

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH 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.

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 46ter(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.

~~3. The Environmental Management and Monitoring Plan shall contain a monitoring programme for at least the first seven years of Exploitation, to be conducted by independent experts and in compliance with the applicable Standards.~~

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

We question the practicalities of the newly proposed text in paragraph 3, specifically the requirement that independent experts conduct monitoring of activities for at least the first 7 years of exploitation.

We consider it is the contractor’s obligation to perform its monitoring programme in accordance with its approved EMMP and it appears excessive to require the contractor to outsource this obligation for at least the first seven years of exploitation.

We also understand that the availability of such independent experts with the requisite knowledge, not least for the timeframe envisaged to conduct monitoring under an EMMP to be at best limited.

We propose the deletion of paragraph 3 on the basis it is unnecessary, and that the contractor’s monitoring programme will be reviewed in accordance with regulation 58.