

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28<sup>TH</sup> SESSION:  
COUNCIL - PART I**

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](mailto:council@isa.org.jm).

**1. Name of Working Group:**

Informal Working Group – Environment.

**2. Name(s) of Delegation(s) making the proposal:**

Submitted by Nauru Ocean Resources Inc. and Tonga Offshore Mining Ltd.

**3. Please indicate the relevant provision to which the textual proposal refers.**

Annex Xter, Paragraph 10.

**4. 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.**

~~10. The longevity of PRZs is important. The duration of post-mining monitoring should until no measurable difference between IRZ and PRZ can be detected anymore.~~

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

- We support efforts to provide further guidance to Contractors on designing and selecting Impact Reference Zones (IRZs) and Preservation Reference Zones (PRZs).
- We are concerned with the temporal aspect of post-mining monitoring as outlined in Annex Xter, Paragraph 10.
- We consider that once nodules are removed from the IRZ, they will take an extremely long time to regrow in the PRZ. The requirement in para. 10 to ensure post-mining monitoring “until no measurable difference between IRZ and PRZ can be detected” ignores this fundamental physical reality.
- We suggest deleting this provision entirely or amending it to reflect this fact.
- We also suggest that matters involving the selection of IRZs and PRZs be placed in a Standard and/or Guideline instead of the Exploitation Regulations, given their prescriptive and technical nature.