

**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.**

Regulation 47

**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.**

In addition to our overall observation that EIA and EIS processes and outcomes should be combined:

Include alternative options including the no-action alternative, which would mean no mining.

The Regulations should include provisions for full public participation, including access to information and participation in the EIA and EIS process and access to review procedures, including ongoing processes.

This regulation should require comments to be taken into account, not simply “Identify comments received through public consultation on the environmental impact assessment and how they have been addressed”.

The Regulation should ensure that require assessing all matters (species, ecosystems, etc) that can potentially be impacted for every impact.

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

Comments must be actually assessed, taking them into account including making necessary changes in the EIS and reporting how they were addressed, on an iterative basis. It also means giving stakeholders sufficient time.