

**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:  
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.  
DR45Alt**

**DR45 Alt (1)(c)** „*Mitigation measures of harmful effects to the marine environment, and where possible, remediation, [restoration and rehabilitation] or, [if restoration and rehabilitation are impossible,] **compensation** of environmental harm, thereby following the mitigation hierarchy of avoid, minimize, remediate*”

Comment: We propose to add “offsetting or” before “compensation” in order to provide for inclusion of this internationally agreed process of the mitigation hierarchy. Offsetting is one of the tools allowing for working on ‘no net loss of biodiversity’ and we should not a priori decide on excluding this option.

**DR 45 Alt (1) (i)** „*Safe management and operation of mining vessels and installations*”

Comment: We would like to bring your attention to the existing regulations and conventions such as SOLAS (International Convention for the Safety of Life at Sea) and International Safety Management (ISM) Code and MARPOL