



Statement re Draft Regulation 7 ISBA/30/C/CRP.1 19 March 2025

The International Cable Protection Committee (“ICPC”) believes that paragraph 3 bis of Regulation 7 should be amended to include a subparagraph requiring that the applicant identify existing or planned submarine cable systems within the contract area (based on publicly or commercially available information) and efforts and agreements to protect submarine cables. The ICPC will address separately necessary conforming changes to Regulation 13 (regarding the assessment of applications) and Regulation 31 and 31 bis (regarding the protection of submarine cables).

The ICPC believes that coordination with and protection of submarine cables should not take place in isolation from the application process for Plans of Work and that the obligations of Regulation 31 and 31 bis must be tied specifically to the application process. The Convention requires the LTC and ultimately the Council to consider such issues in relation to Plans of Work, and that the LTC should not approve Plan of Work that reflects inadequate identification of or coordination with submarine cables.