

**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:

United Kingdom

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

Annex IV

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.

4.6 Physical oceanographic setting

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).

5.4.1 Surface

Describe the biological environment from the surface to a depth of 200 metres, including plankton (phytoplankton and zooplankton), surface/near-surface fish such as tuna, and seabirds, **marine turtles** and marine mammals. The description should also evaluate the temporal and spatial variability in distribution and composition.

6.2.1 Fisheries

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 (move to Section 5 – see below)**

5.2 Regional overview

Provide general regional context, and include site-specific issues and characteristics, existing Regional Environmental Management Plan, areas of particular environmental interest, **ecologically or biologically significant marine areas (moved from Section 6)** and national areas of adjacent countries, if any. References to relevant technical data and previous studies should also be included. This section should be brief, but provide broader context for the more detailed site-specific description below.

5.4 Biological Environment

The description needs to detail faunal communities in the water column down to the Mining Area, including migratory and highly mobile species, their relationship to the natural habitat, including the mineral resource, and the functional ecological relationships across groups to assess the scale of impacts to be expected if mining occurs.

7.9 Noise and light

Noise and light above existing levels—**especially the impacts of noise on marine mammals.**

9.5 Summary of existing **socioeconomic and sociocultural environment**

A table may be a useful summary format. Potential cumulative effects should also be included.

13. Consultation

Describe the nature and extent of consultation(s) that have taken place with parties identified who have existing interests in the proposed project area and with other **relevant sStakeholders.**

13.1 Consultation methods

Describe the mechanism(s) used to consult with different groups and how this aligns with any relevant consultation obligations.

13.2 Stakeholders

List ~~any relevant sStakeholders~~ that have been consulted and explain the process by which **sStakeholders** were identified.

13.3 Public consultation and disclosure

Provide a description of the goals and consultation workshops/meetings that occurred prior to the preparation of the report. Include a description of **key the** concerns and comments identified by **sStakeholders** and ~~whether or not~~ how these **applicant intends to will be** addressed ~~these concerns~~, and, if not, describe the reasons for that decision.

13.4 Continuing consultation and disclosure

Outline any further consultation with **sStakeholders** that has been deemed necessary and is being planned

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

We note text from ISBA/26/C/CRP.1 Annex V 1(b) 'based on data from, as a general rule, 15 years of monitoring and' has not been carried over to ISBA/27/C/IWG/ENV/CRP.1. This provision should be included in the EIA & EIS Standard.

2 (2.3) Agree to facilitators text suggestion in explanatory comment ISBA/27/C/IWG/ENV/CRP.1:

In light of the proposed additional instruments considered potentially applicable by delegations, as reflected in the second part of the paragraph, and of the fact that sponsoring States, flag States and port States may not all be parties to the specific instruments, consideration could be given to including a more general formulation along the following lines:

"In addition to the United Nations Convention on the Law of the Sea and the 1994 Agreement relating to the Implementation of Part XI of the Convention, list the international agreements applicable to the operation, such as the International Maritime Organization environment and safety-related conventions, applicable environmental and biodiversity conventions, and applicable regional agreements."

and put detail of minimum list of applicable international agreements into relevant Standards and/or Guidelines.

5 (5.4) AGREE with additional para, but should read 'faunal' communities.

5 (5.4.1) AGREE with text, but 'sea turtles' or 'marine turtles' should be included. This also applies to (8.3).

6 (6.2.1) Agree with inclusion of EBSAs but should be in section 5 on "biological".

(7) (7.9) Suggest addition of 'especially the impacts of noise on marine mammals'

(9) (9.5) This should read 'Summary of socioeconomic and sociocultural environment' to be in line with 9.4 (linked with comment on (6)). Suggest the same for Section 6.

(13) Consultation should be undertaken with 'all' Stakeholders not just 'relevant'. References to Stakeholders should be capitalized as this term is defined in Schedule Use of terms and scope: "*Stakeholder*" means a natural or juristic person or an association of persons with an interest of any kind in, or who may be affected by, the proposed or existing Exploitation activities under a Plan of Work in the Area, or who has relevant information or expertise"
