

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 30<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.jm](mailto:council@isa.org.jm).*

**1. Name(s) of Delegation(s) making the proposal:**

**SPAIN**

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

Regulation 50 bis

Environmental Management System

**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.**

(b) Be reviewed and undergo periodic audits by an independent recognized and accredited international or national organization, in accordance with applicable Standards;

[(c) Facilitate effective reporting to the Authority in connection with environmental performance, pursuant to Regulations 33, 34, 38, 39, and 52; and

(d) Include the results of the audit in the Contractor's annual reports and the performance assessment of the Environmental Management and Monitoring Plan under Regulation 52.

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

Throughout these regulations we can see how the figures of the "recognized expert", the "competent, independent and accredited auditor", as in this Article 50 bis, or the "independent expert", are used without being very clear about the characteristics of one or the other.

In this sense, we think that given the phase in which we are with the revision of these regulations, perhaps it would be appropriate to start thinking about the possibility to develop a "Guideline" that includes the characteristics of each of these figures: description of the selection process, technical profile, type of relationship they will have with the Authority, access to the information, guarantee of their professional independence, etc.

