

JOGMEC Comments

Document reviewed		
Title of the draft being reviewed:	Draft standard and guidelines on the form and calculation of an Environmental Performance Guarantee developed by the Legal and Technical Commission	
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General Comments		
<p>Since a calculation method for estimating reasonable cost for the guarantee is not precisely mentioned, there may be the possibility that the cost varies greatly among contractors. In addition to the above, since the duration for Closure management is not mentioned as well, this may also cause a great variety in managing closure among contractors. Consequently, in this guideline evaluation standards for the proposal which will be submitted by contractors should be clarified. Also, parameters for cost calculation may need to be specific.</p>		
Specific Comments		
Page	Line	Comment
10	268-269	Fig.2 in the paragraph 47 should indicate procedure of Regulation 52 (6) because prior to rendering to the Contractor Closure Breach, the Commission should take an opportunity to communicate with the Contractor through making inquiry and/or proposing necessary measures to be taken by the Contractor.
9	251-267	The paragraph 46 seems not to be consistent with Figure 2 nor completely compatible with the Regulations. For example, there is no reference to the Closure Breach in the regulation while no Compliance Notice in Figure 2. Therefore, in order to ensure consistency between the Figure and text, the process from the consideration by the Commission onward, which is indicated in Figure 2, should be defined in text form as appropriate.
<i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i>		