

**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.

1. Name(s) of Delegation(s) making the proposal:

Finland

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

Draft Regulation 44

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.

1. The Authority, sponsoring States, the Enterprise and Contractors shall ~~each, as appropriate~~within their respective competence, adopt, plan, implement and modify measures necessary for ensuring effective protection for the Marine Environment from harmful effects which may arise from Exploitation in the Area or from shipboard processing of minerals derived from the mine site, in accordance with the Convention, the Agreement, the rules, regulations and procedures adopted by the Authority ~~in respect of activities in the Area, as well as the Standards and Guidelines referred to in regulation 45.~~ To this end, ~~they shall:~~

(a) In establishing and keeping under periodic review environmental rules, regulations and procedures, as well as the Standards and Guidelines, in accordance with the Convention and the Agreement, the Authority shall:

...

(c) In taking necessary measures to prevent, reduce and control pollution, physical pressures and other hazards, including cumulative impacts, to the marine environment arising from Exploitation in the Area, the Enterprise and Contractors shall implement, mutatis mutandis, the measures set out under paragraph (a)(i) to (iii) above and demonstrate accountability and transparency in the assessment, evaluation and management of Environmental Effects from Exploitation in the Area, including through stakeholder engagement and the timely release of and access to relevant environmental data and information.

...

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

1. We do not see a need to define where the shipboard processing is taking place, and further, “immediately above a mine site” do not necessarily reflect the area affected. Guidelines should also be mentioned together with Standards.

(a) For clarity, Standards and Guidelines should be mentioned here as they are also to be kept under periodic review as techniques, practices and scientific evidence develops.

(c) Impacts from physical pressures, such as e.g. extraction, abrasion and smothering, are not included under ‘pollution’ nor ‘other hazards’ and should therefore be mentioned. In addition cumulative impacts need to be addressed.