



Intervention # 12 - Regulation 11 - Publication and review of the Environmental Plans [and Environmental Management Systems] - delivered by Sergio Cambronero on 18-07-2023

Thank you Co-facilitators

On paragraph 1(a), DOSI supports the amendment to extend the duration of publishing the Environmental Plan on the ISA's website to 90 or more days, as scientists are often at sea for months at a time and thus, this longer publication time is necessary for an inclusive public participation process. Also to ensure a fair process in light of the importance of the common heritage of humankind, DOSI welcomes the inclusion of notifying "the general public" of an Environmental Plan.

DOSI acknowledges the suggestion to include "***relevant*** adjacent coastal states" and we note this is the subject of an intersessional working group. DOSI wishes to point out that deep seabed mining in a designated site in the Area may have far-reaching effects in the water column above, which may impact numerous coastal states, therefore making them ***relevant*** adjacent coastal States. The CCZ area is a good example of the profound connectivity in the oceans. Major currents and gyres determine oceanographic dynamics and not only influence mineral deposition rates but also connect biological communities across extensive geographical ranges. In this regard, we should consider the circulation of different water masses in the CCZ and adjacent areas, and the likely disruption of the Oxygen Minimum Zone of the Eastern Tropical North Pacific by the discharge plumes. We should further consider the close connection to important oceanographic features such as the Costa Rica Thermal Dome, which is recognized as an EBSA under the framework of the CBD, and proposed to be one of the first MPA's in areas beyond national jurisdiction. In light of this, DOSI thus wishes to draw the attention of the Council to the importance of these processes in defining what is a ***relevant*** adjacent coastal State.

Finally, DOSI supports paragraph 1(c) over 1(c) alt, as we believe there should always be a review of the Environmental Plan by independent experts, and not only in the case the Commission evaluates that there are aspects of the Environmental Plans that are not covered entirely by its own internal expertise. We further suggest clarification on what is meant by a 'competent expert', by including specific fields of expertise, for example, but not limited to, biology, ecology, microbiology, physical oceanography, geology, and geo-chemistry. Such an inclusion will ensure greater quality control and consistency across reviews. Relying on a range of competent independent experts, in the form of a subsidiary committee and a roster, will also provide more procedural consistency and transparency.

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