



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 Standard and Guidelines for the safe management and operation of mining vessels and installations
<i>Contact information</i>	
Surname:	Geldart
Given Name:	Ben
Government (if applicable):	
Organization (if applicable):	UK Seabed Resources
Country:	UK
E-mail:	Benjamin.d.geldart@lmco.com

General Comments		
<p>UK Seabed Resources is grateful for the opportunity to comment on the draft standard and guidelines. UKSR notes that there is currently no mechanism envisaged to enable plans to be supplied to the ISA going forward, for example a suitable, secure portal (such as DeepData for exploration data). Whether or not referenced in the guidelines, such a mechanism might aid the ISA in managing the secure communication and storage of large documents.</p>		
<p>The standard and guidelines currently do not mention of “End of life management/disposal”: this could be considered for incorporation in a future draft.</p>		
Specific Comments		
Page	Line	Comment
4	50	<p>I. INTRODUCTION 47</p> <p>1. These Guidelines contain guidance for the safe management and operation of vessels 48 and installations used in the support and conduct of exploitation in the Area. By vessels is meant 49 the vessels that are stationary on the mining site during the mining operations to run and support 50 the marine and submarine operations involved, including temporary storage and transfer of 51 mined material to cargo vessels for transport away from mining site. By installations are meant 52 all equipment deployed in the water column and on the seabed to carry out the mining and 53 seabed-to -surface transport. Such vessels and installations are hereinafter termed Mining 54 Vessels and Installations. 55</p> <p><i>Review “stationary”, operation is transient so include “positioned”.</i></p>
4	89	<p>B. Description of the process 88</p> <p>7. Prior to deployment of a mining Facility into service, the Contractor should, in its 89 application to the International Seabed Authority for approval of a plan of work, document 90</p> <p>2 operational intent and profile following the topics set out in Figure 1 and providing relevant 91 documentation as necessary. 92</p> <p><i>“Facility” requires definition in this context, for example in 1) Introduction with vessels and installations</i></p>
5	97 Figure 1 Table	<p>Choose a consistent grammatical standard for “Content” description. Either commence with “Provides” or “Description of” but not a blend.</p>
<p><i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i></p>		

Comments should be sent by e-mail to ola@isa.org.jm