



UNIVERSITY OF  
PLYMOUTH

Secretariat,  
International Seabed Authority  
14-20 Port Royal Street  
Kingston, Jamaica  
(submitted via email to [ola@isa.org.jm](mailto:ola@isa.org.jm))

3 July 2021

**RE: Stakeholder Consultation - Draft Guidelines on Tools and Techniques for Hazard Identification and Risk Assessments**

Dear Sir/Madam,

Please find below our Commentary on the Draft Guidelines on Tools and Techniques for Hazard Identification and Risk Assessments, as issued in May 2021.

As Group Lead, I submit on behalf of the Marine Conservation Research Group, of the University of Plymouth. The list of contributors is presented at the beginning of the document. Express Consent for sharing is granted.

Sincerely,

Prof. Kerry Howell  
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## TEMPLATE FOR COMMENTS

<b><i>Document reviewed</i></b>	
<b>Title of the draft being reviewed:</b>	Draft guidelines on tools and techniques for hazard identification and risk assessments
<b><i>Contact information</i></b>	
<b>Surname:</b>	Howell
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<b><i>General Comments</i></b>	
<p>The following experts from the University of Plymouth’s Marine Conservation Research Group contributed to this response:</p> <p>Prof. Kerry Howell            Dr. Sian Rees            Dr. Holly Niner            Dr Kirsty McQuaid</p> <p>Below we outline general concerns that apply across the document, followed by a list of specific comments.</p>	
<p><b><i>Coherence and complementarity across all Standards and Guidelines</i></b></p> <p>Many of the comments we provide herein likely have bearing on the detail in the other documents under consultation. We advise that these comments are considered across the full portfolio of Standards and Guidelines to ensure cohesion, complementarity and future ease of application.</p>	
<p><b><i>Definition of terms</i></b></p> <p>Throughout the text, there are multiple references to “<i>Best available techniques</i>” and “<i>Good Industrial Practice</i>”, with no clarity on where information on these should be sought or what this refers to. There are lessons to be learned from existing practices, including other deep-sea or offshore industries. However, a new industry such as DSM should be seeking to build and expand on this experience with a view to halting trends of environmental degradation that continue to occur under current practices.</p> <p>Further it is not clear who will uphold standards for “<i>Best available techniques</i>” and “<i>good industrial practice</i>”.</p>	
<p><b><i>Stakeholder consultation</i></b></p> <p>Guidance or best practice as to how stakeholder identification can ensure that it is appropriate</p>	

<p>and comprehensive is missing here. How can those that have been historically missed or marginalized from consultation be included or notified of opportunities for consultation? We suggest consultation is required and advertised appropriately (with appropriate timescales) in all adjacent states or states through which some link is established to the proposed project. We also highlight the importance of considering whether capacity building efforts are necessary to support participation in consultation exercises.</p>		
<i>Specific Comments</i>		
Page	Line	Comment
3	132	<p>Please include reference to the mitigation hierarchy – given the acknowledgement at Line 120 that “<i>all activities associated with the exploitation of minerals in the Area inherently involve some level of potential risk to the environment...</i>”. We advise that the processes described in this document need to integrate with the concept of the mitigation hierarchy throughout.</p>
4	165	<p>Guidance or best practice as to how stakeholder identification can ensure that it is appropriate and comprehensive is missing here. How can those that have been historically missed or marginalized from consultation be included or notified of opportunities for consultation? We suggest consultation is required and advertised appropriately (with appropriate timescales) in all adjacent states or states through which some link is established to the proposed project. We also highlight the importance of considering whether capacity building efforts are necessary to support participation in consultation exercises.</p>
8	299	<p>Measures of cost effectiveness of assessment rigour should be based on the precautionary principle and in line with the potential risk identified. I.e. risks to some environmental aspects (e.g. provision of key ecosystem services such as climate control) could warrant a high cost approach to fully understand the associated risks.</p>

*Comments should be sent by e-mail to [ola@isa.org.jm](mailto:ola@isa.org.jm)*