

**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 Environment

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

UK

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

DR46ter

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.

1. A Contractor **shall**, pursuant to its Environmental Management and Monitoring Plan required under Regulation 48 **and in accordance with the Standard on environmental monitoring programmes and other applicable Standards, shall** observe, measure, evaluate and analyse, in accordance with Good Industry Practice, Best Available Scientific Evidence, Best Environmental Practices, and Best Available Techniques, the environmental ~~metrics relative to thresholds contained in the Standards, and risks to or effects of pollution and other hazards to of pollution and other hazards~~ Environmental eEffects

3. The Environmental Management and Monitoring Plan shall ~~cover all stages of the mining life cycle, and on submission for approval, contain a detailed monitoring programme for at least the upcoming 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]

3. We agree that a monitoring programme will need to be based on data collected through the mining life cycle, and based on best-practice, and therefore agree that a detailed monitoring plan for a shorter period than the whole contract could be provided in the EMMP at the point of application. We note the proponent has stated minimum 7 years, and it would be useful to know why 7 years so we can consider whether this is the right amount of time. However, as drafted, it risks limiting the need for an EMMP to the first 7 years of Exploitation activity. We therefore suggest clarifying that monitoring is required throughout the whole mining life cycle, including post-closure monitoring, but that a detailed minimum 7-year plan is required at the point of application or review. The review element is also an important aspect missing from this drafting as it stands, as currently it only states ‘the **first** 7 years of exploitation’.