

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

- ITALY -

<b><i>Document reviewed</i></b>		
<b>Title of the draft being reviewed:</b>	Draft guidelines for the preparation of an environmental impact statement	
<b><i>Contact information</i></b>		
<b>Surname:</b>	Bosio	
<b>Given Name:</b>	Daniele	
<b>Government (if applicable):</b>	Italy	
<b>Organization (if applicable):</b>	Ministry of Foreign Affairs and International Cooperation	
<b>Country:</b>	Italy	
<b>E-mail:</b>	daniele.bosio@esteri.it	
<b><i>General Comments</i></b>		
<p>Italy is of the view that this document is of a particular relevance to ensure that the Environmental Impact Statement is structured in a detailed, exhaustive and meaningful way.</p> <p>However, much of these guidelines' content resembles what is already contained in Annex IV of the Draft regulations, which includes a non-mandatory template for the required statement. It is Italy's assumption was that this document was supposed to provide guidance on how to fill with contents the format contained in the Draft regulations rather than restating its requirements.</p> <p>To avoid duplications, and to ensure coherence in the documents submitted to the Authority by the perspective contractors, Italy is of the view that either Annex IV is rendered mandatory in its format - and hence the guidelines serve the purpose of explaining, in detail, what contractors are required to include therein; or the whole guidelines are canvassed in the parallel sections of the template. We support the first option, which would also better reflect the architecture of the Mining code, with the guidelines detailing and clarifying the content of its legally-binding provisions. After all, the same guidelines under comment seem to suggest such an outcome, given the prescriptive language they make use of. In general, we would to see more concise and straight to the point documents.</p>		
<b><i>Specific Comments</i></b>		
<b>Page</b>	<b>Line</b>	<b>Comment</b>
4	167	Add: benefit <b>for mankind</b>
5	181	Add.: and test-mining. Whether or not a test-mining will be mandatory to accede to the exploitation phase is however still subject to debate.

5	212	Not only what, but also why something is out of the scope should be reflected in the EIS
6	238	Replace ‘national or international’ with ‘national and international0
11	488-491	Delete from ‘because’ to the end
11	496	Relevant data could be supplied, when applicable, by Regional Fisheries Management Organisations.
11	505	It seems like the concept of area-based management tools has been misunderstood. Since no provision of the Exploitation Regulations requires the Authority to reject a proposal for a plan of work whose location is conflicting with an existing area-based management tool/marine protected area, Italy believes it is necessary at least to retain reference to them under this paragraph.
<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.im](mailto:ola@isa.org.im)*