

**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 47(3)(c)

**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.**

(c) ~~include~~—Identify substantive and relevant comments received through the Stakeholder consultation process and an explanation of how such comments have been taken into account ~~considered~~ and addressed by the applicant or Contractor, as the case may be, also including a description of the analysis of alternatives, including a no-action alternative;

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

In line with comments on regulation 46 bis paragraphs 8(d) and 9(c), we propose the term “substantive and relevant” comments be the appropriate qualifier in paragraph (3)(c).

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Regulation 47(6)(a)

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**6. Where predictive models have been used to inform an environmental impact assessment:**

~~(a) These shall be reviewed by competent independent experts, with the results provided to the Authority as annexures to the Environmental Impact Statement; and~~

~~(b) The monitoring programme proposed in the Environmental Impact Statement shall describe how predictions made by models will be validated.~~

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

In line with other comments on independent expert reviews, we consider it is the role of the Commission to undertake such reviews. The Commission may engage its own independent experts to conduct a review of predictive models should the Commission not have the necessary skills and experience when assessing the plan of work.