

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27<sup>TH</sup> SESSION:  
COUNCIL - PART II**

***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:**

Submitted by WODA (World Organization of Dredging Associations)

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

Draft Reg. 44(1)(a)(i)

**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.**

(i) Apply the precautionary ~~approach~~ ~~principle~~, as reflected in principle 15 of the Rio Declaration on Environment and Development and the **ecosystem-based management approach** to the assessment and management of risk **of harm** to the Marine Environment from Exploitation in the Area;

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

- We support “Precautionary Approach” as defined by the Rio Declaration Principle 15, not “Precautionary Principle”.
- Principle is not a practical concept and could essentially stop any actions where there is some risk or unknown effect, whereas approach can move things forward in a cautious manner allowing for some risk and encouraging research to address known information gaps.
- Regulation 46bis uses the term, practicable. ((c) The Identification of measures envisaged to prevent, mitigate or if possible, offset, and manage harmful Environmental Effects and risks **to as low as practicable**, including through the development and preparation of an Environmental Management and Monitoring Plan;). Using “Principle” in Regulation 44 is not consistent with practicable actions.
- Several times in the draft regulations, actions are said to be consistent with or in accordance with Good Industry Practice, Best Available Scientific Evidence, Best Environmental Practices, and Best Available Techniques. This is precautionary approach, not precautionary principle.