TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH 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.

1. **Name of Working Group:**
   IWG Environment
2. **Name(s) of Delegation(s) making the proposal:**
   Russian Federation
3. **Please indicate the relevant provision to which the textual proposal refers.**

   Annex Xter

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.**

~~Annex~~

~~Contractors must establish impact reference zones (IRZs) and preservation reference zones (PRZs) in order to monitor the environmental impacts of their activities. The following parameters shall be followed in the designation of IRZs and PRZs.~~

~~1. IRZs and PRZs must be situated within the Contract Area (and the Contract Area may need to be selected around the need for appropriate IRZ/PRZs, especially where multiple or large zones are required).~~

~~2. IRZs must be sites where direct impacts from mining are likely to occur.~~

~~3. For each type of impact identified in the environmental impact statement, there must be at least one corresponding IRZ which will enable the Contractor to monitor that impact. This is likely to require multiple IRZs (or a very large IRZ).~~

~~4. PRZs will be important in identifying natural variations in environmental conditions against which impacts will be assessed. Their species composition, habitat types, and occurrence of mineral resource, must be comparable to that of the impacted areas.~~

~~5. PRZs must be areas that will not be impacted by mining activities, including impacts from operational and discharge plumes.~~

~~6. If a Contract Area consists of several disjunct sub-areas that are isolated from each other, then each of those areas would require a corresponding PRZ.~~

~~7. Use of multiple PRZs should be considered for increase in statistical rigour, and chance of detecting effects and adding redundancy in case of unexpected variation/plan changes.~~

~~8. The area of the PRZ needs to be sufficiently large to contain (and buffer) sufficiently large populations to guarantee long-term survival.~~

~~9. In theory, all species within the IRZ and PRZ will need to be monitored to quantify impacts. In practice, some representative set might suffice. To establish an adequate baseline and find suitable indicator species (e.g. the sensitive species that will suffer most from an impact) it will be necessary to catalogue as many species as reasonably possible in the IRZ and PRZ in question. This will require an extensive sampling effort to collect sample numbers and volumes that allow for a meaningful comparison (i.e., with high statistical power)~~

~~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.~~

~~11. Isolation of PRZs is important: any PRZ will by definition have to remain unimpacted throughout the post-mining monitoring period.~~

~~12. To designate representative IRZs/PRZs requires characterisation of pelagic and benthic communities within all sub-habitats that may be impacted by mining operations, and determination of regional distributions and patterns of connectivity. Temporal variation must also be evaluated annually over multiple years (for at least one test-mining site, and the PRZ site).~~

~~13. A Contractor will need to be able to demonstrate a general knowledge of ecosystem functioning and of the ecology of the present species; an average population density alone will not suffice.~~

Annex ~~Alt~~.

Applicants must establish suitable and effective Impact reference zones (IRZs) and Preservation reference zones (PRZs) in order to monitor the environmental impacts of their activities. The following parameters shall apply in the designation of IRZs and PRZs.

1. IRZs ~~and PRZs~~ must be situated within the Contract Area. PRZs are predominantly situated within the Contract Area. A few Contractors may agree to establish joint PRZs if it meets the criteria for designation of PRZs. Location of PRZs inside existing APEIs or other protected areas is also possible. ~~(and the Contract~~

~~Area may need to be selected around the need for appropriate IRZ/PRZs, especially where multiple or large reference zones are required).~~

2. The applicant needs to demonstrate that the IRZ/PRZs are ~~ecological~~ environmentally similar before the commencement of mining.

3. To designate representative IRZs/PRZs requires characterisation of the pelagic and benthic environment including all sub-habitats that may be impacted by mining operations, and determination of regional distributions and patterns of connectivity of communities. Temporal variation must also be evaluated over multiple years.

~~3~~4. IRZs must be zones where direct impacts from mining are predicted to occur once mining commences.

~~4~~5. All types ~~For each type~~ of impact identified in the E~~e~~nvironmental I~~i~~mpact S~~s~~tatement ~~, there~~ must ~~be at least one~~ correspond with ~~ing~~ IRZ/IRZs, which will enable the Contractor to monitor ~~that~~ these impacts. Designation of ~~This is likely to require~~ multiple IRZs ~~(or a very large IRZ)~~is possible for this purpose.

~~5~~6. The area(s) of the IRZ(s) needs to be sufficiently large and representative to allow adequate assessment of recovery of populations and environmental conditions after the mining activities, in accordance with the relevant Standards and~~,~~ taking into account relevant Guidelines.

~~6~~7. PRZs will be important in identifying natural variations in environmental conditions against which impacts shall be assessed and must be comparable to that of the impacted areas, in accordance with the relevant Standards and ~~,~~taking into account the relevant Guidelines. The abiotic and biotic baseline data include but are not limited to the quantity and quality of mineral resources, species composition and habitat types.

~~7~~8. PRZs must be areas that will not be impacted by mining activities from any contractor, including impacts from operational and discharge plumes and including during the post-closure period. PRZs must also be free as far as possible ~~-~~from impacts of other industrial activities. PRZs must have to remain unimpacted throughout the post-mining monitoring period.

~~8~~9. Where a Contract Area consists of several disjunct sub-areas that are isolated from each other, then each of those areas would require a corresponding PRZ and IRZ.

~~9~~10.Use of multiple PRZs and IRZs should be considered for increase in statistical rigour, and chance of detecting effects and adding redundancy in case of unexpected variation/plan changes.

~~10~~11. The area of the PRZ needs to be sufficiently large to contain sufficiently large populations to guarantee long-term survival. The PRZ will also require a buffer zone around it to protect the populations and ensure maintenance of natural environmental conditions in the PRZ.

~~11~~12. Abiotic and biotic parameters, within the IRZ and PRZ will need to be monitored to quantify impacts. This includes but is not limited to monitoring species diversity and function. To establish an adequate baseline and to find suitable indicator species (e.g., the sensitive species that will suffer most from an impact, key-stone species that are crucial for ecosystem processes, or species which abundance indicates a disrupted ecosystem functioning), it will be necessary to catalogue most species in the IRZ and PRZ in question and unravel their functions. This will require sufficient sampling effort to collect sample sizes that allow for a meaningful comparison (i.e., with high statistical power).

Commented [ЛЕ1]: These provisions would be better to move to Standard or Guidelines

~~12~~13. The longevity of PRZs and duration of post-monitoring ~~is~~ are important. ~~The duration of post-mining monitoring should last until no measurable difference between IRZ and PRZ can be detected anymore.~~

~~13. Isolation of PRZs is important. Any PRZ will by definition have to remain unimpacted throughout the post-mining monitoring period.~~

~~14. To designate representative IRZs/PRZs requires characterisation of the pelagic and benthic environment including all sub-habitats that may be impacted by mining operations, and determination of regional distributions and patterns of connectivity of communities. Temporal variation must also be evaluated over multiple years.~~

15. An applicant will need to be able to demonstrate knowledge of species' ecological requirements (e.g. for successful reproduction); an average population density alone will not suffice.

Commented [ЛЕ2]: These provisions would be better to move to Standard or Guidelines

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

1.We assume that cooperation of the contractors to create joint PRZs is possible as well as creation of PRZs inside existing APEIs or other protected areas.

8 (former 7). Taking into account the freedom of the high seas we can not be sure that all types of industrial activities will not take place within PRZs (e.g., sea traffic)

12 (former 11). We suggest to move the part of this paragraph (from the words: “To establish…”) to the relevant Standard or Guidelines.

Former 13. Paragraph 11 (former 10) already talks about isolation of PRZs. Thus it can be excluded here. The provision about unimpactness we suggest to move to paragraph 8 (former 7).

Former 14. We suggest moving paragraph 14 to the place after paragraph 2.

15. We suggest moving paragraph 15 to the relevant Standard or Guidelines.