

**TEMPLATE FOR SUBMISSION OF COMMENTS ON THE
GUIDANCE TO FACILITATE THE DEVELOPMENT OF REGIONAL
ENVIRONMENTAL MANAGEMENT PLANS (ISBA/27/C/37)**

Please fill out the form for general comments and textual proposals which your delegation(s) wish(es) to amend, add or delete, and send to: pemmr-secretariat@isa.org.im

Field Code Changed

1. Name(s) of Delegation(s) making the proposal, including contact details:

Portugal

2. Please provide general comments, including the main rationales for the textual proposals.

30 (a) "to avoid" harmful effects seem a too soft wording for such important and rare types of habitats. Any environmental policy designed successfully to manage the good environmental status of the deep sea should be primarily based on the principle that those habitats should not suffer any significant impacts. (The same comment applies to subparagraph (b)) _____

52(h) - It should be stated clearly how this prevention takes place. The contractor should present both a prevention and a contingency plan for the introduction of non-indigenous species. The term invasive must be avoided, since a non-indigenous species can be invasive or not. In some circumstances, a non-invasive species can show an invasive "behaviour" in one place and not in the other _____

58 - In our view, clear statement should be made in order to apply specific resources to the development of technological solutions to monitoring. It seems that facilitate a forum on technology development is not enough. Financial resources have to be allocated. It could be up to the Authority to allocate some of the financial outcomes of the exploitation to the development of such solutions (as well as to the adoption of this management plan as a whole)

3. Kindly provide specific textual proposals in table below, using the "track changes" function in Microsoft Word. Please only reproduce the parts of the text that are being amended or deleted.

Specific Textual Proposals	
Relevant provision in document ISBA/27/C/37 (Page and	Proposed amendment(s)/addition(s)/deletion(s)

paragraph number)	
Page 9 – Para 30	<p>(a) Avoid-Take necessary measures to ensure that harmful effects on vent sites with diverse and/or abundant biological communities, including vent communities in areas around a potential mine site <u>are not impacted by the mining activity;</u></p> <p>(b) Avoid-Take necessary measures to ensure that or minimize harmful effects on sensitive habitats and communities, including coral and/or sponge biogenic habitats in the contract areas and surrounding areas <u>are not impacted by the mining activity;</u></p>
Page 13 – Para 52 h)	52. - h) <u>Contractors should present a prevention and a contingency plan for the introduction of non-indigenous marine species</u>
Page 17 – Para 58	58. Technology will play an important role in future environmental management and monitoring. The secretariat will facilitate a forum on technology development to link engineers, contractors and scientists and to better understand how technology is evolving, the impacts of new technologies, and how technology advancements can improve the ability to monitor the marine environment. <u>The Authority should allocate financial resources to the development of new monitoring solutions.</u>