

**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:

DOSI

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

Annex IV Executive summary

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.

(c) Anticipated impacts of the activity (physicochemical, biological, socioeconomic), including expected recovery rates of the ecosystem to its original state;

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

Recovery rates differ between ecosystems and should be clearly stated and acknowledged in the executive summary

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Annex IV, 3.3.1 Project scale

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.

This should include an account of the area to be physically mined, the discharge depth range, as well as the likely extent of any secondary impacts (e.g., sediment plumes), which will be discussed in greater detail later.

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

The target depth range of the discharge plume is important as the depth of this discharge plume will influence its extent as well as the magnitude (or severity) of the plume, because, but not limited to, the dilution of the sediment concentration and the time it will be present in the water column.

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Annex IV 4.6 Physical oceanographic setting

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Seasonal and interannual oceanographic variability ~~is~~ are ~~an~~ important elements to include, and should be measured over multiple years.

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

The current wording of the text suggest that seasonal variability is important, but it does not explicitly state what to do with this. This misses the importance of monitoring such important oceanographic variability, which needs to be understood in relation to potential mining activities. Further, the proposed text now includes interannual oceanographic variability too, for the same reason as seasonal variability.

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Annex IV 4.7 Chemical oceanographic setting

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.

Provide a description of water mass characteristics at the site and above the site at various depths of the water column, including the structure and development of the oxygen minimum zone, and in particular near the sea floor (up to 200m above bottom) that includes nutrients, particle loads, temperature and dissolved gas profiles, vent-fluid characteristics if applicable, turbidity, etc.

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

The original text could be interpreted in multiple ways. One way it could have been interpreted was that the focus on the 200 m above bottom was in relation to the oxygen minimum zone, which typically occur between water depths of 200 and 1000 m from the sea surface. The proposed textual changes aim to address this unclarity, with the intention that the chemical descriptions occur for the whole water column, but in particular the 200 m above seafloor.

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Annex IV 4.11 Greenhouse gas emissions and climate change

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.

Provide a description of the level of gas and ~~chemical~~fluid emissions from both natural and anthropogenic activities in the Area.

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

Both gas and fluids are chemical contents. The proposed textual change is a more appropriate terminological description of the emission characteristics.

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Annex IV 4.9 Natural hazards

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Provide a description of applicable potential natural hazards for the site, including volcanism, seismic activity, cyclone/hurricane trends, tsunamis, [metrics of climate hazard and cumulative climate hazard](#), etc.

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

Deep-sea mining does not act alone on the ocean, but in concert with potential other stressors or hazards. Climate change will likely change the conditions in which the mining operations take place and therefore should be taken into account in the EIS.

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Annex IV 5.4 Biological environment

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5.4 ~~Biological Environment~~ Descriptions of the Communities and Ecosystem Functioning

Address diversity, abundance, biomass, community-level analyses, connectivity, trophic relationships, resilience, ecosystem function and services and temporal variability.

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

The term ‘biological environment’ would refer to the environment experienced by life in the ocean according to most biologists, not life itself. The proposed change would better align with what is described in the paragraph. It is important to recognize the ecosystem services provided by the biological communities residing in the contract areas, and the proposed addition would do so.

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Annex IV 5.4.1 Surface

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.

Describe the biological environment-communities from the surface to a depth of 200 meters, including microbes, plankton (phytoplankton and zooplankton), surface/near-surface fish such as tuna, and seabirds and marine mammals.

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

The term ‘biological environment’ refers, for most biologist, not to the life itself, but to the environment experienced by life. Further, microbes are an important component of the ecosystem and should be included in the EIS.

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Annex IV 5.4.3 Benthic

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Describe the benthic microbial, invertebrate and fish communities, including infauna and demersal fish, up to an altitude of 50 meters above the sea floor.

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

Microbes are an important component of the ecosystem and should be included in the EIS.

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Annex IV 6.2.6 Other

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List other uses of the project area that are not related to the above (e.g., other mineral exploration, exploitation projects, traditional navigation, [marine genetic resources, global-scale regulating and supporting ecosystem services](#)).

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

The entire EIS needs a characterization of the global-scale regulating and supporting ecosystem services, including (but not limited to) carbon burial and sequestration, nutrients recycling. It is another use, but could benefit from having its own section too. Last, marine genetic resources are present in the project area and merit attention.

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Annex IV 6.3 Sites of an archaeological or historical environment

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6.3 Sites of an archaeological, ~~or~~ historical, cultural or paleontological nature
List any sites of archaeological or historical significance, cultural property or cultural heritage, and paleontological nature that are known to occur within the potential area of impact.

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

The contractor areas could potentially also cover areas that are culturally or paleontologically important, and these should be considered. This may relate, for example, but not limited to, to traditional knowledge, or sites that may relate to the mid-Atlantic Slave Trade.