

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>	
Title of the draft being reviewed:	Draft Guidelines for the establishment of baseline environmental data
<i>Contact information</i>	
Surname:	Tauchi
Given Name:	Tomoko
Government (if applicable):	
Organization (if applicable):	Deep Ocean Resources Development Co., Ltd. (DORD)
Country:	Japan
E-mail:	tomoko@dord.co.jp
<i>General Comments</i>	
<ul style="list-style-type: none"> • We would like to express our deep gratitude for such tremendous efforts made by the Legal Technical Commission members and the ISA Secretariat for the development of standards and guidelines required to be established in parallel with development of exploitation regulations. • It is deemed that there are a number of matters related between these draft guidelines and Annex IV of draft exploitation regulations, as well as recommendations for the guidance of contractors for the assessment of the possible environmental impacts arising from exploration for marine minerals in the Area (ISBA/26/LTC/6/Rev.1). Upon comparative review of these documents, maintaining consistency among these documents would be necessary for future use of these documents. • As environmental data will be accumulated in the future, revision of the guidelines for the baseline environmental data is envisioned. As it is preferred that information is compiled in one document, consideration may be necessary for how these guidelines, both ISBA/26/LTC/6/Rev.1 and current draft guidelines, could be effectively revised. • According to 5. Description of the Existing Physiochemical, Biological, and Socioeconomic Environments of the EIS guidelines, it states that the “applicant or Contractor should provide a description of the baseline condition of the physiochemical, biological, and socioeconomic environments.” Therefore, “4. Description of the existing physicochemical environment” and “5. Description of the existing biological environment” contained in Annex IV Environmental Impact Statement of the draft exploitation regulations and these draft guidelines were compared and reviewed. As a result, some may need some consistency among both documents as follows: <ol style="list-style-type: none"> 1) Pore-water is included in “4.8 Seabed substrate-characteristics” in Annex IV, while in “V. Chemical oceanography and biogeochemistry” in these guidelines; 2) Noise and light are included in “4.10 Noise and light” in Annex IV, while in “IV. Physical oceanography” in these guidelines, and 	

<p>3) Ecotoxicology is not included in Annex IV. While is included in these guidelines.</p>		
<ul style="list-style-type: none"> • Upon comparative review on these guidelines and recommendations for the guidance of contractors for the assessment of the possible environmental impacts arising from exploration for marine minerals in the Area (ISBA/26/LTC/6/Rev.1), following consideration may be necessary: <ol style="list-style-type: none"> 1) More details are contained in these guidelines. However, the structure is different from each other and it would be more effective if both documents have same structure for preparing a plan for baseline surveys. (E.g., tides and waves mentioned in Line 485 on page 14 is not prescribed in ISBA/26/LTC/6/Rev.1 document. Noise in Line 577 on page 17 is included in Physical oceanography in these guidelines while included in Biological communities in ISBA/26/LTC/6/Rev.1 document.) 2) As for the items not mentioned in ISBA/26/LTC/6/Rev.1 document, but included in these guidelines, it would be effective if these items are clearly stated. (E.g., Radioactive isotope tracers included in Line 725 on page 20 and Line 1241 on page 32.) 		
Specific Comments		
Page	Line	Comment
44	1754-1755	There are differences in scales as it states that the “sediment should be divided into 0-3cm, 3-5cm and 5-10cm depths and each sieved with cold filtered seawater” on these guidelines, while it states that in “soft sediments, vertical profiles with a suitable depth distribution (suggested depths: 0–1, 1–5, 5–10 cm) should be obtained from box cores (0.25 m ²)” in ISBA/26/LTC/6/Rev.1 document.
47	1879-1880	As for Metazoan meiofauna, it states that “each nodule should then be washed separately on a 25µm mesh sieve” in these guidelines, while in ISBA/26/LTC/6/Rev.1, it states that “Data on metazoan meiofaunal (32 µm sieve mesh size),” where different sieve mesh size is required.
<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