

**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 Working Group on the Protection and Preservation of the Marine Environment](#)

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

[USA](#)

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

[Annex VII](#)

**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. (f) An assessment of the significance of the potential Environmental Effects to receptors identified in the Environmental Impact Statement, their key uncertainties, proposed monitoring approach and objectives, and proposed mitigation measures and management control procedures and responses to minimize, prevent, reduce and control the harm from Environmental Effects, consistent with the environmental impact assessment and the Environmental Impact Statement;

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

We note that previously in paragraph 2(f) of Annex VII there was text specifying a requirement that the EMMP include mitigation measures as well as management control procedures and responses to mitigate harm from Environmental Effects. We recommend that this text be reintroduced to 2(f). We make this recommendation because this appears to be the only place where mitigation measures were considered in this Annex, and as specified in Regulation 46ter, the Environmental Management and Monitoring Plan is intended to set out commitments and procedures for how environmental effects of the mining operation will be monitored and mitigated.