



Document reviewed		
Title of the draft being reviewed:	Draft Guidelines for the preparation of environmental management and monitoring plans	
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General Comments		
We note that Appendix A is blank for now. We will comment on it when ready.		
Specific Comments		
Page	Line	Comment
2	93-96	<p>To amend the second sentence of the para as follows: “The Applicant/Contractor should also conduct a search for laws, regulations and guidelines published by governing bodies that could be of relevance for the project, including national laws and other industry codes that could be developed from time to time.”</p> <p>We have suggested this amendment as the term “guidelines” would not cover national laws.</p>
6 - 7	294	To exclude “Socioeconomic Environment” in the parameters to be monitored 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.
7	321-323	<p>To amend the third sentence of the para as follows: “It must be used to check that the levels of specific environmental parameters are compliant consistent with applicable regulations, Standards or guidelines, and contractual obligations.”</p> <p>The word “compliant” is not suitable for use in connection with guidelines,</p>

		given that guidelines are recommendatory in nature and not legally binding.
7	335	<p>Replace “importance” with “nature and scale”.</p> <p>We suggest this as the effort and resources dedicated to monitoring should be calibrated based on “nature and scale” of the predicted impact and effect. It is not clear what it would mean for this calibration to be based on the “importance” of the predicted impact and effect. Further we note that “nature and scale” is the relevant modifier used at para 58 of this Guideline.</p>
9	413-414	<p>Replace the sentence with the following “Regulation 52 requires that the Contractor shall conduct performance assessments. Appendix A provides an example of the form that such performance assessments may take.”</p> <p>The current formulation appears to imply that Regulation 52 requires compliance with the format in Appendix A which is not the case.</p>
12	546	There needs to be a requirement for restitution after the emergency has passed, or processes need to be put in place to avoid abuse of this system where para 1 does not apply.
14	613	<p>Replace “development” with “developing”.</p> <p>This is to correct a typographical error.</p>
14	619, 620	<p>Replace “in-person” with “on-site”.</p> <p>This would better reflect what appears to be the intention here (i.e. for “on-site training” to be preferred, but where it is not possible to do “in-class training”).</p>