



DSCC intervention on Agenda item 11: Implementation of the decision of the Council in 2019 relating to the reports of the Chair of the Legal and Technical Commission (ISBA/26/C/3)

17 February 2020

Thank-you Mr. President

Our comments are in relation to Sections II and IV of the Secretary General's report related to procedures for the development of standards and guidelines, regulations and REMPs.

It seemed clear from the discussion at the 25<sup>th</sup> session of the ISA and in preparation for this session, the 26<sup>th</sup>, that the 2020 target date for the completion the regulations, standards and guidelines should not be considered viable. Continuing to work towards that deadline risks significantly harming the nature of the procedures followed, and the quality of the output, as the ISA tries to develop its REMPs, Standards and Guidelines and Regulations.

The SG's report indicates, for example, in paragraph 13 that the LTC intends to advance the work on a number of standards and guidelines working to a 2020 deadline. It appears that it is being done without transparency or due process. We would argue that the Council should formulate a transparent accountable, inclusive and expert process to move this forward. The process should not be rushed, and critical standards and guidelines must be developed before any draft exploitation regulations are adopted. We welcome the emphasis placed on the importance of developing REMPs in the SG's report and again we emphasize that key and complex instruments, including the REMPs, will take time to develop.

Thank-you