

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH 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.

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

SPAIN

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

Annex (IV)

Executive Summary

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.

One of the main objectives of the executive summary is to provide an overview of the project and a summary of the content of the Environmental Impact Statement for non-technical readers. Information provided in the executive summary should include:

- (a) A description of the proposed project, its objectives, a description of alternatives analysed, and a justification of the alternative chosen;
- (b) Economic, financial and other benefits to be derived from the project;
- (c) Anticipated impacts of the activity [including but not limited to(, oceanographic, geological, biological, socioeconomic), including cumulative impacts;

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

The executive summary should include the alternatives that have been considered (if any), and the characteristics of the chosen one.

In relation to the anticipated impacts of the activity, those related to biological impacts should be taken into consideration.

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Annex (IV)

2. Policy, legal and administrative context

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.

2.1. Applicable mining and environmental legislation and policies ~~policy, and instruments, rules, regulations and procedures of the Authority~~

Outline the national and international legislation and policies ~~and policy~~ adopted in accordance with article 209 of the Convention, included rules, regulations, and procedures, ~~sStandards or~~ and guidelines as well as the Regional Environmental Management Plan of the Authority, ~~if any that are applicable to the proposed mining operation apply to the management or regulation of Exploitation in the Area, including how the proposed operation will implement them.~~

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

Article 209 (1) of the Convention mentions “international rules, regulations and procedures established in accordance with Part XI” and Article 209 (2) refers to national “laws and regulations”. Section 2 of Annex IV refers to “Provide information on the relevant policies, legislation, agreements, standards and guidelines that are applicable to the proposed mining operation.

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Annex (IV)

3. Description of the proposed project

3.1.2 Associated activities

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4.1.2 Associated activities

Describe the supporting activities and infrastructure required (e.g., transportation corridors, ports for disembarkation of vessels, ports for unloading of ore that are outside the direct mining site, anchoring areas for vessels and machinery).

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

We think anchoring areas for vessels and machinery can be mentioned explicitly, since they will be a key supporting activity for seabed mining.

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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.

1. Name of Working Group:

Informal Working Group on the Protection and Preservation of the Marine Environment

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

Spain

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

Annex IV paragraph 5

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.

Give a detailed account of knowledge of the biological communities and ecosystem functions in the Impact Area, including information from a thorough literature review and baseline data collected from on-site campaigns, in accordance with the Regulations

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

In paragraph 4 there is an explicit reference to “from on-site studies”. On site campaigns are needed to obtain all the information needed.

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Spain

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

Annex IV paragraph 5.4.3.

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.

Describe the benthic microbial, ~~invertebrate~~ and fish communities,

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

There is a need to add a “comma”. Otherwise only microbial invertebrates would be addressed

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Annex (IV)

7. Assessment of impacts on the oceanographic environment and proposed Mitigation

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7.2 Description of potential impact categories

Provide an overview and description of the categories of potential impacts caused by the proposed mining operation. This should introduce the major types of potential impacts, such as habitat removal, variations in communities' composition, the creation of sediment plumes, noise, and light

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

Variations in communities' composition is one of the likely effects of seabed mining, as mentioned in diverse scientific reports.

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Annex IV paragraph 8

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.

Add two new subparagraphs on “Compensation measures” and on “Impacts in Marine Protected Areas” with the consequent following subparagraphs: “potential impacts and issues to be addressed”, “Environmental management measures to mitigate impacts” and “residual impacts”

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

In paragraph 46bis.2.c there is a reference to the possibility of “offset environmental effects”. This concept may be put in place through “compensation measures” that are missing in all this paragraph 8 where only mitigation measures are mentioned. Therefore, for the sake of coherence, compensation measures also need to be included.

We propose a new subparagraph addressing impacts in “Marine Protected Areas” in which the impact and the implications for the site in view of the site's conservation objectives will be assessed.

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13. Consultation

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Describe the nature and extent, participation and outcomes of consultation(s) that have taken place with ~~parties identified who have existing interests in the proposed project area and with other relevant Stakeholders,~~ and how their comments have been addressed in the Environmental Impact Assessment.

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

It is necessary to include in the Environmental Impact Assessment how the comments / suggestions of Stakeholders have been addressed.