

**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 and send to [council2022@isa.org.jm](mailto: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 IV 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.**

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

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

It is also unclear what is exactly meant by “plain” language here, bearing in mind scientific and technical information provided in the EIS. We do not consider this word appropriate. EIS 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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Executive summary 2.1

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2.1 Applicable mining and environmental legislation, policy, and ~~agreementsinstruments~~ rules, regulations and procedures of the Authority

Outline the national ~~and international~~ legislation and policy adopted in accordance with article 209 of the Convention, regulations or guidelines as well as the Regional Environmental Management Plan of the Authority that apply to the management or regulation of Exploitation in the Area, including how the proposed operation will comply with ~~implement~~ them.

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

We support the approach for ranking relevant instruments. Norms on mining and environmental issues are of foremost importance and include ISA rules and national legislation, that should be adopted in accordance of article 209 of the Convention. The term “comply with” has a wider meaning, and more accurately reflects the goals of the projects.

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2.2 Other applicable [national](#) legislation, policies and regulations

Outline any other legislation, policies or regulations that do not necessarily apply specifically to seabed mining or the environment, but may be relevant to the proposal (e.g., shipping regulations, maritime declarations, ~~marine scientific research, climate change policies, Sustainable Development Goals~~). ~~This section should also refer to national regulations and laws that relate to the effects of Exploitation activities on coastal States, or other places where components of Exploitation (e.g., processing) could occur.~~

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

Section 2.2. should refer to national legislation exclusively, as relevant international agreements are included in section 2.3.

In our view, climate change policies relate to environmental policies covered by section 2.1. The last sentence deals with issues related to the mining activities and environmental protection, which are also covered by the previous section.

Marine scientific research is a specific activity, this provision seems not relevant for Exploitation project.

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Annex IV Executive Summary para. (d)

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(d) ~~Mitigation~~ measures to minimize environmental impacts;

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

The word “mitigation” in this sentence has no additional value. The term “measures to minimize environmental impacts” is comprehensive and clear.

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

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

Annex IV. Executive Summary. Paragraph 6.2.5

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.

~~Area-based management tools~~

~~Describe any relevant area-based management established under subregional, regional or global processes and the scope, geographical coverage and objectives of such tools. Also describe any relevant area-based management in adjacent areas under national jurisdiction.~~

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

Area-based management tools are measures within specific regional mechanisms and seems to be outside the scope of socioeconomic environment.

Furthermore, list of States Parties to different regional instruments is not the same. It is proposed to omit this para.

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Annex IV. Executive Summary. Para(e)

3. 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.

(e)Linkages with ~~the Authority’s global environmental policy and strategy~~ and the applicable regional environmental management plan and the development of the Environmental Monitoring and Management Plan; and

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

A summary of the content of the EIS should be brief and informative. For that purpose information requirements should be clear. It is proposed to omit categories, that are not clear as “the Authority’s global environmental policy and strategy”

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Annex IV. Executive Summary. Paragraph 4.5

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[Describe the regional geological framework of the seabed hosting mineral resources, including bathymetry data, geomorphological settings and occurring tectonic and magmatic processes, lithology of host rocks, sedimentary cover extent and sedimentation rates, nature and extent of mineral resources. Give additional focus on hydrothermal vents, seeps, seamounts etc.](#)

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

We presumed the suggested wording is more correct.

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

Annex IV. Executive Summary. Paragraph 4.6

**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.**

Provide a description of oceanographic aspects such as thermohaline conditions, optical properties and turbidity, currents regime, tides, waves, turbulence, and oceanographic fronts and eddies. ~~currents, sedimentation rates oceanographic fronts, eddies, particle flux and waves.~~ Seasonal variability is an important element. Detail is required on the regional setting, as well as the specific site, and should include changes in physical conditions and processes according to depth and horizontal distance from the proposed mine site (near-field, far-field)

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

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

Annex IV. Executive Summary. Paragraph 4.7

**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.**

~~5.~~ Provide a description of water mass hydrochemical characteristics at the site and above the site at various depths of the water column; oxygen (including the structure and development of the oxygen minimum zone), nutrients, pH, carbonate system, trace metals, organic and inorganic matter, particle concentrations and particle fluxes ~~including the structure and development of the oxygen minimum zone in particular near the sea floor (up to 200m above bottom), that includes nutrients, particle~~

~~loads, temperature and dissolved gas profiles~~, vent-fluid characteristics if applicable, [in particular near the sea floor \(up to 200m above bottom\)](#), ~~turbidity and geochemistry, etc.~~

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

We presumed the suggested wording is more correct. [Besides that, turbidity is hydrophysical characteristic.](#)

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

Annex IV. Executive Summary. Paragraph 4.8

**15. 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.**

Provide a description of substrate composition, including [its](#) physical and chemical properties (e.g., sediment ~~composition, lithology, physical and mechanical properties, chemical composition of sediments, oxidation-reduction state, pore water chemistry, rates and depth of bioturbation, etc.)~~

~~pore-water profiles, grain size, sediment mechanics)~~

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

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**17. Name(s) of Delegation(s) making the proposal:**

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

Annex IV. Executive Summary. Paragraph 7.5

**19. 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.**

~~Provide a description of the effects on the current speed/direction and sedimentation rates, etc. A regional oceanographic model will be relevant to this section.~~

Provide a description of the impacts (e.g., sediment plume generation, discharge water) and their effects on the oceanographic settings (e.g., changes in temperature and salinity of water, optical characteristics and turbidity, etc.). A regional oceanographic model will be relevant to this section. Characteristics of sediment and discharge plumes (their frequency, spatial extent, composition and concentration, etc.) should be described (or a reference is made to subparagraph 7.6)

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

It is not clear how exploitation activities can affect the current speed/ direction, because currents are the result of the relationship of a complex of forces and conditions in the ocean. We propose another wording of the subparagraph.

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Annex IV. Executive Summary. Paragraph 6.2.1

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If the project area occurs within an area used by fisheries, then this needs to be described here. This should include description of areas of significance for fish stocks, such as spawning grounds, nursery areas or feeding sites ~~as well as ecologically or biologically significant marine areas~~

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

"Ecologically significant marine areas" are not linked to fisheries. Besides it is not entirely clear what is meant by "ecologically significant marine areas" and how they will be identified as well as "biologically significant areas".

Further consideration is needed of terminology, in particular, "project area" is needed.

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

Annex IV. Executive Summary. Paragraph 7.6

**23. 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.**

Provide a description of the impacts (e.g., sediment plume generation, discharge water) and their effects on the hydrochemical settings of the water column (e.g., clarity of water, particle concentrations and particle fluxes, dissolved gases and nutrient levels, carbonate system, trace metals, organic and inorganic matter, etc.), in all relevant levels of the water column. ~~Provide a description of the effects such as sediment plume generation (frequency, spatial extent, composition and concentration) and the clarity of water, particulate loading, water temperature, dissolved gas and nutrient levels etc., in all relevant levels of the water column.~~ A regional oceanographic model will be relevant to this section. For a sea floor massive sulphide project, the modification of vent-fluid discharges, if present, should be addressed. Characteristics of sediment and discharge plumes (their frequency, spatial extent, composition and concentration, etc.) should be described (or a reference is made to subparagraph 7.5).

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

We presumed the suggested wording is more clear and comprehensive.

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**25. Name(s) of Delegation(s) making the proposal:**

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

Annex IV. Executive Summary. Paragraph 8.2

**27. 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.**

This section is an overview and description of the categories of general impacts caused by the mining operation. This is not expected to be detailed, but rather to introduce the major types of [impacts and their](#)-effects, such as habitat removal, the crushing of animals, the creation of sediment plumes, noise and light, etc. A description should be included of any lessons learned from activities during the exploratory phase of the programme (e.g., mining system component tests).

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

We presumed the suggested wording is more correct.