

**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:**

Pew Charitable Trusts

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

DR 53

**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.**

**Regulation 53**

1 (b) Such resources, training, and procedures as are necessary for the prompt execution and implementation of the Emergency Response and Contingency Plans and any Emergency Orders issued by the Authority including on-vessel presence at all times of personnel authorised and trained to implement the Plan.

2. Contractors, the Authority and sponsoring States shall consult together, as well as with other States and organizations which appear to have an interest, in relation to shall facilitate the exchange of knowledge, information and experience relating to Incidents, between Contractors, and with States, and shall using such knowledge and information to prepare and revise standards and operating guidelines to control hazards throughout the mining life cycle, and shall cooperate with and draw on the advice of other relevant international organizations so that such knowledge and information can be used:

(a) by Contractors to meet the requirements of regulation 53(1), and by the Authority to prepare and revise Standards and Guidelines

3. Following an Incident, a Contractor must submit a detailed report on how the plan worked well or did not work well, and how it was complied with, including, among other aspects, expenses incurred, responsibilities and updating of the plan if necessary.

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

Paragraph 2 of DR 53 seems to conflate the different roles and responsibilities between contractors, states, other International organizations, and the ISA.

For paragraph 3, we suggest that an amendment be made to reflect that there are two separate issues here, namely: (i) was the emergency response and contingency plan adequate, and (ii) was the plan complied with, as these two issues will likely require different responses from the ISA.