



Document reviewed		
Title of the draft being reviewed:	Draft Guidelines for the preparation of an environmental impact statement	
Contact information		
Surname:	Chan	Khng
Given Name:	Sean	Nathaniel
Government (if applicable):	Singapore	Singapore
Organization (if applicable):	Ministry of Foreign Affairs, Singapore	Permanent Mission of Singapore to the United Nations, New York
Country:	Singapore	Singapore
E-mail:	Sean_Chan@mfa.gov.sg	Nathaniel_Khng@mfa.gov.sg
General Comments		
<p>Suggest to exclude “Socioeconomic Environment” in the EIA process and preparation of the environmental impact statement which documents the EIA process, to 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 removal of “socioeconomic” within the definitions of EIA.</p>		
<p>Subsequent mentions of “socioeconomic environment” in Sections II.A.5(c) “Aspects Specific to Description of the Existing Socioeconomic Environment” and 6(c) “Aspects Specific to the Assessment of Impacts on the Socioeconomic Environment” should be referred to purely as guidelines and not standards.</p>		
<p>The basis for including socioeconomic impacts in the scope of effects to be assessed and mitigated as part of the obligations relating to the protection and preservation of the marine environment is not clear.</p>		
<p>We note these draft guidelines are drafted on the basis that a REMP covering the contract area would be a prerequisite for exploitation activities in that area. We note that this is still a matter that is under consideration in the negotiations of the Draft Exploitation Regulations and it should not be prejudged in the EIS.</p>		
Specific Comments		
Page	Line	Comment
2	95-96	To amend the end of the first sentence of the para as follows: “The

		<p>applicant or Contractor should prepare an EIS following the template provided in Annex IV of the Exploitation Regulations, as appropriate."</p> <p>This amendment is necessary, given that the EIS template is not meant to be followed strictly as a general matter: see, further, our comments below on page 2, line 103.</p>
2	103	<p>To add the following sentence after the first sentence of the para: "The EIS template is not intended to be prescriptive."</p> <p>This is drawn from language in Annex IV of the draft exploitation regulations, which should, in our view, be reiterated here. It is consistent with the understanding that the EIS template is meant to guide the development of an EIS in very different terrains. Not every part of the template would be relevant in every region.</p>
6	235-236	<p>To amend the chapeau as follows: "The Contractor should outline the following aspects that may apply to the proposed activities, and indicate how the they will comply with them be dealt with ...".</p> <p>The use of the word "comply" is not appropriate, as the list that follows the chapeau includes guidelines, which are recommendatory in nature and not legally-binding.</p>
6	251	<p>To amend the first line of the sub-para as follows: "Standards and guidelines that will be adhered to applicable during the life of Contract ...".</p> <p>The phrase "adhered to" may imply that guidelines are legally-binding, when they are not.</p>
24	Table	<p>To amend the chapeau in the last box as follows: "Does the EIS discuss how the contractor will address standards and guidelines that will be adhered to applicable during the life of Contract from groups such as ...".</p> <p>The phrase "adhered to" may imply that guidelines are legally-binding, when they are not.</p>