



## **Statement re Draft Regulation 15 ISBA/29/C/CRP.1 25 March 2024**

The International Cable Protection Committee—ICPC— supports adoption of the language in paragraph 2(a) of Draft Regulation 15 and unbracketing of paragraph 2(d). These provisions would address the two key issues with Plans of Work: (i) the risk of damage to existing or planned submarine cables and (ii) the risk of foreclosing cable routes in broader geographic areas in the event of numerous contiguous areas of exploitation. Together, they would clarify for applicants and the Commission the grounds for disapproval of an application, including these instances of inconsistency with articles 87 and 147 of the Convention, as article 3, paragraph 4, of Annex III requires that “every approved plan of work shall: (a) be in conformity with this Convention and the rules, regulations and procedures of the Authority.”