

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH 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 of Working Group:
IWG ICE**
- 2. Name(s) of Delegation(s) making the proposal:
Interoceanmetal Joint Organization**
- 3. Please indicate the relevant provision to which the textual proposal refers.
DR102**

Regulation 102

With regard to 102(2)(a) we support, in general, recording of “time and position of all mining activities and environmental data” but we ask for defining the minimum time of storage and maintenance of recorded data by contractors.

When it comes to UCH, this is not part of environmental data so we do not see reasons for including it here.

3bis should be moved to Regulation 46 [ter] Environmental Management and Monitoring Plan or to a Standard.

With regard to para 5 “All data received and transmitted to the Authority under this regulation shall also be transmitted to the sponsoring State or States”. We are of an opinion that is it not up to the Council to decide whether the sponsoring State would require contractors to submit data. It must be decided by the Sponsoring State itself.

We would like to echo what has been already said in this room that it is simply not technically possible to publish non-confidential data in real time on the Authority website so we propose to delete this part of the paragraph 5.

And lastly we have an impression that many issues covered in this Regulation has been already covered in other parts of the regulations, especially in the environmental sections, so cross-checking is required.