



Status Report - May 2026

Status Report Q2 2026

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Introduction

This document provides an overview of the current status of work being carried out to revise the second version of the draft RIR Governance Document. The goal of this document is to provide transparency and to track drafting progress based on input already received. **It does not open a new consultation or comment period.**

We, the NRO NC, published [the second version of the RIR Governance Document](#) on 28 August 2025. This version incorporated extensive community feedback received through the RIR community consultation and ICANN Public Comment process which was held from 14 April until 27 May 2025. We also published [a document summarising the major differences](#) between the two versions and explained why certain suggestions, while thoughtful and interesting, did not make their way into the second draft.

A subsequent community consultation and ICANN Public Comment was held from 28 August until 7 November 2025. A [summary of the feedback](#) received from the community in this consultation has also been published.

The NRO NC held a workshop from 12 to 14 November 2025, hosted by LACNIC in Montevideo, Uruguay, to review all comments received in detail. These comments were analysed, particularly with respect to whether they added new perspectives or raised issues that had not yet been considered. Following this analysis, we identified a few topics that required further discussion within the NRO NC. These are included in this document with the status “In Progress”. In certain other areas, we agreed on an approach to the topic and to amend the text in the next version. These are reflected in the list of topics with the status “Drafting”.

Building on this work, the NRO NC continued discussions during in-person meetings at ICANN85, held in Mumbai from 7 to 12 March 2026. These engagements also included joint sessions with several ICANN community groups, including the Governmental Advisory Committee (GAC), and a subsequent written [response](#) addressing the questions raised. An [ICANN85 report](#) summarises these sessions and the issues discussed.

This update highlights areas where drafting has progressed, issues that remain under discussion and topics that are still in progress as the NRO NC works towards version 3 of the RIR Governance Document.

As we proceed to update the document, we feel it is valuable to highlight the likely modifications in the version 3 of the document, and to narrow the focus of our discussions to the issues under active discussion and drafting rather than the document as a whole.

We would like to thank everyone who took the time to review the first and second drafts and for your continued participation in this process. As always, we value your input on whether we are on the right track with respect to our approach.

Sincerely,



Hervé Clément, NRO NC Chair

Note: All article and section numbers included in this document are with reference to the second version of the RIR Governance Document.

Items In Progress and Under Drafting

Recognition Threshold (previously Unanimity Minus One)

Background: The current version allows for the recognition of a Candidate RIR based on unanimity minus one (i.e. allows for one dissenting RIR under certain conditions).

Feedback: We received feedback that the requirement that recognition of a new RIR requires unanimous support from the existing RIRs (or unanimous minus one as the current mechanism allows for), might not provide sufficient protection against the possibility that multiple existing RIRs may have a conflict of interest. At the same time, we received feedback noting that the existing RIRs will be obligated to work and cooperate with any new RIRs. The global Internet numbering system relies on effective coordination and cooperation between the RIRs, and this needs to be considered in the recognition process. An additional concern is the possibility that an RIR might be unable to act or take decisions on recognition. A question remains as to whether the current mechanisms adequately balance these concerns.

Status: In progress

Discussions took place on whether the thresholds and processes in version 2 of the RIR Governance Document were adequate to accommodate a range of scenarios such as the possibility that multiple RIRs might have a conflict of interest that could influence their recommendation.

There was agreement that:

- The recognition process should require a supermajority threshold rather than unanimity or unanimity minus one.
- The recognition process should also account for and address possible conflicts of interest.

Additionally, discussions are still ongoing to define ICANN's role in the recognition process.

Relevant section: 2.3.(a).(iii) Approval

Recognition Review (Independent Third Party)

Background: In the event that the existing RIRs do not unanimously recommend recognition of a new candidate RIR, the candidate RIR may submit a written request to



ICANN for a Recognition Review. The Recognition Review process requires ICANN to appoint a qualified independent third party to carry out the review.

Feedback: We received feedback that the document should prescribe minimum attributes of the independent third party. In contrast to this view, there was also discussion on whether the qualifications for the third party should be in implementation details and not included in the draft RIR Governance Document. Further, we understand ICANN may wish to evaluate whether it will carry out the recognition review process itself or use a third party.

Status: In progress

Input is required from ICANN in writing clarifying their role in the process. Simplifying the recognition process by lowering the recognition threshold could remove the need for the recognition review process.

Relevant section: 2.3.(a).(v) Recognition Review

Emergency Continuity Initiation and Renewal Procedures

Background: The initiation of Emergency Continuity procedures requires the unanimous agreement of all other RIRs and ICANN in case an RIR is unable to provide RIR services to its region.

Feedback: We received feedback that the requirement of unanimity among the remaining RIRs might be too high, particularly when the situation requires urgent action. We further discussed the need to add criteria to justify the extension of an Emergency Continuity procedure. In practice, 90 days might not be adequate to identify a successor entity. At the same time, it is important to retain oversight over any extensions. There was an additional concern that the Emergency Continuity procedures could be renewed or extended without adequate oversight.

Response: The NRO NC agreed that an affected RIR should also be allowed to initiate Emergency Continuity if it deems that it will be unable to provide services. Further, the threshold for initiating Emergency Continuity by other RIRs and ICANN will not require unanimity.

An additional consideration was to have a staggered approach towards Emergency Continuity, with the Emergency Operator providing only the most important services from the time that an Emergency Continuity is triggered, and taking on other services gradually.

The text also needs to clarify ICANN's role in the Emergency Continuity and whether it can initiate it unilaterally.

Finally, there was a discussion on whether or not to limit the number of times Emergency Continuity can be renewed, and it was agreed to retain the existing approach of not capping the number of renewals.



Status: In progress

Relevant section: 5.1 Emergency Continuity

Derecognition Threshold

Background: Both the derecognition process and the ad hoc audit process can be initiated by: 1) any RIR or group of RIRs; 2) a group of Members of the impacted RIR — with the current threshold set at 25% of an RIR's total Members or 2,000 Members, whichever is lower; or 3) ICANN."

Feedback: We received a range of comments on this issue. Some comments suggested lowering the threshold, other comments wanted to see anti-capture mechanisms included so that members from a single country or affiliated group will not be able to trigger a derecognition proposal.

Response: The NRO NC reviewed the different governance practices at the RIRs as well as their membership numbers. Derecognition is a final recourse, and the threshold to trigger it is deliberately high. If a Member proposal reaches a high percentage but falls short of the actual 25% threshold it can also serve as a credible basis for the other RIRs or ICANN to take action. Therefore, there will be no change to the derecognition thresholds.

Status: No change

The NRO NC decided to separate the audit threshold issues from the derecognition process. There will be no change to the derecognition threshold.

Relevant Sections: 2.3.(b) Derecognition

Audits

Background: The NRO NC reviewed the criteria for initiating ad hoc audits. In version 2 of the RIR Governance Document, the ad hoc audit process can be initiated by 1) any RIR or group of RIRs; 2) a group of Members of the impacted RIR - with the current threshold set at 25% of an RIR's total Members or 2,000 Members, whichever is lower; or 3) ICANN."

Feedback: We received a range of comments on this issue. Some comments suggested lowering the threshold, other comments wanted to see anti-capture mechanisms included so that members from a single country or affiliated group will not be able to trigger a derecognition proposal.

Response: The NRO NC carried out a holistic review of the entire audit process, including regular audits, the process to request an ad hoc audit and the criteria to request an ad hoc audit. We decided upon the following:

- To change the frequency of regular audits to once every five years. Version 2 of the document sets the frequency at once every three years, which was deemed to be too

frequent. This could lead to RIRs being continuously under audit and unable to focus on their core mission.

- Agreed that regular audits and ad hoc audits have a different scope.
- To rename the 'ad hoc' audit as targeted compliance review in line with its purpose. The goal is to have a mechanism in between regular audits to investigate concerns regarding non-compliance with the RIR Governance Document. Therefore, the term "compliance review" reflects the intention more accurately.

Status: Drafting

Definitions of audit and compliance review will be included in the next version to provide clarity.

Relevant Section: 4.2 Audit

Ad Hoc Audit (renamed Compliance Review)

Background: The NRO NC reviewed the criteria for initiating compliance reviews.

Feedback: It is important to have a balance between enabling ICANN, other RIRs and members to initiate a compliance review and preventing misuse of the compliance review mechanism.

Response: The NRO NC discussed criteria to initiate a compliance review. There was agreement that the criteria should include the following:

- Members of an RIR must have made efforts in good faith to resolve their concern through the existing mechanisms of the RIR in question prior to initiating a compliance review.
- The requesting party should specify for which provisions of the RIR Governance Document they are requesting a compliance review.
- Any party requesting a compliance review must demonstrate that the issue giving rise to their request represents a material issue of sufficient urgency that cannot await the next regular scheduled audit of the RIR in question.

Status: Drafting

The criteria to request a compliance review will be specified, including the threshold for the initiation of a compliance review by members.

Relevant Section: 2.4 Ad Hoc Audit and 4.2 Audit

Document Structure

Background: As the document has evolved, the same issue is addressed across multiple sections.



Feedback: The document has a complex structure and would benefit from restructuring.

Status: Drafting

The document will be restructured for improved flow and clarity.

Transition and Continuity

Background: Article 6 requires a Derecognized RIR to ensure and facilitate the smooth transfer of its RIR services and operations to an interim or successor entity as directed by ICANN.

Feedback: We received feedback that the article should address the transition in more detail, specifically to ensure that communities remain engaged during the transition and to protect the rights of the affected resource holders.

Status: Drafting

The NRO NC will add text outlining requirements for a transition plan that ensures the continuity of service and protection of resource holder rights.

Relevant Section: 6.3 (a) Handoff

Audit Obligations

Background: Section 2.4 allows for ad hoc audits and section 4.2 requires an RIR to be audited no less than once in three years. However, the document does not specify the actions to be taken following an audit.

Feedback: We received feedback that the document does not explicitly oblige an RIR to take action following the publication of an audit report.

Status: Drafting

The NRO NC will amend the text to clarify RIR obligations regarding audits.

Relevant Sections: 2.4 Ad Hoc Audit and 4.2 Audit

Derecognition (Audit as a part of derecognition)

Background: The derecognition process does not include an audit as one of the necessary steps.

Feedback: We received feedback suggesting that an audit be a mandatory part of the derecognition process.



Status: No change

The document requires all RIRs to be audited no less than once in three years (*to be changed to 'once every five years' as referenced above in the 'Audit' section*). It is possible that the derecognition process is triggered after an RIR has already failed one or multiple audits. Including an audit requirement could further delay the process. Article 6.2 Rehabilitation already creates an obligation to provide assistance and rehabilitate an RIR prior to any derecognition processes. Therefore, the NRO NC decided that no changes were needed.

Relevant Sections: 2.3.(b) Derecognition and 6.2 Rehabilitation

Derecognition (Rehabilitation as a part of derecognition)

Background: Article 6.2 requires efforts to be made to rehabilitate a non-compliant RIR prior to derecognition, which is seen as a last resort.

Feedback: Rehabilitation is not listed as a step under the derecognition process under Article 2.3(b).

Status: Drafting

The NRO NC discussed the need to include rehabilitation as a step in the derecognition process. The derecognition process text will be amended to include the obligation to attempt to rehabilitate an RIR before further derecognition steps are taken.

Relevant Section: 2.3.(b) Derecognition