

Intervention by the Maldives delegation at the BBNJ PrepCom2 on Reporting Requirements

22 August 2025

Thank you, co-chair,

The Maldives aligns with the statements with G77 and China and AOSIS. We wish to add the following remarks in our national capacity.

Question 1. What guidance or recommendations should the Preparatory Commission provide to the COP on reporting requirements? In particular, what aspects of the reporting requirements should be addressed by the Preparatory Commission for delivery to the first meeting of the COP?

For the Maldives, a robust yet streamlined reporting framework is essential as echoed by many delegations. We stress the importance of avoiding “one size fits all” reporting requirements, which was mentioned eloquently by the distinguished delegate of Iran. Reporting should be fit-for-purpose, not overly burdensome, and supported with capacity and resources as highlighted by many delegations.

Based on the discussions so far, we would like to note a few observations

- Subsidiary bodies provide guidance and templates for Parties’ reports under their respective chapters as reflected by many delegates. These templates should be user-friendly, with options for “nil” reporting, so it is clear whether a lack of information reflects inapplicability or capacity gaps.
- Reporting guidance should draw on lessons from other multilateral processes (UNFCCC, CBD, RFMOs), including the use of differentiated deadlines, committee-aligned cycles, and automated reminders.
- Confidentiality and access controls should be considered while ensuring transparency envisioned in the Agreement as mentioned by Canada. Parties should have the option to report certain information, with confidentiality.

Question 2. What are the appropriate intervals, format and submission processes for a State Party, subsidiary body and secretariat reporting to the COP? Should these be the same (e.g.

interval aligned with COP or other meeting cycles) or tailored for each? How can these factors be addressed in a manner that mitigates against burdensome reporting?

For Parties of the Agreement: Maldives emphasizes that a ‘one-size-fits-all’ reporting cycle may risk producing outdated or mistimed inputs. Maldives supports a single consolidated reporting format divided into sections as mentioned by AOSIS. We agree that the COP and the SBs should also ensure that reporting is not onerous and should continuously work to streamline the reporting process based on lessons learned from previous reports. However, we would also caution that as conditions and developments in the ocean space can shift markedly within a few months, it is important that the SBs are equipped with the latest and most up to date information for those bodies to provide guidance and recommendations to the COP, when establishing these processes, which Indonesia has raised as well.

Reports should be submitted electronically, ideally through the clearing-house mechanism, in a searchable and publicly available format, supported by a dedicated data reporting interface as mentioned by AOSIS. The interface should be clear and concise, and while reporting deadlines may differ, it should be designed to display all requirements on the same platform. And we note that there are several examples of IFBs with such interfaces which could be used for the basis of developing the BBNJ reporting mechanism. We also take this opportunity to note precedents in other MEAs allowing offline transmission of reports, and support retaining this flexibility for Parties with limited connectivity. Flexibility should also be built in so Parties can reference existing reports under other regimes when relevant.

For Subsidiary Bodies: Reports should be submitted before COP meetings, but cycles should reflect each SB’s mandate. Each SB report should include a dedicated section on how it is addressing the special circumstances of SIDS and LDCs.

For the Secretariat: The Secretariat should report at every COP session, covering all mandates, cooperation activities, and budgetary matters. Reports should also include an assessment of effectiveness.

To mitigate burdensome reporting, Maldives underscores:

- Differentiated timelines and alignment with existing reporting obligations;
- Capacity and financial resource support, especially for SIDS and LDCs;
- Built-in or standalone data validation mechanisms to prevent incomplete submissions and reduce clarification requests in designing the CHM;
- Flexibility in the early years, allowing data gaps to be acknowledged transparently.

We also see merit in beginning with a simplified reporting process in the beginning and scaling, as necessary, as implementation progresses.

Question 3. Subject to the text of the Agreement, what role should subsidiary bodies have in the determination of their own reporting processes for reports by States Parties? Should the process be conducted by subsidiary bodies with final approval from the COP?

Maldives supports giving SBs flexibility to design reporting templates and cycles in line with their areas of expertise, with final approval from the COP. This allows alignment of reporting with substantive work programmes.

We stress two key points:

- Each SB should report on how they are implementing Article 7(m) of the Agreement regarding the special circumstances of SIDS and LDCs.
- SBs should report on interactions with relevant IFBs and their subsidiary bodies, to avoid duplication and enhance coherence.