

**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:

The Russian Federation

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

Annex VII para. 1 (a)

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.

~~Prepared in plain clear language and in an official language of the Authority, together with, where applicable, an official English language version;~~ [Prepared in clear language in an official language of the Authority.](#)

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

EMMP is prepared in an official language of the Authority. It is up to the contractor to indicate what should be an official version. In our view, every document can be provided in any of the six official languages. Ensuring the translation is one of the most basic functions of the Secretariat and this is in line with common practice of international organisations. A recommendation to provide an English version could be included without indication of it as an “official” one.

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Annex VII para. 1 (o)

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~~Details of Mining Discharges, including a waste assessment and prevention audit;~~ [Details of discharges, as defined by relevant IMO conventions, within the project area;](#)

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

In our view, the provision on Mining discharges could be kept, provided that a definition of Mining discharges will be included. It is also to be noted that mining discharges and waste are different terms. Relevant rules on discharges and dumping should be elaborated by competent organization. A clarification is needed on “prevention audit”.

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Annex VII para. 1 (f)

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An assessment of the significance of the potential Environmental Effects, and proposed ~~mitigation measures and~~ management control procedures and responses to minimize the harm from Environmental Effects consistent with the environmental impact assessment and the Environmental Impact Statement;

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

The notion “mitigation measures” is vague and has no added value in this para, as the term “management control procedures and responses to minimize the harm” is more clear and comprehensive.

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Annex VII. Paragraph 1(b)

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

It is not clear who is meant by "independent competent persons". Clarification is required.
The same is required for "verification"

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

Annex VII. Paragraph 2(i)

7. Kindly provide the proposed amendments to the regulation 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.

The location and planned monitoring and management of preservation reference zones ~~or~~ and impact reference zones, and other spatial management planning tools, if any.

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

We propose to replace the word "or" with "and", since preservation reference zones and impact reference zones should be created in any case, and also to add the words "if any".

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

Annex VII. Paragraph 2(n)

11. Kindly provide the proposed amendments to the regulation 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.

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

It is not clear what is meant by the training program for all persons engaged in activities in the project area in this case: it means their experience and training in the past or any special training before starting this project? It is also not clear how information about the training of all persons to be engaged in activities in the project area can be provided. For example, if these persons are still unknown at the moment. Clarification is required.