# RIR Governance Document Version 2 Consultation

Community Input Report

28 August - 7 November 2025

NRO
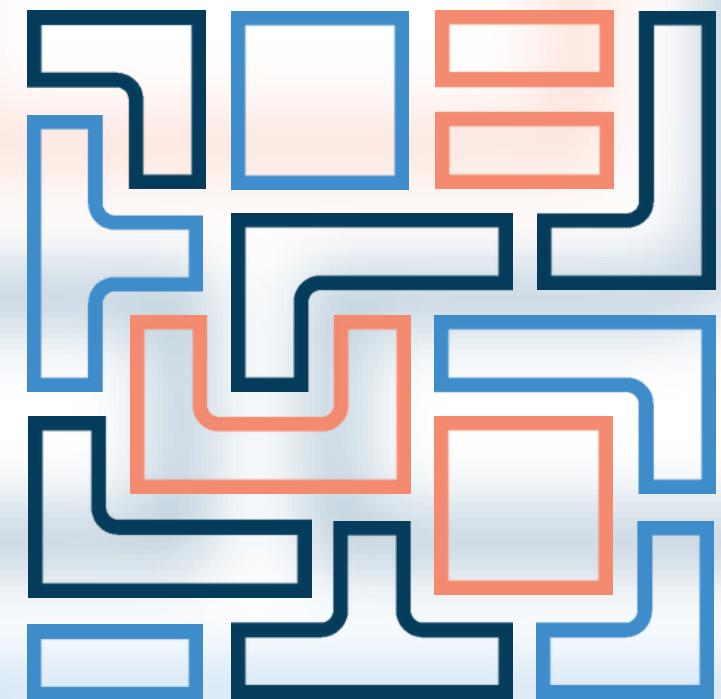
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Introduction

The NRO NC (which fulfils the role of the ASO AC) published the second version of the draft 'Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries' for review on 28 August 2025. This draft document is intended to replace ICP-2: Criteria for Establishment of New Regional Internet Registries.

This report summarizes the input received from the RIR and ICANN communities during the consultation and Public Comment process held from 28 August until 7 November 2025. This includes sessions at RIR and ICANN meetings, webinars, and mailing list feedback.

Please note that this is a summary of the feedback submitted, and those interested in reading through the community input in detail should refer to the Community Engagement page to find direct links to the consultation mailing lists and session archives of all the engagements held during the consultation period. We would like to emphasize that members of the NRO NC have reviewed all the comments that were submitted, even if they have not been included in this report.

This report does not include the NRO NC's opinions on or responses to the comments submitted. The NRO NC will continue to discuss the communities' feedback as well as the feedback received through ICANN's Public Comment while revising the RIR Governance Document.

We extend our thanks to everyone who read through the draft 'RIR Governance Document' and provided us with their thoughtful insights. Your feedback will help us improve this draft for the next consultation.

Preamble

Summary of comments received:

- Editorial change suggestions
- Concern that this draft has no inherent legal force, has a conflict of interest and a transparency problem, and that because the NRO is not a legal body, the draft can only become valid through a contract.

ARTICLE 1: Definitions, Interpretation, and Implementation

1.1. Definitions

This section provides a set of definitions to terms used in the document.

Summary of comments received:

- Some terms in the Definitions section are only used once and would be clearer if explained where they appear in the document.
- Several definitions are seen as unnecessary, too limited, or confusing.
- It is not always clear whether "RIR" or "ICANN" refers to staff, leaders, boards, or the wider community, and suggested making this clear.
- The new definition of "Member" is too narrow compared to the previous draft and whether the narrower definition of "Member" was intentional or a mistake. The definition should use broader wording and reconsider who should count as a Member.
- There should be greater clarity on the definition of "Member", including voting eligibility, membership categories, and how thresholds for derecognition (25% or 2,000 Members) are calculated, given variations in voting rights and membership structures among RIRs. Harmonizing these definitions and thresholds would ensure fairness, transparency, and consistency across all regions.
- Proposed additional definitions such as "Affiliated Members", "Diversity Threshold", and "Represented Country" to support requirements elsewhere in the document.
- The definition of "Control" in Article 1.1 does not adequately prevent indirect influence through affiliates or proxies, creating a risk of coordinated capture of an RIR's Governing Body. Commenters recommend limiting interpretation to contracting RIR Members only.
- There is a need for a clear and consistent definition of "Independent Review Panel" (IRP) to ensure impartiality, independence from RIRs, and adherence to transparency and due process principles across recognition and derecognition processes.

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ARTICLE 1: Definitions, Interpretation, and Implementation

1.2 Interpretation

This section provides guidance for interpreting the document.

There were no comments on this section.

1.3 Implementation

This section acknowledges that separate procedures will need to be developed by the RIRs and ICANN to support implementation of certain provisions.

Summary of comments received:

- Concerns about the three-year timeline for aligning RIR practices and structures, with questions about its necessity and how the document distinguishes governance requirements from resource allocation. While the timeline is not considered unreasonable, there is concern that existing RIRs may agree in principle but fail to comply, undermining accountability and rule-of-law standards.
- The draft lacks sufficient enforcement mechanisms and does not address how currently assigned IP resources would be managed in cases of derecognition or recognition of new RIRs, recommending that high-level guidance on these issues be included rather than deferred to implementation.
- Leaves important details about governance and compliance to "Implementation Procedures" that ICANN and the RIRs will create later. There's no guarantee these will involve the community or follow an open, transparent process, which could allow decisions to be made behind closed doors.
- There is confusion about the roles and responsibilities of the NRO, ASO, and RIRs, and want clearer separation to avoid conflicts of interest. Suggestions include ensuring the community is involved in all Implementation Procedures, publishing a clear charter that explains these relationships, keeping the ASO, NRO, and RIRs separate to avoid conflicts, and setting minimum accountability standards such as audited financials, transparent board decisions, regular audits, open policy-making, and independent dispute resolution to build trust across all regions.

ARTICLE 2: Internet Number Registry System

2.1 Roles and Responsibilities

This section delineates the roles of the various organizations referenced in the document.

Summary of comments received:

- Add language to restrict RIRs to a purely advisory capacity concerning the recognition and derecognition of new Regional Internet Registries.

2.2 Service Region

This section describes the attributes of an RIR service region.

Summary of comments received:

- Consider taking into account the number of Internet users along with linguistic and cultural cohesion rather than rigid geographic boundaries while considering demarcation of RIR service regions.
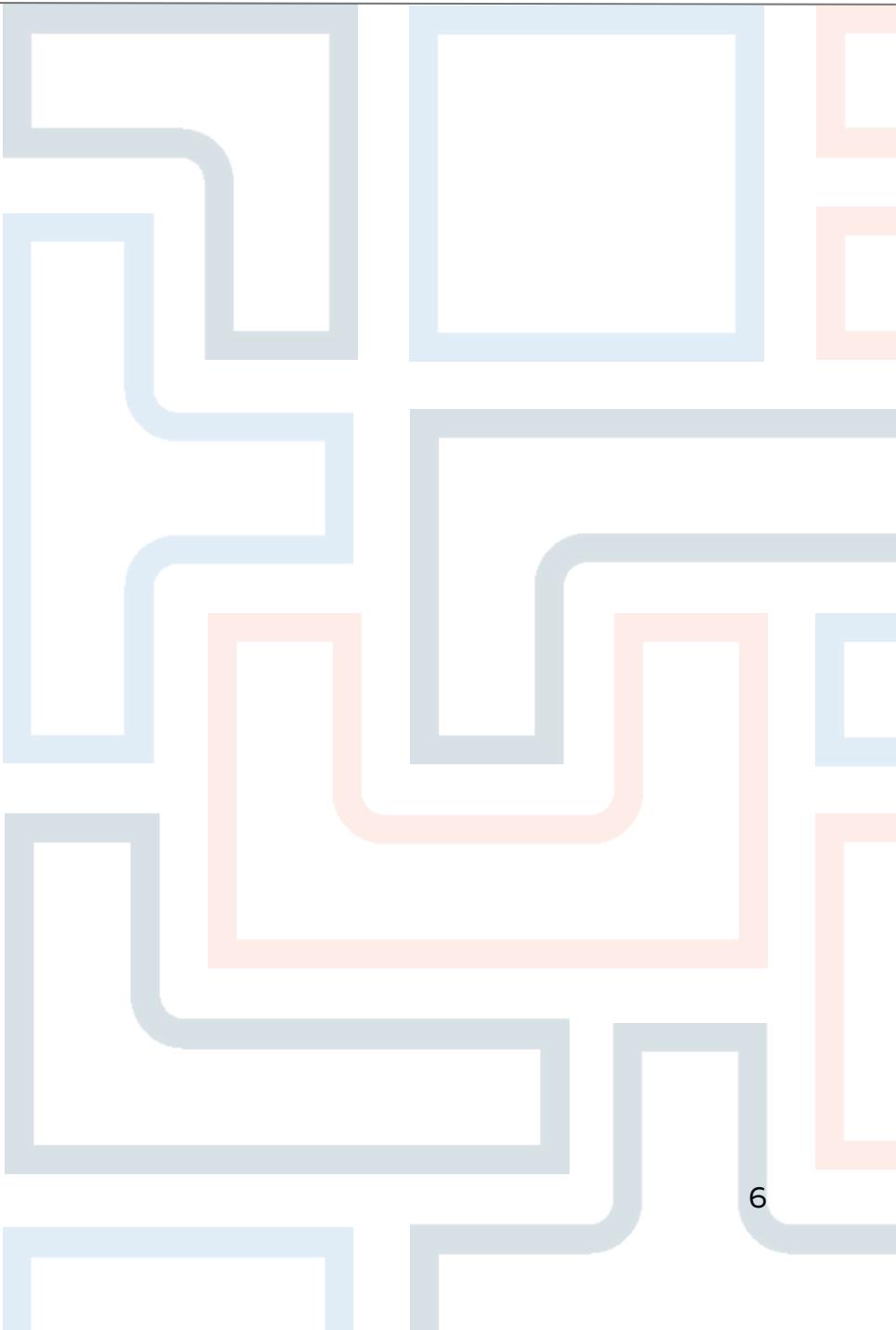
ARTICLE 2: Internet Number Registry System

2.3 Change to RIR Status

This section describes the various stages of RIR status.

2.3.(a) Recognition
Summary of comments received:

- There needs to be more detail about the "Proposal for Recognition".
- Unanimous recognition is likely to be challenging because of the inherent conflict of interest on the part of at least one RIR.
- Another concern was about the lack of clarity regarding deadlines in the recognition process.
- It could be difficult to achieve unanimity if an RIR is unable to express an opinion. The NRO members should make decisions by consensus or by supermajority.
- There was also a question about the status of the NRO as a legal entity.
- There was a suggestion that the onus of providing material facts during the recognition process should not fall on the applicant RIR but on the established RIRs instead.
- There was a concern that establishing NIRs should not become a backdoor towards the recognition of an RIR.
- Another comment suggested that the existing RIRs or community trust should not be inadvertently destabilized by the establishment of a new RIR when realigning service regions.
- One comment suggested creating an independent review panel to safeguard against conflicts of interest and bias and that existing RIRs should be limited to providing technical advice only in the recognition process.
- The threshold for dissenting RIRs should be a qualified majority and any affected party should be able to appeal.
- A comment suggested that any affected party should be able to appeal a decision.

ARTICLE 2: Internet Number Registry System

2.3 Change to RIR Status

This section describes the various stages of RIR status.

2.3.(b) Derecognition
Summary of comments received:

- The threshold of 25% of the membership is very high and is not a level of participation seen at RIR meetings. In some RIRs, bylaw amendments can take place with a two-thirds majority of votes cast, not total membership.
- There was a concern that one country could start a derecognition process if it comprises 25% of an RIR's membership, with a suggestion to add a diversity threshold as an anti-capture mechanism.
- There were comments asking for safeguards against governance capture to prevent member-stacking, vote-buying or mass creation of shell members.
- There was a suggestion that ICANN should verify the submitters of a derecognition petition and publish country-level counts as well.
- The 25% threshold could require a lot of effort and achieving this could take time.
- Having an appeal process could result in a longer delay to derecognizing an RIR, which could be undesirable when the RIR under derecognition is no longer competent.
- There was a suggestion to create an independent review panel to safeguard against conflicts of interest and bias and that existing RIRs should be limited to providing technical advice only in the derecognition process.
- A comment stated that a "collegial model" based on good faith and unanimity would provide peer protection rather than accountability.

ARTICLE 2: Internet Number Registry System

2.3 Change to RIR Status

This section describes the various stages of RIR status.

2.3.(c) ICANN Decision
Summary of comments received:

- There was a suggestion to change the terminology to "Notice of decision", which is a defined ICANN term.
- There was a suggestion to consider scenarios in which ICANN might need to intervene, for instance, when there's a deadlock.
- The reconsideration process refers to "ICANN's then-existing review procedures". This raises the concern that the review procedures could change over time impacting fairness and predictability. There was a suggestion to create a dedicated reconsideration and appeals procedure.
- ICANN should clarify how it will consider input from its stakeholders in recognition and derecognition procedures.
- There was a suggestion to create an independent review panel to safeguard against conflicts of interest and bias.

2.3.(d). Decision Procedures
Summary of comments received:

- No specific comments were received.

ARTICLE 2: Internet Number Registry System

2.4 Ad Hoc Audit
This section outlines the steps for the ad hoc audit process.

Summary of comments received:

- Comments included a request to clarify audit details who would perform the audit and what the next steps would be in terms of approval and remediation.
- A comment asked for the inclusion of diversity and anti-capture mechanisms for members requesting ad hoc audits.
- Some comments were stated that the member threshold to trigger an ad hoc audit was too high.
- ICANN's role was considered to be too reactive, and there should be steps in place between the audit findings and potential derecognition.

ARTICLE 2: Internet Number Registry System

2.5 Coordination Limitation

This section explains the goal and purpose of coordination limitation.

Summary of comments received:

- One comment asked whether this article should be extended to address legal obstruction and governance obstacles.
- Another comment pointed out the value in more formal coordination between the RIRs.

2.6 Sub-Regional Registries

This section outlines the role of sub-regional registries as it pertains to the enforcement of this document.

Summary of comments received:

- There was a suggestion to include specific criteria common to all RIRs for the recognition and derecognition of NIRs.
- Another comment suggested including a baseline of requirements for the functioning of NIRs such as transparency, fairness, and community consultation.
- There was a concern that the use of the phrase "at its complete discretion" confers discretionary powers with the individual RIR for the establishment of National Internet Registries.

2.7 English

This section stipulates English as the official language of the RIR system.

Summary of comments received:

- Comments suggested encouraging multilingual accessibility within RIRs to foster inclusivity.

ARTICLE 2: Internet Number Registry System

2.8 Good Faith

This section establishes the requirement for good faith dealings by ICANN and the RIRs in the support and enforcement of this document.

Summary of comments received:

- A concern was that adherence to key obligations could be delayed or stalled under the guise of "reasonable timeframes". A 90-day window was suggested as a feasible timeline.
- A comment asked how it could be determined if an RIR was not acting in good faith as determined in the article.
- Another comment pointed out that having consultation across all RIR and ICANN communities requires nearly two years, which means that "reasonable timeframes" could be a lot longer in practice.
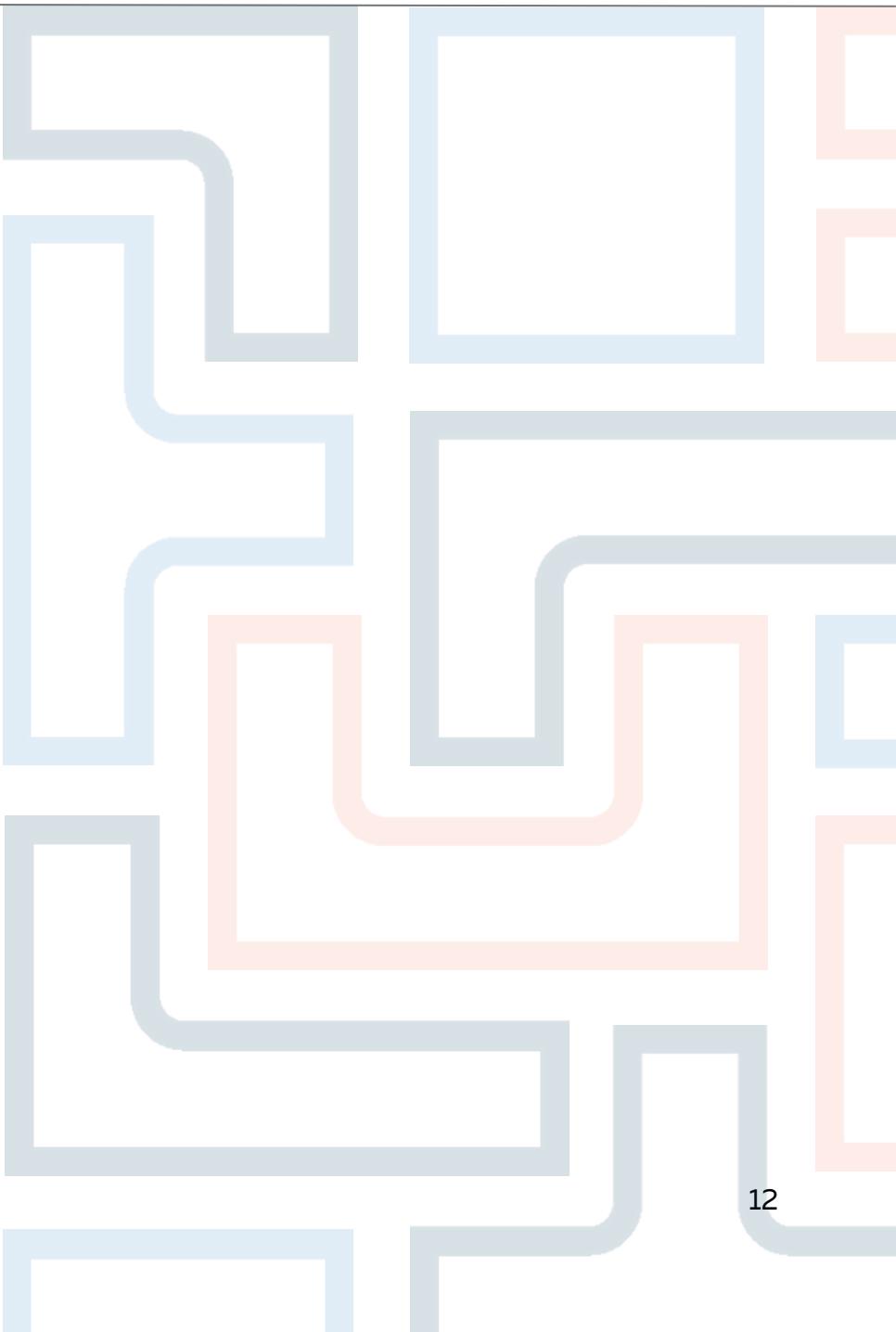
ARTICLE 3: Recognition

This section documents the thresholds for recognition of a new RIR.

Summary of comments received:

- Make it explicit that any Candidate RIR must follow the goals and structure of the Internet Numbers Registry System as defined in RFC 7020, to avoid ambiguity about the RIR's role and mandate.
- Add a requirement under Article 3 for documented and tested anti-capture, continuity, and resilience policies, including crisis management plans, as part of the recognition audit.
- The ability to review an RIR's recognition status is a key change in this draft and should only apply in exceptional cases, such as serious governance failures.
- Additional questions were raised about whether the minimum requirements for creating a new RIR include safeguards to prevent scenarios where a single large country could attempt to become an RIR independently, which could undermine the global RIR system.

3.1. Criteria for Recognition

Summary of comments received:

- Questions about how the new draft reflects the principle of regional community support, which was a key requirement in ICP-2 and is considered essential for the multistakeholder model.
- Clarifying the definition of 'community' in Section 3.1(c) to avoid ambiguity.
- Add a clause under Article 3 requiring a formal agreement (such as an SLA or MoU) between ICANN and the recognized RIR after recognition, covering commitments like service quality, audits, cooperation, capacity building, and dispute resolution.
- The Notice of Decision should include a binding implementation plan with milestones for data transfer, operational setup, and support from the incumbent RIR to ensure a smooth transition.
- Recommendation to remove the phrase 'relative to the then-existing state of affairs' from Section 3.1(f), arguing that improvements should allow proactive changes to strengthen the system before problems arise.

ARTICLE 3: Recognition

This section documents the thresholds for recognition of a new RIR.

3.2. Effect of Recognition

Summary of comments received:

- Establish a formal SLA-based accountability framework between ICANN and all the RIRs, covering recognition, ongoing commitments, and derecognition. This would require amending sections 3.2, 4.1-4.2, 6.1, 6.2, and 2.3(b)(v) to ensure transparency, continuity, and objective oversight throughout the entire recognition lifecycle.

ARTICLE 4: Ongoing Commitments

This section documents the ongoing commitments of the RIRs. These commitments must be met to remain in compliance with the document, and describes the auditing requirements to ensure these commitments are met.

4.1 Operational Requirements

Summary of comments received:

- A call for clearer definitions of financial stability and operational independence, as well as limits on external influence.
- Concerns about including natural persons as members due to data-protection and continuity implications, and suggestions are made to better address governance-capture risks tied to affiliated entities.
- Highlighted the need for more explicit governance expectations, an active and accessible Policy Development Process, and stronger continuity requirements, including defined and regularly tested data-escrow mechanisms.
- Needs clearer transparency standards, safeguards against disproportionate control, and more specific guidance on confidentiality and dispute resolution, along with references to established security and risk-management practices.

4.2 Audit

Summary of comments received:

- Needs a clearer definition of the mechanisms that trigger an audit, including how thresholds for ad hoc audits should apply and how audits initiated by ICANN differ in process and impact from those initiated by the community.
- Article 4.2 benefits from more operational detail, such as measurable indicators, logs, escalation mechanisms, and defined timelines, with suggestions to incorporate quantifiable metrics and drift-detection tools to strengthen its implementation.
- Recommendations regarding the publication of anonymized audit results, corrective-action responses, and follow-up reporting.
- Concerns about the possibility of overlapping or excessive audits if multiple triggers exist without clear frequency limits.
- Discussion of thresholds for member-initiated audits, with some comments indicating they may be either too high or too low depending on the context.

ARTICLE 5: Emergency Continuity

This section outlines the steps to support emergency continuity for an RIR that is temporarily unable to meet the obligations defined in this document.

5.1. Emergency Continuity

Summary of comments received:

- Need for clearer definitions of which RIR services can realistically be restored during and after an Emergency Continuity period, with suggestions to distinguish explicitly between "affected" services and the critical services that must be prioritized.
- The document should clearly state that operational responsibility returns to the affected RIR as soon as its capability is sufficiently reestablished.
- Recommendation for defining verification criteria to determine when restoration is appropriate and requiring the publication of the post-event review and the rationale for returning operations.
- Emphasized the importance of ensuring that the Emergency Operator does not retain control longer than necessary and that the principle of regional self-governance remains intact.
- The current unanimity threshold is too high and could invite inaction.
- The Emergency Operator's authority should be explicitly and strictly limited to operational continuity, not governance or policy-making functions.

ARTICLE 5: Emergency Continuity

This section outlines the steps to support emergency continuity for an RIR that is temporarily unable to meet the obligations defined in this document.

5.2. Post-Emergency Continuity Review

Summary of comments received:

- Need to clarify which RIR services can be realistically restored during and after an Emergency Continuity period, with suggestions to explicitly distinguish between "affected" services and the critical services that must be prioritized.
- The document should clearly state that operational responsibility returns to the affected RIR as soon as its capability is sufficiently reestablished.
- Recommendation to define verification criteria to determine when restoration is appropriate and requiring the publication of the post-event review and the rationale for returning operations.
- Ensure that the Emergency Operator does not retain control longer than necessary and that the principle of regional self-governance is maintained.

Article 6: Derecognition

This section describes the steps and stages associated with derecognition of an RIR.

6.1. Possibility of Derecognition

Summary of comments received:

- Highlighted the need for clearer and more proactive criteria for initiating derecognition, noting that the current model is largely reactive and lacks intermediate measures between compliance and derecognition.
- Recommendation to introduce graduated remedies and linking derecognition to objective performance metrics supported by independent audits.

6.2. Rehabilitation

Summary of comments received:

- Need for a clearer and more structured remediation process, noting that the current wording relies on subjective terms that may lead to inconsistent application.
- Recommendation to establish defined timelines, milestones, and procedures, as well as removing "if requested" to ensure timely support for a non-compliant RIR.
- Highlighted the absence of intermediate measures between compliance and derecognition, suggesting the introduction of graduated mechanisms and the incorporation of objective SLA/MoU-based metrics and audits into the process.

Article 6: Derecognition

This section describes the steps and stages associated with derecognition of an RIR.

6.3. Effect of Derecognition

Summary of comments received:

- Need for greater clarity regarding the consequences of derecognition, particularly in relation to membership in the NRO and how prior actions or sanctions interact with a derecognition decision.
- Highlighted the importance of ensuring that handoff and transition processes preserve not only technical continuity but also regional trust, legitimacy, and community involvement.
- Emphasized that derecognition and handoff scenarios must account for regional legal risks, including the possibility of local court interference.
- Strengthen data escrow and continuity safeguards to ensure that registry operations remain protected and transferable even in adverse legal environments.

6.4.Readiness

Summary of comments received:

- No specific comments were received.

Article 7: Amendment

This section defines the steps to amend this document after it is adopted.

7.1. Approval

Summary of comments received:

- No specific comments were received.

7.2. Rectification

Summary of comments received:

- No specific comments were received.

7.3. Periodic Review

Summary of comments received:

- Commenters agreed that the five-year review cycle was reasonable and that the amendment process would benefit from a similarly detailed framework.
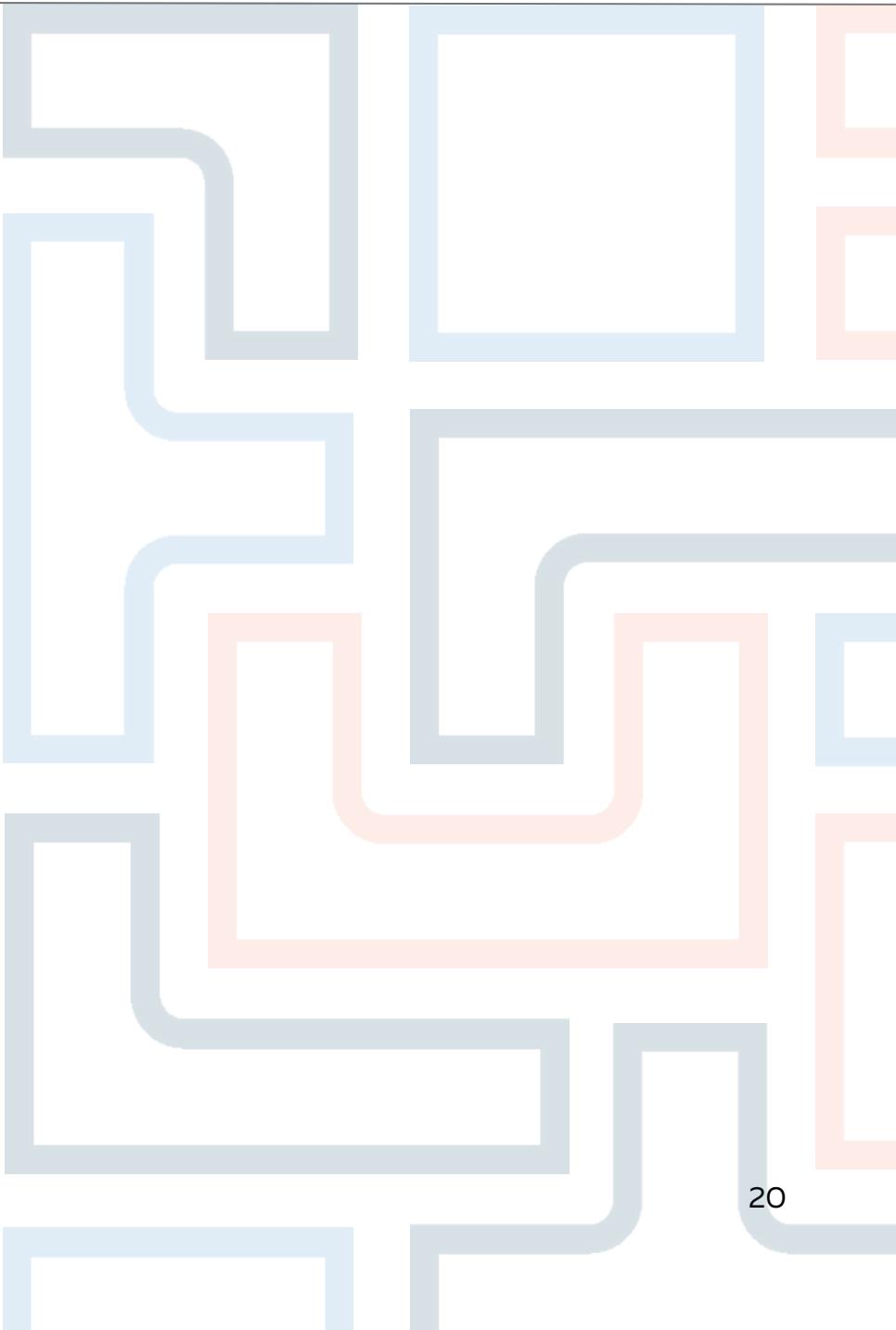
General Feedback

Some of the feedback received was more general and did not correlate to a specific article of the document.
Some additional comments suggested the following:

Summary of comments received:

- Consider updating the overall format of the document for accessibility and consistency, i.e. table of contents, etc.
- Consider adding language regarding harmonization of RIR policy to minimize the administrative and operational burden on resource holders.
- Maintain a clear distinction between the framework this document is intended to define and implementation procedures.
- Clearly define mechanisms to maintain transparency and inclusion for all stakeholders in the implementation of this document.
- Consider if rigid timeline requirements could make it impossible for an RIR to comply with this document in a complex crisis.
- The anticapture provision would benefit from more specificity regarding affiliated entities.
- More clarity is needed around the definition of terms like "RIR membership".
- Consider inclusion of auditable cybersecurity requirements as part of the compliance responsibilities for the RIRs.
- Provide a more clear definition of the responsibilities to sub-regional resource holders in the event of derecognition to ensure sufficient safeguards are guaranteed.
- Consider leveraging existing models for emergency continuity to ensure procedures are in place that guarantee service will not be disrupted by crises, derecognition, or other emergencies.

Conclusion and Next Steps

This summary of the community input received through the consultation on the second draft of the "RIR Governance Document" is provided as an overview for the community in the spirit of maintaining transparency in the revision process of this critical document.

The summary shows a sample of the comments received; all comments received are available in the various RIR mailing list archives listed on the NRO website and in the various session transcripts and recordings.

We hope this summary will give readers a sense of the range and depth of the feedback received, and we would like to reiterate that all comments received have been read and reviewed, even if they have not been referred to in this summary.

Over the coming months, the NRO NC will be revising the draft RIR Governance Document with consideration to the feedback received through all consultative inputs. The NRO NC will engage with the RIR and ICANN communities on outstanding issues and considerations before presenting the final draft to initiate the approval and adoption process in late 2026.

We extend our thanks to all respondents for their insights and effort in responding to the consultation on the second draft. We look forward to continuing to engage with the RIR and ICANN communities in the process of reviewing and updating the RIR Governance Document.

Each RIR has three representatives on the NRO NC. The NRO NC consists of:

- Saul Stein (AFRINIC)
- Maemura Akinori (APNIC)
- Nicole Chan (APNIC)
- Devesh Tyagi (APNIC)
- Amy Potter (ARIN)
- Alyssa Quinn (ARIN)
- Kevin Blumberg (ARIN)
- Ricardo Patara (LACNIC)
- Esteban Lescano (LACNIC)
- Jorge Villa (LACNIC)
- Hervé Clément (RIPE NCC)
- Constanze Bürger (RIPE NCC)
- Andrei Robachevsky (RIPE NCC)

Follow updates on ICP-2 via the NRO website: https://www.nro.net/policy/internet-coordination-policy-2/

The NRO NC
2 February 2026

Appendix

RIR Mailing List Archives

AFRINIC
Mailing List Discussions:
https://lists.afrinic.net/mailman/listinfo/icp2-review

Mailing List Archives:
https://lists.afrinic.net/mailman/listinfo/icp2-review

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Mailing List Archives:
https://lists.arin.net/pipermail/icp2_review/

LACNIC
Mailing List Discussions:
https://suscripcion-lista-icp2.lacnic.net/en

Mailing List Archives:
https://mail.lacnic.net/pipermail/consulta-icp2/

RIPE NCC
Mailing List Discussions:
https://mailman.ripe.net/mailman3/lists/ripe-list.ripe.net/

Mailing List Archives:
https://mailman.ripe.net/archives/list/ripe-list@ripe.net/

Session Archives

All presentations given by the NRO NC at RIR, ICANN and other meetings are archived on the NRO website.
https://www.nro.net/policy/internet-coordination-policy-2/community-engagement/

ICANN Public Comment

The submissions received through ICANN's Public Comment process are available on the ICANN website.
https://www.icann.org/en/public-comment/proceeding/second-draft-of-the-rir-governance-document-28-08-2025

Thank You

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