



**Intervention on DR44**  
**Delivered on 21.07.2022**

Madame Facilitator,

With regard to Draft Regulation 44, DOSI has three points we would like to raise.

First, with regard to Para 1, we support the many States who have flagged that the general obligations currently refers only to direct mining impacts, but not to indirect and cumulative impacts. Direct mining impacts include the destruction and removal of the seafloor along with their unique fauna, while indirect impacts include, for example, the plumes created from seafloor disturbance and the return of sediment-laden wastewater, contaminant release, changes to water properties, increases in noise and light. For this reason, we suggest the inclusion of the wording “or indirectly or cumulative”.

Second, with regard to Para 1 a (iv), in support of Costa Rica and others’ interventions, DOSI also suggests the deletion of “relevant” before the term environmental data, as all environmental data is relevant and should be made publicly available and easily accessible online.

Finally, with regard to DR44 Para 1 c, DOSI wishes to query the newly added text “interference with ecological balance” as raised by Italy and others. We understand that this term derives from UNCLOS, however we would suggest the inclusion of a more commonly used scientific term, perhaps related to loss of ecosystem functions and services. Alternatively, if “interference with ecological balance” is the chosen term, it should be defined using common scientific terms including ecosystem functions and services, for example.

Finally, Madame Facilitator, we hoped you could provide some clarification on the deadline for the submission of comments via the template.

Thank you Madame Facilitator.