



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.jm.

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 Standard and Guidelines for environmental impact assessment process
<i>Contact information</i>	
Surname:	Jantzen
Given Name:	Peter Henrik
Government (if applicable):	
Organization (if applicable):	Blue Minerals Jamaica Ltd. (BMJ)
Country:	Jamaica

E-mail:	peter.jantzen@blue-minerals.com	
General Comments		
<p>BMJ would like to thank the International Seabed Authority for the opportunity to comment and extends its appreciation for the work of the Legal and Technical Commission (LTC) in preparing this Standard and Guideline.</p> <p>BMJ supports the philosophy of restoring and rehabilitating but must ask that a workable format for restoration and rehabilitation for polymetallic nodules is established before it is included in the regulations.</p> <p>At this time, Preservation Reference Zones (PRZ) within contractor blocks and Areas of Particular Interest (API) are the recognized mitigation methods that we all can agree to.</p>		
<p>In general, all aspects of the document to clearly indicate whether at a regional level (e.g. tables page 13-15).</p>		
<p>Following discussions with other contractors, BMJ suggests adding to statement in line 153: <i>“Assessment of impacts shall result in understanding the absolute and relative significance of each impact in such a way to allow mitigation of harmful effects, at the regional level or ecosystem level, to be considered.”</i></p> <p>For the sake of clarity, this statement should be emphasized wherever relevant throughout the document.</p>		
<p>There is a need for absolute clarity on how to conduct the assessment process for “impact” and “harm” – and which entity will conduct such a process. All stakeholders must have confidence in the process and – in particular – the (3rd party?) entity performing it.</p>		
<p>The definition of an EIA includes socioeconomic considerations. A number of sections would be an Environmental and Social Impact Assessment – ESIA and not just EIA.</p>		
Specific Comments		
Page	Line	Comment
1	52	Should be an “Environmental and Social Impact Assessment”(ESIA).
27	914	Need to clarify that this is at regional scale
30	1040-1042	1044, BMJ recommends adding ‘if environmentally, economically, and operationally practical.’

Comments should be sent by e-mail to ola@isa.org.im