

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

*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](mailto:council@isa.org.jm).*

**1. Name of Working Group:**

**IWG-Environment**

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

**Japan**

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

**Annex VII Environmental Management and  
Monitoring Plan**

**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.**

2 (c)bis A description of the environmental baseline data, including measured baseline values for parameters at the site, a characterization of the area proposed to be mined, adjacent areas that could be affected by mining, ~~rare and endangered species present~~, and areas that will be avoided due to their environmental value.

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

It is unclear why only “rare and endangered species” are listed here, and not “endemic species” or “keystone species”. Moreover, the contractors, who are responsible for preparing the Environmental Management and Monitoring Plan (EMMP) as well as members of the LTC and the Council, who are responsible for reviewing and approving the plan, are not able to confirm the existence of the rare and endangered species in the planned mining area. In fact, in the IUCN red list, there is no registered species distributed in the abyssal plain (where manganese nodules exist), and also in the sea mounts area (where cobalt-rich ferromanganese crust exist)(only endangered species (Endangered · EN B2ab(iii)) such as scaly-foot that inhabit the vicinity of hydrothermal vents are included in the list.). As including “rare and endangered species present” to the

EMMP is not feasible, we suggest removal of “rare and endangered species” from this sentence.