

**TEMPLATE FOR SUBMISSION OF COMMENTS ON THE
GUIDANCE TO FACILITATE THE DEVELOPMENT OF REGIONAL
ENVIRONMENTAL MANAGEMENT PLANS ([ISBA/29/C/10](#))**

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to: oemmr-secretariat@isa.org.jm

1. Name(s) of Delegation(s) making the proposal:

Deep Ocean Stewardship Initiative (DOSI)

2. Please provide general comments where applicable here:

DOSI thanks the Commission for its continued work on the standardized procedure and REMP template, which serve as crucial documents in regard to marine protection. Some areas of the Standard Procedure Document need further refinement to enhance clarity and effectiveness. DOSI believed that overall, this procedure could be significantly improved by offering clearer role definitions, principles, and a better explanation of the stakeholder engagement process, alongside better document cohesion and terminology consistency. DOSI's comments below offer some suggestions in this regard.

- **Confusion Between Roles and Terminology:** There is a noticeable lack of clarity regarding the roles and responsibilities for key actions during the scientific and management assessments. Specifically, the confusion between the description, proposal, and identification of Area-Based Management Tools (ABMTs) across different stages of the process must be addressed. Additionally, the terminology lacks uniformity, leading to potential misunderstandings. For instance, terms like "potential spatial extent" and "REMP area" and "geographical scope" are used inconsistently, requiring clearer definitions or the inclusion of a glossary at the beginning of the documents.
- **Stakeholder Engagement Process:** The current guidance on stakeholder engagement is vague and incomplete, especially regarding the process of stakeholder mapping, the selection of experts besides the criteria, and the formal consultation stages. Stakeholder involvement should be explained in greater detail, particularly regarding how their feedback is integrated into decision-making processes. The correspondent section in the Guidance document does not offer the detail of the process.
- **No Expert Committee.** We note that ISBA/26/C/6 envisioned the establishment of an expert committee. We note that the gathering and in depth analyses of environmental (and other) data for the development of a REMP is very complex and time-consuming, and requires substantial input from numerous (science) disciplines, including experts from the respective region. Thus, an expert committee could significantly reduce the very high workload of LTC members.
- **Lack of Principles and Objectives:** The documents would benefit from a stronger foundation of guiding principles and objectives that outline the core goals of REMPs. These principles could offer a clearer roadmap for implementation and review, ensuring consistency and alignment with broader environmental and legal standards.

- **Structural Improvements:** There are opportunities to enhance the flow and structure of both documents. For example, the *Standardized Procedure* does not adequately explain the phases of the process in several sections. The functional schematic diagram in the guidance document could be moved in the Standardized Procedure and include the phases of the decision-making process happening at the ISA for the establishment of REMP. Similarly, the section on *Initiation of the REMP Development Procedure* focuses on legal rationales rather than outlining the specific steps to begin the process, which causes confusion. Another case is the annex: The Template is more of an outline of the Template and it does not reflect the content, so maybe it should be renamed as such since all the detailed explanations are in the guidance document.

References to REMP technical guidelines. It remains unclear to what degree the technical guidelines need to be followed. We note that the standardized and obligatory template should have sufficient information allowing for the establishment of effective REMPs. However, if maintaining the separation between the two documents will allow for a more precise and accurate explanation of the REMP procedure, Cross-referencing relevant sections of the guidance document more explicitly would make it easier for readers to follow the process and find further information.

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

4. **Please indicate the rationale for the proposal. [150-word limit]**

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Section II - title

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~~Initiation of for~~Legal rationale for the regional environmental management plan development procedure

4. Please indicate the rationale for the proposal. [150-word limit]

The content of para 6 and 7 do not explain the start of the process but more the legal rationale for the adoption of REMP. Suggest changing the title accordingly

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In Section II, para 8 - The programme of work will set out an indicative timeline, as well as the potential spatial extent of regional environmental management plans. The underlined term is ambiguous and should be clarified or defined.

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The wording potential spatial extent is confusing, since during the workshops that are part of the REMP development, the geographical scope of the REMP, which could be understood as a synonym is defined. Further explanation of what potential spatial extent means is necessary. NOTE: In 3.1 of the technical guidance document it reads: “Defining geographical scope (spatial extent of the REMP area) is a fundamental, step in the REMP development process”. Therefore a clarification of the definition of potential spatial extent seems necessary.

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(page 3, para 9)- The Commission, with assistance from the secretariat , and external experts and/or organization contracted for the task should ensure that it has access to all available data.

4. Please indicate the rationale for the proposal. [150-word limit]

At this point in the process, it would also be possible (and desirable) to start stakeholder engagement and a call for data and information to submit to the Secretariat. That would support and facilitate the work of the secretariat.

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9(b) Data and information, in particular from scientific projects, initiatives in the region, peer-reviewed articles and publicly accessible databases; and traditional knowledge of Indigenous Peoples and local communities

4. Please indicate the rationale for the proposal. [150-word limit]

Traditional knowledge of indigenous peoples and local communities is part of the most valuable data and information available and therefore must be compiled

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Suggest to review para 11

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

Experts should be brought together, including through workshops, and selected by the Commission on the basis of an expert and stakeholder mapping exercise, in accordance with the regional environmental management plan guidance document

4. Please indicate the rationale for the proposal. [150-word limit]

The stakeholder mapping exercise is not explained in the guidance document.

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Para 11(a) needs clarification

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Define the appropriate regional environmental management plan area

4. Please indicate the rationale for the proposal. [150-word limit]

Is “REMP area” the spatial extent or the geographical scope? Please change accordingly to provide uniformity in the terminology used and avoid confusion. If the terminology is different on purpose an explanation of the meaning is needed

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Para 13- Experts will be selected by the Commission on the basis of an expert and **stakeholder mapping exercise**, in accordance with the regional environmental management plan guidance document

The stakeholder mapping exercise is not explained in the guidance document.

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4. Please indicate the rationale for the proposal. [150-word limit]

Further details on the matter are needed to understand what is the process of selection of the experts, when it happens, who does it, and how it is communicated.

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18. After the closure of the formal stakeholder consultation, i.e. after a minimum of 90 days, the Commission must, at its subsequent regular meeting, ~~consider~~ revise, as appropriate, the draft regional environmental management plan, taking into account the comments received during the stakeholder consultation and any further information.

4. Please indicate the rationale for the proposal. [150-word limit]

The Commission should have to revise the Draft REMP with the comments received from the stakeholder consultation, otherwise it can consider them but still recommend the original REMP to the Council for adoption (which would negate the purpose of the stakeholder consultation).