



## **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. Stakeholders consultations are 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 the stakeholders consultation at its next session.
4. The drafts include a cover page containing substantive background and contextual information on the approach taken by the Commission in developing each standard and guidelines. Review comments are not being sought on this background information.
5. Issues of format and consistency across the standards and guidelines will be reviewed by the secretariat and Commission once the content of the various standards and guidelines is finalized following stakeholders consultations.

### **II. Submitting Comments**

6. To ensure that your comments are given due consideration, please send them by e-mail to [ola@isa.org.jm](mailto: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.
  - 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](mailto: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><b>Document reviewed</b></i>	
<b>Title of the draft being reviewed:</b>	Draft standard and guidelines on the development and application of Environmental Management Systems
<i><b>Contact information</b></i>	
<b>Surname:</b>	Juman
<b>Given Name:</b>	Rahanna
<b>Government (if applicable):</b>	
<b>Organization (if applicable):</b>	Institute of Marine Affairs
<b>Country:</b>	Trinidad and Tobago
<b>E-mail:</b>	imadirector@ima.gov.tt

<b>General Comments</b>		
<i>Sub-contractor management</i> – Sub-contractors should also have an Environmental Management System, which meets these standards and guidelines, as a requirement for selection by a Contractor.		
<i>Annual Reporting</i> – Consideration should be given to increase the frequency of reporting perhaps in the first period of the contract, given the novelty of the activity, and the unknown impacts on the marine environment.		
<b>Specific Comments</b>		
<b>Page</b>	<b>Line</b>	<b>Comment</b>
2	38	e.g. Please replace “abcd” with “pqrs”
5	141	The objectives should also be SMART (specific, measurable, achievable, realistic, time-bound).
10	344	Include ‘but not limited to’ after such as or alternatively remove list of types of resources and examples i.e. paragraph 44
10	342-352	These points might be better placed under Section VIII Support as they are applicable not only to performance evaluation, but to all mining operations.
12	451	“The Contractor should retain documented information as evidence of the results of management reviews.” Consider adding, “for a specified period of time” or “as appropriate” at the end of the sentence.
<i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i>		

Comments should be sent by e-mail to [ola@isa.org.jm](mailto:ola@isa.org.jm)