

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH SESSION:
COUNCIL - PART III**

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:

Consolidated text

2. Name(s) of Delegation(s) making the proposal:

Republic of Nauru

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

Regulation 30bis

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.

~~3. — A proposed change to a Contractor’s safety management system 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 para 3 of regulation 30bis runs contrary to best practices in relation to monitoring and updating safety management systems.

Para 3 would require the Contractor to follow the process set out in regulation 57 regarding changes to their Plan of Work for every modification to their safety management plan. This is an onerous requirement that would only delay updates to the safety management system and add unnecessarily to the Authority’s workload.

Further, best practice for maintaining safety management system is to take a continuous improvement approach, in accordance with the recommendations of the International Standards Organisation. We also expect contractors to regularly align their safety management systems with International Maritime Organization updates.

Requiring constant notification and approval procedures for these updates would not be feasible and would run counter to the philosophy underpinning continuous improvement.

We propose para 3 is deleted. Any material updates can be captured through the annual reporting process.