

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

1. Name of Working Group:

IWG Environment

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

United Kingdom

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.

2.2 Other applicable national legislation, policies and regulations

Outline any other legislation, policies or regulations that do not necessarily apply specifically to seabed mining or the environment, but may be relevant to the proposal (e.g., shipping regulations, maritime declarations, ~~marine scientific research, climate change policies, Sustainable Development Goals~~).

3. Description of the proposal development project

Provide details of the proposed ~~development activity project~~, including relevant diagrams and drawings. It is understood that most projects will likely involve the recovery of minerals from the Area, with the concentrating process(es) occurring on land within a national jurisdiction (outside the jurisdiction of the Authority). While it is expected that this section would provide a ~~brief~~ description of the entire project, including offshore and land-based components, the Environmental Impact Statement should focus on those activities occurring within the Authority's jurisdiction (e.g., activities related to the recovery of the minerals from the Area up to the point of trans-shipment).

4. Description of the existing ~~physiochemical~~ physiochemical oceanographic environment

4.6 Physical oceanographic setting

Provide a description of oceanographic aspects such as thermohaline conditions, optical properties and turbidity, currents regime, tides, waves, turbulence, and oceanographic fronts and eddies including spatial variation at and above the site. 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).

4.7 Chemical oceanographic setting

Provide a description of water mass characteristics at the site and above the site at various depths of the water column, including the structure and development of the oxygen minimum zone in particular near the sea floor (up to 200m above bottom), that includes nutrients, particle loads, temperature and dissolved gas profiles, vent-fluid characteristics if applicable, turbidity, etc.

Provide a description of chemical oceanographic properties at the site, and above the site throughout the water column and horizontally from the proposed mine site, that includes nutrients, particle loads, temperature, oxygen, salinity, density, particulate and dissolved organic matter, pH, chemical composition, including concentrations of trace metals, dissolved gas profiles, depth range and characteristics of oxygen minimum zone, redox regimes, carbonate saturation, and spatial (horizontal and vertical) and temporal (seasonal and interannual) variability of these properties, and vent-fluid characteristics if applicable. Provide projections of how and where these aspects are likely to change over the next 50 years (or time period relevant to the contract term and subsequent Closure period.)

5. Description of the existing biological environment

Give a detailed account of knowledge of the biological communities' composition and structure and ecosystem functions in the Impact Area, including information from a thorough literature review and baseline data collected, in accordance with the Regulations.

5.4.3 Benthic

Describe the benthic microbial invertebrate and fish communities, including infauna, epifauna and demersal fish, up to an altitude of 50 metres above the sea floor. This should include considerations of species richness, biodiversity, faunal densities, community structures and connectivity, etc. Ecosystem functions, such as Bioturbation habitat supply and elemental cycling etc. should also be covered in this section. The description should also evaluate the temporal and spatial variability in distribution and composition.

6.2.5bis Other mineral exploration

...

6.2.6 Other

List other uses of the project area that are not related to the above (e.g., other mineral exploration, exploitation projects, [traditional navigation], marine genetic resources, global-scale regulating and supporting ecosystem services).

8.5 - Benthic Description of the potential effect on benthic invertebrate, microbial and fish communities, including infauna, epifauna and demersal fish, up to an altitude of 50 metres above the sea floor.

9.5 Summary of existing– socioeconomic and sociocultural environment

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

2.2 – To futureproof the regulations, we suggest not referring to Sustainable Development Goals, which only run until 2030, and referencing them in the EIA/EIS Standards and/or Guidelines so that they can be more easily updated/reviewed.

3 (first para): We propose that 'brief' should be removed from the first paragraph of 3. The executive summary is the brief overview, section 3 should provide a full description of the entire project. However, if keeping the EIA to a reasonable length to consider is the aim of such wording, we would consider putting a page limit on EIA submissions would be appropriate.

4 (Title): We propose that 'physiochemical' should be reinserted to the Title as we consider this distinct from just the oceanographic environment.

4 (first para): We note 'impact area' has been added. This needs to be defined and consistently capitalised. It should also be made clear in this para that information will also need to be included

from Impact and Preservation Reference Zones (IRZ and PRZs). This comment applies across Annex IV.

4 (4.6) We support the text but consider it should include, '**including spatial variation at and above the site**', after '**eddies**'.

4 (4.7) We support the text additions but note the inserted text does not make any reference to the need for providing information on chemical oceanographic settings along a horizontal distance from the proposed mine site (as it does in Para 4.6 'Physical oceanographic setting']). We suggest this is added for consistency.

5 (first para) the term 'biological communities' should be followed by the terms 'composition and structure' as both of these elements of biological communities need to be included.

5.4.3; We suggest that two ecosystem functions should be added here after bioturbation if examples are to be listed, as we consider that they are key: 'habitat supply and elemental cycling'

(6) (6.2.6) We propose that 'other mineral exploration, exploitation projects' should be separated out into its own clause and not be included in 6.2.6 with MGR and other uses.

Sections 7,8&9: The terminology and definition of Cumulative Effect/Impact needs to be consistent across the regulations, including annexes, Schedule, Standards and Guidelines.

8(8.5) 'microbial' is missing after benthic.

9) (9.5) This should read 'Summary of socioeconomic and sociocultural environment' to align with 9.4 .