

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27<sup>TH</sup> 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:**

Deep Sea Conservation Coalition

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

Draft Regulation 46 ter

**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 ISA should undertake the monitoring; not the contractor.

Reporting should be real time.

Reports should be communicated to Council and made public. Currently they are only to be sent to the Secretariat and the LTC.

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

The ISA has to have the capacity to independently and effectively monitor all activities in the Area and make that information publicly available. Relying on the contractor to monitor themselves is akin to allowing the fox to monitor the chicken pen. This has already been an issue in regard to activities of contractors under the exploration regulations, whether in terms of a lack of sufficient monitoring programs for the testing of mining equipment, the ability of the ISA to independently verify the accuracy of the annual reports from the contractors, or the Council to exercise proper oversight over the contractors when infractions by the contractors occur. This body should not and cannot allow industry to monitor itself and meet the obligations under the Convention. This is already a problem and needs to be remedied rather than perpetuated through the exploitation regulations. That the ISA cannot or will not monitor the effects illustrates why deep sea mining should not go ahead.