



**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.im, 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 Standard and Guidelines for environmental impact assessment process
<i>Contact information</i>	
Surname:	Langman
Given Name:	Robert
Government (if applicable):	
Organization (if applicable):	MarineSpace Ltd
Country:	United Kingdom

E-mail:	Rob.Langman@marinespace.co.uk	
General Comments		
It would be useful to see a standardised use of terms here (for example Significance, Magnitude, Sensitivity etc.) and see these aligned with the EIA Draft Guidelines to ensure consistency and prevent confusion.		
It would also be useful to see a glossary of terms up front (e.g. EIS and EIA), ensuring consistency of wording across the guidance documents out for consultation. For example, the definitions on page 36 should be brought forwards.		
There are references throughout the document to sections that do not exist in the document. We assume these relate to the sections listed in the Appendices but it would be useful to confirm this.		
Specific Comments		
Page	Line	Comment
1	41	Whilst we agree with the statement “ <i>The format is intended to “provide the Authority, its member States and other stakeholders with unambiguous documentation of the potential environmental effects on which the Authority can base its assessment, and any subsequent approval that may be granted”</i> ”, the EIS should also balance the needs and alternatives, as well as the effects on other users of the sea.
2	95	As above, a definition for “Environmental effects” would help to define what the EIS should document above the potential environmental effects (e.g needs and alternatives, other users etc).
4	132	What does prioritisation mean in this context? Should only the impacts of greatest magnitude be discussed in the Executive Summary, or should all impacts be discussed starting with the potentially largest? If only the greatest should be discussed, then we anticipate that a threshold for these greatest impacts needs to be defined.
4	147	It would be useful to understand what the Plan of Work will require, before committing to this.
6	261	It is typical within the project description to provide the realistic, worst case scenario being tested by the EIA process. We suggest here that the most impactful parameters of the extraction activity likely to take place are presented here to allow the testing of this worst-case realistic scenario.
7	298	As above, we would suggest the definition of a suitable envelope of effect to take account of the different mining equipment that may be utilised, using the worst case realistic scenario to ensure that the worst case realistic effects are considered in the EIA.
7	309	We would suggest that “initiation” is a better word to use than “construction”.
7	311	We would recommend adding the monitoring programme and timetable here, including the feedback mechanisms to modify the monitoring plans based on the results.
7	319	As well as alternatives, socio-economic arguments for the development are also important and should be added to this list.
8	367	Six bullets or less is very prescriptive. We would suggest that this is

		reworded to state “as concisely as possible” or similar.
10	421	We would suggest amending the wording to “The Contractor should provide as comprehensive a list of known species that use the proposed Contract Area, as possible.” This will ensure that migratory species, and seasonality of use is considered.
11	479	There is no Section 3.2 in the document.
11	481	There is also no reference to any features of significance that may have been identified during baseline surveys, or through the EIS process in this section. It is suggested that a mechanism for the assessment and mitigation strategies specifically applicable to these features of significance be added.
13	588	These footprints will presumably be defined by modelling. It may be helpful to provide the parameters for the modelling to ensure a consistent approach.
14	644	We believe that light and noise have been missed from this list of potential benthic impacts (seafloor to 50 m above).
15	700	We believe a monitoring amendment/adaption bullet should be added to this list to ensure that the monitoring remains relevant, valid and fit for purpose.
<i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i>		

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