

25/03/2025

## **Intervention on DR 44 ter: Environmental Goals and Objectives**

**Thank you, Mr. President.**

This intervention is on behalf of the Environmental Justice Foundation, Deep Sea Conservation Coalition, Oceans North, WWF International, Maui Nui Makai Network, Greenpeace, the Sustainable Ocean Alliance, and the Te Ipukarea Society.

We welcome the opportunity to comment on draft regulation 44 ter concerning Environmental Goals and Objectives.

The provisions contained in Article 44 ter are fundamental to integrating environmental protection elements into the structure and function of the ISA. Without these provisions, the alignment between overarching environmental commitments and their practical application risks being lost.

Scientists are warning of the severe and potentially irreversible risks posed by deep-sea mining. These include the loss of genetic diversity, the disruption of population connectivity, and the degradation of critical ecosystem functions— many of which remain poorly understood - all of these are issues DR 44 ter is trying to address. The deep ocean is one of the most fragile and least explored environments on the planet. It is imperative to ensure that the decision-making processes of the ISA account for both the seriousness of these risks and the overwhelming scientific consensus calling for precaution.

It is therefore concerning that DR 44 ter was deleted and moved to the suspense document, despite the fact that no explicit opposition on the content was raised during Council discussions. On the contrary, the majority of states expressed support for the content and explicitly ask to retain this regulation in the draft while a general policy to the same effect is developed. Removing it now appears inconsistent with that direction and would undermine the Authority's efforts to act in accordance with Article 145 of UNCLOS.

We urge that Draft Regulation 44ter on Environmental Goals and Objectives be reinstated in the draft of the exploitation regulations and we believe these goals and objectives should be reflected across all instruments of the ISA including in a general policy of the authority. We consider its intentions to be central to the fulfillment of the mandate of the ISA to protect the marine environment.

Thank you.