Highly esteemed co-facilitators, Ms Olai Uludong and Mr Bille Hermann,

On behalf of Seas At Risk, an association of over 30 environmental NGOs from across Europe, all working to protect and restore the marine environment, we welcome the zero draft of the declaration of the UN Ocean Conference 2020, and would like to thank you for transparency of the process and the opportunity to provide comments. Besides our comments below, we would also like to provide you (in annex and at http://bit.ly/38UEx37) a joint NGO blue call to action, a call on governments and businesses to RISE UP for the ocean which we hope provides some inspiration for an action oriented declaration.

Below we propose detailed adjustments to the declaration text, with suggestions for text additions in blue, and for text struck through to be deleted.

**Paragraph 1:**
In the context of the current climate and biodiversity emergencies, we need the ocean to continue protecting us from the worst impacts of climate change, and for that it is of utmost importance to halt biodiversity loss and enhance ocean resilience. We therefore propose to adjust the last sentence as follows: “...we are determined to act decisively and urgently to improve the health and productivity resilience of the ocean”

**Paragraph 6:**
As scientists are very clear on the way forward to address cumulative human impacts on the sea, we propose to the following adjustments:

*We are greatly concerned about the ‘blue acceleration’, i.e. the sharp increase of the human pressure on the world’s ocean since the start of the 21st century, which shows no sign of slowing, according to a comprehensive new analysis on the state of the ocean by the Stockholm Resilience Centre. We are alarmed by the findings about cumulative human impacts on the ocean, including ecosystem degradation, and species extinctions and the need for transformative change, as established by the Intergovernmental Science-policy Platform on Biodiversity and Ecosystem Services Global Assessment Report. We are committed to halting and reversing the decline in the ocean’s ecosystems and to protecting and restoring its resilience and ecological integrity. We acknowledge the calls of the IPBES, IPPC and International Resource Panel for transformational change of our economies and societies, as the only way to ensure that climate change, biodiversity loss and unsustainable use of resources reaches tipping points of global catastrophe. We bear in mind that the transition to a more sustainable economy and society must be just, fair and inclusive.*

**Paragraph 6bis:**
*We re-affirm the importance of the application of the precautionary principle when developing new technologies. We are extremely concerned about the fast rise of the emerging sector of deep seabed mining, and the warnings by scientists that this would lead to significant and irreversible loss of biodiversity, both by destroying seabed life where mining would take place, with little prospect of recovery, and by generating plumes, light, toxins and noise that could impact both benthic and mesopelagic marine life far beyond actual mining sites.*
Paragraph 10:
c. Reducing marine pollution, including sea-based pollution from shipping, marine plastic litter and nutrient pollution, contributing to comprehensive life-cycle integrated approaches that include waste prevention as a priority over improved waste management capacity building and developing new, biodegradable reusable materials to replace single-use products and packaging which compose most of that can reduce additional marine plastic litter,
c bis: Stopping any further development of new activities that risk to irreversibly harm ocean health, such as seabed mining
e. Developing and implementing measures to mitigate and adapt to climate change, including through an immediate ban on all new offshore oil and gas explorations and production, a rapid phase out of current offshore oil and gas extraction, measures to reduce black carbon emissions from ships in the Arctic and expedited action to decarbonise international shipping, increasing the use of low-impact ocean-based renewable energy technologies, implementing nature-based solutions for carbon sequestration, preventing coastal erosion and preparing for ocean-related extreme weather events,

Paragraph 11:
g. ...to understand the importance of and the need to contribute to the health of the ocean through promoting and supporting quality education and life-long learning for ocean literacy to support marine life and ecosystems’ restoration
g bis: Strengthen the implementation of the precautionary principle – in particular for emerging sectors such as deep sea mining - which requires that lack of full scientific certainty shall not be used as a reason for failing or postponing to take action to prevent environmental degradation; the burden of proof should rest with the proponents of an activity; and with the need to explore a wide range of alternatives to possibly harmful actions.

We hope you can integrate these proposals in the final declaration, and would like to thank you once again for your consideration of our comments.

Sincerely,

Dr Monica Verbeek
Executive Director Seas At Risk