

**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.**

Regulation 46(2)&(3)

**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.**

2(d) Undergo ~~periodic an annual management review~~ management review and include the results and details of any changes to the system in the Contractor’s annual reports and the performance assessment of the Environmental Management and Monitoring Plan under Regulation 52.

3. A proposed material change to a Contractor’s Environmental Management System shall be treated the same as a modification of a Plan of Work, pursuant to regulation 57.

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

An Environmental Management System will evolve as knowledge advances and best practices identified. This is a dynamic process that should be supported and encouraged, provided that a contractor’s EMS remains within the parameters of this regulation and the applicable standard and applicable guideline.

We consider that treating *any* change as a modification of a plan of work, over-regulation, and that this paragraph be limited to *material* changes. Equally, any changes to the EMS can be reflected in the contractors’ annual report and reviewed by the Commission during its review of the annual report. The Commission may then seek clarification of or further information on any changes made. This will also contribute to the development of best practices for environmental management systems through revised guidelines.