

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

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 on the Protection and Preservation of the Marine Environment

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

USA

**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.**

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.

(...)

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 are known to be measurably sensitive to specific impacts 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).

13. The longevity of PRZs [and duration of post-mining ] [is] [are] 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.] no measurable difference between IRZ and PRZ can be detected anymore.

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

(...)

15. ~~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.~~

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

In paragraph 12, we propose the phrase “measurably sensitive” be used here in place of “suffer most” in selecting suitable indicator species. It is important that the species not only be affected by a given impact, but that the impact be measurable and possible for the Contractor to monitor on site.

In paragraph 13 we note that it is unlikely on human timescales that monitoring will detect “no measurable difference between IRZs and PRZs” and therefore prefer the criteria described in version 13Alt.

Finally in this Annex, we suggest that paragraph 15 be removed from the text since it is duplicative with the content of paragraph 3.