



09.07.2025

**Statement by WWF International for Item 14: Report of the Chair of the Legal and Technical Commission on the work of the Commission at the second part of its thirtieth session**

Thank you, Mr. Vice-President, for giving me the floor.

As it is the first time WWF International takes the floor, I would like to thank our host country of Jamaica, as well as the members of the LTC and the Secretariat for their hard work. We would also like to join those expressing our condolences for the sad loss of Mr. Harald Brekke.

WWF takes the floor to comment briefly on the LTC report, in particular the intersessional work on the development of environmental threshold values. We note that LTC presented last night in their dialogue, that the scientific information necessary to inform the thresholds is not available. According to independent scientists it will also take years, if not decades, to gather the necessary scientific information to develop such thresholds.

We want to emphasize the required obligation established in article 145 which specifically refers to the prevention of damage to flora and fauna of the marine environment. 'Prevention' of damage implies a zero-harm threshold, meaning that no harm is acceptable. UNCLOS does not allow for this obligation to be weighed up against social, political or economic interests. Species extinction or ecosystem loss is not acceptable, and would undermine commitments under international frameworks, for instance Target 1, 3 and 7 in the Global Biodiversity Framework that respectively aim to "reduce biodiversity loss", "halt species extinction" and "reduce pollution to levels that are not harmful to biodiversity".

Finally, as noted in the report, these thresholds relate to other parts of the regulatory framework, including other standards and guidelines and the draft exploitation regulations. We would therefore also call for the working group to be conducted in open session to increase transparency on this important issue.

Thank you, Mr. Vice-President.