

From:
To:
Cc:
Subject: Input to the study on the technical aspects of the operationalization of the Clearing-House Mechanism (CLHM) under the BBNJ Agreement
Date: Thursday, November 27, 2025 8:25:27 PM

Dear DOALOS colleagues,

on behalf of the High Seas Alliance and its members, we would like to take this opportunity to provide written input to the study on the technical aspects of the operationalization of the Clearing-House Mechanism (CLHM) under the BBNJ Agreement, as invited in the terms of reference for such a study published on 4 November 2025.

The Clearing-House Mechanism is critical to the effective implementation of the Agreement. Discussions during the First and Second Sessions of the Preparatory Commission (PrepCom) have made it clear that the successful implementation of the Agreement depends on an effective CLHM and that early operationalization is a key requirement to allow Parties to fulfill information-sharing obligations. A central effort in designing such a mechanism concerns the technical aspects required for its operationalization, including taking stock of existing mechanisms and information-sharing platforms so as to support the creation of a cost-effective and efficient tool.

In view of the importance of the CLHM to the implementation of the Agreement, we welcome this timely consultancy and would like to share a few documents that we believe can support the consultant's work in preparing this study.

In particular, we would like to share:

1. A study undertaken by the Natural Resources Defense Council (NRDC), OceanCare, and the High Seas Alliance (HSA) entitled "Designing an Effective BBNJ Clearing-House Mechanism: Insights and Guidance Drawn from Comparable Tools". The study may be helpful as it identifies key functions of the CLHM that are common across the various parts of the Agreement, highlights backend technical and IT-related elements essential for establishing a robust, user-friendly and secure mechanism, and draws on existing arrangements to help inform the discussion. The study is available at:
https://www.oceancare.org/wp-content/uploads/2025/08/Final_Aug-17_NRDCOCHSA_CLHM-paper_3-logos_distribution-2.pdf
2. The HSA's PrepCom Deep Dive on Operationalising the Clearing-House Mechanism, which inter alia helpfully outlines how the mechanism will interact with several of the subsidiary bodies under the Agreement. This document is available at:
<https://highseasalliance.org/wp-content/uploads/2025/04/CIHM-August-2025.pdf>
- 3.

The recommendations under “functional approach” in HSA’s supplementary updated briefing prepared ahead of PrepCom 2, available at: <https://highseasalliance.org/wp-content/uploads/2025/04/CIHM-Supplement-August-2025.pdf>

We thank you for your attention to these comments. Please do not hesitate to contact us if we can provide any further information or be of additional assistance, including in future rounds of consultation.

Best regards,

Daniel Kachelriess Cross-Cutting Coordinator, High Seas Alliance



Designing an Effective BBNJ Clearing-House Mechanism: Insights and Guidance Drawn from Comparable Tools

Executive summary: The BBNJ Clearing-House Mechanism (CLHM) plays a central role throughout the BBNJ Agreement. Properly implemented, the CLHM will greatly facilitate international cooperation, enhance transparency, and promote informed decision-making in the governance of marine biodiversity beyond national jurisdiction.

During the first PrepCom (14–25 April 2025), States expressed a preference for: i) an incremental approach to operationalizing the CLHM, including an interim or pilot phase; and ii) a functional approach that identifies and prioritizes functions across the main parts of the Agreement.

This briefing presents recommendations regarding the structure, functionality, and user interface of the BBNJ CLHM derived from an analysis of how other international agreements, arrangements, and processes have approached mechanisms for data sharing. The briefing identifies core functions of the CLHM that are common across the Agreement¹ and that should be prioritized in the initial pilot or interim phase, and identifies best practices for fulfilling those functions. Key findings include:

1. The BBNJ Agreement clearly articulates when, how, and with whom different types of information must be shared through the CLHM, establishing well-defined obligations that do not require additional interpretation by the PrepCom.
2. Important information exchange obligations under Parts II (MGRs), IV (EIAs) and V (CBTMT) begin to accrue when the Agreement enters into force, which may occur as soon as early 2026. It is therefore urgent that a pilot or interim CLHM be developed as soon as possible that enables States to fulfil imminent obligations, including mechanisms for:
 - uploading and downloading information;
 - notifying States Parties and others of the availability of information and deadlines;
 - ensuring data security;
 - establishing user modalities (e.g., who can upload and download information); and
 - providing live assistance to users in close to real time.
3. Most information published in the BBNJ CLHM can and should be made publicly available in real time through automated processes to promote transparency and ensure timely access to information by all stakeholders.
4. The core basic components are similar across all parts of the Agreement and are relatively straightforward to implement.

¹ Note: cross-cutting core components are the subject of this briefing. Additional functionalities will be necessary to implement CLHM functions unique to a specific part of the Agreement, such as the match-making function in capacity-building and the transfer of marine technology (CBTMT) (which could partially be implemented as an automatic function, but will likely require proactive human involvement to work effectively) and the automatic generation of a batch identifier when a pre-collection notification is received by the CLHM under Part II.

I. Introduction

While various parts of the BBNJ Agreement assign different tasks to the CLHM, Article 51(3)(a) summarizes its main function as to

“[s]erve as a centralized platform to enable Parties to access, provide and disseminate information with respect to activities taking place pursuant to the provisions of this Agreement....”

Based on desktop research and conversations with administrators and users of CLHM-like mechanisms under other international agreements and processes,² as well as with IT experts with experience creating and using interactive databases,³ this briefing:

- a. identifies key functions of the CLHM that are common across the various parts of the BBNJ Agreement and that should be addressed in an interim or pilot phase;
- b. identifies “backend”⁴ technical and IT-related elements that are essential to establishing a robust, user-friendly and secure CLHM; and
- c. highlights best practices, innovative modalities, and functional attributes to help inform the design and implementation of the CLHM.

II. Key functions of the BBNJ CLHM common to all parts of the Agreement

The basic functions of the CLHM are to:

- a. facilitate obligatory information sharing by providing a mechanism (a data platform) to receive information from Parties and others, store it, and provide means of accessing it; and
- b. provide a notification function⁵ to inform other Parties and stakeholders when various actions are undertaken.

These basic functions – providing a data sharing platform and a notification mechanism – are linked to obligations in the BBNJ articles presented in Table 1.

² The arrangements and processes evaluated *inter alia* include: the Antarctic Treaty System Environmental Impact Assessment (EIA) Database, World Trade Organization (WTO), Joint CLHM Basel, Rotterdam and Stockholm (BRS) Conventions, the International Atomic Energy Agency (IAEA) (Emergency Preparedness and Response Information Management System and the International Radiation Monitoring Information System), the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), the Convention on Biological Diversity (CBD), the European Environment Agency (EEA), the International Labour Organization (ILO), the United Nations Office for the Coordination of Humanitarian Affairs (OCHA), the Organisation for Economic Co-operation and Development (OECD), the Convention on Migratory Species (CMS), the United Nations Framework Convention on Climate Change (UNFCCC) Climate Technology Centre and Network (CTCN), and the Agreement on the Conservation of Cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic Area (ACCOBAMS).

³ A separate briefing prepared by the High Seas Alliance addresses overall considerations on the institutional set-up of the CLHM.

⁴ “[T]he part of a computer system, piece of software, etc., where data is stored or processed rather than the parts that are seen and directly used by the user,” Cambridge Dictionary.

⁵ The term “notification” is used with varying meanings throughout the Agreement. In Part II, it principally refers to the submission of information by a Party to the CLHM, whereas in Parts III and IV it denotes the availability of information on the platform.

Table 1: Key functions assigned to the CLHM and corresponding articles of the BBNJ Agreement

Function	Relevant provisions	Articles
Database management/receiving and storing information/making information publicly available	<p>Several provisions of the BBNJ Agreement require that information be shared and stored through the CLHM, including:</p> <p>Part II (MGRs):</p> <ul style="list-style-type: none"> - Pre-collection information - Post-collection information - Information on any publications, patents, products, and/or revenue generated from MGRs or associated DSI - Information related to implementation <p>Part IV (EIAs):</p> <ul style="list-style-type: none"> - Decisions not to prepare an EIA - Draft EIA reports - EIA reports (including, when appropriate, under Article 29.5, reports of assessments conducted under other instruments/frameworks) - Views and recommendations by the STB, Parties, Indigenous Peoples and others - Decision documents - Monitoring and reviewing reports <p>Part V (CBTMT):</p> <ul style="list-style-type: none"> - Requests and opportunities for CBTMT in support of Parties obligations to ensure capacity-building and cooperate to achieve the transfer of marine technology - Cooperate at all levels (e.g., including private sector, civil society, and Indigenous Peoples and local communities as holders of traditional knowledge) and in all forms - Sharing and use of relevant data, information, knowledge, and research results - Sharing manuals, guidelines, and standards - General requirement to facilitate access to related know-how and expertise 	<p>Articles 12(2) and 12(4)</p> <p>Article 12(5)</p> <p>Article 12(8)</p> <p>Article 15(4)</p> <p>Articles 28(2)(a) and 28(2)(c)</p> <p>Articles 29(5) and 29(6)</p> <p>Articles 31(1)(a)(i) and 31(1)(a)(vi)</p> <p>Articles 33(3) and 33(5)</p> <p>Article 34(3)</p> <p>Article 36(2)</p> <p>Articles 37(4)(d), 37(5), and 37(6)</p> <p>Article 41(2)</p> <p>Article 42(1)</p> <p>Articles 44(1)(a), 44(1)(b), and 44(1)(f)</p> <p>Article 51(3)(a)(iv)</p>
Notification ⁶	<p>The Agreement requires alerting Parties and others when undertaking certain activities, including for example:</p> <p>Part II (MGRs):</p> <ul style="list-style-type: none"> - Potential role for CLHM in fulfilling “Due regard” obligation for coastal States rights 	Article 11(3)

⁶ As noted in footnote 5, “notification” is used here in the sense applied in Part III and Part IV of the Agreement, referring to informing other Parties of the availability of information.

	<p>Part IV (EIAs):</p> <ul style="list-style-type: none"> - Notice of a planned activity affecting BBNJ - Notice of scoping documents and draft EIAs - In case of unforeseen impacts or in case of breach of any conditions, notification of the CoP, other Parties and the public, including through the CLHM. <p>Part V (CBTMT):</p> <ul style="list-style-type: none"> - Notice of matching request or opportunity for CBTMT 	Article 32 Article 33(5) Article 37(2) Articles 51(3)(a)(iv) and 51(3)(b)
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III. Technical (IT) requirements

The “backend” technical aspects of the functions required to fulfill the information-sharing obligations above are relatively simple to design and execute. Table 2 provides an overview of the main elements required to implement the basic functions assigned to the CLHM, including key considerations for an effective system.

Table 2: Necessary technical (IT) functions of the CLHM and corresponding articles of the BBNJ Agreement

Function	Description	Articles
Uploading, downloading, and modifying information	<p>Upload and download functions provide a means of exchanging information and data among stakeholders and are a cornerstone of the BBNJ Agreement:</p> <ul style="list-style-type: none"> - Uploading will allow users to contribute documents, reports, or data to the CLHM, ensuring that essential information is made available to other interested Parties and stakeholders. - Downloading will enable users to access relevant information, such as reports and decision documents. 	Articles 12(2), 12(5), and 12(8) – Submit information required in pre-, post- collection, and utilization notifications. Article 15(4) – Make information on implementation of Part II available to the Access and Benefit-Sharing Committee, via the CLHM. Article 28(2)(a) – Make relevant information available during the national process. Article 28(2)(c) – Ensure EIA reports and relevant monitoring reports are available. Article 29(5) – Make EIAs available when conducted under a relevant instrument/framework. Article 29(6) – Monitoring and review reports must be published (uploaded) if not subject to monitoring and review under other instrument/framework and if criteria in 4(b)(i) are met. Articles 31(1)(a)(i) and (vi) – Upload information when a decision is made that an EIA is not required and any registration of views and recommendations by the STB.

		<p>Articles 33(3) and (5) – Make draft EIAs available for comment and publish final EIA reports.</p> <p>Article 34(3) – Make decision documents outlining any conditions of approval (e.g., mitigation measures) publicly available.</p> <p>Article 36(2) – Make monitoring reports publicly available.</p> <p>Article 37(4)(d) – Make any concerns, notifications and recommendations by the STB publicly available via the CLHM.</p> <p>Article 37(6) – Publish reviews of the impacts of authorized activities and decision documents.</p> <p>Article 42(4) – Facilitation of self-assessment of needs and priorities.</p> <p>Article 51(3)(a)(iv) – Enable access, provide and disseminate information, including requests and opportunities for CBTMT.</p> <p>Article 51(3)(b) – Provide a platform for facilitating exchange of CBTMT needs and opportunities⁷ and facilitate access to related know-how and expertise (e.g., technical assistance database).</p>
Notification mechanism	<p>Several provisions require that Parties and the public receive timely notifications to keep stakeholders and Parties informed in real time of any actions, new information, deadlines for comment, etc. This can be accomplished through email alerts to focal points or in-system notifications.⁸</p> <p>Given the importance of the timeliness of information subject to notification requirements, including deadlines for comment set by the BBNJ Agreement (e.g., Article 31(1)(a)(ii)), notifications should be sent out in real-time.</p>	<p>Article 11(3) – Parties shall endeavor to cooperate, as appropriate, including through the CLHM in a way that collection of MGRs of areas beyond national jurisdiction is carried out with due regard for coastal and other States.</p> <p>Article 32(1) – Parties shall ensure timely notification of a planned activity.</p> <p>Article 33(5) – The Secretariat shall ensure that all Parties are notified when reports are published.</p> <p>Article 37(2) – In case of impacts unforeseen in the EIA (or from a breach of any conditions), the Party shall notify the CoP, other Parties and the public.</p> <p>Article 37(5) – All States and stakeholders shall be kept informed through the CLHM (review of authorized activities and impacts).</p>

⁷ A full matching function and a human element as envisioned in the Agreement will need to be integrated to maximize effectiveness, this will however require further time and resources to be fully operational.

⁸ Understood as a message that appears within the interface of a specific software application or platform.

User management (the process of creating, controlling, and maintaining user accounts, including managing user access rights, permissions, and credentials).	A user management system will help ensure secure and role-based access to information, maintain data integrity, and enable accountability through traceable user actions.	This important function is relevant across the Agreement.
Security	<p>Login credentials for uploads are essential to ensure that uploaded data is secure and authentic.</p> <p>Credentials also support accountability by tracking user actions and by making it more difficult for malicious actors to insert viruses or corrupt or invalid data.</p>	While log in credentials are essential for uploading information, downloading should not require a log in, as the provisions of Part IV permit wide access to posted information, reflecting the importance that the BBNJ Agreement, particularly Part IV, attaches to transparency and publicly available information.

IV. Key insights

Based on an evaluation of existing CLHMs and similar arrangements in other international agreements or processes, along with feedback from users of these mechanisms, several best practices and key features that could facilitate effective operationalization of the CLHM were identified:

1. Categorize available data in a user-friendly fashion and provide a filtering mechanism

A key similarity between CLHM mechanisms under different international arrangements is the use of centralized platforms or repositories where data is categorized and then made publicly available through interactive dashboards, searchable databases, or dynamic maps. This thematic structure is useful in managing large datasets and enhancing user accessibility.

Many arrangements incorporate a filtering function, typically including criteria such as location (e.g., country), type of information, and other relevant parameters to ensure that the data shared is appropriately categorized and accessible in a user-friendly way. For example, the World Trade Organization (WTO) Notifications Portal allows users to filter information by country; the Antarctic Treaty EIA Database enables filtering by Party, topic (e.g., drilling or use of explosives), and time period (Figure 1); and the Organisation for Economic Co-operation and Development (OECD) platform allows filtering by topic/policy area.

To support capacity-building and access to knowledge, the Basel, Rotterdam and Stockholm (BRS) Conventions host workshops and make them available through a searchable tab function (Figure 2). This allows users to filter workshops by convention, region, and year (the "Workshop Library") and better understand the objectives and outcomes of the workshops.

By enabling users to filter information based on specific criteria – such as region, year, or thematic focus – stakeholders can quickly identify relevant materials, including material related to past events.

Figure 1: Filtering options for the Antarctic Treaty EIA Database

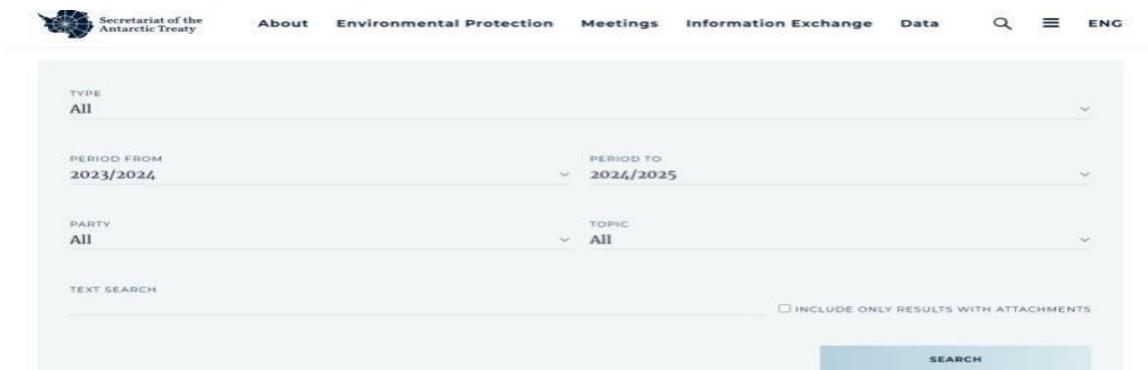
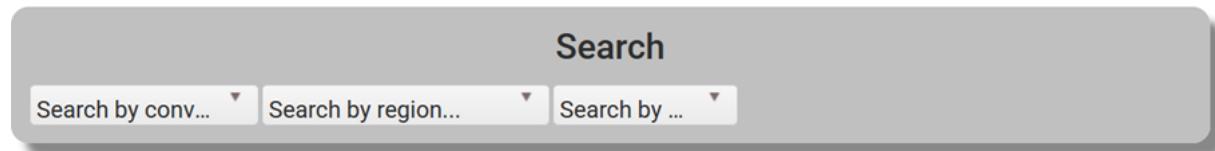


Figure 2: BRS Conventions searchable workshop library

We invite you to visit the "Workshop library" below to learn more about the workshops planned and carried out:



2. Provide dedicated overview webpages to help navigation

Several existing arrangements (e.g., the Convention on the Conservation of Migratory Species of Wild Animals (CMS) and the WTO) use dedicated webpages to provide users with a clear overview of available resources on the data platform, along with helpful resources on other platforms.

For example, [CMS has a dedicated page for capacity-building tools](#), featuring links that direct users to various resources (e.g., E-Community platform, information on workshops and other activities). The BRS Conventions platform also links e-learning material that is available on other platforms (Figure 3).

The WTO offers dedicated webpages that provide the user with an overview of general and specialized WTO-related technical assistance and training opportunities (e.g., trade policy courses, briefing sessions on specific issues). Additionally, the [WTO provides a dedicated e-learning platform](#) that offers online training on WTO Agreements, intended to support countries in building related capacity. The WTO notably has a dedicated institutional structure, the Institute for Training and Technical Cooperation ([ITTC](#)), that coordinates technical assistance and training across the organization.

Figure 3: BRS Conventions linking e-learning courses available on other platforms

The Basel, Rotterdam and Stockholm Conventions

Electronic Tools

Electronic tools for capacity development are interactive and flexible sets of learning possibilities (e.g., electronic courses, modules, videos), which allow participants the possibility to learn at their own pace.

E-learning courses are interactive training sessions that consist of one or more modules or chapters. E-learning courses can track progress in learning and can be taken in different sessions, following the individual pace of the learners.

Some e-learning courses related to the Basel, Rotterdam and Stockholm conventions are available in the InforMEA portal in the "Chemical and Waste" cluster. For example:

- Introductory Course to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and Regional
- Introductory Course to the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International
- Introductory Course to the Stockholm Convention on Persistent Organic Pollutants
- Basic Principles of Chairing and Role of the Chairs of Meetings of the Basel, Rotterdam and Stockholm Conventions

Additionally, other e-learning courses are available in other platforms:

A deep dive into the Rotterdam Convention

This new self-paced course serves as a 'one-stop-shop' for those keen to explore the mechanisms and provisions of the Rotterdam Convention, as well as the breadth of available resources to support its implementation. The course is primarily targeted at Designated National Authorities (DNAs) and Official Contact Points (OCPs). It also offers valuable knowledge for other actors with a role in the implementation of the Convention, such as custom authorities to chemical importers. Upon successful completion, users are awarded a certificate. The course is available in an online format with animations and interactive exercises, as well as offline with a full package of supporting materials including presentations, handouts and learning journals. Currently available in English, it will soon be available in French and Spanish.

The Basel, Rotterdam and Stockholm Conventions and their linkages with the Sustainable Development Goals (SDGs)

The overall aim of this course is to guide Parties to the Basel, Rotterdam and Stockholm Conventions, and those interested in these topics, on the linkages between the three conventions and their contributions to the Sustainable Development Goals (SDGs). The course explains, in an interactive way with text, videos, animations and exercises, how each convention and their respective mechanisms for sharing information are used to measure SDGs' indicators. The course is designed for learners to work flexibly at their own pace. And at the end of the course, users can obtain a certificate.

E-Learning Tool - ITO.R.C.

The Secretariat of the Rotterdam Convention has developed this e-Learning tool with the goal of providing technical training to Designated National Authorities (DNA) and other interested stakeholders for the implementation of the Convention.

E-learning module for law enforcement officers

Interpol and the Secretariat have jointly developed an e-learning module for law enforcement officers on hazardous chemicals and wastes under the Basel, Rotterdam and Stockholm Conventions. The legal international trade in chemicals and wastes is an important part of the global economy, but it is crucial that this trade be effectively controlled.

3. Provide a user-friendly platform to facilitate CBTMT

Various platforms provide useful examples of relatively streamlined capacity-building and technology transfer functions. For example, the United Nations Framework Convention on Climate Change (UNFCCC) Climate Technology Centre and Network (CTCN) provides the option for States to submit requests for assistance (Figure 4), with the CTCN offering the opportunity to do so using pre-drafted templates. This approach facilitates the process of identifying and articulating capacity-building needs and making them accessible to potential providers of support. The user is guided throughout the process, much of which is conducted online, starting with the submission of a request.

An additional tool provided by the UNFCCC CTCN is an active technical assistance database that helps connect needs with available support. This database can be searched, for example, by sectors (e.g., forestry), by approach (e.g., ecosystems and biodiversity), by United Nations group (e.g., SIDS or Least Developed Countries), by objective (e.g., adaptation or mitigation), or by type of assistance (e.g., financing facilitation, recommendation for law, policy and regulations). The entries made to the database follow a similar pattern, whereby the country seeking assistance outlines the type of technical assistance sought, the expected outcomes, the requesting entity, and any documents (e.g., an official request form) already submitted. Additionally, the respective entry in the database often includes, for completed processes, a link to a closure report outlining the delivered outputs, the methodology employed and a dedicated section on “lessons learned”. Such reports foster transparency and accountability but moreover allow for peer learning and replicability.

Figure 4: UNFCCC CTCN technical assistance request step-by-step approach

Technical Assistance

We have the technological capability to meet our needs in a cleaner, more efficient way and to adapt to a changing climate. The Climate Technology Centre and Network (CTCN) puts that potential in the hands of developing countries by accelerating the development and transfer of climate technologies at their request, as they strive to meet their climate change and sustainable development goals.

- To developing countries at the request of their NDEs,
- Free of charge (with a value up to 250,000 USD),
- At local, national or regional levels,
- To academic, public, NGO, or private sector entities,
- For a broad range of adaptation and mitigation technologies,

At all stages of the technology cycle: from identification of climate technology needs; policy assessment; selection and piloting of technological solutions; to assistance that supports technology customization and widespread deployment.

What is Technology Transfer?

Technology transfer encompasses the broad set of processes that cover the flows of knowledge, experience, and equipment for mitigating and adapting to climate change among different stakeholders. It comprises the process of learning to understand, utilize, and replicate the technology, including the capacity to choose it, adapt it to local conditions, and integrate it with indigenous technologies.

IPCC Special Report on Methodological and Technological Issues in Technology Transfer, 2000

[Submit Request](#)

How Technical Assistance Works

From Request to implementation

1 Request Submission
Interested parties in developing countries contact the national focal point (National Designated Entity, NDE) to request climate technology assistance. The NDE confirms the alignment of the request with its national climate priorities and passes it along to the CTCN.
[Learn more about NDEs](#)

2 Response Plan Design
The CTCN collaborates with the NDE and applicants to develop a tailored technology transfer plan, called 'Response Plan'.

3 Bidding Process
The Climate Technology Centre selects a Consortium or Network member to implement the technology solutions.

4 Project Implementation
The selected Network member through a bidding process implements the projects according to the 'Response Plan', and the Climate Technology Centre conducts due diligence of deliverables including its closure reports and impact statements.

5 Monitoring and Evaluation
The Climate Technology Centres regularly reach out to the NDEs, project implementers, and project proponents to follow up to collect the lessons learned and impacts achieved in countries.

V. Recommendations

Based on this review of CLHM-like platforms created under other international agreements and arrangements, we recommend incorporating the following into the design of the BBNJ CLHM. Recommendations relevant to the interim or pilot phase appear in **bold**.

- **The design of the mechanism must be in line with the requirements placed on Parties to the BBNJ Agreement. The initial interim operation of the CLHM must, at a minimum, include the functions necessary to enable Parties to meet their obligations under the Agreement.**
- **Dashboards and other visual tools should be integrated across all functions of the CLHM to improve user experience, accessibility, and engagement. Key information – such as documents, data, deadlines, and relevant contacts – should be presented in a clear, intuitive, and visually structured format that allows users to quickly navigate, filter, and access the content most relevant to them. Models such as the Antarctic Treaty EIA database offer helpful design inspiration.**
- **Pre-recorded videos explaining how to use the platform and how Parties can engage with it should be made available to eliminate the need for individual workshops and to accommodate new users efficiently (e.g., [United Nations Office for the Coordination of Humanitarian Affairs and the Response Planning and Monitoring Module](#)).**

- **Videos and other instructional materials should be supplemented with a close to real-time live-help mechanism. For example, the CBD Secretariat provides live staff support for Parties experiencing problems with its information sharing platform during office hours in Montreal or on the next business day. See Table 2 of the Annex for further details.**
- **Given the time-sensitive nature of information exchange requirements for some parts of the Agreement, including in the EIA process, (including deadlines for comment), it is critically important that uploaded information be made available directly through the CLHM in real time.**
- **An easy-to-navigate platform for capacity-building and technology transfer (e.g., through a dedicated webpage) should be accompanied by clear instructions on the process, including submission and review, and include capacity-building opportunities, including relevant programs, funding sources, and initiatives linked to the implementation of the Agreement that can be easily added to the website by sponsoring Parties or organizations.**
- A dedicated section should be created to host technical manuals, pre-recorded e-learning modules, and training materials, and to advertise upcoming workshops and webinars (which should be recorded for future use in a searchable format).
- A dedicated section (or a separate webpage) should clearly outline information exchange requirements (i.e., also noting the corresponding article) of different parts of the Agreement.
- A process for publication of CBTMT requests should be included, for example through an active technical assistance database that includes a brief description of assistance requests (see the [UNFCCC CTCN active technical assistance database](#) as well as Table 3 of the Annex).
- Links should be included to relevant capacity-building initiatives under other agreements, arrangements, or processes, in order to foster synergies, streamline access, and avoid duplication ([see for example BRS Conventions](#)).
- The mechanism should be constructed in a way that allows it to handle a growing volume of data and users over time, and adapt to evolving needs, including new functions.

VI. Conclusion

The BBNJ Agreement provides future Parties with clear guidance on the basic functions of the CLHM. It outlines when, how, and with whom different types of information must be shared, establishing well-defined obligations. Given the CLHM's central role in enabling Parties to meet their obligations from the moment the Agreement enters into force, these functions are critical, and most are relatively easy to implement. Existing examples from comparable mechanisms offer useful guidance for developing the BBNJ CLHM. While these tools may not be directly transferable in every case, they provide a solid foundation and practical inspiration as delegations continue efforts to operationalize the Mechanism. As negotiations advance, this initial guidance will be further refined and elaborated to ensure the CLHM fits the state of discussions.

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Annex: For further consideration

Table 1 of the Annex: Suggested minimum information for the dashboard/entry portal for Part IV

Type of information shown on dashboard/summary portal	Comments
Party making the submission	
Type of submission/stage of the EIA process	Given the variety of information, the BBNJ Agreement requires Parties to make available draft reports, final EIA reports, decision documents, monitoring reports, and reports on the review of authorized activities. The EIA CLHM should clearly specify which type of report has been made available.
Title of the document(s)	A clear title will make it easier to understand what the submission relates to.
Organization/agency/ office/person responsible (including contact info)	This will allow users to identify which department and/or individuals within a proponent government has been tasked with managing the project.
Location of the activity	This will help other Parties identify whether a proposed project is relevant to their interests and requires closer attention and/or response. This will also help in identifying cumulative impacts.
Stage of process	The provisions related to EIAs under BBNJ contain several steps. Parties and other stakeholders should have a clear understanding of the stage at which the respective process is, especially in view of the participation opportunities during the consultation process. This includes screening, scoping, and the full EIA, as well as the <u>specific obligations arising under Articles 29(4), 29(5), and 29(6)</u> .
Any deadlines associated with the activity	This should be clearly stated. For example, Article 31(1)(a)(ii) provides the opportunity for a Party to register its views within 40 days.
Period/timeframe of the activity	This will help identify when the activity is set to take place and its duration. Additionally, it will assist in identifying potential cumulative impacts, as Parties will gain an understanding of which activities are occurring, where, and for how long.
Decision	This will allow Parties to quickly determine whether an activity of concern or interest has been allowed to proceed or not.
Conditions of approval	This should not replace a more detailed treatment (i.e., uploading of decision documents), but will help other Parties understand under what circumstances the activity has been authorized.
List of documents related to the activity	All documents related to the activity should be listed and hyperlinked to streamline review.
Exchange requirements	While not necessarily required for every dashboard, it could be helpful to have a dedicated page that clearly outlines the requirements (e.g., exchange, sharing, or making available) derived from the BBNJ Agreement.

Table 2 of the Annex: Further components of the CLHM worth consideration

Category	Description
Online pre-recorded courses	<p>Pre-recorded online courses on both the BBNJ CLHM and on specific matters relevant to Parties could be helpful in providing Parties with clear, accessible and consistent guidance on how to navigate the procedures. These courses could be permanently posted on the website (see for example CMS guidance on the implementation of the Convention) and can offer step-by-step instructions on how to make submissions in compliance with, for example, the exchange of information requirements of the Agreement, ensuring that all Parties – regardless of their technical capacity or resources – can effectively engage with the process. Having these permanently posted as a reference provides stakeholders the flexibility to learn at their own pace (and could alleviate challenges associated with finding appropriate times for a workshop for different time zones).</p>
Interactive maps	<p>Interactive maps showing where EIAs have been conducted, as well as where activities will take place, could assist Parties and stakeholders in identifying activities they may want to monitor, or ignore, as appropriate.</p> <p>These maps would provide transparency and allow Parties, stakeholders, and the public to easily track the locations of ongoing and planned activities in areas beyond national jurisdiction. This is particularly important when wanting to ensure that cumulative impacts on marine biodiversity are considered comprehensively (see BBNJ Articles 30(1)(a)(ii), 30(2)(e), and 31(1)(b), for example).</p> <p>By visualizing the distribution of activities and EIA submissions, the maps would allow for better coordination and help identify areas where multiple activities might overlap or interact, potentially exacerbating environmental pressures. They would support the assessment of cumulative impacts – something that is often challenging in the high seas – by enabling the consideration of not only individual activities but also the broader context in which they are taking place. This information can guide decision-making to avoid or minimize negative cumulative impacts on marine ecosystems, ensuring that conservation and sustainability goals under the BBNJ Agreement are met more effectively.</p>
E-Community/forum	<p>After having properly operationalized the key functions of the CLHM, in which sufficient experiences have been accumulated, Parties may wish to explore the idea of an e-community (see for example the CMS platform). This may be beneficial to BBNJ Parties as it would provide a dynamic platform for real-time engagement and collaboration. By allowing Parties to exchange experiences, share best practices, and ask questions, such a community would foster a stronger sense of cooperation and mutual learning. It would enable countries, especially those with limited resources, to access valuable knowledge and guidance from peers, facilitating more informed decision-making and promoting consistency in the implementation of BBNJ measures.</p>
Infographics depicting the CLHM process	<p>Infographics can simplify complex procedures, making it easier for Parties or potential Parties to understand the various functions and opportunities offered by the CLHM. In particular, clearly outlining the request for assistance function of the CLHM, can enhance accessibility and transparency by visually guiding users through each step of the process. This helps ensure that no Party is left behind in benefiting from available support for capacity-building and technology transfer.</p>

Table 3 of the Annex: Information for database for ongoing and past technical assistance requests to facilitate broad assistance

The BBNJ Agreement sets a series of CBTMT-related objectives and obligations. In Article 41(2), the Agreement requires Parties to cooperate “at all levels and in all forms, including through partnerships with and involving all relevant stakeholders, such as, where appropriate, the private sector, civil society, and Indigenous Peoples and local communities as holders of traditional knowledge”. Article 42(4) underscores that CBTMT needs to be based on the needs and priorities of developing State Parties.

The CLHM plays several key roles in implementing Part V of the Agreement, most directly by facilitating needs-assessments together with the CBTMT Committee (as an alternative to self-assessed) under Article 42(4) and through matching capacity needs with opportunities (Article 51(3)(b)). Further, Article 42(1) requires Parties, within their capabilities, to ensure capacity-building for developing States Parties and to cooperate to achieve the transfer of marine technology. Article 51(3)(a)(iv) can be read as a way for Parties to discharge this obligation of conduct, by submitting requests and opportunities for CBTMT to the CLHM. It emphasizes that the CLHM should serve as a centralized platform to allow Parties to access, provide and disseminate information, including requests for CBTMT, as well as research collaboration and training opportunities.

To streamline such an effort, Parties may wish to integrate a dedicated active technical assistance database that provides an overview of past and ongoing technical assistance requests. Parties can use the CLHM to publish their assistance needs and to be better connected with potential support opportunities – arguably in a more targeted and timely manner. Such a tool would also promote transparency, coordination, and peer learning by showing what support has been provided and where gaps remain. It helps countries build on existing efforts, avoid duplication, and develop more informed, targeted requests for capacity-building and technology transfer.

This database could – based on Parties’ expressed preferences during the first session of the PrepCom – be strengthened by a robust human component that can support both requesters and providers of CBTMT with bilateral, on demand assistance, and conduct manual quality control of entries and matching functions. This should be a central component of future discussions.

The table below provides suggested minimum information that would make such a tool beneficial.

Type of information made available	Comments
Date of submission	The date of submission is important because it helps track the timeliness of requests, monitor progress, and prioritize support based on urgency or sequence. It also provides a reference point for evaluating response times and ensuring accountability in the delivery of assistance. This can help support the work of the monitoring and review work of the CBTMT Committee.
Country/Party making the request	Listing the Party making the request is important for ensuring transparency, tracking support geographically, and identifying specific capacity needs. It also enables tailored responses, facilitates coordination among donors and providers, and helps avoid duplication of efforts across regions or thematic areas.
Objective of the request	Identifying the objective of the request clarifies specific needs and goals, enabling more tailored and effective support. This improves matching by helping providers understand exactly what assistance is required, ensuring resources are directed where they can have the greatest impact.
Description	A description is important because it provides detailed context about the request, helping potential supporters fully understand the issue and its complexity. This enables more accurate assessment, better advice, and more appropriate and effective assistance.

Delivery format (e.g., in-person or online training, equipment transfer, policy advisory support)	This helps the users quickly identify how support was or can be provided, facilitating better planning and matching of assistance to needs. It also enables analysis of which methods are most effective in different contexts, improving future capacity-building efforts. For recorded formats, providing a link allows others interested in similar assistance to access, review, and learn from the materials.
Thematic focus	Including thematic focus helps organize and classify assistance by key subject areas, making it easier for users to find relevant support and for providers to identify gaps. This likewise ensures alignment with specific priorities of the BBNJ Agreement and facilitates targeted, effective capacity-building.
Outcome and lessons learned	This category would help document the impact and effectiveness of assistance, providing valuable insights for improving future support. It also promotes transparency, accountability, and the sharing of best practices across Parties.
Key documents	Having all relevant documents (including request forms and closing reports that could be based on pre-designed templates) in one place provides easy access to important reports, guidelines, and resources related to the assistance. This supports knowledge sharing, helps users understand the context and results, and enables replication of successful approaches.



Operationalizing the Clearing-House Mechanism

Briefing: BBNJ PrepCom
April 2025

Executive Summary

The Agreement under the UN Convention on the Law of the Sea (UNCLOS) on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement) was adopted on 19 June 2023.

To prepare for the Treaty's entry into force and its first Conference of the Parties (COP), a UN Preparatory Commission (PrepCom) will meet twice in 2025 (14-25 April and 18-29 August), and at least once in 2026. During these meetings, Parties will develop the operational framework for the Agreement to ensure it can function and work effectively, and prepare recommendations for the COP. Well-structured, fair, and efficient institutions will shape the Treaty's long-term success and determine how quickly we can turn global ambition into tangible results for ocean protection.

This briefing paper examines the BBNJ Clearing-House Mechanism (CI-HM) and highlights key areas for discussion during PrepCom 1 in April 2025.

Key takeaways:

The CI-HM will play a central role in implementing the BBNJ Agreement. All parts of the Agreement (except Part III on area-based management tools (ABMTs)) explicitly rely on its functions, such as information sharing and notifications, and several subsidiary bodies depend on it to fulfill various tasks under their mandate.

A pilot¹ or interim phase of the CI-HM would enable Parties to meet their information sharing and notification obligations for the entry into force of the Agreement and provide the CoP with valuable experience to inform its discussions on specific modalities. This interim phase should address: 1) the generation of the batch identifier in Part II of the Agreement, related to the monitoring of marine genetic resources (MGRs), 2) the matchmaking role for the CI-HM, envisioned in Part V for capacity building, and 3) the relatively easy but critical information sharing and notification functions the CI-HM serves in Part IV, related to environmental impact assessments (EIAs).

- Accessibility is crucial to ensure that all stakeholders, regardless of their level of technical expertise or language, can effectively engage with and contribute to the mechanism. This would promote inclusivity, transparency, and widespread compliance with the BBNJ Agreement's requirements.
- The CI-HM has been tasked with accessing, providing, and disseminating information on the establishment and implementation of ABMTs, including marine protected areas (MPAs) (Art. 51(3)(a)(ii)). Part III of the Agreement does not, however, specify when and how it should perform this function. Parties must clarify the mechanism's role in this context, including defining the type and scope of information to be provided, and the standardized formats required.
- An alert or notification mechanism will be important to keep Parties and other stakeholders informed about relevant updates and newly uploaded information. This will be particularly crucial when specific deadlines for action exist, such as comment periods under Part IV. For the EIA elements of the CI-HM, notifications should be made in real time and through system-generated emails.

^[1] "Pilot phase" in this context is not intended to mean the building of a prototype that is then discontinued and replaced by a full version later, but rather an early version of the CI-HM that can be incrementally built and expanded.

- Given the evolving nature of the CI-HM, both in terms of implementation and potential subsequent needs, it should be adaptable, with future technical support and maintenance requirements considered from the outset.²
- Implementation of the CI-HM will require dedicated human resources to support its functions.²
- Information within the CI-HM will need to be regularly and manually curated to ensure it is well-presented, accessible, up-to-date, and easy to find. A search and filter function would be advisable.
- Data security measures will be crucial for preserving the integrity and reliability of CI-HM information. Parties must work towards implementing protections that prevent unauthorized access, alteration, or disclosure, along with regular backup protocols to mitigate the risk of data loss due to cyber threats, technical failures, or natural disasters.

1. Purpose and main functions of the CI-HM

The CI-HM will play a central role in implementing the BBNJ Agreement by providing a centralized, open-access platform to facilitate the exchange of information and cooperation. All parts of the Agreement, except Part III on ABMTs,³ rely heavily on a well-functioning CI-HM.

Part II: Marine Genetic Resources, including the fair and equitable sharing of benefits

The CI-HM is central to the functioning of Part II of the Agreement. There is an obligation on States to send notifications to the CI-HM in advance of and after the collection of MGRs, and when those MGRs or their Digital Sequence Information (DSI) are utilized (Art. 12(2)(5)(8)). See the Annex for further details about the information that will be required.

Upon receiving the pre-cruise notification, the CI-HM will generate a BBNJ standardized batch identifier (Art. 12(3)).⁴ The CI-HM will be the main source of information for the Access and Benefit-Sharing Committee (ABSC) in fulfilling its function to monitor the implementation of Part II and make recommendations to the CoP on how to improve it (Art. 16(3)). For more information see [High Seas Alliance BBNJ PrepCom briefing on ABSC](#).

The CI-HM may also be used to facilitate access to traditional knowledge associated with MGRs, subject to free, prior, and informed consent (FPIC),⁵ or the approval and involvement of Indigenous Peoples, and local communities, under mutually agreed terms (Art. 13).

^[2] With regards to CB&TMT provisions and taking into account Article 51(5), this could include human capacity to:

- Proactively gather relevant information, especially on CB&TMT opportunities, potentially through regionally distributed personnel supporting the CI-HM.
- Ensure adequate manual oversight and quality control when matching CB&TMT opportunities with needs, and enable States to request bilateral support (e.g., via a call or chat) for using this CI-HM function.
- Provide needs-tailored capacity building on the use of the CI-HM for States and other users (if any), with special consideration of Article 51(5). This could include, but should not be limited to:
 - Pre-recorded videos explaining how to use the platform and how Parties can engage with the tool should be made available.
 - These videos and other instructional materials should be supplemented with a live-help mechanism, such as a chat function during office hours and, within reasonable limits and resources available, the possibility to schedule bilateral support calls, e.g. to support first-time users in correct and consistent data entry.

^[3] Part III does not explicitly mention the CI-HM, but the CI-HM could provide an important platform to share information related to proposed MPAs and ABMTs.

^[4] The BBNJ standardized batch identifier was framed as a human and machine-readable digital group identifier for samples from one collection event, attached to individual samples. It will facilitate monitoring of implementation. See: Oldham, P., Chiarolla, C., Thambisetty, S. (2023) Digital Sequence Information in the UN High Seas Treaty: Insights from the Global Biodiversity Framework-related Decisions, LSE Law School Policy Briefing 53/2023.

^[5] Free prior informed consent (FPIC) is a principle of international law used, among others, in the 1992 Convention on Biological Diversity (CBD) and its 2011 Nagoya Protocol in the context of access to genetic resources, and the 2007 United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). A large body of practice and guidelines of applying FPIC exists from these other fora.

Part IV: Environmental Impact Assessments

The CI-HM will serve two basic functions related to EIAs. It will provide a) a platform for sharing information about planned activities that could affect areas beyond national jurisdiction (ABNJ) and b) a mechanism for Parties to fulfill their various notification obligations.

Part IV of the BBNJ Agreement requires the following information to be shared through the CI-HM:

- Decisions not to prepare an EIA after screening (Art. 31(1a));
- Draft EIA reports (Art. 33(3));
- EIA reports (Art. 33(5)) including, when appropriate, reports of assessments conducted under other instruments or frameworks (Art. 29(5));
- Concerns registered and recommendations made by the Scientific and Technical Body (STB), Parties, Indigenous Peoples, and local communities, and others (Art. 37(4));
- Decision documents (Art. 34(2), Art. 37(6)(b));
- Monitoring and review reports (Art. 37(6)(a)).

It also requires Parties to notify other Parties and stakeholders at different stages of the EIA process, including:

- Notice of a planned activity;
- Notice of scoping, draft EIAs;
- Notice of cases of unforeseen impacts or a breach of any conditions. The CoP, other Parties, and the public must be notified of these events.

An alert mechanism to keep Parties and other stakeholders informed about relevant updates and newly uploaded information should be considered.

Part III: Area-based management tools

The Agreement specifies that the CI-HM will serve as a centralized platform for accessing, providing, and disseminating information on the establishment and implementation of ABMTs, including MPAs (Art. 51(3)(a)(ii)). Part III of the Agreement does not, however, specify when and how the CI-HM should perform this function, highlighting the need to clarify its role in this context.

Part V: Capacity-building and the transfer of marine technology

The CI-HM will serve two main functions with regard to CB&TMT:⁶

1. A potential role in the development of capacity needs assessment mandated by the Agreement, which can be either self-assessed or facilitated through the CB&TMT Committee and the CI-HM (Art.42(4)). Which specific function the CI-HM may serve in this context is not specified in the Agreement.
2. To facilitate the matching of capacity needs with the support available (Art. 51(3)(b)).

Additional roles for the CI-HM

As noted, the CI-HM could play an important role in facilitating the execution of the many information-sharing obligations related to ABMT proposals (Arts. 20, 21). In addition, it could play a broader role in facilitating transparency (Art. 51(3)(e)), in harmonizing the process for Parties when they report on the implementation of different parts of the Agreement, and in helping to avoid overlaps in requirements (Arts. 16(2), 23(7), 26(1), 45(3), 54). However, its role in these areas is not explicit in the Agreement and needs to be clarified.

Another important role of the CHLM is to address the special requirements of developing States, as well as the special circumstances of SIDS, including the removal of “undue obstacles or administrative burdens” and, potentially, to facilitate the provision of “specific programmes for those States” (Art. 51(5)).

This list of roles and potential roles for the CI-HM to serve as a centralized platform is not exhaustive. The CoP can task the CI-HM with new functions (Art. 51(3)(g)), thereby opening the possibility of its future expansion.

^[6] Notwithstanding CBTMT-relevant information shared in other parts of the Agreement, e.g., notifications under Part II.

2. Relevant items on the PrepCom agenda

The CI-HM is established by the Agreement and will legally exist once it enters into force. However, in practice, steps must be taken now to ensure it is ready for operation. The CI-HM will be managed by the Secretariat (Art 51(1)(2)) and the CoP will determine the specific modalities for its operation.

The Organizational Meeting of the PrepCom (24-26 June 2024) identified several issues related to the CI-HM to be addressed by the PrepCom ([A/AC.296/2024/4](#)):

1. The type, architecture, and functionalities of the platform;
2. The process for generating the BBNJ standardized batch identifier;
3. Modalities to facilitate the matching of capacity-building needs with the support available and with providers for the transfer of marine technology, and to facilitate access to related expertise;
4. The terms of cooperation with relevant legal instruments and frameworks and relevant global, regional, subregional, and sectoral bodies.

The provisional program of work (PPW) ([A/aC.296/2025/L.2](#)) specifies that PrepCom 1 will focus on “Modalities for the operation of the Clearing-House Mechanism” (PPW Item I(5)), while PrepCom 2 will address “Arrangements to enhance cooperation with relevant legal instruments and frameworks and relevant global, regional, subregional and sectoral bodies” (PPW Item I(2)). This briefing focuses on issues to be discussed at PrepCom 1.

In its note on the BBNJ’s subsidiary bodies,⁷ ([A/AC.296/2025/4](#)), the Division of Oceans and Law of the Sea (DOALOS), offers general considerations pertaining to the operation of the CI-HM, including a) the type, architecture, and functionalities of the platform (section II), b) its specific functions (section III), and c) other considerations relating to the operationalization of the mechanism (section IV). Several of the most pressing components addressed in the note are considered throughout this briefing.

3. Connection with the CoP and other subsidiary bodies

The CI-HM’s functions are cross-cutting and it will interact directly with several subsidiary bodies.

The ABSC has the mandate to make recommendations to the CoP on matters relating to Part II of the Agreement (Art. 15(3)), including specifically on matters related to the CI-HM, and to monitor its implementation (Art. 16(2)(3)). Some of the information submitted by Parties to the ABSC will be shared through the CI-HM (Art. 15(4)), while implementation reports will be shared directly with the ABSC (Art. 16(2)). Given the CI-HM has a central function in the notification system, the ABSC will rely heavily on it in fulfilling its mandate.

The CB&TMT Committee has the mandate to monitor and review the implementation of Part V of the Agreement and to make recommendations to the CoP (Art. 45(2)). The reporting modalities for Parties on the implementation of Part V to the CB&TMT Committee do not explicitly mention the CI-HM (Art. 45(3)). However, given the specific roles assigned to the CI-HM for the implementation of Part V (e.g., to facilitate the matching of capacity needs with available support and the facilitation of needs assessments), the CB&TMT Committee will probably draw on information from the CI-HM and review and make recommendations on its functions for Part V of the Agreement.

The Implementation and Compliance Committee (ICC), in its overall mandate to facilitate and consider implementation and promote compliance (Art. 55(1)), may draw on appropriate information from other subsidiary bodies (Art. 55(4)), which includes the CI-HM.

The CI-HM plays a role in making **the STB**’s views on EIAs public (Art. 31(1)(a)(vi)), and the CI-HM will also serve as a source of information for the STB as it fulfills its mandate under Part IV of the Agreement.

^[7] Note by the Secretariat on “Issues pertaining to the operation of the Clearing-House Mechanism under the Agreement under United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction” ([Advanced, unedited version](#)) at <https://www.un.org/bbnjagreement/sites/default/files/2025-02/20250227BBNJPrepComNotebySecCHMAdvancedUnedited.pdf>

4. Considerations for PrepCom 1

General modalities

- A **user-friendly interface**, flexible content management system (CMS), and multilingual accessibility are crucial to ensure that all stakeholders, regardless of their technical expertise or language, can effectively engage with and contribute to the CI-HM. This approach would facilitate inclusivity, transparency, and compliance with the BBNJ Agreement's requirements.
- Some functions of the CI-HM go beyond those typically associated with a static platform. For example, the facilitation of needs assessments and the matching of CB&TMT needs with supply may best be served by **dedicated staffing**. Dedicated human capacity would also fulfill the duty to give full recognition to the special circumstances of developing countries and SIDS in the operation of the CI-HM (Art. 51(5)).
- **Regionally distributed support** to the CI-HM could provide localized assistance and stakeholder engagement, thereby facilitating accessibility. Article 51(3)(d) could be interpreted as permitting the creation of regional and sub-regional mechanisms under the global CI-HM.
- **Standard operating procedures** and due diligence practices for accepting and validating data and other information submitted by Parties (and others) are important to ensure validity and reliability.
- The CI-HM has two functions related to the **relevant knowledge of Indigenous Peoples and traditional knowledge of local communities**: 1) to provide links to relevant databases pertaining to such knowledge (Art. 51(3)(c)), and 2) an optional function to facilitate access to traditional knowledge on MGRs in ABNJ, with FPIC and under mutually agreed terms (Art.13). It will be important for Parties to learn from other UN mechanisms and fora that have made progress in integrating different knowledge systems, such as the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) and the Convention on Biological Diversity (CBD). It would also be beneficial to invest in establishing good processes and meaningful engagement from the onset,⁸ in particular culturally appropriate processes and guidelines developed in partnership with Indigenous Peoples, as well as local communities.

Other important general considerations are **confidentiality** (Art. 51(6)), where required, and ensuring **data security**, which is critical to maintaining the integrity, reliability, and trust in the CI-HM. Although much information will be openly accessible, certain data (such as user credentials and login details) require restricted access. Measures to prevent unauthorized access or the modification of data should be developed, including backup protocols to avoid the loss of important information, including through cyber threats or disasters. Recognizing that the CI-HM will often only contain links to external data, rather than copies, expanding minimum standards of data security of external databases that contain the linked information is advisable.

Entry into force of the BBNJ Agreement will require Parties to submit different types of information to the CI-HM. A pilot or interim phase⁹ of the CI-HM is recommended to gather operational experience before the CoP adopts the mechanism's specific modalities. Such a pilot would be consistent with the practice of other international frameworks and bodies (IFBs) and could help inform the design of its specific modalities at the first CoP.¹⁰ An incremental approach to operationalizing the CI-HM, as discussed in paragraph 96 of the Secretariat's note, would align well with a pilot phase and could focus on data sharing, search functions, and user navigation. Incorporating a feedback loop would facilitate continuous improvement and platform enhancement.

It should be noted that the CI-HM's role requires it to assist in the implementation of several provisions across different parts of the BBNJ Agreement. The operationalization of each provision will require very different levels of complexity.

^[8] Morgera, E. (2025). Conclusions: Equity, Sustainability, and Transformation Under the BBNJ Agreement. In: Humphries, F. (eds) Decoding Marine Genetic Resource Governance Under the BBNJ Agreement. Sustainable Development Goals Series. Springer, Cham. https://doi.org/10.1007/978-3-031-72100-7_15.

^[9] "Pilot phase" in this context is not intended to mean the building of a prototype that is then discontinued and replaced by a full version later, but rather an early version of the CI-HM that can be incrementally built and expanded.

^[10] See Secretariat note, paragraphs 6 and 97.

Part II: MGRs

As discussed, the CI-HM is fundamental to the implementation of Part II of the BBNJ Agreement. Its key functions are to receive the notifications required under Article 12 and, upon receiving pre-cruise notifications, to generate a BBNJ batch identifier (Art. 12(3)). Some questions Parties may wish to consider when operationalizing the notification element of the CI-HM are:

- Who can submit notifications? For example, will all users be permitted to do so or only national focal points? Should the CoP make this decision, or leave it up to individual Parties to determine?¹¹
- How to address situations in which no BBNJ batch identifier was generated but utilization would fall under the BBNJ's mandate? This could, for example, apply to situations in which MGRs and DSI were collected prior to the Agreement's entry into force.¹²
- Determining how the batch identifier will be generated constitutes a separate workstream within the broader operationalization of the CI-HM. The Secretariat's note makes some excellent considerations in paragraphs 51-59. Given its central role in the functioning of Part II of the Agreement, operationalizing the batch identifier as early as possible in a pilot phase should be a priority.

Part III: ABMTs

While Part III of the Agreement does not define a specific role for the CI-HM, it has broad potential to support collaboration with IFBs and consultation on the development of ABMT. For example, the mechanism could assist in the development of MPA proposals by making them publicly available and by receiving and publicizing input during consultations. The type and scope of information to be provided to the CI-HM, and any standardized formats required, need to be determined. In particular, as explained in the Secretariat's note, if Parties were to request the CI-HM to display spatial data, it would potentially require specialized software, a CMS, and human resources (compare Secretariat's note, paragraphs 49 and 50).

Part IV: EIAs

As noted, the two main functions of the CI-HM with respect to EIAs are information sharing and the provision of a notification mechanism. The Agreement provides detailed minimum information requirements on EIA reports (e.g., Art. 33(2)), so the construction of the EIA-related elements of the mechanism can be straightforward and relatively simple.

It may, however, be beneficial to Parties to further explore the potential structure of information, and to link records on EIAs to ensure accessibility. This could include, for example, integrating keywords and a search function capability, as well as organizing information that allows filtering by criteria (e.g., submissions by Parties). A further, and equally important, component of the CI-HM for Parties to consider is how the mechanism will receive and disseminate (i.e., make public) comments and responses during the consultation process of an EIA.

Research and stakeholder interviews identified the following elements to be of particular importance to maximize the effective implementation of the CI-HM for the EIA component of the Agreement:

- A simple structure that is accessible and easy to navigate, includes a search function capability that allows filtering with pre-defined keyword lists, and is capable of supporting evolving needs;
- A centralized portal where all information related to a specific EIA or activity is accessible under one dashboard to help users find all of the information related to a specific project in one place;
- Provision of support, including e-learning capabilities and also real-time assistance, to help Parties navigate the system without unnecessary delays;
- A notification mechanism that informs Parties of the availability of new information in real time, which becomes particularly important when deadlines for responses exist.

Given that the operationalization of the EIA-related CI-HM provisions is likely to be the easiest and most cost-effective to implement, it is advisable to include them in the CI-HM pilot phase.

^[11] See Secretariat note, paragraph 32.

^[12] See Secretariat note, paragraph 33.

Part V: CB&TMT

As noted, the CI-HM has two main functions concerning CB&TMT, to support needs assessments (Art. 42(4)) and to facilitate the matching of capacity needs with available support (Art. 51(3)(b)). While full recognition of the special requirements of developing State Parties, as well as the special circumstances of SIDS, must be given throughout the operation of the CI-HM (Art. 51 (5)), it seems particularly relevant to the CI-HM's functions on CB&TMT. The recommendations above on ease of use and the availability of human assistance in real-time for the CI-HM, as well as the requirement for it to be designed with in-built flexibility so that it can evolve over time, apply equally to CB&TMT.

A series of in-person trainings on the use of the CI-HM and its functions for Parties would be beneficial, particularly in the initial period after its launch.

In addition, ensuring adequate staffing to carry out the following functions would further improve the usefulness of the CI-HM with regard to CBTMT:

- The proactive identification of sources of support and opportunities for developing countries for capacity building and technology transfer;
- The provision of manual oversight and quality control, and a means by which States can request bilateral support in using this function of the CI-HM;
- The regular and manual curation of information to ensure it is well-presented, accessible, up-to-date, and easy to find.

5. Recommendations

These recommendations are specific to PrepCom 1 in April 2025. They may evolve, be re-prioritized, or adjusted as preparations and discussions related to the BBNJ Agreement's entry into force unfold and develop.

- A pilot¹³ or interim phase of the CI-HM would enable Parties to meet their information-sharing and notification obligations early on and provide the PrepCom (and later the CoP) with valuable experience to inform discussions on specific modalities. This interim phase should address the three areas in which the CI-HM plays a particularly important role: 1) the operation of the batch identifier in Part II, related to the identification of MGRs, 2) the matchmaking role for the CI-HM in Part V for capacity building, and c) the critical information sharing and notification functions for EIAs in Part IV of the Agreement.
- In designing the CI-HM, Parties should consider the potential role(s) of national focal points. This could include submitting information as required by the Agreement and/or, if (some) Parties allow stakeholders to submit (some) information directly, receiving alerts when such information is submitted by approved stakeholders under their jurisdiction (if any) to ensure Parties can monitor compliance.
- A user-friendly interface, flexible CMS, and multilingual accessibility are crucial to ensure all stakeholders can effectively engage with and contribute to the mechanism, regardless of their technical expertise or language. Such a system would promote inclusivity, transparency, and widespread compliance with the BBNJ Agreement.
- While the CI-HM has been tasked with accessing, providing, and disseminating information on the establishment and implementation of ABMTs, including MPAs (Art. 51(3)(a)(ii)), Part III of the Agreement does not specify when and how it should perform this function. Given the CI-HM's broad potential under Part III, Parties must establish a clear way forward, including defining the type and scope of information to be provided, and any standardized formats required.
- An alert or notification mechanism is important to keep Parties and other stakeholders informed about relevant updates and newly uploaded information. This is particularly crucial when specific deadlines for action exist, such as comment periods under Part IV. For EIA elements, notifications should be made in real time through system-generated emails.
- Given the evolving nature of the CI-HM, both in terms of implementation and potential subsequent needs, the mechanism should be adaptable, with future technical support and maintenance requirements considered from the outset.

^[13] "Pilot phase" in this context does not mean the building of a prototype that is then discontinued and replaced by a full version later, but rather an early version of the CI-HM that can be incrementally built and expanded.

- Implementation will require dedicated human resources to support the CI-HM's functions.¹⁴
- Regular manual curation of information is necessary to ensure it is well-presented, accessible, up-to-date, and easy to find. A search and filter function is important.
- Data security measures are crucial for preserving information integrity and reliability. Parties must work towards implementing protections against unauthorized access, alteration, or disclosure, along with regular data backup protocols to mitigate risks of data loss due to cyber threats, technical failures, or natural disasters.

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Annex: Text

Article 12:

Notification on activities with respect to marine genetic resources and digital sequence information on marine genetic resources of areas beyond national jurisdiction.

1. *Parties shall take the necessary legislative, administrative or policy measures to ensure that information is notified to the Clearing-House Mechanism in accordance with this Part.*
2. *The following information shall be notified to the Clearing-House Mechanism six months or as early as possible prior to the collection in situ of marine genetic resources of areas beyond national jurisdiction:*
 - (a) *The nature and objectives under which the collection is carried out, including, as appropriate, any programme(s) of which it forms part;*
 - (b) *The subject matter of the research or, if known, the marine genetic resources to be targeted or collected, and the purposes for which such resources will be collected;*
 - (c) *The geographical areas in which the collection is to be undertaken;*
 - (d) *A summary of the method and means to be used for collection, including the name, tonnage, type and class of vessels, scientific equipment and/or study methods employed;*
 - (e) *Information concerning any other contributions to proposed major programmes;*
 - (f) *The expected date of first appearance and final departure of the research vessels, or deployment of the equipment and its removal, as appropriate;*
 - (g) *The name(s) of the sponsoring institution(s) and the person in charge of the project;*
 - (h) *Opportunities for scientists of all States, in particular scientists from developing States, to be involved in or associated with the project;*
 - (i) *The extent to which it is considered that States that may need and request technical assistance, in particular developing States, should be able to participate or to be represented in the project;*
 - (j) *A data management plan prepared according to open and responsible data governance, taking into account current international practice.*
3. *Upon notification referred to in paragraph 2 above, the Clearing-House Mechanism shall automatically generate a "BBNJ" standardized batch identifier.*
4. *Where there is a material change to the information provided to the Clearing-House Mechanism prior to the planned collection, updated information shall be notified to the Clearing-House Mechanism within a reasonable period of time and no later than the start of collection in situ, when practicable.*

^[14] With regards to the CB&TMT provisions and taking into account Article 51(5), this could include human capacity to:

- Proactively gather relevant information, especially on CBTMT opportunities, potentially through regionally distributed personnel supporting the CL-HM.
- Ensure adequate manual oversight and quality control when matching CBTMT opportunities with needs, and enable States to request bilateral support (e.g., via a call or chat) for using this CL-HM function.
- Provide needs-tailored capacity building on the use of the CL-HM for States and other users (if any), with special consideration of Article 51(5). This could include, but should not be limited to:
 - Pre-recorded videos explaining how to use the platform and how Parties can engage with the tool should be made available.
 - These videos and other instructional materials should be supplemented with a live-help mechanism, such as a chat function during office hours and, within reasonable limits and resources available, the possibility to schedule bilateral support calls, e.g. to support first-time users in correct and consistent data entry.

5. Parties shall ensure that the following information, along with the "BBNJ" standardized batch identifier, is notified to the Clearing-House Mechanism as soon as it becomes available, but no later than one year from the collection *in situ* of marine genetic resources of areas beyond national jurisdiction:

- (a) The repository or database where digital sequence information on marine genetic resources is or will be deposited;
- (b) Where all marine genetic resources collected *in situ* are or will be deposited or held;
- (c) A report detailing the geographical area from which marine genetic resources were collected, including information on the latitude, longitude and depth of collection, and, to the extent available, the findings from the activity undertaken;
- (d) Any necessary updates to the data management plan provided under paragraph (2) (j) above.

6. Parties shall ensure that samples of marine genetic resources and digital sequence information on marine genetic resources of areas beyond national jurisdiction that are in repositories or databases under their jurisdiction can be identified as originating from areas beyond national jurisdiction, in accordance with current international practice and to the extent practicable.

7. Parties shall ensure that repositories, to the extent practicable, and databases under their jurisdiction prepare, on a biennial basis, an aggregate report on access to marine genetic resources and digital sequence information linked to their "BBNJ" standardized batch identifier, and make the report available to the access and benefit-sharing committee established under article 15.

8. Where marine genetic resources of areas beyond national jurisdiction, and where practicable, the digital sequence information on such resources are subject to utilization, including commercialization, by natural or juridical persons under their jurisdiction, Parties shall ensure that the following information, including the "BBNJ" standardized batch identifier, if available, be notified to the Clearing-House Mechanism as soon as such information becomes available:

- (a) Where the results of the utilization, such as publications, patents granted, if available and to the extent possible, and products developed, can be found;
- (b) Where available, details of the post-collection notification to the Clearing-House Mechanism related to the marine genetic resources that were the subject of utilization;
- (c) Where the original sample that is the subject of utilization is held;
- (d) The modalities envisaged for access to marine genetic resources and digital sequence information on marine genetic resources being utilized, and a data management plan for the same; (e) Once marketed, information, if available, on sales of relevant products and any further development.

Article 51:

Clearing-House Mechanism

1. A Clearing-House Mechanism is hereby established.

2. The Clearing-House Mechanism shall consist primarily of an open-access platform. The specific modalities for the operation of the Clearing-House Mechanism shall be determined by the Conference of the Parties.

3. the Clearing-House Mechanism shall:

(a) Serve as a centralized platform to enable Parties to access, provide and disseminate information with respect to activities taking place pursuant to the provisions of this Agreement, including information relating to:

- (i) Marine genetic resources of areas beyond national jurisdiction, as set out in Part II of this Agreement;
- (ii) The establishment and implementation of area-based management tools, including marine protected areas;
- (iii) Environmental impact assessments;
- (iv) Requests for capacity-building and the transfer of marine technology and opportunities with respect thereto, including research collaboration and training opportunities, information on sources and availability of technological information and data for the transfer of marine technology, opportunities for facilitated access to marine technology and the availability of funding;

(b) Facilitate the matching of capacity-building needs with the support available and with providers for the transfer of marine technology, including governmental, non-governmental or private entities interested in participating as donors in the transfer of marine technology, and facilitate access to related know-how and expertise;

- (c) Provide links to relevant global, regional, subregional, national and sectoral clearing-house mechanisms and other gene banks, repositories and databases, including those pertaining to relevant traditional knowledge of Indigenous Peoples and local communities, and promote, where possible, links with publicly available private and non-governmental platforms for the exchange of information;
- (d) Build on global, regional and subregional clearing-house institutions, where applicable, when establishing regional and subregional mechanisms under the global mechanism;
- (e) Foster enhanced transparency, including by facilitating the sharing of environmental baseline data and information relating to the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction between Parties and other relevant stakeholders;
- (f) Facilitate international cooperation and collaboration, including scientific and technical cooperation and collaboration;
- (g) Perform such other functions as may be determined by the Conference of the Parties or assigned to it under this Agreement.

4. The Clearing-House Mechanism shall be managed by the secretariat, without prejudice to possible cooperation with other relevant legal instruments and frameworks and relevant global, regional, subregional, and sectoral bodies as determined by the Conference of the Parties, including the Intergovernmental Oceanographic Commission of the United Nations Educational, Scientific and Cultural Organization, the International Seabed Authority, the International Maritime Organization and the Food and Agriculture Organization of the United Nations.

5. In the management of the Clearing-House Mechanism, full recognition shall be given to the special requirements of developing States Parties, as well as the special circumstances of small island developing States Parties, and their access to the mechanism shall be facilitated to enable those States to utilize it without undue obstacles or administrative burdens. Information shall be included on activities to promote information-sharing, awareness-raising, and dissemination in and with those States, as well as to provide specific programmes for those States.

6. The confidentiality of information provided under this Agreement and rights thereto shall be respected. Nothing under this Agreement shall be interpreted as requiring the sharing of information that is protected from disclosure under the domestic law of a Party or other applicable law.



The High Seas Alliance is a group of 50+ non-governmental members who work together to inspire, inform and engage the public, decision makers and experts to support and strengthen High Seas governance and conservation.



Operationalizing the Clearing-House Mechanism Supplementary update for PrepCom 2

Briefing: BBNJ PrepCom
August 2025

Executive Summary

This briefing provides specific recommendations on matters relating to the BBNJ Agreement's Clearing-House Mechanism (CI-HM), set to be discussed at PrepCom 2 from 18 - 29 August 2025. It takes into account relevant discussions during PrepCom 1 in April 2025 and should be considered as a supplement to the [High Seas Alliance Deep Dive briefing on CI-HM](#).

At PrepCom 1, Parties converged on the importance of developing a pilot¹ or interim phase of the CI-HM, given its central importance to implementing the Agreement. There was also some convergence of States' positions that the CI-HM's operational framework should focus on the core functions needed to fulfill its role across the entire Agreement, rather than its role in individual sections.

The core functions of the mechanism include, at a minimum, user management², the submission of and access to information, and data security. These are necessary for State Parties to fulfill their basic obligations related to marine genetic resources (MGRs), environmental impact assessments (EIAs), and capacity-building and the transfer of marine technology (CBTMT), obligations that will accrue as soon as the Agreement enters into force.

Delegations also supported proposals to convene an informal group on the technical aspects (IGTA) of the operationalization of the CI-HM, for which the Co-Chairs have developed draft Terms of Reference (ToR) for consideration and approval at PrepCom 2.

Recommendations:

Recognizing the urgency to operationalize an interim CI-HM, the High Seas Alliance recommends the following for consideration:

- **Take early action** at PrepCom 2 to consider and rapidly adopt the ToRs so that the IGTA can start working immediately on the interim CI-HM to ensure it is operational by entry into force of the agreement.
- **Limit the size** of the IGTA, while allowing for expert representation from the identified stakeholder groups, by supporting the option for the group to be 'composed of up to 50 experts' in paragraph five of the draft ToR and by supporting paragraph six bis.
- **Safeguard the IGTA's legitimacy and credibility** by ensuring its members serve in their expert capacity and in the best interests of the BBNJ Agreement.
- **Ensure the IGTA addresses the CI-HM's core functions** needed to implement the entire Agreement as a matter of urgency. These include:
 - **Upload and download functions:** These provide a means of exchanging information and data among stakeholders and are central to an effective CI-HM. In particular, the uploading of information (e.g., MGR notifications, EIA reports, and the supply and demand of CBTMT) will enable States to fulfill their obligations under the Agreement as soon as it enters into force and ensure that essential information is made available to other Parties and stakeholders.

^[1] "Pilot phase" in this context is not intended to mean the building of a prototype that is then discontinued and replaced by a full version later, but rather an early version of the CI-HM that can be incrementally built and expanded.

^[2] User management refers to the process of creating, maintaining, and controlling user accounts and permissions within a system or network to ensure secure and appropriate access to resources.

- **An alert or notification mechanism:** This is essential to keep Parties and other stakeholders informed about relevant updates and newly uploaded information. Such a mechanism is particularly crucial when specific deadlines for action exist, such as comment periods under Part IV of the Agreement. For EIA elements, notifications should be sent in real time via system-generated emails.
- **Data security measures:** These are crucial for preserving information integrity and reliability. Parties must work towards implementing protections against unauthorized access, alteration, or disclosure, along with regular data backup protocols to mitigate risks of data loss due to cyber threats, technical failures, or natural disasters.

1. Considerations on the operationalization of the CI-HM for PrepCom 2

During PrepCom 1, there appeared to be general agreement on adopting an incremental and phased approach towards operationalizing the CI-HM, including the deployment of a pilot or interim phase, which some Parties expressed a willingness to support financially. There was convergence on the importance of establishing a dedicated intersessional working group to advance the operationalization of the CI-HM - and recognition of the PrepCom's mandate to establish such a working group - but leaving the exact size and composition of such a group, as well as the scope and modalities of its work to be considered and approved by PrepCom2. Furthermore, there was broad agreement that future work on the CI-HM should follow a functional approach, rather than prioritizing specific parts of the Agreement.³

One open question that Parties did not address in detail at PrepCom1 was the role of the CI-HM with regard to Part III of the BBNJ Agreement on area-based management tools (ABMTs).⁴

1.1 Terms of reference for the informal group on the technical aspects of the Clearing-House Mechanism

As agreed by Parties at PrepCom 1, the Co-Chairs have prepared draft ToRs for the IGTA.⁵ Given its pivotal role in advancing and shaping the operationalization of the CI-HM, delegations at PrepCom 2 must approve this group's creation and dedicate sufficient time and attention to thoroughly consider its size and composition, as well as its scope and modalities of work, including its objectives, tasks, and working methods. Ensuring clarity and shared understanding on these points will be key to fostering a constructive and efficient process.

The IGTA will be operating under significant time pressure to establish an interim CI-HM so that Parties can meet their respective obligations once the BBNJ Agreement enters into force, which is likely to occur between the end of 2025 and early 2026. It is, therefore, particularly important to establish a solid foundation for its work from the outset to support progress within the limited timeframe, balancing inclusive participation with the advantages of working in a smaller group.

The IGTA will work intersessionally, including between PrepCom sessions 2 and 3, and provide recommendations to the PrepCom. These include:

- A **draft roadmap** for the phased operationalization of the CI-HM, including phases, goals, timelines, and resource needs.
- A **draft workplan** for the initial phase.
- Recommendations on **specific modalities** for CI-HM operation, particularly regarding:
 - The design and functionality of the web-based platform and interface
 - The functions and processes for matching supply and demand for capacity building and the transfer of marine technology
 - The mechanism's operational compatibility and alignment with existing platforms

^[3] This section represents HSA's takeaways from PrepCom 1 discussions. For the oral reports of the Co-Chairs during PrepCom 1 see: <https://www.un.org/bbnjagreement/sites/default/files/2025-04/20250425Cluster2Issue7Chm.pdf>

^[4] The Agreement specifies that the CI-HM will serve as a centralized platform for accessing, providing, and disseminating information on the establishment and implementation of ABMTs, including marine protected areas (MPAs) (Art. 51(3)(a)(ii)). Part III of the Agreement does not, however, specify when and how the CI-HM should perform this function, highlighting the need to clarify its role in this context.

^[5] Document A/AC.296/2025/15, including its annex with the draft terms of reference for an informal group on the technical aspects of the operationalization of the Clearing-House Mechanism is available at: <https://docs.un.org/en/a/ac.296/2025/15>.

At PrepCom 2, delegations will be asked to consider and decide on the following matters:

1. Size and composition of the informal group

- a. Should the informal group be limited in size (e.g., 50 experts) or open to all experts?
- b. If the group is limited, an additional section (six bis - six quater) outlines nomination categories:
 - Up to 30 experts nominated by States (with regional balance)
 - Up to seven nominated by Indigenous Peoples and local communities (by sociocultural regions)
 - Up to seven nominated by relevant bodies (e.g., IOC-UNESCO, ISA, IMO, FAO)
 - Up to six nominated by civil society, academia, or the private sector
- c. How should the experts be nominated?
 - Will the experts be selected by the Co-Chairs (with or without Bureau consultation)?
 - Will the experts serve in their personal capacity or as official representatives?

2. Meeting modalities

The group will mainly work virtually, but in-person meetings and workshops are possible if funding allows. States may wish to further consider the following:

- Meeting formats and suggested frequency
- Funding mechanisms for in-person meetings and technical workshops
- Consultations to be undertaken with relevant stakeholders, especially in view of the need for transparency (see Annex in the Co-Chairs' draft ToR, paragraph 13)

3. Additional participation by observers

- States may wish to clarify observer participation (e.g., whether to include all interested State Members of the UN, members of specialized agencies, etc.)

1.2 Functional approach

The [High Seas Alliance Deep Dive briefing on CI-HM](#) for PrepCom 1 emphasized that, at the very least, an interim phase of the CI-HM needs to address: 1) the generation of the batch identifier in Part II of the Agreement, related to the monitoring of MGRs, 2) the matchmaking role for the CI-HM, envisioned in Part V for capacity building, and 3) the information sharing and notification tasks assigned to the CI-HM under Part IV, related to EIAs.

There was some convergence during PrepCom 1 that the operationalization of the CI-HM should follow a functional approach, rather than prioritizing specific parts of the Agreement. Should Parties decide to follow this approach, the basic functionalities required include, at a minimum, user management, submission of and access to information, and data security. These functions are necessary to effectively implement basic MGR, EIA, and CBTMT-related provisions when the Agreement enters into force.

2. Recommendations

The following recommendations for PrepCom 2 in August 2025 are supplementary to those in the [High Seas Alliance Deep Dive briefing on CI-HM](#), which remain pertinent.

2.1 Terms of reference for the IGTA

Document A/AC.296/2025/15, prepared by the Co-Chairs, contains draft ToRs for an IGTA to advance the operationalization of the CI-HM. Based on these, the High Seas Alliance proposes the following recommendations:

- Following the original reasoning for the establishment of the IGTA, its membership should be limited to ensure its efficient functioning and coordination. At the same time, its limited size should not in any way exclude the valuable expertise and experiences of identified stakeholders. This will safeguard the group's legitimacy while ensuring it benefits from diverse knowledge and experiences.
- With this in mind, States should support the option 'composed of up to 50 experts' in paragraph five and the inclusion of paragraph six bis in the draft ToRs.

- Given the technical nature of the IGTA, its members should serve in an expert capacity and in the best interest of the Agreement. Such an approach would ensure that recommendations are grounded in technical expertise and enhance the group's legitimacy and credibility, thereby contributing to the effective implementation of the BBNJ Agreement.
- Consideration should be given to the capacity constraints of smaller delegations, particularly in light of the frequency of meetings envisioned for the informal group. This is important to ensure the meaningful and equitable participation of all delegations, as it helps prevent smaller or resource-limited delegations from being disproportionately burdened and promotes a more balanced and inclusive decision-making process.
- Agreeing on the ToRs and starting the work of the IGTA should be an urgent priority so that the interim operation of the CI-HM can begin as soon as the Agreement enters into force. This will enable Parties to meet their information-sharing and notification obligations and provide the BBNJ CoP with valuable experiences to inform its discussions on specific modalities during its first meeting.

2.2 Functional approach

The initial operationalization of the interim CI-HM should focus on the following basic functions that feature throughout the BBNJ Agreement:

- Basic functionalities required include, at a minimum, user management, the submission of and access to information, and information sharing. These functions are necessary to effectively implement basic MGR, EIA, and CBTMT-related provisions as soon as the Agreement enters into force.
- Upload and download functions provide a means for exchanging information and data among stakeholders and are central to an effective CI-HM. In particular, the uploading of information (e.g., MGR notifications, EIA reports, and the supply and demand of CBTMT) will assist States in fulfilling their obligations under the Agreement as soon as it enters into force, ensuring that essential information is made available to other Parties and stakeholders.
- An alert or notification mechanism is essential to keep Parties and other stakeholders informed about relevant updates and newly uploaded information. This is particularly crucial when specific deadlines for action exist, such as comment periods under Part IV on AMBTs. For EIA elements, notifications should be sent in real time via system-generated emails.
- Functions related to data security measures are crucial for preserving information integrity and reliability. Parties must work towards implementing protections against unauthorized access, alteration, or disclosure, along with regular data backup protocols to mitigate risks of data loss due to cyber threats, technical failures, or natural disasters.

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