

## **ISA 29th Session, Part II – Reading of the Draft Consolidated Text**

### Oral Statement by the Federal Republic of Germany

Delivered in July 2024

#### **Regulation 50bis – Env Management System**

We thank the UK for their proposal to reword **paragraph 2(a)**, which seems helpful.

In **paragraph 2(b)**, we suggest being specific with regard to the timeframe in which an audit has to be carried out. For example, this may be annually.

We wonder if **paragraph 2(d)** is better placed elsewhere as it speaks about including the audit reports of the Environmental Management System in the Contractor's annual report. While we can support the content of this provision, it does not appear to fit into paragraph 2, which covers issues, which the Environmental Management System is supposed to include.