

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

Informal Working Group - Environment

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to council2022@isa.org.jm.

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

Belgium

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

General statement prior to the start of the Standards & Guidelines discussion.

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.

Thank you, Madam facilitator.

Belgium also wants to thank the LTC for its work and the Chair and dr. Clark for their explanations during this session.

We want to join others by expressing our concerns about not knowing to what extent and why our comments have been taken into account (or not) after the first round of comments. That makes it very difficult to evaluate our position and adopt a new position, potentially discarding elements of the former position that have become superfluous or simply are not good enough. Consequently, we run the risk of turning in circles and not making progress.

One more general issue with respect to the content of the Standards & Guidelines: we understand that their focus is process-related. For instance, on the issue of environmental objectives or thresholds, we understand that it is difficult to produce them at this stage. And we even think they might be better embedded in the Regional Environment Management Plan. However, since we don't have a good view

yet on the REMPs in the Regulations, it is difficult for Belgium to rely on that alternative of having the environmental objectives in the REMPs. This illustrates once more the difficulty of working in parallel on the Regulations and the Standards and Guidelines.

Thank you.

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

We are in line with a lot of interventions that have been made so far on ahead of the Standards & Regulations discussion, but we wanted to highlight our support for having a document with track changes and the difficulty of working in parallel on the Regulations and the Standard & Guidelines.