

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 31st 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:

United Kingdom of Great Britain and Northern Ireland

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

Standards and Guidelines

The United Kingdom thanks the Legal and Technical Commission (LTC) for its consideration of the status of work relating to the development of Standards and Guidelines to support exploitation ([ISBA/31/C/34](#)). The tables in Annex 1 of the Commission's report are a helpful next step in that regard.

In particular, we thank the LTC for its efforts in identifying Phase 1 drafts already prepared that could be subject to update or revision, as well as indicative Phase 1 Standards and Guidelines needing development. Noting the Council Decision agreed in July ([ISBA/31/C/4/Add.2](#)), we understand that the LTC will prepare updated and consolidated versions of the currently drafted Phase 1 Standards and Guidelines (i.e. those listed in Table I), and prepare drafts of the indicative, not yet drafted, Phase 1 Standards and Guidelines in Table II, as the LTC considers appropriate, in the first part of its 32nd session. We look forward to the LTC's update concerning the outcomes of this work in its next report to Council.

The UK has some additional comments that we had intended to raise at the planned session on Standards and Guidelines at July 2026 Council, which was postponed, and that may be useful to the LTC as they undertake this work ahead of the 32nd Session.

The UK considers that further Council discussion on phasing and prioritisation of certain Standards and Guidelines, including additional topics not currently reflected in Annex 1, may be beneficial.

In our view, the draft Standard and Guidelines on Test Mining, currently classified as Phase 2 (Annex I, Table II, [ISBA/31/C/34](#)), should be reclassified to Phase 1, as Test and Pilot Mining are some of the earliest activities an exploitation applicant or Contractor would undertake. They should also include Pilot Mining, taking into account the work of the Informal Working Group.

We also note that the draft Standard on the Scoping Report is currently classified as Phase 2. In response to the LTC having asked for Council's guidance on specific matters in Table 1, we agree with the LTC (Annex 1, Table II) that Scoping has interlinkages with the draft Standard and Guidelines for the other parts of the EIA process, and that Scoping could be integrated into such Standards and Guidelines. We would, however, like to emphasise that it is imperative that

Scoping is considered in Phase 1, as it is one of the earliest activities of any exploitation applicant.

We also consider that the EMMP Standard and Guidelines should also include Standards and Guidelines on plans for Closure, to reflect recent changes in the EMMP and Closure regulations.

In our view, Annex I is missing reference to the following three Standards and Guidelines:

- Effective control;
- Monopolization;
- Impact Reference Zones and Preservation Reference Zones (as raised by the UK at July 2026 Council during our intervention on Annex X bis, which noted that we consider this topic could be integrated across other Standards and Guidelines as LTC see fit, noting their direct relevance to the draft environmental Standards and Guidelines that are being updated by LTC for March 2027 Council). We consider this to fall into Phase 1.

We note that the LTC have requested feedback from Council as to whether Standards should be developed where currently only Guidelines exist, as per Table I of Annex I to ISBA/31/C/4/Add.2. The UK is in favour of the development of Standards for EIS, EMMP, and the establishment of environmental baseline data, and would support a broader discussion on this at Council, if needed.

If revisions to the Phase 1 drafts raise legal, technical or policy issues, the LTC should seek Council views. The Council should provide high-level guidance on these issues, rather than devote dedicated time to drafting Standards and Guidelines.

While mindful of the LTC's significant workload, we are also conscious that while completing this work, the Commission may identify opportunities to increase coherence between the draft Standards and Guidelines and the regulations. We would be open to considering any recommendations, including on the regulations, LTC may deem useful to make in this regard, in line with paragraph 23 of ISBA/31/C/4/Add.2. For example, there are currently proposed or draft Standards and Guidelines relating to different elements of the Environmental Impact Assessment process, which could be streamlined.