



Document reviewed		
Title of the draft being reviewed:	Draft Standard and Guidelines for the preparation and implementation of emergency response and contingency plans	
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General Comments		
<p>There are several references to “environmental risk analysis” (e.g. lines 196, 199, etc.). Please clarify if “environmental risk analysis” should be “environmental risk assessment”. If so, all references in the draft standard and guidelines should be amended accordingly.</p>		
Specific Comments		
Page	Line	Comment
3	72- 74	<p>“The Contractor shall prepare an emergency preparedness manual, which <u>shall capture the essence of this Standard with relevant links</u> to the Contractor’s Health, Safety, Environment, Quality (HSEQ)/Management systems.” To delete “capture the essence of this Standard with” and replace with “covers the areas set out in this Standard”.</p>
5	140-142	<p>To amend the third sentence of the para as follows: “This process shall be undertaken in consultation with the sponsoring State(s), the flag State(s), and coastal States and other entities having relevant jurisdictional competence or rights and legitimate interests with regard to specific components of the plan.”</p> <p>The proposed amendment would be to clarify that only relevant coastal States need be consulted.</p>
6	187-188	For clarity, “(at least every 5 years)” to be replaced with “(minimally once every 5 years)”.
8	254-255	For clarity, “to participate in drills and exercises from time to time” to be replaced with “to participate in drills and exercises once every X year(s)”.

9	300-304	To specify the frequency of the third type of audit (external party audits of the Contractor and the subcontractor), similar to how frequency has been specified for the first and second types of audits. In addition, on the alignment of timing of the external party audits of the Contractor and the subcontractor to coincide with a drill to enable active participation from all parties, we would like to clarify what are the circumstances of the drill that will enable active participation from all parties.