

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 29TH 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:

Environment

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

Federal Republic of Germany

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

Annex VII: Environmental Management and Monitoring Plan

Red text is in original draft; **blue text** indicates Germany's textual proposals

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.

Annex VII [IWG ENV]

Environmental Management and Monitoring Plan

1. The Environmental Management and Monitoring Plan prepared under these regulations and this annex VII shall be:

...

(a)bis Prepared in accordance with the relevant Regulations **and Regional Environmental Management Plan** ~~and Regional Environmental Management Plan~~, taking into account applicable Guidelines ~~and Regional Environmental Management Plans~~, on the basis of Best Environmental Practice, Best Available Scientific ~~Information~~ **Evidence**, and Best Available Information; and

[...]

2. An Environmental Management and Monitoring Plan shall contain:

...

(d) A description, prepared in accordance with the relevant Standard and taking into account the relevant Guidelines, of how the monitoring data will be transmitted during operations, how the data will be labelled and monitored by qualified personnel, and how the data will be stored;

(e) The qualifications and proposed location of the personnel monitoring the ~~data~~ environment;

...

(nk) A description of a system for ensuring that the plan shall adhere to [~~Good Industry Practice,~~] Best Available Techniques, Best Environmental Practice and Best Available Scientific [~~Information~~Evidence], and a description of how such practices are reflected in the proposed Exploitation activities;

(o)bis: “A description of a statistically sound comparison of the monitoring results collected within the Contractor’s IRZs and PRZs which compare the monitoring results with the baseline as well as between IRZs and PRZs to determine and quantify impacts and recovery of impacted areas.

[...]

(qn) Details of ~~the~~all training programmes for all persons engaged or to be engaged in activities in the project ~~or its~~ area;

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

- Para 1: Germany considers REMPs to be very important in guiding the content and implementation of EMMPs.
- Para 2(e): The qualifications of those monitoring the environment appear to be more relevant than those monitoring the resulting data – although the data should not be mismanaged either.
- Para 2(o)bis: Germany proposes this addition to ensure ongoing comparison between IRZs and PRZs as well as comparison between the monitoring results and baseline information.
- Para 2(q): As far as possible, all training programmes, whether active in the project area or elsewhere, should be included in the EMMP.