

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

*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:  
Interoceanmetal Joint Organization**
- 3. Please indicate the relevant provision to which the textual proposal refers.  
DR44**

IOM would like to say that going through this comprehensive document still is not too easy experience, mainly due to the very detailed, long provisions, additionally complicated by intrusions of explanations and iterations. Despite the fact that we understand the reason behind so very specific and detailed provisions, IOM would like to express an opinion, that it is not necessary to list all the principles “Best Available Techniques, Best Scientific Evidence, Best Environmental Practice and according the relevant Standards and taking into account relevant Guidelines” in almost every provision which describes contractors’ obligations. In our understanding the obligation imposed on contractors in *DR44 General obligations* is now exhaustive and covers everything. It is explicitly said in this regulation that Contractors, among other users, “shall [...] take necessary measures to ensure effective protection of the Marine Environment [...] in accordance with Regulations, Standards and taking into account Guidelines including those referred to in Regulation 45 and the relevant Regional Environmental Management Plan”.

DR44 iterates: precautionary approach, and the ecosystem-based management approach, Best Available Techniques and Best Environmental Practices, Best Available Scientific Information, accountability and transparency and the polluter pays rule. Those are **overarching rules and obligations to be applied in every and each activities undertaken by contractors, there is no need to list them again in all of the following provisions.**