## TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS FOR THE $28^{\text{TH}}$ SESSION: COUNCIL - PART II

## Informal Working Group - Environment

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to council2022@isa.org.jm.

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

Submitted by the International Marine Minerals Society (IMMS)

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

Annex Xter – Design Criteria for Impact Reference Zones (IRZs) and Preservation Reference Zones (PRZs); Annex Alt. Item 12.

 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.

Annex Alt.

12. The longevity of PRZs is important. The duration of post-mining monitoring should last until monitoring results show a trajectory towards recovery. Post-mining monitoring should be described in the final EMMP and/or Closure Plan.

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

- While we agree post-mining monitoring is important, monitoring until there is no measurable difference between the IRZ and PRZ is not a realistic or practical aim. For example, the mineral resource will have been removed in the IRZ and not the PRZ. There will remain a measurable difference between the two.
- Instead, we suggest that it would be more realistic for the EMMP to describe the 'post mining goals' (e.g. a trajectory towards some pre-agreed level of recovery) and present a monitoring plan that can demonstrate whether those goals are being met.

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**Deleted:** no measurable difference between IRZ and PRZ can be detected anymore