

**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.

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.

The Environmental Impact Statement prepared under these regulations and the present annex shall:

(a) Be prepared ~~in plain language and~~ in an official language of the Authority ~~together with an official English language version, where applicable;~~

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

Environmental Impact Statement should be 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. It is preferable to include a recommendation to provide an English translation.

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.

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

Executive summary, para (e)

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.

Click or tap here to enter text.

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

It is not clear what is meant by “the Authority’s global environmental policy”

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

Section 3. Paragraph 3.7

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.

~~Provide an account of alternative options that were considered and rejected in favour of the current proposal.~~ Provide an account of alternative options, if any, that were considered and rejected in favour of the current proposal.

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

it is not clear whether providing “an account of alternative options that were considered and rejected in favour of the current proposal” is considered mandatory or not. We propose to add the words "if any"

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

Section 4. Paragraph 4.5

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.

It is proposed to amend the text as follows:

«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.»

~~Describe the nature and extent of the mineral resource and bedrock within a broader geological context. Describe the general geological landscape and topographic features geological petrographic and geomorphological setting of the site, including high resolution bathymetric maps and sedimentation rates, and refer to submarine features such as hydrothermal vents, seeps and seamounts~~

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

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

Section 4. Paragraph 4.6

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.

It is proposed to amend the text as follows:

Provide a description of oceanographic aspects such as thermohaline conditions, optical properties and turbidity, currents regime, tides, waves, turbulence, and oceanographic fronts and eddies. 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)

~~Provide a description of oceanographic aspects such as 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)~~

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

Section 4. Paragraph 4.7

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.

It is proposed to amend the text as follows:

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, vent-fluid characteristics if applicable, in particular near the sea floor (up to 200m above bottom)

~~Provide a description of water mass characteristics at the site and above the site at various depths of the water column, 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, turbidity and geochemistry, etc.~~

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

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

Section 4. Paragraph 4.8

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.

It is proposed to amend the text as follows:

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, vent-fluid characteristics if applicable, in particular near the sea floor (up to 200m above bottom)

~~Provide a description of substrate composition, including physical and chemical properties (e.g., sediment composition, pore water profiles, grain size, sediment mechanics)~~

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

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

Section 6. Paragraph 6.2.1

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.

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

It is not entirely clear what is meant by "ecologically significant marine areas" and how “ecologically significant marine areas” will be identified as well as biologically significant areas”. Clarification is required

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

Section 7. Paragraph 7.5

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.

It is proposed to amend the text as follows:

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)

~~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~~

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

It should be taken into account that currents are the result of the relationship of a complex of forces and conditions in the ocean. With that it is not clear how exploitation activities can affect the current speed/ direction.

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

Section 7. Paragraph 7.6

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.

It is proposed to amend the text as follows:

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. 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)

~~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~~

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

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

Section 8. Paragraph 8.2

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.

We propose the following wording of the subparagraph:

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.

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

We propose to add the words "impacts and their" and reword the second sentence as proposed.