

I wish to bring the following comments to your attention and apologize for the lateness of these comments. I hope they can still be taken into account by the GMA International Workshop to be convened in conjunction with the fifth meeting of the Consultative Process (7 to 11 June 2004). The following comments reflect the views of the IMO Secretariat only and not of the Organization. The IMO Marine Environment Protection Committee has not yet had the chance to discuss the development of the GMA-process. We will prepare a submission on this issue for consideration by MEPC 52 to be held from 11 to 15 October 2004. The comments referring to GESAMP are made in my capacity as Administrative Secretary of GESAMP.

General Comments

In general, the IMO Secretariat supports the set-up of the GMA-process and the envisaged start-up activities. In keeping with statements often made by governments and UN organizations alike, when new initiatives are discussed the GMA-process should indeed build upon and use, as much as possible, existing structures and co-ordination mechanisms in order to be cost effective and avoid duplication (See for instance Chapter II, Section 4 (Co-ordination of the GMA-process)).

Specific Comments

1 The IMO Secretariat supports the current text under Chapter I, Section C "Scope" of the document, but suggests adding that assessments should enable stakeholders to judge on the effectiveness of international legal instruments to protect the marine environment. This point could be included under the first bullet point, as follows:

"Synthesize the scientific findings of the state of and trends in the marine environment based on regional and national assessments, and outline options for policy makers and other stakeholders enabling them *inter alia* to assess the effectiveness of international legal instruments to protect the marine environment. A regular scientific report should be produced,....etc."

2 The IMO Secretariat supports the notion that the GMA process should be based on comprehensive and integrated assessments undertaken, insofar as possible at a regional level. I wish to stress that not only is the combination of global and regional assessments important as a concept, but for a truly global assessment it is very important that ALL regions are covered in the exercise, including the ocean basins (Chapter II, Section A-2, paragraph 13).

3 The IMO Secretariat agrees with the description of the Global Scientific Assessment Panel (paragraphs 26 to 29), but wishes to note the specific proposal which GESAMP made to UN-DOALOS in its letter of 16 May 2003 offering to fulfil the functions as described in this section. This applies also to paragraph 37 of this draft document.

4 Obviously, the challenge under the "Regional Scientific Assessments" will be to develop qualitative and quantitative assessment mechanisms for those regions where currently no assessments exist. The document should attempt to describe, as much as possible, the modalities for bringing these regions to the level of the well-established ones, rather than by saying that capacity building is required.

5 One of the major weaknesses in this document is that it is extremely vague on the importance of capacity building needs for the GMA process (Paragraph 38). It is stated in the third bullet point that:

"The GMA must have, as an integral component, the means to foster substantial capacity building in multiple regions,, in co-operation with relevant United Nations agencies and programmes, in order to perform the scientific work needed around the globe. Capacity building programmes must enable full participation of scientists within the regional and global fora *as well as training of young scientists for the many scientific disciplines included in the work of the GMA* (emphasis added). Resources must be dedicated to these efforts from the outset."

The IMO Secretariat believes that capacity building for the purposes of the GMA should focus on developing multidisciplinary *assessment* capabilities and not on basic science education, which should be addressed through other mechanisms due to its specificity and financial implications. The statement in paragraph 39 that the capacity building efforts are not included in the current \$30 to \$40 million cost estimate for the full 5-year cycle, would - without the proposed specification - result in a wholly unrealistic and non-sellable proposition. Even with an agreed understanding of the GMA capacity building needs, not all associated costs should automatically be allocated under the GMA budget itself but the document should identify other sources involved (e.g., GEF support for LME studies, see also paragraph 49 and Chapter VI of the document).

6 Another major weakness is that the institutional arrangements are not yet developed (paragraphs 46 to 48). These arrangements should describe the governance structure for the GMA, serve the goals of the governments, be transparent and with adequate geographical representation, etc. With regard to the GMA Secretariat the potential for synergies should be explored and assessed, in particular, with the plans for the future GESAMP Secretariat.

7 A minor point on the structure of this short document. The current structure with no fewer than seven levels is confusing for use in discussions (Chapters I-VI; Sections A, B, C; sub-sections 1,2 3; texts under a, b, c, and i, ii, iii; bullet points and paragraph numbers) and, therefore, the next version should be redesigned using Arabic numbers throughout.