

**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.im](mailto: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 VII, paragraph 1(b)

**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 VII [IWG ENV]**

**Environmental Management and Monitoring Plan**

1. The Environmental Management and Monitoring Plan prepared under these Regulations and this Annex VII shall be:

[...]

~~(b) Verified by the report of [independent] competent [independent experts persons] appointed by the Authority.~~

[...]

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

- We remain concerned at proposals to outsource the role of the Commission to independent experts paid for by Contractors.
- Requiring outside verification of Environmental Management and Monitoring Plans would usurp the Authority’s assessment and regulatory role, potentially creating conflicts in direction to Contractors, and add to the cost and time associated with their preparation.
- The Commission is able to obtain its own expert(s) should this be required.
- As such we propose to delete sub-paragraph (b).