Intervention #9 - Regulation 48 ter - Test mining - Delivered by Patricia Esquete on 13/07/2023

Thank you, Madam facilitator

DOSI wishes to thank Germany and Belgium proposal, and congratulate the intersessional working group for the work done on the development of a regulation of test mining. We have a few comments that we would like to share for consideration by the Council:

We would like to stress that, although the data collected during test mining would be valuable for a better understanding of the potential levels of environmental harm to be incurred, the potential resilience to mining impacts, including via the improvement of plume models, test mining remains an activity that **has** an impact in the marine environment.Therefore, if conducted, it should always be subject to an Environmental Impact Assessment, the development of an Environmental Impact Statement, and Monitoring.

We agree with the statement in the report of the intersessional working group that modeling requires baseline data. The results of a model are only as good as the input data, and we must reiterate that we are far from having sufficient and adequate data for reliable results of modeling for most of the deep-sea ecosystems and areas targeted for deep-sea mining.

Finally, we would like to stress that mining tests performed without a complete system and full scale of the collector, rising system, and other machinery do not allow us to accurately assess the possible impacts of the marine environment of mining activities. Such impacts are assessed for both the seafloor and the water column, from microbes to large animals. Without such thorough methods, the data collected is not reliable. As shown on two posters outside this room, independent research carried out in the framework of the project Mining Impact, testing a smaller pre-prototype of a collector has demonstrated that this is not sufficient to be able to draw conclusions on the ecological impacts of the operations for most of the parameters studied.

Thank you madam facilitator