

## **DOSI intervention #10**

### **DR 48ter - test mining - Delivered by Patricia Esquete on 27/03/2024**

Thank you Madam facilitator,

DOSI supports the requirement of test mining prior to the approval of a plan of work. Test mining is an opportunity to evaluate mining machinery and operations, but also, importantly, to better understand the potential impacts on the environment. The current gaps in our scientific knowledge regarding biodiversity loss, ecosystem recovery rates, and thresholds on ecosystem services, to take just a few examples, mean it is difficult to properly evaluate potential mining impacts. Without test-mining, the data upon which an application for mining will be based will largely come from predictive models and small-scale experiments - and this gives a higher degree of uncertainty to the predictions about likely impacts from mining.

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 models.

In addition, it is important to remember that test mining is a mining activity in itself, and therefore has an impact on the marine environment. Accordingly, when test mining is conducted it should always be subject to an Environmental Impact Assessment, even though it is also used to inform the Environmental Impact Assessment for the application for a Plan of Work, as well as subsequent long-term monitoring plans.

We caution, however, that long-term impacts of mining such as the presence or abundance of nodule-dependent faunas, and the recovery of natural sediment habitats - among other currently unknown impacts - will not be apparent on test mining timescales. The effects of the test mining will also be long lasting and therefore monitoring should be maintained throughout the duration of the activity, to continuously inform on the long-term effects on the marine environment and recovery of the ecosystem. A validation monitoring system shall be established by the contractor, which should include monitoring of the long-lasting effects of test-mining

DOSI raises concerns on paragraph 4 of DR48 ter, which suggests that test mining does not have to be included in every project. The impacts of an activity on the marine environment can only be fully assessed after a test of the whole mining system including all technology on a full scale. 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. Results from other studies or smaller-scale tests are not reliable.

Thank you