



| Document reviewed | |
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| Title of the draft being reviewed: | Guidelines for the establishment of baseline environmental data |
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| General Comments | |
| <p>Australia confirms its position, as previously stated, that these Guidelines can only be approved as part of a package, together with the Draft Exploitation Regulations (Regulations) and other Standards and Guidelines. We note also that to the extent these Guidelines refer to other Guidelines which are yet to be developed, it is appropriate to have a further opportunity to comment on this Guideline in the light of the other Guidelines once they have been prepared.</p> | |
| <p>Australia reiterates comments made on the draft Regulations and Annex VII and considers that any proposed amendments to the Regulations should also be reflected in the Guidelines.</p> | |
| <p>These Guidelines should include a statement to the effect that where the Guidelines seemingly conflict with the Regulations, including their annexes, or any Standards, the Regulations or Standards will prevail.</p> | |
| <p>The document is highly detailed and should function well to identify environmental indicators prior to anthropogenic influence in the area - a necessary feature of an effective regime built around a precautionary approach.</p> | |
| <p>The document is a good summary of best practices, methodologies/tools and datasets. The physical oceanographic variables listed and the comments on their collection seem comprehensive and reasonable</p> | |
| <p>Lines 65-68 clarify that these Guidelines primarily focus on deep-sea polymetallic nodules found in the central and NW Pacific and Indian Oceans, with further iterations to be issued to cover polymetallic seafloor massive sulphides and cobalt-rich ferromanganese crusts. Noting the scope limitations, Australia suggests that the title of the Guidelines be amended to reflect the scope.</p> | |
| <p>Terms defined in the schedule to the Regulations should be consistently used and capitalised throughout the Guidelines.</p> | |
| <p>Noting the importance of the baseline data, as identified in paragraphs 5 and 6 of Purpose and Scope, Australia queries whether at least part of these Guidelines should be transferred to a Standard. That is, while under Annex IV, the EIS must include baseline descriptions of the</p> | |

| <p>environment and the baseline data collected, there is no specific requirement to collect baseline data.</p> <p>Failure to provide sufficient baseline data may result in the Commission being unable to satisfy itself that the applicant meets the requirements in the Regulations and to recommend approval of the Plan of Work. The Guidelines are not consistent in specifying data collection guidance, by clearly setting out the minimum amounts of data to be collected but in other sections providing vague indications on what may be collected. We suggest taking a consistent approach and stipulating the minimum data to be collected to enable the Commission to satisfy itself of the requirements in regulations 12(4) and 13.</p> | | |
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| <p>Australia notes that some of the sampling methodologies contemplated for Biological Communities involve the physical removal of organisms from their environment (e.g. net sampling, mid-water and bottom trawls). Australia recommends that the Guidelines remind applicants that such activities may also engage the international obligations of the relevant coastal State, flag State, sponsoring State and/or the State of nationality of the applicant. For example, obligations contained in the Convention on International Trade in Endangered Species of Wild Fauna and Flora and the Convention on the Conservation of Migratory Species of Wild Animals could be relevant, as could the measures of regional fisheries management organisations.</p> | | |
| <p>Supportive of the document's focus on strong environmental regulation.</p> | | |
| <i>Specific Comments</i> | | |
| Page | Line | Comment |
| 4 | 69-70 | Please replace "These Guidelines provide guidance on meeting the requirements concerning [...]". |
| 5 | 117-118 | Consistent with other parts of the Guidelines, please provide a minimum number of replicate observations to provide greater guidance of expectations. |
| 7 | 159 | Consistent with other parts of the Guidelines, please provide a minimum number of replicate observations to provide greater guidance of expectations. |
| 7 | 166 | Please clarify what is meant by 'contrasting seasons'. Does this mean winter vs summer, or can it be in summer and spring? |
| 8 | 212 | Please replace "the existing knowledge" with "best available existing research and data." |
| 8 | 225 | Please clarify that the independent feedback should be provided from an organisations or person with relevant expertise in the field. |
| 10 | 296 | There has been no specified minimum thus far. Please clarify whether the minimums are actually contained in the subject matter sections. If not, please amend the section on sampling and data acquisition to contain clearly stated minimum tasks and data to be collected. |
| 10 | 315 | Please expand "WGS84". |
| 10 | 318 | Please refer to example "established metadata standards". |
| 12 | 370-375 | Please expand "CTD", "LADCP", "AUVs", "ADCP" on first use. You may prefer to provide a list of abbreviations at the beginning or the end of the document. |
| 13 | 430 | Please expand "ROV" on first use. |

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| 14 | 474-475 | Please clarify whether it is suggested or recommended that applicants use Joseph (2014) on how to best present graphical data. As drafted currently, the reference to Joseph (2014) provides no guidance on what to do with that information. |
| 14 | 485-496 | Section E only mentions using pressure sensors or satellite altimetry for data. Future surveys are likely to utilise GNSS buoys (by which is meant a floating buoy that hyper-accurately determines its height above the spheroid). Suggest also referencing future technology in this section. |
| 15 | 497 | Please clarify by whom the methods should be commonly accepted. Is it the scientific community? |
| 16 | 556 | Please clarify whether options for different types of fluorometers can be found in the stated references. |
| 16, 31, 41, 42 | 570, 1207, 1210, 1598, 1638 | Please use a consistent spelling for “chlorophyll a” or “Chlorophyll-a”. |
| 18 | 625 | Please clarify how models should be validated and accepted by the ocean modelling community. Also, if this is not a commonly understood term, please clarify what is meant by ‘the ocean modelling community’. |
| 20 | 695 -731 | Please clarify whether it is suggested that these chemical variables are tested or whether, at a minimum, these chemical variables, should be tested. |
| 21 | 778 | Please insert “below” after “variable” for clarity. |
| 24 | 871 | Please clarify where the information on the analytical quality should be indicated. |
| 27 | 1019 | Please clarify where (and if relevant how) the propagated uncertainties should be reported. |
| 31 | 1180 | Please expand “IOCCG” on first use. |
| 31 | 1183 | Please replace “is should” with “can”. |
| 31 | 1187 | Please clarify on what subject matter more details can be found. |
| 31 | 1191 | Please expand abbreviations where they have not already been explained. |
| 32 | 1222 | Please clarify to whom and how this information should be provided. |
| 32 | 1249 | Please clarify ‘for at least several weeks’ as this technically simply means more than two weeks. If the authors seek more than 3 weeks, then this should be clarified. |
| 34 | 1323 | Please amend for clarity: “... the relevance of the variable will serve as an indicator...” |
| 36 | 1384-1386 | Please clarify whether applicants are encouraged to use the resources referenced here. |
| 36 | 1422 | Please clarify where and how the descriptions should be provided. |
| 38 | 1476 | Please provide more information on the quality assurance plans to be used, particularly who develops the plans or if best practice quality assurance plans exist. |
| 49 | 1944-1945 | Please clarify where and how this information should be provided. |