

DOSI intervention on the LTC CHAIR REPORT (ISBA/30/C/4/Add.1)

Delivered on 9 July 2025

Thank you Mr Vice President

DOSI would like to echo the comments by Costa Rica in honouring Remi Parmentier and the enormous contribution he made to protecting the Ocean, and also your reminder to celebrate the memory of Harald Brekke and his great work in the LTC.

DOSI sincerely thanks the members of the Commission for their significant efforts since March, and the Secretariat for supporting their work.

Regarding the LTC Chair report, DOSI is concerned to learn in paragraph 13 that Contractors are limiting their exploratory environmental studies and sampling. This means that important baseline information on spatial and temporal variability is not being captured. We are also concerned to learn in paragraph 19 that Contractors are not adequately collecting information on surface observations of birds, whales, turtles, and other megafauna, nor collecting mid-water biological observations. Comprehensive baseline data are needed for adequate environmental impact assessments and to inform Environmental Management and Monitoring Plans. Likewise, DOSI is concerned to learn in paragraphs 16 and 20 that data are not being reported properly. Transparent data sharing is necessary for trust and verification to ensure effective protection of the marine environment, support Regional Environmental Management Plans, and to verify whether environmental goals and objectives are met. DOSI encourages the Council to review these systemic data collection and sharing deficiencies, to give guidance to the Secretariat and Commission on their authority to require compliance by Contractors.

DOSI notes in Section II F, para 25, that the LTC has recommended an environmental impact assessment for test mining. In our public comment for this EIS, DOSI highlighted that the impact and preservation reference zones were, in our view, inadequately sampled to inform environmental baselines. DOSI also assessed that the limited available data indicated that these zones were not similar, and thus, not suitable for the proposed environmental management and monitoring program. DOSI is concerned that these inadequacies would be difficult to resolve in the revised EIS process without significant additional sampling effort. We look forward to reviewing the approved test mining EIS to understand the Commission's decision, which we believe became available today.

Regarding Section III A on development of environmental thresholds, DOSI thanks the LTC for an informative side event on Tuesday, and recognizes the hard work of the members of the Intersessional Expert Group in advising the LTC on this matter. DOSI supports the proposed concept of using "zones of impact" as an approach, and notes that considerable work still lies ahead to define the pressure thresholds that delineate the zones, and also of the monitoring of effects needed to verify impact levels are not being exceeded. In addition to the considerable scientific work needed to set these thresholds, the Council also needs to decide on environmental goals and objectives to define what levels of harmful effects are acceptable in the various zones. For example, would any mortality or sublethal effect be allowed in the outer "zone of influence", or is any mortality in this outer zone viewed as a

harmful effect that leads to serious harm? DOSI also cautions the Council that the revised timeline for stakeholders to review the initial thresholds report, at the last quarter of 2025, should therefore delay the decisions of Council on draft regulations that require reference to the standards and guidelines.

DOSI notices the request from the Commission in Section III B para 34-35 for guidance from the Council on the next steps required to develop Standards and Guidelines. DOSI also seeks the Council's views on this, as environmental Standards and Guidelines are crucial for ensuring effective protection of the marine environment and provisions in the Draft Exploitation Regulations that refer to these Standards and Guidelines cannot be operationalised until the Standards and Guidelines have also been adopted.

Finally, regarding the LTC's development of a Regional Environmental Management Plan for the Northwest Pacific discussed in Section IV A, DOSI highlights the 2023 report by DOSI members, published in the Canadian Technical Report of Fisheries and Aquatic Sciences, on the categorization of seamounts in this region as being ecologically or biologically significant areas, in accordance with the Convention on Biological Diversity. Of relevance to REMP development, DOSI highlights a forthcoming study which documents that nodule areas in the North West Pacific occur within the seamount EBSA buffer zones. Likewise, in the Clarion Clipperton Zone, nodule density is highest in areas adjacent to seamounts. Such spatial overlap complicates management planning where it is assumed these substrates occur in separate habitats. DOSI strongly encourages the LTC to consider the co-occurrence of nodules and seamounts in the development of the REMP for the North West Pacific, and elsewhere. DOSI welcomes the continued opportunity to work with the Commission on the development of this REMP.

Thank you, Mr Vice President