

**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:

Japan

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

Draft guidelines for the preparation of Environmental Management and Monitoring Plans

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.

Japan appreciates for the tremendous work undertaken by the LTC for advancing development of Standards and Guidelines.

We would like to support suggestions made by various delegations during the session for updating document with track changes together with reasons for reflecting or not reflecting comments being submitted for the future work.

We would like to propose amendments to the following text:

4. Monitoring stations

45. Annex VII, paragraph 2 (h) of the exploitation regulations provides that an EMMP must provide a detailed description of the proposed monitoring stations across the project area, including the frequency of monitoring and data collection, the spatial and temporal nature of such monitoring and justification for such arrangements.

46. Monitoring associated with exploitation in the Area should take place in multiple locations in the project area, including but not limited to:

- Monitoring to evaluate the characteristics of the operational plume and any Environmental Effects;
- Monitoring to evaluate the characteristics of the “returned water” plume and any Environmental Effects;
- ~~Long-term~~**Permanent** monitoring in locations to assess physical oceanography characteristics such as current speed and direction to inform operational decision-making and any Environmental Effects;

- Monitoring in locations to meet specific monitoring objectives relative to the Environmental Effects identified in the EIS;
- IRZ monitoring; • PRZ monitoring.

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

Permanent monitoring after cessation of mining activities may not be realistic given the costs the contractor needs to bear. It is therefore suggested to change it to another expression, such as long-term monitoring.