



Document reviewed		
Title of the draft being reviewed:	Draft Guidelines on tools and techniques for hazard identification and risk assessments	
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General Comments		
Cross-references to sections within the draft guidelines should be consistent with the numbering style used <i>e.g.</i> reference to “Section 2.1” should read as “Section II.A”.		
Cross-references should be accurate <i>e.g.</i> Line 697 of page 19 refers to Section 2.2, but it appears that the correct reference should be Section II.C.		
Specific Comments		
Page	Line	Comment
7	263	Suggest to exclude “Socioeconomic issues” from the list of categories of potential hazards that should be reviewed with respect to the proposed Plan of Work activities and Mining Area and focus on parameters with direct impacts to physical environment to minimise the potential of dragging the EIA process out and increasing uncertainty for businesses. There is no worldwide standard of including socioeconomic considerations in the EIA process; therefore, this should not be a mandatory requirement.
14	479-481	To amend the second sentence of the para as follows: “Because of these uncertainties, it is important that principles of the precautionary approach are is applied to environmental risk assessment.” The phrase “principles of the precautionary approach” is unclear. It suffices to refer to “the precautionary approach”, without more.
20	745	“Links to resources to assist with developing risk registers are provided in <u>Section 5.2.</u> ” Please clarify if this should refer to Section VI.B instead.

22-23	789-798	<p>Para 78 should read as follows: “The Precautionary Approach is the approach reflected in Principle 15 of the Rio Declaration, which states that: “In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”</p> <p>This is per how the term is defined in the draft guidelines for the preparation of environmental management and monitoring plans (at para 7).</p>
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