

DOSI Intervention regarding Item 10: Draft Regulations on exploitation of mineral resources in the Area: Fourth meeting of the Informal Working Group on the Protection and Preservation of the Marine Environment

Annex 10 ter - Design Criteria for Impact Reference Zones (IRZs) and Preservation Reference Zones (PRZs)

#30 Delivered 22 March 2023 by Sonigitu Ekpe

Thank you, Madame Facilitator. The Deep-Ocean Stewardship Initiative welcomes the inclusion of the topic of this Annex. These reference zones are crucial environmental management tools and are **the best way** to directly measure the environmental impacts of seabed mining on the ecosystems.

To your question, Madame Facilitator, on which of the Annex versions is preferred, DOSI recommends that the “alternate” version is stronger, as it includes the reminder that Impact and Preservation Reference Zones need to consider the various sub-habitats of both pelagic water column impact types and benthic seafloor impact types separately. The alternate version also considers temporal variation, and, importantly, an assessment of the ecological requirements like reproduction and connectivity of the populations being compared.

We note that the Annex does not specify a minimum number of reference zones, just that one is required for each impact type. DOSI would like to flag that the requirement for Impact Reference Zones to be “sites where direct impacts from mining are likely to occur”, as described in Annex Paragraph 2 or ALT Annex Paragraph 10, is too restrictive, as indirect impacts should also be considered.

Regarding the description of Preservation Reference Zones in Annex Paragraph 8 or ALT Annex Paragraph 10, DOSI recommends that the requirement should be for a PRZ to include a “buffer zone” similar to the buffers around Areas of Particular Environmental Interest, to ensure that the core of the PRZ is protected from all impacts.

Thank you, Madame Facilitator.