



**Template for the review of the draft standards and guidelines
associated with the draft regulations on exploitation of mineral resources in the Area**

I. Background

1. The draft regulations on exploitation of mineral resources in the Area ([ISBA/25/C/WP.1](#)) require that certain issues are addressed in accordance with, or taking into account, standards and guidelines to be developed by the organs of the Authority. The standards will be adopted by the Council and will be legally binding on Contractors and the Authority, whereas the guidelines will be issued by the Legal and Technical Commission or the Secretary-General and will be recommendatory in nature.
2. Stakeholder consultation is an integral part of the process decided upon by the Commission for the development of the standards and guidelines ([ISBA/25/C/19/Add.1](#)).
3. The Legal and Technical Commission will consider the comments received through stakeholder consultation during its current session.
4. The drafts include a cover page containing background and contextual information on the approach taken by the Legal and Technical Commission in developing each standard and guidelines. Please note that stakeholder comments are not sought on this cover note.
5. Issues of format and consistency across the standards and guidelines will be reviewed by the secretariat and the Legal and Technical Commission once the content of the various standards and guidelines is finalized following stakeholder consultation.

II. Submitting Comments

6. To ensure that your comments are given due consideration, please send them by e-mail to ola@isa.org.jm, at your earliest convenience but **no later than the date announced on the ISA website for the relevant draft standards and guidelines**.
7. When submitting comments, please adhere to the following guidance as much as possible:
 - a. Please provide all comments in writing and in an MS Word .doc or .docx format using the table provided below.
 - b. The table format allows for an unlimited number of comments to be added. To add more comments, you may add more rows.

- c. Please provide full contact information for the individual/Government/organization submitting the comments.
- d. Please avoid commenting on issues related to format, grammar, spelling or punctuation, unless it affects the overall meaning of the text, as the document will be formatted and edited when the final draft is prepared by the Legal and Technical Commission.
- e. To facilitate the revision process please be as specific as possible in your comments. In areas where you feel additional or alternative text or information is required, please suggest what this text may look like or what information should be included.
- f. Text may be copied from the draft into the table if stakeholders wish to use "track changes" in editing text (this is encouraged to ensure accuracy and avoid numbering errors).
- g. If you refer to additional sources of information, please include these with your comments when possible or provide a complete reference or hyperlink.
- h. All review comments will be posted on the ISA website, unless otherwise requested by the submitting entity.

8. Should you have any questions regarding the review process, please contact ola@isa.org.im.

III. Template for Comments

9. Please use the review template below when providing comments.

10. Line and page numbers have been provided in the drafts. Please use these as a reference as illustrated in the table below.

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>	
Title of the draft being reviewed:	"Draft Guidelines on tools and techniques for hazard identification and risk assessments"
<i>Contact information</i>	
Surname:	Breedlove, Rousseau
Given Name:	Tyson, Joseph
Government (if applicable):	N/A
Organization (if applicable):	American Bureau of Shipping
Country:	Worldwide Organization

E-mail:	tbreedlove@eagle.org	
<i>General Comments</i>		
The draft should include which activities are to be documented so that the operator and auditors know what records to evaluate during the periodical audits.		
This Guideline document should be limited to the roles of stakeholders, specific aspects to be addressed in the context of deepsea mining, required deliverables, records to be retained, etc. Sections C, D, and E could be largely deleted.		
<i>Specific Comments</i>		
Page	Line	Comment
1	49	<p>The ISA is promoting a ALARP risk technique approach, and the Standard could benefit from a visual diagram.</p> <p>Recommend the below diagram, taken from “ABS GUIDANCE NOTES ON RISK ASSESSMENT APPLICATIONS FOR THE MARINE AND OFFSHORE INDUSTRIES . 2020” and originally expressed by the UK Health and Safety Executive.</p>

		<p style="text-align: center;">ALARP Diagram</p>
1	49	Operators will need a way to demonstrate to the ISA the cost is beyond what is reasonably practical. Recommend adding “cost-benefit studies can be used to support an argument that ALARP has been achieved.”
6	18 7	It should be made clear that the Contractor is the responsible party as a “duty holder” or similar term, to carry out and implement the risk assessment findings.
7	26 6	Add <p>“Subsea Mining Facility and Equipment Hazards (pressure, lifting equipment, dropped objects, erosion/corrosion, toxic substances such as H2S, materials handling, air and marine transport, fire and gas hazards arising from storage and transport of mining products)”</p>
8	27 7	The ABS Guidance Notes can provide supplemental information not included in ISO 31010. This includes diagrams, examples and lists of hazards. The mining vessels, which will be classed, will also be subject to Class requirements for Risk. Replace: “These techniques are described in further detail in ISO/ICE 31010” With “These techniques are described in further detail in ISO/ICE 31010 as well as Class publications such as ABS GUIDANCE NOTES ON RISK ASSESSMENT APPLICATIONS FOR THE MARINE AND OFFSHORE INDUSTRIES . 2020.
8	29 0	Guidance is needed for the contract to understand what the end result of the hazard assessment stage is.

		Recommend adding “The Hazard Identification Process should result in {insert what reports ISA expects to see} that will be maintained through the duration of the plan of work” or similar wording.
9	29 1	Text should include a reference to existing standards and publications on risk, rather than attempting to summarize and restate. This Guideline document should be limited to the roles of stakeholders, specific aspects to be addressed in the context of deepsea mining, required deliverables, records to be retained, etc. Sections C, D, and E could be largely deleted.
21	78 5	Management of Change should be addressed in this Risk Management section, as this is a common industry practice in the offshore industry. This correlates with “Good Industry Practice.” Recommended adding the following from the ABS GUIDANCE NOTES ON RISK ASSESSMENT APPLICATIONS FOR THE MARINE AND OFFSHORE INDUSTRIES 2020 “Implement and maintain a Management of Change (MOC) policy in order to ensure that safety, health, and environmental risks and hazards are properly controlled when an organization makes changes to their facilities, operations or personnel.”
24	86 7	Insert as referenced: <ul style="list-style-type: none"> • “ABS GUIDANCE NOTES ON RISK ASSESSMENT APPLICATIONS FOR THE MARINE AND OFFSHORE INDUSTRIES 2020” • https://ww2.eagle.org/content/dam/eagle/rules-and-guides/current/other/97_riskassessapplmarineandoffshoreoandg/risk-assessment-gn-may20.pdf • ABS GUIDE FOR SUBSEA MINING • 2020, • Link: https://ww2.eagle.org/content/dam/eagle/rules-and-guides/current/offshore/318_guideforsubseamining/subsea-mining-guide-oct20.pdf • UK HSE, 2010a, HID’S Approach To “As Low As Reasonably Practicable” (ALARP) Decisions • https://www.hse.gov.uk/foi/internalops/hid_circs/permissioning/spc_perm_39.htm

Field Code Changed

