

IUCN

Thank you Mr. President.

IUCN welcomes this discussion today, and would like to build on the comments of Algeria, Australia, Chile, Netherlands, New Zealand, Spain, Tonga and many others who have spoken before about the importance of environmental considerations in the future exploitation regulations.

IUCN would like to address three issues now, and will provide detailed comments later.

- First, IUCN would encourage the incorporation of a global level Environmental strategy as well as regional level environmental plans including goals, objectives, targets and indicators. Project level targets and indicators as envisaged in the current draft regs are important, but will need to reflect wider regional level effects, activities and cumulative impacts. Regional scale goals and objectives –driven by higher level global environmental objectives-- will also be important in the establishment of APEIs, IPRs, and PRZs, as well as contractor obligations. The capacity to monitor, observe and respond to change will be critical.
- Second, IUCN believes that acceptable definitions of “effective protection”, “harmful effects” and “serious harm” will require vastly improved scientific knowledge and understanding. Given the large number of gaps in knowledge --both known unknowns and more significantly, the unknown unknowns --and that fact that any biodiversity loss is likely to last forever on human timescales--there is a large risk that we won’t know what we have lost until it is gone.
- Third, with respect to the Process for developing the various drafts of the exploitation regulations, IUCN is concerned that its speed has not provided its various drafters the opportunity to incorporate comments that have been proffered on previous drafts. For example, the discussion paper on environmental matters from January was unable to take on board the comments on the draft terms of contract released following Council in July 2016 and submitted in November. This most recent draft reflects neither the results of the Berlin Workshop in March 2017 nor the LTC comments. This runs the risk of duplicating the efforts of all.

Many thanks for this opportunity to proffer these initial observations.