

Comments on the Draft Strategic Plan for the International Seabed Authority for the Five-year Period 2024-2028

General Questions

1. Does the Draft Strategic Plan for the period 2024-2028 clearly encapsulate the mandate and responsibilities set out for the Authority by the Convention and the 1994 Agreement?

《战略规划（2024-2028）》结合当今国际社会深海大洋活动的新形势以及深海采矿的新发展，在《战略规划（2019-2023）》的基础上做了更新、调整和发展。我们认为目前的战略规划可以较好地概括《联合国海洋法公约》（以下简称《公约》）和1994年《执行协定》为国际海底管理局（以下简称管理局）规定的任务和责任。

The Draft Strategic Plan for the period 2024-2028 has been updated, adjusted and developed on the basis of the Strategic Plan for the period 2019-2023, taking into account the new situation of the deep ocean activities in the international community and the new developments in deep sea mining. We believe that the current Strategic Plan can better encapsulate the mandate and responsibilities set out for the International Seabed Authority (the Authority) by the United Nations Convention on the Law of the Sea (the Convention) and the 1994 Agreement.

2. How do you think the Strategic Plan and associated High-Level Action Plan have contributed to fulfil the mission of ISA (as per the mission statement)?

在一个不断变化的世界中，在其作为人类共同遗产守护者和管理者的作用中，管理局面临着许多挑战。它需要在多个目标之间取得适当的平衡。在这种情况下，一个有明确目标导向的系统规划方案对管理局来说是非常重要的。因此，我们认为《战略规划》和《高级别行动方案》在促进管理局履行职责方面具有非常重要的作用。

In a changing world and in its role as the guardian of the common heritage of mankind and as the regulator, the Authority faces many challenges. It needs to strike an appropriate balance between multiple goals. In this context, a clear goal-oriented and systematic planning programme is of great importance to the Authority. We therefore believe that the Strategic Plan and the High-level Action Plan play an important role in fulfilling the mission of the Authority.

3. To what extent do you think the work of ISA provides a useful model for sustainable management of the global commons as Steward of the Area and its resources?

与南极洲、外空等国际领域的全球治理相比，以管理局为核心的国际海底区域治理呈现出快速而健康的发展趋势。我们赞赏管理局发挥的积极作用，特别是管理局的机构运作、治理机制、对国际法的推动和对人类可持续发展的促进作用，为其他全球公域科学规范化管理和可持续利用树立了良好榜样。

Compared with global governance in international fields such as Antarctica and outer space, the governance of the international seabed area, with the Authority at its core, has shown a rapid and healthy development trend. We appreciate the positive role played by the Authority, especially its institutional operations, its governance mechanism, its promotion of international law and its role in promoting sustainable human development, which sets a good example for the scientific standardized management and sustainable use of other global commons.

4. What should be the priorities of the Authority for the next five years?

我们希望管理局在前期工作基础上，优先就以下领域开展工作：

1.在全球可持续发展背景下实现管理局的作用。将管理局方案和倡议与实现其任务所涉及的可可持续发展目标相结合。以负责任的方式管理与深海采矿相关的各种经济、环境和治理问题，在科学支撑的基础上积极塑造深海采矿活动的正面形象，构建国际社会对深海采矿活动的信任，促进深海采矿活动的可持续发展。

2.加强“区域”内活动的监管框架。（1）加强组织协调各成员国共同稳健推动开发规章及配套标准和准则制定，对规章制定作出更加务实合理的安排，促进开发规章早期出台。（2）加强监测和审查海底采矿活动方面的趋势和发展，包括定期分析世界金属市场情况和金属价格、趋势和前景，降低市场不确定性给深海采矿带来的风险。（3）制订合理的惠益分享制度，促进人类共同继承财产制度的发展，推动全球可持续发展。

3.保护海洋环境。（1）保护海洋环境免受“区域”内活动可能产生的有害影响，鼓励承包者通过勘探、试采等深海活动收集环境基线数据，开展环境影响监测与评价、积累科学数据，支持承包者参与相关环境阈值制定工作。（2）积极平衡推进各区域的区域环境管理计划（REMP）制定工作，在REMP制定过程中，采取协作和透明的方式推进环境数据收集和分享，充分听取各利益攸关方特别是承包者的意见，在切实保护海洋环境的同时，保护承包者的合同权利和开发积极性。

4.促进并鼓励“区域”内的海洋科学研究。（1）加强在海洋科学研究方面的协调，避免重复工作并从协同增效中获益。协调承包者之间以及承包者与国际科学界之间联合开展海洋科学相关调查及合作研究。（2）鼓励承包者利用管理局DeepData数据库，与相关发展中国家合作开展生境制图、测绘和分类研究，提高对区域的科学认知。

We would like the Authority to build on the previous work and prioritize work in the following areas:

1. Realize the role of the Authority in the context of global sustainable development. Integrate the Authority's programmes and initiatives with the achievement of the sustainable development goals underlying its mandate. To manage the various economic, environmental and governance issues related to deep sea mining in a responsible manner, to actively shape a positive image of deep sea mining activities on the basis of scientific support, to build international confidence in deep sea mining activities, and to promote the sustainable development of deep sea mining activities.

2. Strengthen the regulatory framework for activities in the Area. (1) Strengthen the organization and coordination of member States to jointly and steadily promote the development of Exploitation Regulations and supporting standards and guidelines, make more practical and reasonable arrangements for the development of regulations, and promote the early introduction of Exploitation Regulations. (2) Strengthen the monitoring and review of trends and developments in seabed mining activities, including regular analysis of world metal market conditions and metal prices, trends and prospects, to reduce the risks posed by market uncertainties to deep-sea mining. (3) Formulate a reasonable benefit-sharing system to promote the development of the common heritage of mankind, and to promote global sustainable development.

3. Protect the marine environment. (1) Protect the marine environment from possible harmful effects of activities in the Area, encourage contractors to collect environmental baseline data through deep-sea activities such as exploration and test mining, carry out environmental impact monitoring and evaluation, accumulate scientific data, and support contractors to participate in the formulation of relevant environmental thresholds. (2) Promote the development of the regional environmental management plan (REMP) in each region in a balanced manner actively. In the process of developing REMP, collaborative and transparent methods are adopted to promote the collection and sharing of environmental data, and the opinions of various stakeholders, especially contractors, are fully listened to, so as to protect the contractual rights and development enthusiasm of contractors while effectively protecting the marine environment.

4. Promote and encourage marine scientific research in the Area. (1) Strengthen coordination in marine scientific research, avoid the duplication of efforts and benefit from synergies. Coordinate joint marine science-related investigations and collaborative research among contractors and between contractors and the international scientific community. (2) Encourage contractors to use the Authority's DeepData database to conduct habitat mapping, mapping and classification studies in collaboration with relevant developing States to improve scientific knowledge of the Area.

Specific questions:

5. Does the “Mission Statement” (unchanged from the first strategic plan) continue to accurately reflect the mandate of the Authority?

我们认为目前的“任务说明”可以体现管理局的使命和授权。但仍建议做以下调整以更好地体现：

管理局的使命是，为全人类的利益促进“区域”内资源的合理、有序和持续开发，确保承包者有法可依地从勘探进入开发阶段。为此应制定全面的商业性国际海底采矿监管规则和机制，确保不同主体之间的权利义务的平衡，资源开发利用与环境保护之间的平衡以及全人类利益与开发者商业利益的平衡，包括制定统一和非歧视的向承包者提供鼓励的具体措施，兼顾开发利用与深海环境保护的具体制度，公平对待承包者、管理局和全人类的缴费制度，公平分享从“区域”内活动取得的财政和其他经济利益的机制，以及鼓励缔约国和承包者开展必要的实践来探索实现深海资源合理利用的有效途径。

We believe that the current “Mission Statement” reflects the mission and mandate of the Authority. However, the following adjustments are recommended to better reflect:

The mission of the Authority is to promote the rational, orderly and sustainable exploitation of the resources in the Area for the benefit of mankind as a whole, and to ensure that contractors move from exploration to exploitation in a lawful manner. To this end, comprehensive regulatory rules and mechanisms for commercial mining in the Area should be developed to ensure a balance between the rights and obligations of different entities, between the exploitation of resources and environmental protection, and between the interests of mankind as a whole and the commercial interests of contractors. These regulatory rules and mechanisms include the development of unified and non-discriminatory specific measures to provide incentives to contractors, a specific regime that balances exploitation and environmental protection of the deep sea, a payment system to fairly treat contractors, the Authority and all mankind, mechanisms for the equitable sharing of financial and other economic benefits derived from activities in the Area, and incentives for States parties and contractors to carry out the necessary practices to explore effective ways to achieve the rational utilization of deep-sea resources.

6. How do you consider that the context and challenges identified remain relevant? Should there be any new elements identified?

我们认为是。无需增加新的要素。

We believe so, and no new elements need to be identified.

7. Are the “Results and Priority Outputs” appropriate and is there a clear link between the “Strategic Directions” and the “Results and Priority Outputs”?

目前的“预期成果”符合《公约》和1994《执行协定》的相关要求。“战略方向”若能很好地执行将有利于“预期成果”的实现。

The current “Results and Priority Outputs” are consistent with the relevant requirements of the Convention and the 1994 Agreement. The “Strategic Directions”, if well implemented, will facilitate the achievement of the “Results and Priority Outputs”.

8. Are there any specific observations or comments that Member States and other stakeholders wish to make connection with any other aspect of the Draft Strategic Plan for 2024-2028?

管理局可以同一些联合国内外的国际组织加强合作以应对挑战。例如，管理局在制定开发规章及相关标准和准则时，一些流程标准是由众多标准制定组织发展起来的，不少是在行业、国家、区域和全球层面按主题或就具体行业问题制定的。其中最为突出的是国际标准化组织(ISO)制定的标准。而在深海采矿中涉及的船舶安全及船舶污染防控等方面，可以同国际海事组织合作，借鉴其制定的相关标准和规范。

The Authority can enhance cooperation with international organizations within and outside the United Nations to address the challenges. For example, as the Authority drafts Exploitation Regulations and related standards and guidelines, some process standards have been developed by numerous standard-setting organizations, many by topic or on specific industry issues at the industry, national, regional, and global levels. The most prominent of these are the standards developed by the International Organization for Standardization (ISO). In terms of the ship safety and vessel-based pollution prevention and control involved in deep sea mining, it is possible to cooperate with the International Maritime Organization and draw on its relevant standards and codes.