

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>		
Title of the draft being reviewed:	Draft standard and guidelines for the preparation and implementation of emergency response and contingency plans	
<i>Contact information</i>		
Surname:	Arai	
Given Name:	Yumiko	
Government (if applicable):		
Organization (if applicable):	Japan Oil, Gas and Metals National Corporation (JOGMEC)	
Country:	Japan	
E-mail:	isa-jogmec@jogmec.go.jp	
<i>General Comments</i>		
<p>Although security incidents are included in contingency planning in the draft, they should be separated from other emergency responses plan and organized separately because they include the anti-terrorism measures and would have a strictly confidential manual. For the above reasons, thorough information management of security planning should be clearly mentioned.</p>		
<i>Specific Comments</i>		
Page	Line	Comment
4	84	<p>The word "security incidents" should be deleted from line 84. At the end of Article 11, it should be added that "Contractors shall establish their own individual manuals for security planning and ensure thorough information management."</p> <p>【Amendment proposal】</p> <p>11. In the contingency planning, the Contractor shall consider and cover the major categories of scenarios that are foreseen to occur such as collision, grounding, fire and explosion, pollution incidents, safety incidents, security incidents, etc. Contractors shall establish their own individual manuals for security and ensure thorough information management.</p>
7	234	<p>The word "security incidents" should be deleted from line 234.</p> <p>【Amendment proposal】</p> <p>32. The EPA hazards, DSHAs, barrier management etc., shall be the basis for developing an emergency preparedness organization. The EPA shall also be the basis for the contingency planning. The contingency plans shall be developed on a high level that highlights the processes for different scenarios such as collision, grounding, fire and explosion, pollution incidents, safety incidents, security incidents, etc. The processes shall have close links to emergency preparedness plans. The EPA, based on the risks identified, shall also have a process that identifies the risk ownership.</p>

Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”

Comments should be sent by e-mail to ola@isa.org.jm