

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27<sup>TH</sup> 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](mailto:council@isa.org.jm).*

**1. Name of Working Group:**

IWG - Environment

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

Republic of Nauru

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

Annex IV, Paragraph 1(b)

**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.**

(b) Provide information, ~~based on data from, as a general rule, a minimum of 15 years of monitoring,~~ in accordance with the relevant regulations, ~~requirements of the relevant regional environmental management plans, and applicable~~ Standards and ~~taking into account the relevant applicable Guidelines and taking into account the relevant applicable regional environmental management plan,~~ 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;

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

We consider the reference to a minimum of 15 years of monitoring arbitrary, and do not understand the basis or rationale for its inclusion. The Commission’s Recommendations for the guidance of contractors for the assessment of the possible environmental impacts arising from exploration for marine minerals in the Area (document ISBA/25/LTC/6/Rev.2) recommends over at least 3 years at paragraph 46 of Annex I. We suggest the phrase/term is deleted.

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Annex IV, Paragraph 13(1)

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**Provide a description of** the nature and extent, participation and outcomes of consultation(s) that have taken place **with relevant** Stakeholders, **and how ~~their~~any substantive and relevant** comments have been addressed in the Environmental Impact Assessment.

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

Consistent with other comments, we consider that appropriate qualifiers “substantive and relevant” should be added to Paragraph 13.1.

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Annex IV, Paragraph 13(3)bis

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See comments below.

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

We support the process and framework contained in Paragraph 13.3, specifically the Commission’s role in providing feedback and recommending a scoping report and proposed terms of reference for the environmental impact assessment.

However, we are in a state of limbo with contractors progressing work under their exploration contracts, and yet to be adopted exploitation regulations which set the parameters for documentation and processes to be undertaken in the exploration phase with a view to an application for a plan of work for exploitation.

We note, for example that some contractors have prepared scoping reports, but the Commission was not in a position to provide any feedback or recommendations in the absence of adopted exploitation regulations.

We consider that due recognition be given to work undertaken including for those contractors that have already prepared a scoping report and have commenced the preparation of an environmental impact assessment in the absence of a recommendation from the Commission.