

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH 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.

- 1. Name of Working Group:**
IWG-Environment

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

- 3. Please indicate the relevant provision to which the textual proposal refers.**
Annex X ter

- 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.**

Paragraph 3

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

Paragraph 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~~

Paragraph 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 whose 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).~~

Paragraph 13

The longevity of PRZs and duration of post-mining 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.~~

Paragraph 15

To designate representative IRZs/PRZs requires characterization 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.

Paragraph 16

~~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.~~

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

(Paragraph 3 and 15)

Because local ecosystems differ greatly at each site, it would be better not to uniformly categorize them as pelagic or benthic, or all sub-habitats, therefore we suggest deletion of these words from paragraph 3 and 15.

(Paragraph 7 and 12)

Details of abiotic and biotic baseline and parameters should be described in the relevant Standards or Guidelines.

(Paragraph 13)

Ecosystem functions will change to a varying degree even under natural conditions with no anthropogenic disturbance and it is not expected that they will return to the level of the pre-mining condition. For this reason, we support Paragraph 13 which requires monitoring until confirming a trajectory towards recovery and is more realistic than Paragraph 13 Alt.

However, we suggest removal of the latter half of the originally drafted last sentence which states “no measurable difference between IRZ and PRZ can be detected anymore”, since there are geographical differences in change of ecosystem functions.

(Paragraph 16)

It should be described in the relevant Standards or Guidelines.