

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28<sup>TH</sup> SESSION:  
COUNCIL - PART I**

*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:**

President's text

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

Russian Federation

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

Reg. 37

**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.**

~~4. alt 1 [In the case of specific training on Mitigation and the prevention of pollution from the Area, participation of representative of the adjacent coastal State should be ensured.]~~

~~4. alt 2 [The Training Plan presented by the Contractor must contain proposals of at-sea training as well as capacity building in other areas of relevance such as: Environmental Management, International Law (with a focus on the Convention and the Mining Code, Modeling, Statistics and Marine Spatial Planning.)~~

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

4.alt 1. This would be an excessive unreasonable burden on the Contractor. Besides that, the Convention doesn't contain any provisions about trainings of representatives of the Coastal States.

4.alt.2 Areas of expertise that should be subject of trainings should be listed in relevant Standard. Not all such areas of expertise require at-sea trainings.