

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH SESSION:
COUNCIL - PART III**

Informal Working Group on ENVIRONMENT

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to council@isa.org.jm.

1. Name of Working Group:

IWG ENVIRONMENT

2. Name(s) of Delegation(s) making the proposal:

CHINA

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

Annex IV Environmental Impact Statement

4. 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.

***Note:China's amendments are in Blue**

2. h "Details of the proposed monitoring stations across and beyond the [project contract](#) area".

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

The term "project area" means the actual operation area. It is reasonable to cover the project area with monitoring stations. And "project area" is also used in Annex VII.2.(q). There should be consistency between provisions.

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3.2 "Estimates of the inferred indicated resource ~~and probable reserves~~ should be provided on the basis of the international CRIRSCO reporting template....."

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

The Recommendations for the guidance of contractors on the content, format and structure of annual reports (ISBA/21/LTC/15) suggests that information such as inferred resources should be submitted in the annual reports of contractors, but does not require that probable reserves should be submitted.

Article 10 of Annex V of the document provides that measured mineral resources may be converted into either proved mineral or probable mineral reserves. Measured mineral resources may be converted into probable mineral reserves because of uncertainties associated with some or all of the modifying factors that are taken into account in the conversion from mineral resources into mineral reserves. Article 28 provides that an indicated mineral resource has a lower level of confidence than that applying to a measured mineral resource and may only be converted into a probable mineral reserve. Thus, the "probable reserves" is only a form of presentation of the presumed resource but not an inevitable outcome of all exploration results. At the same time, both the Exploration Regulations and the Draft Exploitation Regulations contain requirements for the confidentiality of exploration data and information, and

in the absence of an explicit requirement from the Authority, contractors can choose whether or not to disclose the probable reserves according to their needs.

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3.3.2-3.3.5

It is suggested to delete the sentence "Describe the energy requirements of the requisite machinery"

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

The energy requirements of the four major systems and installations of mining are neither directly related to nor normally a part of the EIS. Energy requirements may also involve commercial confidentiality and should not be specified here.

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~~4.5 “Provide a baseline description of seabed substrate composition characteristics (to benthic subsurface layers), including specific gravity, bulk density, grain size, dissolved and particulate organic and inorganic carbon, nutrients, carbonate, physical and chemical composition of pore water, redox regimes, and spatial (horizontal and vertical) and temporal (seasonal and interannual) variability in these characteristics. Substrate composition shall be described to a depth below the seafloor prescribed in the relevant Standard or Regional Environmental Management Plan.”~~

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

This part is too detailed to be provided for in the Regulation. It is suggested to be included in the relevant standard or guidelines.

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4.7 ~~“Provide projections of how and where these aspects are likely to change over the next 50 years”~~

4.11 ~~“Effects of mining on ocean climate mitigation functions and services should be described”~~

5.4.3 ~~“The description should also evaluate the temporal and spatial variability in distribution and composition”~~

5.4.4 ~~“The summary should consider [trophic relationships, ecosystem functioning, benthic-pelagic couplings,]”~~

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

It is difficult to provide the mentioned information with available data and current technology. Even if the information is provided, it might be difficult to reach consensus on the conclusions.

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~~9.4bis “Assess and analyse how the proposed operations may impact on gender roles and relationships.”~~

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

"Gender roles and relationships" is only one element of the socioeconomic environment and it is difficult to prove that deep seabed mining has a particular impact on gender roles and relationships. Therefore, it seems unnecessary to highlight the gender element here.