

**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.im.

1. Name of Working Group:

Informal Working Group on 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.

Annex III bis, sub-paragraph (i)(iii)

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 III bis [IWG ENV]

Scoping Report

An ~~environmental Impact Assessment~~ Scoping Report shall include the following:

[...]

(i) A preliminary impact analysis which categorizes the important issues into high-risk, medium-risk and low-risk for the Environmental Impact Assessment to address and evaluates the need for further information, taking into account the Environmental Risk Assessment; ~~;~~ ~~which includes;~~

(iii) A description of the cumulative effects of the project, combined with other authorized, ~~anticipated, or expected~~ activities ~~and;~~ actions, or natural phenomena;

[...]

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

- It is important that the preliminary impact analysis in the Scoping Report is appropriately focused so that it is useful and covers its contents at a proper level of depth.
- We consider that requiring applicants to include “anticipated” and “expected” activities would be an incredibly broad and an unclear requirement, that would require applicants to predict potential future scenarios that may be irrelevant or mere hypotheticals.
- As such, we propose limiting sub-paragraph (i)(iii) of Annex II bis to refer to authorized activities and actions and natural phenomena.