

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH SESSION:
COUNCIL - PART III**

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:**
Informal Working Group – Environment.

- 2. Name(s) of Delegation(s) making the proposal:**
Submitted by Nauru Ocean Resources Inc., Tonga Offshore Mining Ltd. and Blue Minerals Jamaica Ltd.

- 3. Please indicate the relevant provision to which the textual proposal refers.**
Draft Reg. 47

- 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.**

~~Regulation 47
Environmental Impact Assessment Process~~

Regulation 47alt
Environmental Impact Assessment Process

- 5. Please indicate the rationale for the proposal. [150-word limit]**
 - We prefer Draft Regulation 47alt as the basis for this text. It sets clear and workable requirements for EIAs without being overly prescriptive.
 - Draft Regulation 47 is overly prescriptive, overly detailed and too absolute. It creates a rigid and inflexible EIA regime that would be unable to respond appropriately to changing circumstances.
 - Therefore, we welcome the Facilitator’s suggestion to focus on Draft Regulation 47 alt as the text for EIA processes rather than Draft Regulation 47.