

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>		
Title of the draft being reviewed:	Draft guidelines for the preparation of an environmental management and monitoring plan	
<i>General Comments</i>		
e.g. The draft should include...		
<p>The guideline creates confusion regarding the legal nature of the document and its relationship with other ISA documents. Page 4, lines 46-49 provide: “These Guidelines should be read in conjunction with the Exploitation Regulations, the relevant Exploration Regulations, other relevant International Seabed Authority (the ISA or the Authority) rules, regulations, recommendations and procedures, as well as other relevant Standards and Guidelines.” Notably, statements to this effect in other draft guideline documents do not mention other “rules, regulations, recommendations, procedures” of the ISA.</p> <p>Additionally, this guideline contains at least one instance of legally binding language - “shall” at page 4/line 65 - and seems to inaccurately paraphrase legally-binding requirements of the exploitation regulations.</p>		
<i>Specific Comments</i>		
Page	Line	Comment

1	62-67	Add additional text relating to monitoring of environmental effects, in addition to mitigation, as follows: “The EMMP outlines commitments and procedures on how <u>environmental effects of exploitation activities will be monitored and</u> mitigation measures will be implemented, how the effectiveness of <u>mitigation</u> measures will be monitored, what the management responses will be to the monitoring results and what reporting systems will be adopted and followed <u>to monitor and assess environmental effects. . .</u> ”
2	74-77	Areas of particular environmental interest are not defined in the Exploitation Regulations
2	111	Suggest instead “...consistent with the UN Sustainable Development Goals <u>14</u> .” The SDGs are interlinked and seabed mining relates to multiple goals.
2	122	Propose using term “monitoring and management tool,” rather than only referring to “management.” The purpose of the EMMP should be for monitoring environmental effects as well as managing such effects.
6	267	Revise the phrase “reduce residual impacts to acceptable levels” to “avoid, minimize, and reduce impacts,” to more precisely identify the purpose of mitigation measures. The term “acceptable levels” does not provide a precise, quantifiable measure of what level of environmental effects may be acceptable. Further, the purpose of mitigation should be to reduce all impacts of exploitation; therefore the term “residual impacts” appears inappropriate here.

286-294

Suggest this section be more specific on parameters to be monitored within each subsection. The types of environmental parameters that should be monitored as part of Exploitation applications in the Area are those studied during the baseline study, EIA and EIS phase. At a minimum, these should include:

(a) Physicochemical Environment

(1) Discharges –

(i) Salinity, temperature, density.

(ii) Suspended particulates concentration and density.

(iii) Particulate and dissolved nutrients and metals;

(iv) Size, configuration, and velocities of discharge.

(2) Upper water column –

(i) Nutrients;

(ii) Salinity, temperature, density;

(iii) Currents and direct current shear;

(iv) Vertical distribution of light;

(v) Suspended particulate material advection and diffusion;

(vi) In-situ settling velocities of suspended particulates.

(3) Lower water column and seafloor –

(i) Currents;

(ii) Suspended particulate material advection and diffusion;

(iii) In-situ settling velocities of suspended particulates;

(iv) Benthic scraping and blanketing, and their impacts and recovery.

(b) Biological Environment --

(1) Endangered species (observations);

(2) Zooplankton and trace metals uptake;

(3) Fish larvae;

(4) Behavior of biota, including commercially and recreationally valuable fish.

(c) Other marine activities in the area.

7	394	Replace “socioeconomic environment” with “other marine activities in the area.”
10	318-319	Propose replacing “ensure that prescribed mitigation measures” with “monitor the prescribed mitigation measures and assess whether the measures,” and remove the term “residual.” Further, as noted above, the terms “residual impacts” and “acceptable levels” do not precisely describe the purpose of mitigation measures. More precise language should be used here.
10	320	Propose replacing “periodically” with “regularly.”
11	502	Consider setting a minimum threshold for frequency of assessing performance standards.
20	794	In the Rules, Regulations and Procedures table, suggest adding "Rules concerning Activities directed at Underwater Cultural Heritage" (annex Rules) http://www.unesco.org/new/en/culture/themes/underwater-cultural-heritage/2001-convention/annex-of-the-convention/
25	Para. 8	Propose removing “(residual Environmental Effects)” as this term may create confusion.
<p><i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i></p>		