

**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.

- **Name of Working Group:**

Informal working group on the protection and preservation of the marine environment – IWG ENV

- **Name(s) of Delegation(s) making the proposal:**

United States

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

Annex VII Paragraph 2

- **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. An Environmental Management and Monitoring Plan shall contain:

(o) ~~Details of Mining Discharges, including a waste assessment and prevention audit~~Details of discharges, including those as defined by relevant IMO conventions, within the project area;

...

(s) Details of reporting requirements and timing, including details of the methodology to be applied to ensure that monitoring data submitted are provided in an accessible and interpretable format consistent with best scientific practices.

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

- In paragraph (o), limiting this to discharges as defined under IMO conventions may not capture all discharges of relevance to the ISA. E.g., Article 145 provides that "drilling, dredging, excavation, disposal of waste, construction and operation or maintenance of installations, pipelines and other devices related to such activities" are "activities in the Area," and therefore under the remit of the ISA (see also ISA Technical Study No. 25, which states "Article 145 of UNCLOS, expressly and exclusively empowers ISA to regulate for the prevention, reduction and control of pollution and other hazards to the marine environment from activities in the Area.")

- In paragraph (s), we recommend that details on data submission formatting be added for consistency with the suggested proposal for DR 44 on applying best scientific practices to environmental data and information submissions from mine sites.