TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS FOR THE 29^{TH} 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 <u>council2022@isa.org.jm</u>.

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.

DR 48 bis (b) 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.

DR 48 bis (b) <u>A [significant Material] Cchange in the Marine Environment [compared to baseline data]</u> is detected through monitoring or other data sources which would call for a new or [revised reviewed]environmental monitoring demonstrates that impacts significantly exceed the impact predictions made in the Environmental Impact Statement [or Environmental Management and Monitoring Plan],

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

The wording of this draft regulation is not clear. Baseline data is what is collected prior to mining, so a change is expected to that, for the areas that are mined. What is not expected is a significant difference between impact predictions made in the EIS and those determined through environmental monitoring.