

Principle 15, on other relevant actors, besides States and international organizations. While the commentary in paragraph 6 does include a list of such actors, the principle could make further explanation what kind of other relevant actors are meant here, and why they are addressed with these principles, considering that they may not all be subjects of international law.

Now we return for a moment to the principles proposed previously. Understanding that they are placed in two different parts of the list of principles, we still find principles 9 and 16 to be both repetitive and inconsistent. While principle 9 provides a recommendation (should) to designate protected zones, it is almost fully covered within principle 16 and the two should therefore be merged. Furthermore, principle 9 provides that protected areas could be designated either by agreement or otherwise, while principle 16 stipulates that only protected zones designated by agreement shall be protected against attacks, leading to the question, whether protected zones that are established otherwise shall be under the same protection or not.

Understanding that the wording 'major environmental or cultural importance' is intended to leave open the precise meaning of this requirement on purpose and that it is sometimes difficult to distinguish the two, the wording could be amended so that it is clear whether both the conditions < envi

Mr/Mrs Chairperson,

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We follow with interest the ongoing discussions on determining immunity, notably taking into account a new proposal of the Working Committee having submitted a draft article +

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Commission a comprehensive study of issues arising in the context of protection of affected persons(All aspects mentioned in this regard in paragraph 16 of the report are fully valid and we would welcome addressing them in future reports of the Commission(

Like the lawyers, are used to base our arguments on precedents(Like search for analogies, because we would like to maintain legal certainty(However, this very specific topic 'sea level rise in relation to international law' requires also an analysis of 'unprecedented issues'. Similarly, analogies are here not necessarily available(Consequently, we need to consider 'unconventional solutions and think in some cases outside of the box(

Mr/Mrs Chairperson,

Coming to the end of our comments, we would like to note, that the topic sea level rise in relation to international law identifies a number of areas of international law that need to be analysed with the view of the question whether only norms can be relied upon or if norms need to be proposed(Like see the potential of the outcome of the Commission to be most likely of great influence to the international law, including law of the sea and keeping that in mind, we wish the Commission and the Study Group all the success in their endeavours(

Thank you for your attention(