

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28<sup>TH</sup> SESSION:  
COUNCIL - PART I**

*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:**

President

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

Republic of Costa Rica

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

Annex VI

**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.**

**Health and Safety Plan**

(c) ~~Be designed with the aim to e~~Ensure that all personnel on a vessel or installation engaged in activities in the Area are provided with safety and health protection, including occupational safety and health protection, and live, work and train in a safe and hygienic environment ~~with roles and responsibilities allocated to relevant named personnel appropriately~~;

(h) Be worded in plain language ~~and, for submission as part of the application for approval of a plan of work, prepared in an official language of the Authority.~~

(i) Be gender-sensitive, and specifically address women’s safety, and freedom from harassment in the workplace, and consider other issues relevant to ensuring an equitable and inclusive working environment for a diverse workforce.

(n) A description of the equipment and tools to be provided to ensure that all operations are conducted in such a manner as to minimize any adverse effects on ~~the workers’~~ occupational safety and health ~~of personnel~~ to the extent necessary;

**Maritime Security Plan**

(h) Be gender-sensitive, and specifically address women’s security, and any other issues relevant to ensuring maritime safety measures are applied equitably and inclusively for a diverse workforce

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

General comment - we note the frequent term ‘as a well as applicable international rules and standard’ as seen in para (1)(b) used frequently in the draft regulations. We believe for the regulations to be accompanied by Standards or Guidelines from the ISA to assist Contractors understand what laws and rules are considered ‘applicable’. For Annex VI,

where the Contractor is a private sector entity, so not directly bound by international treaties of the ILO or IMO; and where there may be overlapping or conflicting national legal regimes on relevant issues between the vessel flag state, and the ISA sponsoring State.

For paragraph (h), we suggest this be amended to be consistent with DR 7, which requires “Each application for approval of a Plan of Work shall be in one of the languages of the Authority together with an official English-language version”.

For paragraph (i), we suggest this be gender-sensitive, and specifically address women’s safety, and freedom from harassment in the workplace, and consider other issues relevant to ensuring an equitable and inclusive working environment for a diverse workforce.

For paragraph (n), ‘personnel’ rather than ‘worker’ would be consistent with the rest of this Annex, and would also avoid inadvertent exclusion of persons on the vessel who might not fall within the definition of a ‘worker’ for the Contractor, for example, trainees, volunteers, temporary staff, agency staff, observers etc