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:**
   Environmental

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

Russian Federation

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

   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.**

   2. (b) Be carried out by qualified, ~~independent~~ experts,

   (c) Include an environmental risk assessment ~~and a survey of the seabed to identify Underwater Cultural Heritage~~ that takes into consideration the region as a whole taking into account the objectives and measures of the relevant and applicable Regional Environmental Management Plan,

   3. The Environmental Impact Assessment Process ~~must~~ shall follow certain procedural steps to having the plan of work assessed and entail the following elements:

   (b)   An Environmental Impact Assessment, documented and reported by an Environmental Impact Statement to describe the impacts on the Marine Environment ~~[]~~ and predict the nature and extent of the Environmental Impacts and Environmental Effects of the mining operation including residual impacts, also considering other existing and foreseen mining operations. [This description of the impacts mentioned includes assessing:

   (c)   The Identification of measures envisaged to monitor, prevent, minimize, control, mitigate []~~ and manage~~ Environmental Impacts and Environmental Effects [and risks] to as low as reasonably practicable, while within acceptable levels in accordance with environmental Standards, including through the development of an Environmental Management and Monitoring Plan,

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

We prefer Reg. 47alt, but for any case, we also would like to comment Reg. 47

2(b): we think that experts of an applicant could take participation in environmental impact assessment process, not only independent experts.

2(c): survey of Underwater Cultural Heritage isn't an obligation of contractor/applicant

3(b),(c): there is a difference between Environmental Impacts and Environmental Effects