

**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:

Protection and Preservation of the Marine Environment

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

The Pew Charitable Trusts

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.

- **Red font** are proposed amendments by the Facilitator in this revised text.
- Our proposed amendments and our questions or comments regarding the facilitator’s remarks are indicated as in-line edits in **blue**. Proposed deletions of text proposed by the facilitator appears in strikethrough and **bold**.

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

Subject to the pending amendments to the regulations on the Environmental Impact Assessment and Statement, we are generally supportive of this particular Annex being moved to a Standard and as such have refrained from making proposed amendments to this Annex for the time being.

But welcome the approach outlined by the UK, which seems a sensible and methodological way of undertaking any movements. We would welcome clear, objective and agreed criteria, before text is moved out of the regulations into Standards and Guidelines.

In any case, we consider that an EIS template should be binding, which would provide clarity to both Contractors and the Regulator on what a ‘complete’ EIS entails and ensure consistency across EIS, recognizing that contents/expectations of an EIS vary amongst member States. In this regard, our initial view is that we do not believe it would be appropriate to move any section to a Guideline, which is non-binding.