

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 29<sup>TH</sup> 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](mailto:council@isa.org.jm).

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

Russian Federation

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

Reg. 13 Alt

**3. 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. ~~(d) The applicant has demonstrated that it will meet the requirements in regulation 18 bis;~~

4. ~~(a) Certification to operate under internationally recognised quality control and management standards;~~

(c) The technology, ~~knowledge~~data and information, and procedures necessary to comply with the terms of the Environmental Management and Monitoring Plan and the Closure Plan, and the applicable Regional Environmental Management Plan, including the technical capability to identify and monitor key environmental parameters and ecosystem components so as to detect any adverse effects, and to modify management and operating procedures as required to meet all environmental requirements;

7 (a) Whether the Plan of Work will provide [optimum] revenue to the Authority, ~~and taking into account negative externalities caused by any damage to the Marine Environment,~~ will benefit humankind as a whole;

8(b)(i) identify in-service ~~and planned~~ submarine cables and pipelines in, or adjacent to, the area under application using the publicly-available data and resources taking into account the Guidelines;

9. (a) Whether the Plan of Work demonstrates that it will meet the Authority’s Strategic Environmental Goals and Objectives under Regulation 44ter, the regional environmental objectives and measures under the relevant Regional Environmental Management Plan, and the environmental thresholds in the applicable Standards, taking into consideration the cumulative effects of ~~all Relevant-Exploitation~~ Activities, as far as possible;

(c) Whether the Plan of Work demonstrates that:

(i) it is based on adequate environmental baseline data, in accordance with applicable Standards and taking into consideration Guidelines;

(vii) identifies and manages appropriately the ~~gaps and certainties,~~ uncertainties ~~or~~

~~inadequacies~~ in the data or information available at the time of application; and

(d) (i) Any Environmental Impacts and Environmental Effects ~~or impact on other activities~~ of allowing the Exploitation activity;

~~(iii) An evaluation of harmful effects individually, in combination, as well as cumulatively, including effects from other activities in the area under application;~~

(viii) The matters set out at Regulation 46(3)(b);

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

We prefer work with draft reg. 13 Alt because it is better structured.

2(d): it is too vague and unnecessary, we suggest deleting it

4(a): The notion of “internationally recognised” quality control and management standards is not clear, in particular taking into account that ISA is supposed to elaborate Standards and Guidelines which may cover these issues.

8(b)(i): information about planned cables could not be available

9(a): Climate change is a global phenomenon. In our view, activities should be taken into account for the purpose of cumulative impacts.

Issues of 9(d)(iii) are covered by subparagraph 9(d)(i)