

## Italy

### **Considerations on Part IV Section 2 of the Draft Regulation on exploitation of mineral resources in the Area**

Our considerations concerns DR47 in particular as regards the Environmental Impact Assessment.

Environmental Impact Assessment (commonly called EIA) is a process well established at the international level and applied worldwide for the evaluation of the environmental and social effects of complex projects such as the exploration and exploitation of deep sea mining projects would be.

EIA process identifies and sets out also the preventive mitigation measures to avoid or, where this is not possible, minimize the negative impacts on the natural environment and the population directly and indirectly affected. Furthermore, EIA even on the basis of a risk based approach, sets in the most appropriate environmental management practices which normally represent the fundamental part of the Environmental management plan. Finally, EIA includes the assessment of the closure plan as well as the design of an appropriate monitoring plan, developed upon the established environmental and technical standards. More importantly, a critical part of the EIA process is, inter alia, the public consultation process which has, among its prerogatives, the possibility of introducing modification in the proposed project, i.e. to the Plan of Work.

According to DR 47, the complex of procedures and activities highlighted above, which are commonly applied across the world, are included within the so called Environmental Plans, and in particular, the overall EIA process would be part of a document, namely the Environmental Impact Statement. In our opinion, although the matter is the objective of the “Guidelines for environmental impact assessment and preparation of an environmental impact statement” aimed at defining the most appropriate EIA procedures, we believe that this draft regulation does not reflects the logic of the approach and the process flow of

the overarching environmental assessment framework. Therefore, DR 47 should be amended in a way to correctly represent the actual prerogatives of a full environmental impact assessment process.