



IUCN on Agenda 6 EIAs and SEAS 30/3/17

Thank you Mr. Facilitator. Good morning to all.

IUCN would like to comment on the topic of triggers and thresholds and place this in the context of climate change and threats to ecosystem services beyond national jurisdiction.

First: If EIA triggers do not include activities within national jurisdiction with a potential to cause impacts beyond national jurisdiction and do not use the threshold of significant adverse impacts, then there is the potential for conflicting and duplicative processes to be developed. SDG 14.2, as you recall, calls for States to sustainably manage and protect marine and coastal ecosystems to “avoid significant adverse impacts” by 2020. Under international law, this obligation extends to the environment of other states and areas beyond national jurisdiction.

Second, as we have been hearing, increasing emissions of carbon dioxide are changing the ocean in fundamental ways, thereby increasing the vulnerability of marine biodiversity to other stressors. Environmental assessments will therefore need to approach thresholds from a more comprehensive perspective that includes:

- assessment of vulnerability to climate stressors;
- assessment of ecosystem services provided by the area of interest; and
- potential impacts on ecosystem services.

Third, triggering conditions and thresholds for carrying out EIAs and SEAs should thus include activities with the potential for significant adverse impacts, recognizing the increasingly vulnerable state of marine ecosystems and resources to carbon dioxide induced changes, including from warming temperatures, increasing ocean acidification and decreasing oxygen levels and the sensitivity of the receiving environment.

Fourth, the scope of EIAs and SEAs should also recognize that ecosystem services derive from multiple life stages, migrations, water or chemical movements, and other transboundary processes, and reflect the potential for cumulative impacts to these services by activities in widely separated areas.

Decision making processes related to EIAs and SEAs would therefore need to ensure the protection of ecosystem services of ABNJ that may be altered by climate changes, including from ocean acidification.

Where possible, baseline analyses and assessments should be based on information gathered from no-take marine reserves used as reference areas for management.

And finally, with respect to ongoing activities, we recognize Japan’s points about the complexities of conducting EIAs before each voyage, whether for fishing purposes or transport of goods. However, such activities may have significant cumulative impacts that would be important to consider in larger decision making processes. IUCN would like to suggest leaving the option open for sectoral organizations to conduct a wider strategic process for incorporating biodiversity, CO2 impacts and ecosystem services into their activities, and for such organizations to be invited to report of their progress. Such processes could be based on the approaches used in the CBD towards the development of national biodiversity



strategies and action plans, used for integrating biodiversity into considerations throughout management and decision-making processes.