Avatangiisinut Pinngortitamullu Naalakkersuisoqarfik Ministry of Environment and Nature



PAME II-2014 Agenda Item 4.6 (a) AMSA recommendation II(D)

## Specially Designated Marine Areas in the Arctic - submission by the Kingdom of Denmark

The Kingdom of Denmark welcomes this useful and objective report "Specially Designated Arctic Marine Areas" by Det Norske Veritas (DNV). The Kingdom of Denmark appreciates the opportunity to submit our views on the report and the report recommendations again.

The Kingdom of Denmark stresses that it is important that conclusions and recommendations of the report reflect the results of the in-depth and factual analysis of the report. There should be a clear correlation between the environmental sensitivities, the threats identified, the need for protection, the assessed IMO measures and the final recommendation for appropriate measures.

It is important to notice that the risk of shipping accidents is considered low, even if the scenario with the highest expected increase in activity is taken into consideration. Also it is worth noting that there are significant limitations to the present state of knowledge.

It should be noted that according to the paragraphs in Art. 76 in UNCLOS the Coastal State shall delineate the outer limits of its continental shelf, where the shelf extends beyond 200 nautical miles from the baselines. The Kingdom of Denmark is in the process of making this delineation, and for the time being the Kingdom of Denmark cannot support the PSSA-approach suggested in the report.

However, the Kingdom of Denmark finds it very appropriate to pursue further monitoring of the Arctic High Seas to ensure that possible future developments in environmental sensitivity and/or shipping patterns can be met with appropriate measures applying the precautionary principle.

Furthermore, the Kingdom of Denmark finds it important to conduct research within the Arctic High Seas in order to gain more profound knowledge about shipping activity, ecosystems, biodiversity and environmental sensitivity etc. 12-09-2014 Journal No. 2014-101109 Doc. No. 1688873

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