



**Template for the review of the draft standards and guidelines
associated with the draft regulations on exploitation of mineral resources in the Area**

I. Background

1. The draft regulations on exploitation of mineral resources in the Area ([ISBA/25/C/WP.1](#)) require that certain issues are addressed in accordance with, or taking into account, standards and guidelines to be developed by the organs of the Authority. The standards will be adopted by the Council and will be legally binding on Contractors and the Authority, whereas the guidelines will be issued by the Legal and Technical Commission or the Secretary-General and will be recommendatory in nature.
2. Stakeholder consultation is an integral part of the process decided upon by the Commission for the development of the standards and guidelines ([ISBA/25/C/19/Add.1](#)).
3. The Legal and Technical Commission will consider the comments received through stakeholder consultation during its current session.
4. The drafts include a cover page containing background and contextual information on the approach taken by the Legal and Technical Commission in developing each standard and guidelines. Please note that stakeholder comments are not sought on this cover note.
5. Issues of format and consistency across the standards and guidelines will be reviewed by the secretariat and the Legal and Technical Commission once the content of the various standards and guidelines is finalized following stakeholder consultation.

II. Submitting Comments

6. To ensure that your comments are given due consideration, please send them by e-mail to ola@isa.org.jm, at your earliest convenience but **no later than the date announced on the ISA website for the relevant draft standards and guidelines**.
7. When submitting comments, please adhere to the following guidance as much as possible:
 - a. Please provide all comments in writing and in an MS Word .doc or .docx format using the table provided below.
 - b. The table format allows for an unlimited number of comments to be added. To add more comments, you may add more rows.

- c. Please provide full contact information for the individual/Government/organization submitting the comments.
 - d. Please avoid commenting on issues related to format, grammar, spelling or punctuation, unless it affects the overall meaning of the text, as the document will be formatted and edited when the final draft is prepared by the Legal and Technical Commission.
 - e. To facilitate the revision process please be as specific as possible in your comments. In areas where you feel additional or alternative text or information is required, please suggest what this text may look like or what information should be included.
 - f. Text may be copied from the draft into the table if stakeholders wish to use "track changes" in editing text (this is encouraged to ensure accuracy and avoid numbering errors).
 - g. If you refer to additional sources of information, please include these with your comments when possible or provide a complete reference or hyperlink.
 - h. All review comments will be posted on the ISA website, unless otherwise requested by the submitting entity.
8. Should you have any questions regarding the review process, please contact ola@isa.org.jm.

III. Template for Comments

- 9. Please use the review template below when providing comments.
- 10. Line and page numbers have been provided in the drafts. Please use these as a reference as illustrated in the table below.

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>	
Title of the draft being reviewed:	Draft Guidelines on tools and techniques for hazard identification and risk assessments
<i>Contact information</i>	
Surname:	McLachlan
Given Name:	Corey
Government (if applicable):	
Organization (if applicable):	Tonga Offshore Mining Ltd (TOML)
Country:	Tonga

E-mail:	corey@metals.co	
General Comments		
TOML would like to thank the International Seabed Authority for the opportunity to comment.		
TOML strongly supports using the principle of ALARP as the basis for risk assessment.		
Line 116-118 states that one of the development principles is <i>“the effective protection of the marine environment from harmful effects which may arise from exploitation”</i> . All extractive processes will have impacts on the environment many of which could be deemed harmful. TOML understood the mandate to be the protection of the environment from serious harm by managing and minimizing harmful effects.		
There is continual reference to the lack of full scientific certainty in the document, TOML notes there is rarely full scientific certainty, and this is not unique to seafloor mineral development.		
Specific Comments		
Page	Line	Comment
8	286-287	Rarely will there ever be full scientific certainty, therefore, TOML suggests that <i>“where there is lack of full scientific certainty”</i> be replaced with: <i>“where there is a lack of previous experience and studies, a more thorough analysis....”</i>
<i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i>		

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