

TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS FOR THE 28TH 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:

Submitted by the International Marine Minerals Society (IMMS)

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

Annex IV (EIS) (1) (b) from Dr Taga's (Facilitator the IWG on the Protection of the Marine Environment) further revised **text**, made available on 3 March 2023:

<https://www.isa.org.jm/wp-content/uploads/2023/03/ENV-Facilitator-further-revised-text.pdf>

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.

(b) Provide information in accordance with the relevant regulations, ~~applicable regional environmental management plan, Standards and Guidelines, and corresponding to the scale and potential magnitude of~~ the activities, to assess the likely Environmental Effects of the proposed activities. Such effects shall be discussed in proportion to their significance. Where an applicant or Contractor considers an Environmental Effect to be of no significance, there should be sufficient information to substantiate such conclusion, or a brief discussion as to why further research is not warranted;

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

- The text provided appears to place a new requirement of 15 years of baseline studies. We note the appropriate duration of baseline studies is dependent on many things, such as the impacts of the proposed project and their scale and duration, the natural variability of the existing environment, the mitigation practices envisaged, etc., and a timeframe less than or greater than 15 years may be appropriate. We note this new requirement does not align with any current ISA guidance, recommendation, or guideline. We recommend the removal of the reference to 15 years of monitoring.

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