

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>		
Title of the draft being reviewed:	Draft Standard and Guidelines for environmental impact assessment process	
<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>This draft guideline applies the IAIA's definition of EIA (line54) to identify, predict and evaluate environmental impacts and consider mitigation measures for EIA before decision making for developments. It is assumed that baseline and monitoring surveys are a series of processes for EIA, therefore, the draft guideline for the establishment of baseline environmental data and this draft guideline need to be consistent; however, there are differences in the evaluation items. In addition, each standard or guideline should be an independent document and completed in itself without relying on the other guidelines.</p>		
<i>Specific Comments</i>		
Page	Line	Comment
1	51	The evaluation items of this draft guideline and the draft guideline for the establishment of baseline environmental data are different. The former is physiochemical, biological and socioeconomic environment, while the latter is divided into physical, chemical, biogeochemistry, geological properties, and biological communities (line 101-104 in the draft guideline for the establishment of baseline environmental data). Please provide reasonable explanation for this difference.
1, 6, 27, 34, 36	52, 235, 918, 1153, 1238	The term of “socioeconomic” environment appears five times in this draft (line 53, 235, 918, 1153 and 1238), however there is no explanation for it. Socioeconomics is a broad concept in general and should be explained in this draft guideline, otherwise some other document describing it should be referred (e.g. see Annex IV, Exploitation regulation).
1	44	There is a description as follows, “to anticipate, avoid or minimise harmful environmental effects” (line44), however, there is no explanation about the harmful effect (or significant effect). In addition, line 29-39 provides other guidelines and standards to be read together, but it is difficult to find the meaning of “harmful effect” from them.
2	66-84	Please provide the more detailed figure. Even if it can be understood by reading it together with the second part of the draft Exploitation regulation, the information on who applies, accepts and approves it should be included

		in the guideline.
<i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i>		

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