

ISA 29th Session, Part II – Reading of the Draft Consolidated Text

Oral Statement by the Federal Republic of Germany

Delivered in July 2024

Regulation 51 – Compliance with EMMP

We suggest that some streamlining between DR 49, 50 and 51 would be helpful to avoid repetition and to harmonise wording.

In **paragraph (b)**, we support transmission of monitoring data in real time, where possible and otherwise monthly, not only yearly. In general, we welcome paragraph (b) including the public release of environmental data and information. We suggest adding two requirements though. First, we suggest for both the Contractor and the Authority to use monitoring data to continuously improve operations and management practices. Given the Authority currently operates in a situation of significant scientific uncertainty, monitoring data will be valuable information not only for the Contractor but also for the Authority to review and update its regulatory work. We note that the LTC's Report that was presented last week notes that the standardised procedure for REMPs will need regular reports on advances in scientific information and monitoring data to help review the REMPs and keep them updated. We believe DR 50 or 51 could reflect that.

Second, we suggest adding language to require the LTC to evaluate monitoring data against baseline data and environmental thresholds and to report any non-compliance to the Compliance Committee.

Lastly, there appear to be some typographical errors in **paragraph (a)**: We suggest that the first line should read: *"Monitor continuously in accordance with the applicable Standard on Environmental Monitoring, the Environmental Effects of its activities (...)"*. Also, in line four, the text should refer to a comparison between monitoring data and threshold values, instead of baseline data and threshold values.