

COMMENTS by DORD

<i>Document reviewed</i>		
Title of the draft being reviewed:	Draft standard and guidelines on the development and application of Environmental Management Systems developed by the Legal and Technical Commission	
<i>Contact information</i>		
Surname:	Fukushima	
Given Name:	Tomohiko	
Government (if applicable):		
Organization (if applicable):	Deep Ocean Resources Development, Co., Ltd.	
Country:	Japan	
E-mail:	fukushima@dord.co.jp	
<i>General Comments</i>		
<ul style="list-style-type: none"> • It would be helpful if a list of standards and guidelines related with the draft exploitation regulations is posted on the ISA website, by indicating whether they are under drafting stage or approved, as a number of standards and guidelines are/will be under consideration in parallel with the draft exploitation regulations and such list would be helpful to see the overall picture of this important process. • As standards and guidelines related with environment mutually related, it would be helpful if any standards/guidelines referred to in other standards/guidelines have information whether such standards/guidelines are already approved, under drafting, or to be drafted in a footnote. • It is expected that guidelines on environmental baseline surveys, environmental impact assessment, environmental monitoring, and etc. will be prepared in near future. It would be desirable to have no discrepancies arise among these standards/guidelines to avoid any confusion. • We wonder whether the ISO standards and ISA guidelines completely coincide with each other. • What is definition of “harmful effects”? Without clear definition of this term, it would be difficult to establish an environmental objectives (Line 140). 		
<i>Specific Comments</i>		
Page	Line	Comment
8	227	What is definition of “operational criteria” ?
8	254	What is definition of “environmental acceptance criteria”?
9	271	What does “a follow-up audit” mean?
9	278-279	What does establishment of “a process to ensure environmental issues are taken into consideration when ordering and procuring equipment and other physical assets”?
11	347	Is performance criteria different from operational criteria?
12	397-398	How will third party audits be carried out?

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