



Document reviewed		
Title of the draft being reviewed:	Draft Standard and Guidelines for environmental impact assessment process	
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General Comments		
<p>Suggest to exclude “socioeconomic” effects of the proposed mining activities in the EIA process and focus on parameters with direct impacts to physical environment to minimise the potential of dragging the EIA process out and increasing uncertainty for businesses. There is no worldwide standard of including socioeconomic considerations in the EIA process; therefore, this should not be a mandatory requirement.</p>		
<p>Suggest to remove “socioeconomic” within the definitions of EIA.</p>		
<p>Subsequent mentions of “socioeconomic” in Sections I.B “Purpose of this Guideline” and IV.D “Impact Significance” of the draft guidelines should be referred to purely as guidelines and not standards.</p>		
<p>Cross-references to sections within the draft guidelines should be consistent with the numbering style used <i>e.g.</i> reference to “Section 2.1” should read as “Section II.A”.</p>		
Specific Comments		
Page	Line	Comment
3	88	Replace “unlikely to have harmful environmental effects” with “that will not meet the threshold and criteria for an EIA”.
3	92-93	<p>Replace “be of some significance” with “meet the threshold and criteria for an EIA”</p> <p>The threshold and criteria for an EIA in this standard should be consistent with that found in Article 206 of UNCLOS. To prevent this para from being unwieldy, we suggest referring to the “threshold and criteria for an EIA”</p>

		without spelling it out.
3	116	There appears to be a missing word between “approaches” and “impact assessment methods”.
4	131	<p>“Together with <u>an enhanced ERA</u> these components provide the basis for determining (a) the significance of the impacts and (b) the development of mitigation to be incorporated into design and project planning to manage the impacts.”</p> <p>The term “an enhanced ERA” does not appear in the Draft Exploitation Regulations or anywhere else in these draft standard and guidelines nor is it defined. We would propose deleting the word “enhanced”.</p>
4	150-151	<p>“The applicant or Contractor shall also identify the impacts (including cumulative effects) of the project at a regional scale.”</p> <p>It is not clear exactly what is meant by the identification of impacts “at a regional scale”. We propose that this sentence be deleted.</p>
8	297-298	<p>Delete “at both, a local and regional level”.</p> <p>It is not clear exactly what is meant when the guideline states that the assessments will describe potential impacts of the activity at the “regional level”. It goes without saying that the assessments will describe effects at the local level.</p>
20	640	Please delete “applicable”, as it is not clear what “applicable biodiversity” is referring to.
34	1187	“The Exploitation Regulations <u>require</u> the EIS <u>must</u> include a section on monitoring, ...” There is a typographical error, we propose deleting the word “must”.
35	1192-1198	We suggest deleting this section. It is not clear what an “EIA Audit” will entail. The objective of ensuring subsequent monitoring and adaptive management of environmental effects will be taken care of by the EMMP.