

**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:

President's Text

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.

Draft Regulation 30 bis (3)

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.

Regulation 30 bis

Human health and safety management system

[...]

3. A proposed ~~Material change~~ Change to a Contractor's safety management system, that has the potential to also constitute a Material Change to the Contractor's implementation of its Plan of Work, shall be treated the same as a modification of a Plan of Work, pursuant to Regulation 57 mutatis mutandis.

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

- Proposed Draft Regulation 30bis(3) runs counter to best practices regarding monitoring and updating safety management systems. It would require contractors to follow the process set out in Draft Regulation 57 for each and every modification to their safety management plan, no matter how minor the change. This would be an onerous requirement that would only delay updates to safety management systems and add to the Authority's workload.
- Best practice for safety management systems is to adopt a continuous improvement approach (in accordance with the recommendations of the International Organization for Standardization). We would also expect contractors to regularly align their safety management systems with updates from the International Maritime Organization.
- Requiring constant notification and approval procedures for these updates would not be feasible and undermine the aim of continuous improvement.
- As such, we propose that Draft Regulation 30 bis (3) is deleted, or if it is retained we have proposed potential amendments to limit when Draft Regulation 57 would apply to changes to safety management systems.