



Template for the review of draft standard and guidelines on the development and application of Environmental Management Systems developed by the Legal and Technical Commission

**TEMPLATE FOR COMMENTS**

<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>	
Regulations should require a contractor to demonstrate that its baseline data is consistent with Environmental Management System in its vicinity and that baseline studies are included in the regional database that will inform subsequent Environmental Management Systems.	
An Environmental Management System should define any fragile ecosystem in its region. Regulations for such rare ecosystems should set robust protection measures.	
According to Draft regulations, it seems that each contractor will need one (1) EIA that informs one (1) Environmental Impact Statement and one (1) Environmental Management and Monitoring Plan. But mining activity occur often at multiple stages and in different locations within one contract area. The Draft Regulations should anticipate these aspects.	
ISA Regulations should require contractors to contribute to large-scale regional assessments in order to draw the most effective Areas of Particular Environmental Interest	
Environmental Management and Monitoring Plan should include specific strategies for monitoring the environmental impacts of mining.	
Contractors should compare monitoring data on a year-to-year basis.	
While environmental monitoring will be focused on a range of planned operational parameters the ISA should also require contractors to provide incident reporting for unexpected events including: incidents, response action, lessons learned and relevant data	
Incident Reports should be made publicly available to allow other contractors to learn lessons from them.	
ISA should require Contractors to provide periodic (more frequently than annually) reports including statistical analysis and assessment of trends...	

