

TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS FOR THE 28<sup>TH</sup> 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](mailto: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.**

Definition of Best Available Techniques from [President's Text](#) – Schedule – Use of terms and scope

**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.**

**Alt. 1** “Best Available Techniques” means the most appropriate processes, within reasonable technical and economic constraints, facilities or methods of operation that indicate the practical suitability of a particular measure for the avoidance, prevention, reduction and control of pollution and the protection of the Marine Environment from the harmful effects of Exploitation activities, taking into account the guidance set out in the applicable Guidelines.

**Deleted:** [the latest stage of development, and state-of-the-art processes, [within reasonable technical and economic constraints,] of

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

There are a number of terms that need better definition. These terms should be defined with input from the whole spectrum of ISA stakeholders.

There are also a few terms that have been defined (see Schedule, Use of terms and scope, of the President's Text) for which we see room for improvement.

- We do not support the definition of “Best Available Techniques” provided in Alt.2, and support Alt. 1, subject to some additional amendments. We consider that the concept of “Best Available Techniques” does not always mean the latest or state-of-the-art technology.

**Deleted:** Alt. 2 [“Best Available Techniques” means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing the basis for emission limit values and other permit conditions designed to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole: