

REVIEW OF THE DRAFT STANDARD AND GUIDELINES: THE COMMONWEALTH OF THE BAHAMAS

We reviewed Annex I - the Draft standard on the development and application of environmental management systems and advise as follows:

- Generally, the term Environmental Management System should be used consistently throughout the draft ("environmental management system" vs "Environmental Management System").
- Page 2, Lines 21 to 24, tabulate sentence for clarity as follows:
 - (c) is developed by applying ... , in particular:
 - (i) ISO 31000: ...,
 - (ii) ISO 14001: ..., and
 - (iii) ISO 19011: ...; and.
- Page 2, Line 37, the phrase "to follow up and be able to check" is superfluous.
- Page 2, Line 38, delete the words "results achieved are" and substitute the words "outcome is".

We reviewed Annex II - the Draft guidelines on the development and application of environmental management systems and advise as follows:

- Generally:
 - (i) the term Environmental Management System should be used consistently throughout the draft ("environmental management system" vs "Environmental Management System"); and
 - (ii) the term International Seabed Authority should be used consistently throughout the draft ("ISA" vs "Authority").
- Page 15, Lines 551, 553, 560, 562 are repetitive. The abbreviations EMS (line 79), EIA (line 199), BAT (line 217) and ALARP (line 216) are mentioned in the body of these Guidelines.
- Page 8, Line 281, delete the words "potential the" and substitute the words "the potential".
- Page 8, Line 260, ? whether the word "swiftly" can be measured.
- Page 6, Line 187, referenced the word "these" - it is unclear what is being referred to.
- Page 4, Lines 90 to 111, the provisions do not reflect the Heading. The heading is entitled "Purpose" but the words "objectives", "functions", focus, etc. are used.
- Page 4, Line 98, ? what is being referred to as "core process".

- Page 4. Line 103, ? what "functions" are being referred to.

Finally: under Regulations#4, the term "...serious harm" is used. It would be beneficial to provide a definition for that term.