



## **Regulation 48bis - Test mining (delivered 25 July 2022)**

Thank you Madame Facilitator.

The Deep-Ocean Stewardship Initiative supports the new text suggested by Germany on test mining, given the high uncertainties with regard to how any future mining technology may function, and the currently sparse environmental baseline data in the deep sea. We caution, however, that long-term impacts of mining and cumulative impacts by multiple operations and non-mining related stressors will not be apparent on test-mining timescales. This includes the re-generation of nodules, the abundance of nodule-dependent biomass, and the recovery of natural sediment habitats - among other currently unknown impacts. We thus believe that test mining should be subject to EIA, EIS, and subsequent long term monitoring plans, as suggested by the German proposal. We would also like to stress the importance of an adequate stakeholder consultation process for the EIS, to ensure transparency and effectiveness of the process.

Thank you Madame Facilitator.