

COMMENTS

<i>Document reviewed</i>		
Title of the draft being reviewed:	Guideline on the preparation and assessment of an application for the approval of a Plan of Work for exploitation developed by the Legal and Technical Commission	
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<i>General Comments</i>		
<p>On para 2 of the cover page</p> <p>A Guideline should not by principle be limited to a checklist, because of the significant amount of information already incorporated in the Draft regulations. The key question is whether 'significant amount' equals 'sufficient amount', so as to establish a clear and robust application and assessment procedure. The answer shall take into account the rationale for the reference to 'guidelines'. It is very unlikely that the Guidelines in question expressed a simple need for a check list. Guidelines might include a checklist, but it is very uncommon that they are intended to provide only that. Moreover, the current version of the draft guidelines doesn't tackle the 'assessment'.</p>		
<i>Specific Comments</i>		
Page	Line	Comment
2	13	The purpose is twofold, because the application also serves the fulfilment of the essential role of the Authority, to assess and approve (or disapprove) the application. Thus, we suggest to add a second sentence to para 2, along the following lines: 'In addition to that, the purpose for the Authority is to have the necessary information available to assess and approve or disapprove the application for a Plan of Work.'
2	23	We think this is not correct. The assessment of the Plan of Work is not tackled by this Guideline, this Guideline only reformulates the very general procedural assessment steps mentioned in the draft Regulations in a flowchart. That is an extremely minimalistic approach
2	37-40	The Guidelines are not binding, but they have their place in the regulatory framework.
<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.jm