

**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:

Pew Charitable Trusts

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

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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.

Please note that Pew’s proposed edits are highlighted in yellow

Environmental Standards shall be developed in accordance with regulation 94 and shall include **inter alia** the following subject matters:

(a) Environmental quality objectives, including **but not limited to** on biodiversity **from sea surface to the benthic subsurface** layers, plume density, **chemistry** and extent, **ecosystem function and services, noise, light, air quality, waste** and sedimentation rates

(b) **Environmental management and** Monitoring procedures **and interpretation of results**; and

(c) Mitigation measures

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

In para 1, we support the proposal to include ‘inter alia’ and agree that the list should be non exhaustive.

In subpara (a) we also believe that some other important elements could also be usefully added to this subparagraph. In addition to suggestions from other delegations to include, noise, light, and toxicity, we would also specify that biodiversity, for the avoidance of doubt, encompass the sea surface to the benthic subsurface layers, and would add ecosystem function and services to the list of environmental effects that must be addressed, in addition to impacts. We would also agree with Germany that standards on baseline data will be needed to ensure statistical comparability across contractors and cumulative assessments. We further note that these environmental quality objectives, despite being a critical component of the regulatory framework, are not yet under consideration in either Phase 1 or 2 of the development of standards and guidelines. Given the complexity that this exercise is likely to entail, the working group might wish to reflect on how these objectives will be developed and identify them as a priority for elaboration.

Amendments in subpara (b) are made in the interest of consistency with other elements of the draft regulations.

On subpara c, it would seem to make more sense for mitigation or remedial measures to be included within the EMMP Standards and for environmental risk assessment to be included within the EIA/EIS Standards.

We also agree with the proposed subparagraph 2 as a useful measure to ensure that the Authority's regulatory framework is complete and capable of executing the Authority's responsibilities as a prerequisite to exploitation.