

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 29TH SESSION:
COUNCIL - PART II**

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(s) of Delegation(s) making the proposal:

The Pew Charitable Trusts

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

Draft regulation 1

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.

4. Terms and phrases used in these Regulations are defined for the purposes of these Regulations ~~and the applicable Standards and Guidelines~~ in the ~~S~~schedule.

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

Paragraph 4: we would suggest deleting the reference to ‘applicable Standards and Guidelines’. The word ‘applicable’ implies to us that the paragraph applies to some Standards and Guidelines, and not others. We are unclear how this is to be determined, or what force the paragraph has while this is left unclear. We would suggest a better approach would be for each Standard and Guideline document to expressly state whether or not it adopts the same definitions as those used in the Regulations. That way the matter can be addressed sensibly on a case-by-case basis, in a way that is clearer to all stakeholders than this paragraph (4).

Paragraph 6: we support the inclusion of reference to REMPs, which the Council has previously indicated will be a crucial part of the ISA’s environmental management regime and should be developed in conjunction with the Regulations. We believe the phrasing ‘further complemented’ is appropriate reflecting that REMPs are policy documents and that relevant elements of REMPs will be given legal effect by the regulations.