

Annex X bis (IRZ/PRZ)

Impact and Preservation Reference Zones (IRZ/PRZs) remain disjointed in The Mining Code, with confusion as to their purpose and implementation. These critical environmental management tools need to be developed and implemented in a joined-up manner in The Mining Code, flowing in a connected way from Exploration through to Exploitation. Not implementing this approach will undermine their effectiveness, as they are fundamentally a statistical tool which must remain static with an unimpacted control site throughout their use in order to work.

Annex X(bis), originally proposed by DOSI for which we thank them, is a starting point for the design criteria of IRZ/PRZs, but we consider this Annex, alongside [ISA Technical Study 21 – ‘Report of ISA Workshop on the Design of “Impact Reference Zones” and “Preservation Reference Zones” in Deep-Sea Mining Contract Areas’](#) should instead move to the Standards. This annex, retaining all proposals, should be the basis of the LTCs work on either developing a specific set of Standards and Guidelines for IRZ/PRZs, or perhaps more appropriately in our view, integrating IRZ/PRZ criteria across the suite of existing S&Gs as LTC sees fit (e.g. *S&Gs for establishing environmental baselines, EIAs, EMMPs, Test Mining & Closure Plans*). This should be in phase 1 of the Standards and Guidelines roadmap. We recommend during this process, “The Recommendations for the guidance of contractors for the assessment of the possible environmental impacts arising from exploration for marine minerals in the Area” are also considered, and potentially updated by LTC, to ensure the flow of these statistical tools from exploration to exploitation, which is critical to achieve their purpose.

High-level requirements for IRZ/PRZs should be secured in the regulations covering the Environmental Plans.