



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 Guidelines for the establishment of baseline environmental data.	
<i>Contact information</i>		
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.	
Country:	Ecuador	
E-mail:	digeim@armada.mil.ec	
<i>Specific Comments</i>		
Page	Line	Comment
6	158	Figure 1 "Conceptual scheme of a sampling program". It is not indicated on

		the basis of which criteria the “Exploration contract area” is divided into subareas.
7	189-194	The sampling resolution for rocks from the seabed is not included, only the resolution for vertical sampling is established, which would correspond only to sediments.
<i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i>		

Document reviewed		
Title of the draft being reviewed:	Draft Standard for environmental impact assessment process.	
Contact information		
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.	
Country:	Ecuador	
E-mail:	digeim@armada.mil.ec	
Specific Comments		
Page	Line	Comment
6	243-245-248	Preparation of an “Environmental Management and Monitoring Plan (EMMP)” and a “Regional Environmental Management Plan (REMP)”. It could be considered to prepare a (single) environmental plan consolidated in the document “Environmental Management and Monitoring Plan (EMMP)”.
<i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i>		

Document reviewed		
Title of the draft being reviewed:	Draft Guidelines for the preparation of an environmental impact statement.	
Contact information		
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.	
Country:	Ecuador	
E-mail:	digeim@armada.mil.ec	
General Comments		
It is suggested that for the physicochemical and biological aspects an area of direct affectation of 0 to 200 m of the seabed be defined, since the quality of the seabed in geological terms is affected and its recovery will depend to a large extent on the activity specific to be carried out and the dimensions of the project.		
This document does not define the profile of the competent personnel authorized to prepare this document.		
Specific Comments		
Page	Line	Comment
6	261	“Project Description” section describes the content of the environmental impact studies, for which, the description of the mineral resource

	exploitation method is mentioned, but it does not emphasize the description of the exploration method, which would also be appropriate . It is recommended to prepare separate documents, that is, an EIS for the exploration stage and another for the exploitation stage of mineral resources.
<i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i>	

Document reviewed		
Title of the draft being reviewed:	Draft Guidelines for the preparation of environmental management and monitoring plans.	
Contact information		
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.	
Country:	Ecuador	
E-mail:	digeim@armada.mil.ec	
Specific Comments		
Page	Line	Comment
16	643-651	The characteristics that a competent person "Competent Person" must meet, who is the one who would verify the "Environmental Management and Monitoring Plan" report. According to these requirements, it is enough that said person only has practical experience, but considering the importance and the highly specialized nature of the topics to be covered, it is recommended to include more demanding requirements for said person, for example, that they have a university degree in geosciences and some knowledge of Economy and Finance.
<i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i>		

Document reviewed	
Title of the draft being reviewed:	Draft Guidelines on tools and techniques for hazard identification and risk assessments.
Contact information	
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.
Country:	Ecuador
E-mail:	digeim@armada.mil.ec
General Comments	
This document does not define the profile of the competent personnel authorized to prepare this document.	
<i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i>	

Document reviewed	
Title of the draft being reviewed:	Draft Standard for the preparation and implementation of emergency response and contingency plans.
Contact information	
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.
Country:	Ecuador
E-mail:	digeim@armada.mil.ec
General Comments	
This document does not define the profile of the competent personnel authorized to prepare this document.	
<i>Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"</i>	

Document reviewed	
Title of the draft being reviewed:	Draft standard and guide lines for the safe management and operation of meaning vessels.
Contact information	
Government (if applicable):	Directorate-General for Maritime Affairs (DIGEIM) of the Ecuadorian Navy.
Country:	Ecuador
E-mail:	digeim@armada.mil.ec
General Comments	
The contractor or interested party must carry out an environmental impact study in order to determine the possible risks that the extraction of minerals may pose and how this may affect distant areas before extracting any mineral from the Area.	
The contractor or interested party must prepare an Environmental Management and Monitoring Plan, where prior approval, the National Maritime Authority of the area of direct influence of the project, must approve the respective Plans. In addition, it must present the respective environmental monitoring programs and contingency plans, in accordance with the MARPOL regulations, the London Protocol and other regulations issued by the IMO.	
Socialization of the exploration and exploitation plans, contingency plans and everything related to the affectation of a certain area, to the coastal States that are part of the agreement, and that may possibly be affected in their maritime jurisdictions due to the marine disturbances that may occur.	
<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