*DOSI Interventions*

**Intervention - Report on the Implementation of the 2019 decision of the Council on the Reports of the Chairman of the LTC - ISBA/26/C/3 - FINAL - Delivered Monday 17th Feb.**

Thank you Mr President.

As this is the first time that the Deep-Ocean Stewardship Initiative takes the floor, please allow us to extend our congratulations for your election, Mr President. We also thank the Secretary General for this detailed report.

DOSI would like to take this opportunity to applaud the ISA for establishing the two technical WGs to develop Standards and Guidelines, as well as all work undertaken by the Secretariat with the support of consultants where necessary, as outlined in paragraph 13. We particularly commend the Secretariat on its efforts to articulate overarching environmental goals and objectives as part of its work on Standards and Guidelines. Explicit goals and objectives are critical for setting targets and realizing ISA’s mandate to “ensure effective protection of the marine environment from harmful effects”. DOSI would like to propose that all draft documents are published for consultation to allow for input by independent scientific expertise as well as other stakeholder groups.

DOSI also commends the Secretariat for the efforts to revise the Clarion-Clipperton Zone Environmental Management Plan and to develop the northern Mid-Atlantic Ridge Environmental Management Plan. However, DOSI would like to emphasise the need for a standardised mechanism for the development of all REMPs to ensure all key components, such as representativity, connectivity, and consideration of areas in need of protection and precaution are included.

Finally, we look forward to the continued improvements to DeepData and recommend this platform to be integrated with global observing efforts and to also adopt best practices, interoperability, and accessibility.

Thank you, Mr President.

**Intervention - Draft Exploitation Regulations - FINAL - Delivered on Tuesday 18th Feb.**

Mr President,

We welcome the Briefing Note from the previous President of the Council regarding a way forward to develop Regulations on exploitation of mineral resources in the Area at the 26th session of the Council of the ISA, and support suggestions for two further open-ended working groups. This will prove especially useful for matters on the protection and preservation of the marine environment mostly in Part IV, as well as related annexes, appendices and terms. We would be grateful if these open-ended working groups are open to all stakeholders, including independent scientific expertise.

In addition to Costa Rica, the Pew Charitable Trusts, the IUCN, and the Institute of Advanced Sustainability Studies and others, we note that many useful comments made in Council Session submissions during the latest consultation, as well as previous Annual Sessions, do not appear to have been captured in this revision. DOSI would therefore respectfully suggest that the compilation document be worked upon further to incorporate these, as well as request that the Secretariat put in place a clear transparent process for the uptake of subsequent comments.

Thank you Mr President.

**Intervention - Support for adoption for German REMPs submissions - ISBA/C/26/6 and 7 - FINAL - Delivered Wednesday 19th February 2020.**

Mr President.

DOSI would like to support the delegations of Germany, the Netherlands, and Costa Rica for their submissions, ISBA/C/26/6 and ISBA/C/26/7, related to the establishment of a standardized approach to REMPs in the Area. We were especially pleased that many DOSI scientific experts were invited to participate in and contribute to the REMP workshop in Hamburg last year.

The need for clarity and consistency in the contents of, and procedure for the development, approval and review of REMPS is crucial. For DOSI, the adoption of a strategy that guarantees an extensive assessment of scientific knowledge; the involvement of all stakeholders, including scientists; and that promotes accountability and transparency, are of great priority for the development of comprehensive REMPs. DOSI applauds the extensive nature of the contents of the proposed template in ISBA/26/C7, but also recognizes that the exact details for the content may need to be modified based on scientific input and the determination of minimum requirements.

According to the Draft Exploitation Regulations, Environmental Impact Statements, Environmental Management and Monitoring Plans, and Closure Plans should be developed in accordance with the respective REMPs. In this regard, as already raised by many delegations this morning, DOSI strongly believes that the establishment of a standardized approach to REMPs in the Area as a starting point will facilitate this alignment.

Thank you, Mr. President.

**Intervention - EIS template - FINAL - Delivered Friday 21st February 2020.**

Thank you for allowing us to take the floor, Madame Acting President.

Overall, the template for the Environmental Impact Statement is quite comprehensive, however, the Deep-Ocean Stewardship Initiative considers this a work in progress and as such has a number of substantial comments. We will highlight just seven now and submit our more detailed comments, including line by line alterations, in writing. DOSI would hope that the full set of comments from our global community of scientists will be reflected in the next iteration of a consolidated text.

First, as the intention of the template is to, and I quote, “provide the International Seabed Authority, its member States and other stakeholders with unambiguous documentation of the potential Environmental Effects on which the Authority can base its assessment,”  we are unsure how the Contractor will obtain the information on impacts. This is particularly problematic since there has been no discussion of what constitutes an impact and the conditions under which mitigation would be required. There are currently no objectives or targets that the Contractor and the ISA can use as a guide to evaluate the EIS.

Second, this template is said to be not prescriptive but rather to guide the format and general content of EIS. Guidance is not legally binding. Our delegation considers that contractors should be required to complete all aspects of the template. If the Contractor deems certain aspects not applicable, a justification for not completing those should be provided for evaluation. We agree with Germany and the Netherlands that having a set Template would ensure consistency and comparability. We also look forward to a consultation process on the Standards and Guidelines on the EIS template, which we understand are currently being drafted by the LTC.

Third, under this section, it is suggested that the EMMP is listed as a separate document, but that it can be used as an opportunity to highlight some of the key issues from the EIS to be addressed in the EMMP. The EIS and EMMP should be tightly linked. The EMMP should directly refer to the EIS rather than to only key issues arising from it. The EIS should identify the parameters and activities that must be monitored and provide the metrics for both impact and mitigation; the EMMP needs to outline the implementation of a plan to obtain these metrics.

Fourth, several sections list the need for defining mitigation measures, but there is no mention of developing or using existing mitigation measures or initial studies showing that certain measures are appropriate or effective.

Fifth, every EIS should also take into consideration the region as a whole and the relevant REMP. Similarly to  the Closure Plan (Annex VIII), the EIS should and I quote “be prepared and implemented in accordance with the Guidelines and the relevant regional environmental management plan”. This could be addressed in 1(b) and would link to Draft Regulation 47(3)(c) that calls for the EIS to be in accordance with the objectives and measures of the relevant REMP. Additionally, within the EIS, each element requiring regional overview (e.g., Sections 4.2, 5.2) and an assessment of cumulative impacts of the mining activity (e.g., 7.13, 8.7) should include specific reference to the REMP and assessing cumulative impacts at this scale.

Sixth, a standardized protocol to measure abiotic and biotic environmental variables is missing. Without a standardized protocol, data may not be comparable among Contractors, even within a region. Independent expert review could develop these standardized environmental protocols for polymetallic nodules, polymetallic sulphides and cobalt-rich crusts. In addition to specifics of methodology, these protocols should also cover the appropriate spatial and temporal scales for environmental investigations required. These should be referred to in the Draft Exploitation Regulations.

Seventh and finally, the EIA should consider climate change as a source of uncertainty and should be incorporated as: quantification of projected changes, inclusion in risk assessment, inclusion in mitigation planning, and quantification of mine project contributions to climate change.

Many thanks, Madame Acting President.