

December 9, 2021

DSCC Intervention on Item 13: Regional Environmental Management Plans (REMPs)

As we noted earlier, our understanding of the marine environment, its species, ecosystems processes and connectivity is at an early stage. The Seabed Disputes chamber emphasised the obligation for the sponsoring State to apply a precautionary approach in ensuring effective protection of the marine environment. As the UK noted, there are still some habitats unrepresented in APEI system. It is unacceptable that regulations could allow exploitation to start when such gaps still exist.

Scientific concerns are also emerging on the effects of deep-sea mining activities on fish and fisheries, including through sediment plumes, and REMPs need to take account of these as well. Climate impacts likewise need to be taken into account, as DOSI has just noted, as well as cumulative impacts, as Earthworks observed.

Where a REMP cannot, taking into account the precautionary principle, show that the environment can be effectively protected, they cannot be used to justify the commencement of exploitation. In other words, they are necessary but not sufficient.

We join Earthworks and note that loss of biodiversity is unacceptable, and we cannot contemplate adopting regulations, standards and guidelines when we cannot ensure the effective protection of the marine environment.

Finally, Mr President, workshops have been referred to by a number of delegations and they are an important method used by the Authority in developing REMPS and other policy. But they are all too often conducted without transparency, closed to observers and with hand-picked participants. Transparency must apply to all organs of the ISA including the LTC and its workshops. Likewise, REMPs should not be presented to the LTC before they are opened to a public consultation process.

Thank you, Mr President.