

**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 Environment**
- 2. Name(s) of Delegation(s) making the proposal:
Interoceanmetal Joint Organization**
- 3. Please indicate the relevant provision to which the textual proposal refers.
DR45**

IOM prefers DR45 over DR45 alt but we still would like to make some comments on 2/a/ii, 2/a/vi and 2/f:

(a)/(ii) “[...] *sediment plume properties such as dispersion and dilution, resettlement, **temperature, toxicity and composition***”

Comment: We propose to add “water” before temperature and “chemical” before composition for the sake of clarity.

2/a/vii “*habitat removal*”

Comment: We are not sure that one can remove habitat; one can rather alter or modify habitat. It is substrate what is being removed.

(f) “**Technical requirements** for environment protection with regard to the equipment used for the *Exploitation activities.*”

Comment: We propose to add “minimum” at the beginning of the sentence so that this Environmental Standard describes the minimum technical requirements. We have however some concerns how this Standard relates to the application of Best Available Techniques as it is required in DR44.