

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH SESSION:
COUNCIL - PART 2**

Informal Working Group - Environment

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete.

1. Name(s) of Delegation(s) making the proposal:

African Group of 47 Member States

2. Please indicate the relevant provision to which the textual proposal refers.

48bis

3. Kindly provide the proposed amendments to the regulation or standard or guideline in the text box below, using the “track changes” function in Microsoft Word. Please only reproduce the parts of the text that are being amended or deleted.

No specific proposed amendments but comments below

4. Please indicate the rationale for the proposal. [150 word limit]

We would like clarification on how the Test Mining Report is intended to relate to the Environmental Impact Statement. Rather than a separate report, should the Test Mining Report be included as a chapter in the EIS to avoid duplication?

We have a comment on para 4 regarding situations where a test mining project does not need to be undertaken. Having early clarity on whether a test mining project will be needed would assist in the efficient production and consideration of the Environmental Plans. In a similar vein to requiring a prior approval by the Authority for a Test mining project (para 3), we feel that a similar prior approval by the Authority for not requiring a test mining project would be useful for contractor and regulator clarity through the environmental assessment process.

Clarity on the process, timings and decision points will be important to address in this regulation. Such clarity is needed for the Contractor, the Authority and Stakeholders.