

**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:

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 VIII, Subparagraph 1(h)

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.

1. The Closure Plan or Final Closure Plan shall be prepared and implemented in accordance with Regulation 7, the Environmental Management System, Standards and taking into consideration Guidelines and the relevant Regional Environmental Management Plan and shall include the following information:

[...]

(h) ~~[The temporal and spatial intensity of monitoring to be undertaken during and after Closure needs to mirror monitoring efforts prior and during Exploitation using the same methodology to allow for full quantification of the impact as well as of any recovery from impacts Details of monitoring to be undertaken during and after closure (comparable to monitoring efforts prior and during exploitation) that specify the sampling design (spatial and temporal sampling), the methods to be used and the duration of the post closure activities];~~

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

- We do not support the inclusion of the newly proposed language in subparagraph 1(h) that requires closure monitoring to be comparable to that undertaken during exploitation. This would be an extremely onerous obligation for Contractors.
- Monitoring requirements are reduced after closure as monitoring is only conducted to ensure that stated closure objectives have been met. The intensity of monitoring should be determined by what these objectives are and what is required to monitor them, it

cannot simply mirror monitoring efforts prior and during exploitation (during which there are actual activities taking place).