

Statement re Annex I ISBA/28/C/WOW/CRP.2 8 November 2023

Consistent with the positions of Australia and the United States, the ICPC supports the inclusion of item 20. bis in Annex I as drafted, and removal of the brackets around that text. 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.