

**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.  
DR47**

The EIS is to be carried out, according to DR47/2b, by qualified independent experts and then, subsequently, according to DR27/2e, it must be subject to an independent scientific assessment prior to the submission to the Authority. So we have the document which was prepared by independent experts but apparently their independency is in question as the subsequent assessment by another independent experts, in this case scientists, is required. Then, after a round of stakeholders consultation, it is again assessed by the independent body of experts, namely the LTC.

It can be said that one can have this feeling of lack of trust in contractors – lack of trust in this that they are capable of doing their job according to standards and guidelines and in line with all the requirements set out in the regulations we are working on so hard right now. Independent assessment with no doubt crucial in the EIA but is there really a need for 3 subsequent independent assessment in a row?

We propose to delete DR47/2b and DR27/2e as the contractor is qualified to carry out EIA.