



**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](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 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](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>Document reviewed</i>	
<b>Title of the draft being reviewed:</b>	<b>Draft Guidelines for the preparation of environmental management and monitoring plans</b>
<i>Contact information</i>	
<b>Surname:</b>	Petersen / Marques
<b>Given Name:</b>	Sven / Filipa
<b>Government (if applicable):</b>	
<b>Organization (if applicable):</b>	International Marine Minerals Society
<b>Country:</b>	International

<b>E-mail:</b>		
<b>General Comments</b>		
<b>IMMS is pleased to provide its comments on these draft guidelines and appreciates the opportunity to do so.</b>		
A key concern is the definition of adaptive management which is too imprecise and risks improper management of monitoring programs (see below).		
<b>Specific Comments</b>		
<b>Page</b>	<b>Line</b>	<b>Comment</b>
	74	Since the Authority here already specifies APEIs as “set aside” areas, it might be the appropriate time to rename them proposed or adopted Marine Protected Areas to fit with worldwide norms for naming such areas.
	209-261	The definition of “adaptive management” used here is too imprecise. It could allow for the sloppy and lazy management of monitoring programmes, with the regulator given flexibility to change the rules with little or no accountability. Adaptive management can be used effectively only when monitoring thresholds for action are clearly defined <i>a priori</i> and requirements for operator responses to threshold exceedance are also clearly defined. Thresholds and exceedance responses can be modified by mutual consent as more knowledge becomes available, but this principle must be specifically included in the definition of this term to provide assurance that the adaptations ultimately adopted are justified and can lead to improvements in impact mitigation and avoidance.
	308	Should be “Types of monitoring include:”
	520	Missing period
<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)