Mr Chair

We would like to comment on two issues

**Firstly, the role of the ISA**

We complement, but do not undermine, sectoral bodies.

The issue we are confronting is cross sectoral effects – for instance fishing. The ISA has no competence to stop fishing in The Area, and conversely, RFMOs have no competence over seabed mining in the Area. Therefore, we cannot exclude the Area from competence. There is clear scope for assessments taking into account cumulative impacts.

**Secondly: EIAs: Transboundary EIAs**

All human activities with the potential for significant adverse impacts in ABNJ need to be assessed, regardless of where they actually take place. Transboundary EIAs (TEIAs) should be required for activities conducted within national jurisdiction that may significantly affect marine biodiversity or the environment in ABNJ, as well as for activities conducted in ABNJ that may affect biodiversity or other interests of coastal States within national jurisdiction.

Thank you