

TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH 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.

1. Name of Working Group:

IWG ENV

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

UK

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

Annex IV

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.

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

We make the following comments on restructuring the Annex, but understand streamlining work is ongoing in the informal intersessional working group on EIAs and EIS.

We note Sections 4,5,6 describe the different aspects of the environment. **Then 7, 8 & 9** assess the impacts and mitigation measures on these aspects of the environment.

We suggest rearranging these sections to have each description and impacts section together would be useful. For example, Section 4 and Section 7 on the oceanographic environment could be combined to first of all 1) describe the baseline (section 4), and then 2) the impacts on the baseline (section 7), followed by 3) how they would be mitigated (section 7). This would be the same for sections 5 and 8, and section 6 and 9.

Grouping sections thematically would make both their drafting and reading easier.

We further note in addition to these 3 sections above, there needs to be a section titled ‘Cumulative Impact Assessment’, as currently, Cumulative Impacts are only considered in a piecemeal approach throughout section 4,5,6,7,8 and 9. There should be a description of the overall Cumulative Impact Assessment in the EIS, and we suggest adding a section on this after Section 9.

4.5 Facilitator notes: One delegation has suggested to move the new addition (starting from “Provide a baseline description...” and onwards) in section 4.5 to the Standard due to its detailed nature. Furthermore, to delete the additions made to points 4.7, 4.11, 5.4.3 and 5.4.4 due to it being difficult to provide the mentioned information with available data and current technology and it might be difficult to reach consensus on the conclusions. I note to there should be a dynamic approach to anticipating emerging issues, irrespective of it being difficult to obtain all relevant information. I invite for views on this.

Agree detail of Section 4.5 can be moved to Standards. However, we do not agree to removal of additions to 4.7, 4.1, 5.4.3 and 5.4.4 which has been proposed. The facilitator

notes we should have a dynamic approach to anticipating emerging issues, irrespective of it being difficult to obtain all relevant information. We agree with this, and therefore suggest the high-level content be retained here (e.g. bullet pointed list of sections), and further detail under each heading moved to Standards.