

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH SESSION:
COUNCIL - PART I**

Informal Working Group Institutional Matters

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.

Preamble

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.

Reward to ensure that damage to the flora and fauna of the marine environment, degradation of marine ecosystems, their resilience or ecosystem services, loss of biodiversity and other harmful effects are prevented in relation to the authorization of any activities in the Area pursuant to Part XI and other relevant provisions of the Convention and the Agreement.

Provide that the Exploitation of the Resources of the Area should not be carried out unless and until it can be proven that such activities will benefit humankind as a whole, and will not harm the marine environment or cause any damage to marine flora and fauna, loss of biodiversity etc consistent with the Convention and more recent international political commitments for the protection of biodiversity and the marine environment such as the Leaders’ Pledge for Nature.

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

These regulations must not be adopted for the reasons stated above, but also because the ISA is not fit for purpose and its structure and bylaws do not allow the ISA to act on behalf of humankind as a whole. Crucial shortcomings include:

1. There is no scientific or environmental committee.
2. The LTC meets behind closed doors, does not produce reports and is essentially a black box. No independent advice is required.
3. There is no general discretion by the LTC to refuse applications.
4. Lack of accessible and transparent appeal and dispute resolution procedures.

5. The voting structure allows for the LTC and a small number of countries in key positions on the Council to virtually guarantee an application for a plan of work is approved, even if a large minority/majority of ISA members oppose.
6. The ISA has a conflict of interest as a regulator and as a recipient of the payments. It has a dual mandate to protect the marine environment and regulate a harmful activity.