

IUCN on LTC report:

IUCN would like to thank the LTC members and chair for their hard work.

IUCN would like to also thank the Africa Group, Brazil and others for highlighting once again the need for open meetings of the LTC as the Assembly requested.

With respect to the Annual Reports of contractors: the extent of non-compliance with this basic requirement is not a good omen for compliance under the Exploitation Regulations. A history of non-compliance should be a factor in considering the technical capacity of any future applicants, in addition to other possible consequences.

We underline the importance of effective mid-water column sampling for all resource categories as highlighted by DOSI.

On the REMP workshops, we endorse NZ and Tonga suggestions for a strategic plan and schedule for convening of workshops and other measures to enable the widest possible participation in these workshops.

Mr. President, the process for review of EIAs for test mining or test mining components is clearly a gap in the current process. Review for completeness is not enough: a substantive review is needed to assess for adverse effects and mitigation measures.

We would suggest that the LTC examines revision of the recommendations and/ or the exploration regulations to ensure substantive reviews, public comment and mechanisms for consultation on proposed EIAs.

Finally, Mr President, we suggest that consultation mechanisms should be considered for any future applications for contracts for exploration as there may be others with an interest in that area. This is to fix the gaps exposed when a contract for exploration was approved in an EBSA.

Additional point not spoken: IUCN also requests that the working group established by the Commission to investigate a systematic approach to facilitate the relinquishment of areas under the contracts for exploration for polymetallic sulphides and for cobalt-rich ferromanganese crusts also consider how that WG might address how this process can be linked to the designation of networks of APEIs, as highlighted in the article by Dunn and Van Dover et al, 2018. A strategy for the conservation of biodiversity on mid-ocean ridges from deep-sea mining