



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.im, 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 Guidelines for the establishment of baseline environmental data, Developed by the Legal and Technical Commission
<i>Contact information</i>	
Surname:	Nygård
Given Name:	Henrik
Government (if applicable):	Finland
Organization (if applicable):	
Country:	Finland

E-mail:	Henrik.nygard@syke.fi	
General Comments		
<p>There is an inconsistency in temporal and spatial scope throughout the document. This leads to a baseline that needs to be interpolated across different scales, which will induce a lot of uncertainty in the end and complicate mining impact assessments.</p> <p>Uncertainty in both data and models needs to be considered carefully when setting the baseline and the uncertainty should be accounted for when doing the EIA. If the uncertainty is high, the precautionary principle should be applied.</p> <p>Regarding the need for replication: The need is related to the study question, e.g. to be able to answer to temporal and spatial questions, different sampling designs are needed. This means that understanding of the sources of variability is also needed when designing the sampling programme.</p>		
Specific Comments		
Page	Line	Comment
7	200	These guidelines should not be based on expectations. Need to validate this, or remove sentence.
9	251-252	Suggest to encourage sharing of environmental data in a more persuasive manner.
9	253-262	GOOS cannot replace a baseline, but GOOS could be one avenue to data sharing and communicating information along with the European Union's EMODnet data sharing system.
9	285-286	Uncertainty needs to be assessed and communicated also whenever interpolations or models are used, not only for measurements.
21	752	Please add " ... should be obtained using a multicorer, ROV-pushcores, <u>or similar reliable equipment</u> for the top decimetres of sediments and a gravity corer for deeper samples.
35	1383	Please add " ... should be obtained using a multicorer, ROV-pushcores, <u>or similar reliable equipment</u> for the top decimetres of sediments and a gravity corer for deeper samples.
40	1576-1579	Should also be done in reference areas, i.e. areas not affected by either mining activities or plumes, but having otherwise comparable conditions.
51-53	2041-2147	The text on ecosystem functioning concentrates only on food web structure, but should also include other aspects of functioning, e.g. role in sediment biogeochemistry etc.

<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