approval of a Plan of Work, the ICPC believes that it is critical for the Commission to receive information from a contractor regarding submarine cables and coordination activities.