

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28<sup>TH</sup> 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](mailto:council@isa.org.jm).*

**1. Name of Working Group:**

Informal WG on the protection and preservation of the marine environment

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

Federal Republic of Germany

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

Annex VII: Environmental Management and Monitoring Plan

**Green text** is in original draft; **blue text** indicates Germany's textual proposals

**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.**

(....)

2. An Environmental Management and Monitoring Plan shall contain:

(a) A non-technical summary of the main conclusions and information provided to facilitate understanding by members of the Authority and Stakeholders;

(a)bis Outline the guiding principles which apply to the monitoring approaches;

(b) A description of the project and the area likely to be affected by the proposed activities **and by any suspension plumes they generate**. Include detailed location maps showing proposed impact reference zones and preservation reference zones as well as locations of other nearby contract areas or known seabed infrastructure the Preservation Reference Zones, the Impact Reference Zones and the surrounding area with reference to the Regional Environmental Management Plan **including any buffer zones to prevent damage to these areas**;

...

(g) A description of the planned monitoring programme, with reference to the applicable Standard on Monitoring, and the overall approach, standards, protocols, methodologies, procedures and performance assessment of the Environmental Management and Monitoring Plan, including the necessary risk assessment and techniques for managing these risks, including the use of monitoring data to validate predictive models and reduce uncertainties, and adaptive management techniques, if appropriate, needed to achieve the desired outcomes Each component should be described separately in a manner consistent with sections 7-10 of Annex IV. Monitoring methodology/results should provide a sufficient degree of confidence that conclusions in the Environmental Impact Statement can be validated and that agreed

performance standards are being met (monitoring should have the statistical power to detect changes in environmental state). The components of the monitoring programme should, at a minimum, include those applicable to the Contractor during its exploration phase to allow for comparison of monitoring data.

(h) Details of the proposed monitoring stations across the contract area, including the frequency of monitoring and data collection, the spatial and temporal arrangements for such monitoring and the justification for such arrangements, including how in situ validation of modelled results will be carried out. The proposed monitoring stations should, at a minimum, include the monitoring stations used during mining tests carried out in the Exploration phase;

(i) The location and planned monitoring and management of Preservation Reference Zones and Impact Reference Zones designed in accordance with the criteria contained in Annex [Xter], as well as other spatial management planning tools if any;

(i)bis The location and boundaries of planned or established long-term protected areas within the Contract Area as ~~indicated~~ ~~determined~~ in the applicable Regional Environment Management Plan as well as of declared PRZs of neighboring Contract Areas, if known;

(i)ter Details of any plans outside of the Contract Area to increase scientific knowledge and other knowledge/information in the relevant region, including in collaboration with other contractors or via international cooperation efforts, as well as in collaboration with Indigenous Peoples and local communities;

...

(q) Details of any practicable restoration and rehabilitation of the project area and the monitoring of their success;

...

(s) Details of reporting requirements and timing (< 2 years) including details of the methodology to be applied to ensure that monitoring data submitted are provided in an accessible and interpretable format consistent with best scientific practices; and

(t) An overview program (list) of all proposed activities

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

Plumes are a direct consequence of mining activities and thus need to be managed within the EMMP. Their potential to impact PRZs and neighboring contract areas can be mitigated by introducing proper buffer zones as already agreed for APEIs. These designated zones apply to PRZ (not IRZ) and should be reported in the EMMP. [This could also be introduced under points 2(d) or 2(e)bis.]

Using the components of the monitoring programme during a Contractor's Exploration activities as minimum standards, including reuse of sampling locations, will allow for a proper before-after mining comparison to assess impacts.

Observing neighbouring PRZs by avoiding plumes to impact them will prevent jeopardizing the operation of neighbouring mining activities (as well as having to compensate for potential loss).

The success of all attempts to restore or rehabilitate should be monitored thoroughly to avoid additional damage. The quest for improved transparency requires a maximum time window for the publication of (scientific) results.