

Document reviewed		
Title of the draft being reviewed:	Draft standard and guidelines for the preparation and implementation of emergency response and contingency plans	
Contact information		
Surname:	Petch	
Given Name:	Eleanor	
Government (if applicable):	United Kingdom	
Organization (if applicable):		
Country:	United Kingdom	
E-mail:	Eleanor.Petch@fcdo.gov.uk	
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>We are pleased that there is a clear understanding here of the purpose of Standards and Guidelines leading from clearly defined and agreed understanding of applicant / Contractor duties in the draft Exploitation Regulations e.g. <i>“In that regard, the Commission noted that the scope of an emergency response and contingency plan is clearly defined in the Draft regulations and that, as such, the draft standard and guidelines ought to be a tool for ensuring the effective application of the emergency response and contingency plan by contractors, as it pertains to the identification of hazards, preparedness and response.”</i> We note this positive link to the Regulations and the clear understanding of the purpose of Standards and Guidelines in this document. We believe it would be useful to reflect this understanding in the other draft Standards and Guidelines.</p>		
Specific Comments		
Page	Line	Comment
Standard		
3	67-69	We note that the range of unplanned environmental risks should go considerably beyond acute pollution. This paragraph should align with the environmental sections in the draft risk Guideline.
6	187	We suggest that a similar list to that concerning review of the EMMP is used here instead of only specifically mentioning a review at least every 5 years.
6	196	We suggest that the considerations noted in the EMMP are used here, not just different geographical vulnerabilities. Vulnerability is likely to change with seafloor composition, operational equipment etc.
7	203	We are unsure what exactly this particular sentence means. Could it be

		rephrased for clarity?
Guideline		
12	428	KPIs are not used in other environmental Standards and Guidelines. We suggest that terminology should be aligned across Standards and Guidelines.
15	604	Section B1 is not appropriate for mining operations – shallow gas blowouts and reservoir blowouts are unlikely to occur outside the petroleum industry
16-17	644-662	We have previously requested clarity regarding what a ‘notifiable event’ could include in the draft Regulations – to note that the list here will need to reflect any updates/clarifications in the draft Regulations.
<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