

<b>Document reviewed</b>		
<b>Title of the draft being reviewed:</b>	Draft standard and guidelines on the development and application of Environmental Management Systems developed by the Legal and Technical Commission	
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<b>General Comments</b>		
Draft regulation 46 mentioned in Page 1, Point 2 (b) 'be capable of cost-effective' is too broad and subjective. Needs to be definitive.		
<b>Specific Comments</b>		
<b>Page</b>	<b>Line</b>	<b>Comment</b>
2, Annex I	35	The word 'eliminate' may be deleted as it may not be possible. It may be replaced with 'maintain As Low As Reasonably Possible (ALARP)'
3, Annex II	84	'Including but not limited to those related to' is too broad. May be defined clearly.
5, Annex II	148	Words 'Long Term', 'Short term', 'Objectives' and 'Targets' may be clearly defined. Instead of permitting contractors to use them interchangeably.
7, Annex II	215	Who defines or decides 'the best practices'?
7, Annex II	227	Should Mitigating measures be designed by the contractor?
7, Annex II	229-231	Delete the lines.
8, Annex II	270	'To ensure environmental issues are taken into consideration when ordering and procuring equipment...' is too broad and generic to comply with.
8, Annex II	288-289	'the contractor should provide training activities for the subcontractor' may be replaced with 'the contractor may provide training activities for the subcontractor, if needed'
8, Annex II	324	'according to the criteria, method and frequency as defined by the contractor' may be changed as 'according to the criteria, method and frequency as defined by the contractor and accepted by the authority'
11	383	Any guidelines for setting up of the audit parties ?
11	383	" Bi- annual audits " should be deleted

<p><i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i></p>		