

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>	
Title of the draft being reviewed:	Draft Guidelines for the preparation of an environmental impact statement
<i>Contact information</i>	
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<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. • “Review Form: EIS Content” of IV. Appendices is in consistency with the table of contents of the EIS of Annex IV of the draft exploitation regulations and is user-friendly to review contents of the EIS. • It is understood that the exploitation regulations are legally binding. If it is deemed that frequent amendment for requirements for an EIS would be necessary as exploitation of deep seabed mineral resources in the Area advances, it would be desirable that such requirements are briefly explained in the exploitation regulations while details are contained in guidelines. • According to 5. Description of the Existing Physiochemical, Biological, and Socioeconomic Environments on page 8 of the guidelines, it states that the “applicant or Contractor should provide a description of the baseline condition of the physiochemical, biological, and socioeconomic environments.” Meanwhile, according to 4. Description of the existing physicochemical environment of Annex IV of the draft exploitation regulations, it states that the “detail in this section is expected to be based on a prior environmental risk assessment that will have identified the main impacts, and thus the elements that need to be emphasized in the environmental impact assessment.” It would be helpful if it is clarified on what basis the existing physicochemical, biological and socioeconomic environments shall be described. • The guidelines need to be restructured as there are some reference numbers that are not used (e.g. Section 2.2.1, Section 2.1.5, Section 2.1.6 and Section 4.2.6). 	

Specific Comments		
Page	Line	Comment
14	633	It would be easier to understand if the phrase “200-50 m above seafloor” is stated as “200 m from the surface to 50 m above seafloor.”
16	710	Corrective procedures are one of the key issues to be addressed in the EMMP. However, corrective procedures are not included in the Annex IV of the draft exploitation regulations. Consistency would need to be maintained among these documents.
		Please check following lines as these seem to be misspelled.
6	138	Correct “physiochemical”to “Physicochemical” (14 more to be corrected)
3	125	Correct "tro" to "to"
4	147	Correct "relavant" to "relevant"
10	435	Correct "tcan" to "can"
23		Correct “Does it outline were” to “Does it outline where”
<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