

**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.

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

China

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

Draft guidelines for the preparation of Environmental Management and monitoring Plans (ISBA/27/C/6), paragraph 25.

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.

25. The EIA, ERA and mitigation measures are used to prepare the detailed monitoring plans within the EMMP. Detailed guidance regarding an EIA, ERA and EIS can be found in their respective guidelines. The applicant should develop mitigation measures and control procedures for ~~each Environmental Effect~~ any significant changes identified in the EIA process and described in the EIS. The mitigation measures identified for ~~each potential Environmental Effect identified~~ any potential significant changes in the EIA should then be used to design the monitoring programme(s) (see below). Given the fundamental link between engineering design and environmental outcomes, consideration of mitigation measures should be included from the earliest stages of programme and engineering design.

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

We notice that there is inconsistency between this paragraph and that in Annex VII, paragraph 2(e), Draft Exploitation Regulations which provides “An assessment of the potential Environment Effect of the proposed activities on the Marine Environment, and any significant changes likely to results”. We suggest to revise the para. 25, utilizing the wording of “any significant changes” instead of “each Environmental Effect”.

China believes that it is neither necessary nor feasible to develop mitigation measures and control procedures for each Environmental Effect, because some of Environmental Effects may have no influential impact on the biodiversity. Instead, we should focus on mitigation measures and control procedures for “any significant changes”.

**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.

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

China

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

Draft guidelines for the preparation of Environmental Management and monitoring Plans (ISBA/27/C/6), paragraph 29.

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.

While inherent uncertainties will take time, gained knowledge and experience to resolve, applicants and Contractors should maintain familiarity with the fundamental principles of the exploitation regulations as set out in regulation 2(among other applicable regulations), which include the application of the precautionary approach. Adaptive management is an important part of the implementation of a precautionary approach in that it ensures that the management and monitoring of Environmental Effects is ~~constantly~~ informed by Best Available Scientific Evidence, Best Available Techniques and Best Environmental Practices.

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

Management and monitoring of Environmental Effects usually last decades. Meanwhile, technology is continuously developing. But the techniques used by the contractor are not suggested to change consistently. The problem will arise when data collected in different periods appears to be disparity if the techniques have been changed. Such disparity cannot necessarily be concluded as a result of the environmental effects, considering that change of techniques per se may cause data disparity. Thus, the stability of the techniques adopted by applications and Contractors within a certain period should be ensured.

**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.

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

China

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

Draft guidelines for the preparation of Environmental Management and monitoring Plans (ISBA/27/C/6), paragraph 41.

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.

The effort and resources allocated to monitoring different parameters should be proportionate to the nature and scale of the predicted environmental impacts and effects (subject to complying with the overall objectives and requirements in the exploitation regulations), the level of residual uncertainty from the EIA and the areas of main focus for adaptive management strategies. The monitoring should reflect the ~~sum total of~~ predicted impacts and management strategies, with the aim of determining if the environmental objectives are being achieved. Monitoring methodology/results should give a sufficient degree of confidence that Environmental Effects are as anticipated and agreed performance standards are being met (monitoring should have the statistical power to detect changes in environmental states)

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

The Guidelines for the preparation of EMMP lacks an explicit indication of the "sum total of" , which needs clarification. Otherwise, the wording of "sum total of" should be deleted.

**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.

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

China

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

Draft guidelines for the preparation of Environmental Management and monitoring Plans (ISBA/27/C/6), paragraph 63(a).

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.

None.

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

The mining discharge guidelines should be adopted as soon as possible, but no later than the submission of the Plan of Work by the applicant since it relates to the EMMP.

**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.

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

China

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

Draft guidelines for the preparation of Environmental Management and monitoring Plans (ISBA/27/C/6), paragraph 81.

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.

On a regular basis (monthly or quarterly), Contractors could provide brief and focused monitoring reports, including monitoring data, statistical analysis, test results and model validation, assessment of trends and identification of areas for improvement. Contractors should also discuss with the Authority the provision of periodic reports on longer-term Environmental Effects (annually or post-survey, and every 5-year substantive review)

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

China supports short-term monitoring reports and periodic reports on long-term Environmental Effects. For the former, its format and requirements should be clarified in the guideline, brief and focused. For the latter, China suggests that the reporting period should be lengthened to improve the effectiveness of the reporting content.

**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.

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

China

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

Draft guidelines for the preparation of Environmental Management and monitoring Plans (ISBA/27/C/6), ANNEX III

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.

none

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

We agree with the questions and comments about stakeholders here. Furthermore, we suggest providing the list of the stakeholders, specifying stakeholders’ role in the project, and how/when they will be consulted during the project. We propose to develop a standard or guideline to specify the abovementioned issues.