

**Deep Sea Conservation Coalition
ISA Council
DSCC Intervention 17 July 2019
Draft Regulations Part IV**

Madam President

DR 47

While the EIA process has finally been introduced, there is no clarity even over who is responsible for overseeing the EIA process and who carries out the EIA, other than stating that the applicant or contractor prepares the EIS. Scoping has finally been re-inserted, which is a good thing, but this provision has a long way to go. There is no public review included.

DR 52

The contractor conducts its own performance assessment of its own Environmental Management and Monitoring Plan. This is unacceptable. The performance assessment should be independent of the contractor. Also, the 2 year period has been deleted: 2 years was already too long. Now it is subject to what the Contractor chooses to put in its own Plan.

DR 54, 55

We have already addressed the issues of the fund, the need for the purposes to be only for liability, and the need for workshops to determine the value of natural capital and potential damage.