

## **Agenda Item 19, ISBA/27/A/6, Proposed Amendments to Rule 82**

The Ocean Foundation aligns itself with Observer statements and echoes calls not to amend rule 82.

Contractors already have a voice in these proceedings, both through Sponsoring States and through industry associations (and, as GreenPeace International noted, contractors are privy to information that Observers are not). As Australia and many others have stated, other international bodies which regulate industrial activities, such as the IMO, allow participation of the regulated industry not through individual companies, but through industry associations. Such associations are, of course, already allowed to be Observers at the ISA.

In these proceedings, we believe it is particularly important that Sponsoring States retain effective control over contractors, as envisaged in the Convention, and support the Deep Sea Conservation Coalition's statement.

Again, we urge the Authority, amidst and in line with rising standards regarding inclusivity, transparency and participation of all stakeholders in global governance, to consider how best to engage **all** stakeholders. Unlike contractors, many stakeholders with both interest and expertise have neither Observer status, industry membership, or close relationships with delegates from Member nations. The Ocean Foundation urges the Secretariat (and, in our unique capacities - all of us) to invite diverse voices to this conversation - including youth and Indigenous voices and other ocean users such as fishers, wayfarers, scientists, explorers and artists.