TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS FOR THE 28TH 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 World Organization of Dredging Associations (WODA)

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

Draft Annex Xter - Design Criteria for Impact Reference Zones (IRZs) and Preservation Reference Zones (PRZs)

- Annex Alt, para 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.

Original text

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

Proposed text to replace this para

We believe the replacement text here warrants further discussion with the Working Group, but as a suggestion we propose:

12. Post mining monitoring shall continue until ecosystem function returns to the level of the premining condition agreed within the EMMP/Closure Plan, and taking into account the time taken to reach a new equilibrium state.

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

The goal implied in the original text is complete recovery of the conditions at the mining site. This is impractical. Similar to mining on land, mineral resources will not return to "pre mining conditions". There will always be a detectable difference in the IRZ because the mineral resource won't be there, whereas in the PRZ, it will.

The duration of monitoring will also need to reflect the time taken for the site to reach a new equilibrium.

Therefore we recommend that the recovery objectives should be set within the EMMP/Closure Plan. The plan should detail the length of time required and what the closure objectives are. This can be reviewed by the ISA and its relevant experts.