

| Document reviewed | | |
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| Title of the draft being reviewed: | Guideline on the preparation and assessment of an application for the approval of a Plan of Work for exploitation | |
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| General Comments | | |
| As indicated in the cover note attached, this document does not appear to elaborate on the sections of the draft Regulations relating to this issue. We would welcome a revised document for comment in the future. | | |
| To note, the draft flow diagram highlights the issue around agreeing these Guidelines before the draft Regulations are agreed. A key concern is around timings. In several instances, timings have been made available in the draft Regulations, but they are not included in this flowchart. | | |
| While we do not agree that this document as currently drafted constitutes a Guideline, we can see the benefit of having an easy-to-use version of the appropriate sections of the draft Regulations to check that an application contains all of the mandatory information before submitting. Cross-referencing to the relevant parts of the draft Regulations is helpful, as is the flow diagram. | | |
| In future drafting, to ensure consistency, it would be helpful to ensure that capitalisation is used consistently for Standard and Guideline where the documents in question are created by the ISA. The necessity of this was noted in the Pretoria workshop (2019) to make sure that there was a clear separation between ISA-initiated Standards and Guidelines and international standards. | | |
| There is reference to legal views in the document (p7) "none of the views expressed in this document should be treated as a substitute for legal advice". We note that this wording has not been included in other draft Standards and Guidelines, and we suggest removing this line from the future draft as it creates a degree of allowance for stakeholders to deviate from the requirements outlined within the Guideline. | | |
| Specific Comments | | |
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| <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