

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS FOR THE 29TH SESSION: COUNCIL -
PART II**

Informal Working Group - Environment

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to council2022@isa.org.jm.

1. Name(s) of Delegation(s) making the proposal:

Submitted by the International Marine Minerals Society (IMMS)

2. Please indicate the relevant provision to which the textual proposal refers.

DR44ter from the consolidated draft text (ISBA/29/C/CRP.1) dated 16 February 2024.

3. 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.

We suggest deleting this draft regulation in its entirety.

4. Please indicate the rationale for the proposal. [150 word limit]

We see a number of issues with this proposed regulation, which was suggested by one delegation. We agree with the Facilitator’s note that it could be considered instead to regulate this in a policy, as the environmental goals and objectives are already handled in Regulation 13.

It is also worth reviewing the UK/GER/NL submission on streamlining the environmental regulations as environmental goals and objectives may be considered too detailed for regs and it might be more appropriate to incorporate them into REMPs and/or an environmental Standard can be developed.

HOWEVER, should there be support for DR 44 ter to remain, then we offer feedback on specific parts in separate submissions (please see attached).