

Statement re Draft Regulation 3 ISBA/30/C/CRP.1 18 March 2025

With respect to paragraph (d), the International Cable Protection Committee ("ICPC") believes that the brackets should be removed. The ICPC also believes that the reference to "other relevant parties" should be reinstated. This language gives meaning to the due and reasonable regard obligations in articles 87 and 147 of the Convention, which will require cooperation and exchanges of information among States, international organizations, Contractors, and other stakeholders, including submarine cable operators.

With respect to paragraph (f)(i), the ICPC supports the proposal of Portugal and others to delete the word "environmental," given the importance of sharing other data to ensure compliance with due and reasonable regard obligations under the Convention.

Inclusion of this language is also consistent with the existing practice of the Authority with respect to stakeholder consultation, which the Authority uses to gather information and further cooperation.