

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 29TH 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.

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

The Pew Charitable Trusts

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

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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.

(e) Details of all revenues and operating costs associated with activities in handling and processing of the Minerals, to the degree available.

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

Regarding DR 71, we support the proposed inclusion of new paragraph 1(e), which aims to ensure that the Authority is appropriately informed, to the degree possible, of sales beyond the Contract Area, as a means of due diligence with regards the entire value chain.

We wish to raise in this regard that how minerals from the Area are processed and used is a question not only of financial interest, but also of environmental, social and human rights standards. Processing of mineral ore can produce significant volume of tailings (waste products) that may be toxic or present hazards to the environment and communities where they are stored. Although we appreciate that such matters may not fall directly under the ISA’s jurisdiction for regulatory purposes, the ISA is responsible to ensure that the common heritage resources of the Area are developed for the benefit of humankind as a whole, and this would not be served by enabling downstream processes that, for example, cause environmental crimes, loss of life or other human rights abuses.