

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

*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., Tonga Offshore Mining Ltd. and Blue Minerals Jamaica Ltd.

**3. 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)

**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.**

**Explanation / Comment**

- Furthermore, I believe that there would be merit in considering placing the content in a relevant standard. In any circumstance, to my understanding this annex should be more concise and focused on the purpose of the IRZ/PRZ and the design criteria, while specific details related to baseline data collection and monitoring should refer to the respective standards and guidelines. I therefore, kindly invite for discussions on that.

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

- We support the Facilitator’s proposal that the content of Annex Xter should be placed in a relevant standard. This would assist in the overall streamlining of the Draft Regulations.

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Annex Xter – Design Criteria for Impact Reference Zones (IRZs) and Preservation Reference Zones (PRZs), paragraph 13 alt

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[13 Alt. Post mining monitoring shall continue until [monitoring results show a trajectory towards recovery of 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. ]

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

- We are concerned that the proposed requirement in paragraph 13 Alt for post-mining monitoring to continue “until ecosystem function returns to the level” of pre-mining conditions would be excessively lengthy or impossible to achieve.
- The relevant sites, while adequately protected during mining activities by the Serious Harm standard, may not return fully to pre-mining conditions, at least not on a local time scale.
- We propose that post-mining monitoring continue until there is a demonstrable trend towards eventual ecological recovery. This can be linked to the standards agreed in the Final Closure Plan.