

)Chapter	From Page	From Line	To Page	To Line	Comment
Chapter 6: Trends in the biodiversity of main taxa of marine biota	129	39	129	39	<p><u>US comment on first draft:</u> This study only looks at data deficient sharks in Europe. They make a case to extrapolate to world populations, but it hasn't been done.</p> <p><u>Authors:</u> [No comment.]</p> <p><u>US comment on second draft:</u> The Walls and Dulvy study, as noted in the Reference on pg 137 of the first draft WOA, confirms that this study was specific to Europe. Suggested revision: “Ecological and trait-based methods for predicting the conservation status of DD species suggest that, at least for <u>Europe’s sharks and rays</u>, around a half to two-thirds of species in this category should also to be considered at risk of extinction (Walls and Dulvy, 2019).”</p>
Chapter 6: Trends in the biodiversity of main taxa of marine biota	186	5		23	<p><u>US comment on first draft :</u> this might be best summarized in a table</p> <p><u>Authors:</u> [No comment.]</p> <p><u>US comment on second draft:</u> The chapter makes broad use of charts/tables and this data seems ideal for a table or chart, so request clarification as to why the initial comment was ignored, and whether a chart or table is possible for this data.</p>
Chapter 7: Habitat diversity	425	23	425	25	<p><u>US comment on first draft :</u> Recommend striking the bullet, "Despite its importance, the increasing threats to the Sargasso Sea demonstrate the weakness of the current system of ocean governance in addressing cumulative impacts of human activities on the high seas." This is a policy statement not a scientific fact.</p> <p><u>Authors:</u> We believe the statement should stay-it is an important conclusion of our assessment.</p> <p><u>US comment on second draft:</u> We continue to believe this bullet is policy prescriptive as drafted. Suggested revision: “Despite its importance, the I <u>The potential for increasing threats to</u> activity in the Sargasso Sea demonstrates the weakness of the current system of ocean governance in <u>importance of</u> addressing cumulative impacts of human activities on the high seas.”</p>

Chapter 7: Habitat diversity	431	22	431	25	<p><u>US comment on first draft:</u> Strike these lines - policy statements and inaccurate: "The outlook for the Sargasso Sea, both in the short and long term, depends upon international decisions and priorities. The importance of the Sargasso Sea is recognized internationally but because it is in the high seas, beyond the jurisdiction and responsibility of any national Government, it enjoys little protection." The area enjoys protection through multiple legal instruments and authorities such as IMO, RFMOs, ISA, etc.</p> <p><u>Authors:</u> No-again this is an important conclusion of our work, and the Sargasso Sea does NOT “enjoy protection” from these organisations – it is within their competence but only NAFO has taken any protection measures.</p> <p><u>US comment on second draft:</u> Differences in policy are the reasons more action has not been taken in those organizations, not the fact that the Sargasso Sea is in the high seas, as the draft text asserts; hence, this remains a policy discussion and the text must not appear to be policy prescriptive. Suggested revision: “The outlook for the Sargasso Sea, both in the short and long term, depends upon international decisions, and priorities, and cooperation. The importance of the Sargasso Sea is recognized internationally, and its protection falls within the competence of a number of organizations. but because it is in the high seas, beyond the jurisdiction and responsibility of any national Government, it enjoys little protection.”</p>
Chapter 7: Habitat diversity	431	28		30	<p><u>US comment on first draft:</u> Strike this statement as speculative and not scientifically proven: "the potentially increased fishing activity over the last three years by some 28 countries shown by automatic identification system data (Sargasso Sea Commission, 2019), and". AIS data is only an indication of a vessel being present in an area, not that the vessels are engaged in an activity or specifically in fishing activity.</p> <p><u>Authors:</u> No-this is a recognised method for observing fishing activity. Fishing activity was estimated from AIS data by Ocean Mind for the Sargasso Sea Commission using vessel behaviour analysis, a method which has been developed over a number of years.</p> <p><u>US comment on second draft:</u> Point taken, but the text as drafted asserts that AIS shows fishing activity, when fishing activity is rather estimated using AIS. Suggested revision: "the potentially for increased fishing activity over the last three years by some 28 countries as estimated using shown by automatic identification system data (Sargasso Sea Commission, 2019), and"</p>

Chapter 7: Habitat
diversity

431 31 431 35

US comment on first draft : Strike this sentence - policy judgement not scientific fact. "The ongoing negotiations on the BBNJ process are of crucial importance for high seas ecosystems like the Sargasso Sea and its experience demonstrates how difficult it is for existing sectoral bodies to govern an ecosystem in a holistic manner so as to protect it from a range of cumulative impacts and threats."

Authors: Not deleted. Again, we stress that we are engaged on an assessment. The conclusion is both true and important.

US comment on second draft: The BBNJ process is a policy forum, and the way this text is framed ventures into that policy discussion. If the text cannot be deleted, we propose some revisions. **Suggested revision:**
~~"The ongoing negotiations on the BBNJ process are of crucial importance for high seas ecosystems like the The Sargasso Sea and its experience demonstrates how difficult it is the challenges faced by for existing sectoral bodies to govern an high seas ecosystems in a holistic manner so as to protect it from a range of cumulative impacts and threats."~~