

Document reviewed		
Title of the draft being reviewed:	Draft Guidelines for the preparation of an environmental impact statement	
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General Comments		
<p>We are aware that these draft documents refer to draft Regulations which have not yet been finalised and, in some cases, also refer to other Standards and Guidelines which may not yet have been drafted or agreed. Following consideration of stakeholder comments, the draft Standards and Guidelines will need to be reviewed again once the relevant exploitation Regulations have been agreed, and other relevant draft Standards and Guidelines are available.</p> <p>As an example, this Guideline links to a considerable number of sections within the EMMP and EIA documents. Therefore, these cross-references will need to remain open for review until all documents are ready to be finalised.</p> <p>As another example, this EIS Guideline is largely based on Annex IV of the draft Exploitation Regulations, which is still under consideration in ISA Council. The draft of Annex IV currently includes more detail than this draft Guideline. We recommend that this Guideline is updated so that it is fully in line with the draft Exploitation Regulations; uses the same terminology as the draft Exploitation Regulations; and uses the same numbering as Annex IV in the draft Exploitation Regulations.</p>		
Specific Comments		
Page	Line	Comment
1	24	We recommend that this wording is amended to be in line with the draft Exploitation Regulations.
1	25	We recommend that this sentence is amended to reflect that the EIS should cover all aspects prescribed by Annex IV, not just the “main” ones.
1	28	We recommend that this wording is updated - both here and also in the draft Exploitation Regulations - to clarify what this should actually include. For example, does this mean inclusive of scoping?
1	40-42	We recommend that this wording is updated to clarify that an important part of the EIS is to document and assess residual effects (not all environmental effects will be mitigable within acceptable limits).
1	57-63	To update the title of this referenced Guideline document
2	101-103	We recommend that this mandatory template should be included in the

		Regulations or Standard, with this document providing more specific detailed guidance.
3	119-120	Residual effects should be included in this list, as well as in the 'key messages' section of the EIS.
4	133-138	We recommend that this section is updated to fit with the detail and format of the rest of the document and other Standards and Guidelines. We agree that the Executive Summary should align with impact magnitude, but also overall impact. Magnitude is only one stage of assigning importance of impact.
4	158	We recommend that 'scoping' is included here ("work undertaken prior to the EIA"). Exploration work and marine scientific research feed into screening and scoping, which feeds into EIA / EIS.
4	167	We recommend that the word 'benefits' is clarified here (NB Annex IV notes that the benefits mentioned in this Guideline are benefits to mankind).
5	182	We recommend that this phrase should be consistent with the wording in Annex IV.
5	193	We recommend that this section should also include details of Sponsoring States and any relevant connections of the applicant/Contractor
5	212	We recommend that no impact should be considered out of scope at the start of the industry, although the EIS should rightly focus on the most important impacts.
6	244	We recommend that this section could also include environmental international conventions such as CBD.
6	259 onwards	<p>We recommend that this section should be aligned with Annex IV of the draft exploitation Regulations (see 'General Comments' above).</p> <p>The following sections are in Annex IV, but not in the Guideline:</p> <ul style="list-style-type: none"> - Associated activities - Funding and associated approvals <p>The following sections are in in the Guideline, but not in Annex IV:</p> <ul style="list-style-type: none"> - Statement of objectives - Capacity building commitments - Restoration <p>We also recommend that protected areas should be included in the locations and boundaries section, as well as in maps.</p>
7	318	We recommend expanding on the requirements for consideration of alternatives (see also comments in the relevant section of the draft EIA guidelines).
9	382	We recommend that this list should include whether any of these effects are cumulative (additive/multiplicative etc.); as should the biological list.
9	398	Understanding noise may also be needed beyond the contract area to assess impact on marine mammals.
9	401	We welcome the inclusion of aspects relating to climate change in the EIS

		guidelines. We recommend that this is also included where appropriate in the draft baseline guidelines and in the draft EIA Standard and Guidelines.
10	422	We recommend that this should also include species lists separately from dredging areas, areas indirectly affected by dredging, and reference areas.
10	426	We recommend that this should also include marine invertebrates, including corals.
10	430	We recommend that deep-diving mammals should also be explicitly mentioned in the draft baseline guidelines.
10	432	We recommend that the depth categories here should be aligned with those in the draft baseline guideline.
10	443-448	As above, these categories – particularly those involving life history, recruitment and behaviour – should be aligned with the draft baseline guideline.
11	487	As above, we recommend that the data requirements to assess ecosystem services, as recommended here, should also be included in the draft baseline guideline.
11	488	We question whether ‘direct socioeconomic impacts to specific communities are not expected’?
11	493-509	We recommend adding in here important regulatory services, which are also considered ecosystem services.
12	538	We recommend including here reference to mitigation.
14	619	We note that impacts will always be related to project, resource and area, and therefore some ‘key’ impacts may not be appropriate or missing from this list if new areas or technologies are involved.
14	622-623	We recommend that collisions/ship strikes should also be considered here.
14	648	We recommend not including specific examples here (ammonia, sulphides).
15	701	We recommend that this reference to EMMP should be amended if there is no EMMP Standard, only Guidelines.
16	705-713	We recommend that this list should be aligned with the suggested contents of the EMMP.
16	732-735	We recommend including all these impacts in the EIA/EIS, rather than separating them from the impact assessment.
16	725-741	We support the responsible end use of materials, but are not sure about the exact wording in this section. We recommend further consideration of whether/how end use of materials (beyond the activities covered by the exploitation licence) should be covered in an ISA document.
22	Review Form	We recommend that this helpful review form should be revisited once all the environment Standards and Guidelines and the Exploitation Regulations have been agreed.
<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.jm