



**DOSI intervention #7**

**DR44bis - regional environmental management plans & 45 Development of Environmental Standards and Guidelines – Delivered by Patricia Esquete on 02.11.2023**

Thank you Madam Facilitator,

Our apologies, DOSI also seems to have missed the opportunity to talk to DR44bis, so we will first address that and then move to DR45

With regards draft Regulation 44 bis, DOSI emphasises the importance that the Council considers a Plan of Work only once a REMP is in place for the applicable area. DOSI notes the inclusion of “without undue delay” in paragraph 2 and highlights that this should not lead to a REMP being hastily adopted because a Plan of Work has been submitted. All REMPs should be robust, and contain a procedure to allow them to be reviewed and updated at regular intervals or on a regular basis.

DOSI highlights that it is necessary for the standardised approach to REMPs to be finalised for adequate REMPs to be developed in an appropriately inclusive manner, and that include clear overarching strategic environmental goals and objectives. Given that these goals and objectives will define harmful effects and serious harm it is hard to see how the LTC or ISA could consider a plan of work without them. These standardised documents should be agreed and applied prior to finalising a REMP for any area for which a Plan of Work is submitted to ensure consistency between REMPs of different areas.

Now for DR45

DOSI suggests including a provision for a timeline for the review of environmental standards. The increased availability of environmental baseline data that ought to be collected during the Exploration Contract Periods, will provide crucial new information about ecosystem structure, functioning and services. Ongoing research will also provide increased confidence levels on thresholds for various impacts. In addition, with the ongoing climate change emergency (as well as the global pollution and biodiversity crises), it is likely that environmental conditions will change due to climate change and phenomena previously not observed may occur which in themselves might affect those conditions, and this in turn may require review of ISA Standards and thresholds. We therefore recommend the addition of a new paragraph 6 to define the timeframe for regular review of the standards.

In addition, DOSI suggests removing ‘including restoration measures’ in paragraph 2(d), given that there is an established mitigation hierarchy that includes restoration.

Thank you Madam Facilitator