

**TEMPLATE FOR SUBMISSION OF COMMENTS ON THE
GUIDANCE TO FACILITATE THE DEVELOPMENT OF REGIONAL
ENVIRONMENTAL MANAGEMENT PLANS ([ISBA /29/LTC/8](#))**

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:

The Guidance Document on (REMP) is very detailed and comprehensive for the most part. However there are some areas that require clarification and elaboration to improve its effectiveness and clarity:

- **Discrepancies with Standardization Procedures:** There are inconsistencies regarding the public consultation process compared to the standardized procedures. Specifically, the nature of stakeholder consultation—whether it is public or not—needs to be clearly explained in each phase. Clarifying how workshop outcomes will be reported publicly, alongside the nomination and selection process, will enhance transparency. Additionally, further explanation is needed regarding stakeholder mapping exercises and ensuring equitable geographic representation, particularly for participants who may lack financial resources to engage fully. Moreover, there is discordance and confusion about the expert deliberations and the stakeholder consultation during the Review process of the REMP as proposed in the documents;
the criteria for determining the necessity of expert deliberations during the REMP review process, should be explicitly defined, including how these deliberations relate to public stakeholder consultation.
- **Workshop Outcomes:** The guidance document should clarify the process for compiling workshop reports, addressing who authors them, whether participants can contribute to writing or proofreading, and how these reports will inform the development of the draft REMP. Both management and scientific workshop outcomes need to be adequately represented. For example, Section 2.2 raises several questions about how stakeholders are engaged throughout the pre- and post-workshop phases.
- **Tailored Assessment Criteria for ABMTs:** In Section 4.1, it is crucial to emphasize that while the criteria for assessing Area-Based Management Tools (ABMTs) are standardized, the results may vary significantly based on the environmental characteristics of each region and the data available. The identification of ABMTs or other management measures cannot follow a one-size-fits-all approach; they must be tailored to specific circumstances. For instance, the proximity between ABMTs aimed at protecting the environment and

exploration areas may differ depending on various factors, including the type of activities, environmental context, water depth, and the scale of buffer zones.

- **Site of Particular Environmental Interest (SPEIs):** it would be informative to include that SPEIs, as a fine filter tool, allow the identification of sites of particular rarity, high value, or high risk also within or in close proximity of exploration contract areas. Moreover, due to the nature of these easily recognizable sites, general provisions on an avoidance mechanism that should not require waiting for a review process, in case of an on-site discovery, could be included in the technical guidance.
 - **Terminology clarification:** In the document, some paragraphs would benefit from a review of the terminology used and/or a clarification of their definition. Sections 4.1.1 and 4.2.3 should clarify terminology regarding sites and areas in network analyses to avoid confusion and ensure accurate application of the network criteria; the document should provide a clearer definition of "implementation" in Section 2.3 and align more closely with the standardized procedure's clarity on establishing REMPs. This will help convey the specific phases involved in the process.
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 4. **Please indicate the rationale for the proposal. [150-word limit]**

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Para 2.1. It is not clear what is the difference between the Data Report (DR) and the Regional Environmental Characterization document (REC) in this para. A brief explanation could be included.

This section could be completed by explaining how these documents are compiled, by whom and when, and specify that are available to the public in the website of the Authority

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A clarification and definitions would allow better use of the document.

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Para 2.2 would benefit from more detailed explanations of the following:

- How the stakeholders will be engaged during the pre-workshop and post-workshop processes?
- Will the workshop outcomes (the workshop reports) be available to the public?
- How does the nomination and selection process work? The selection criteria are clear but how do the decisions take place?
- How does the stakeholder mapping exercise work?
- How will equitable geographic representation and developing state representation be ensured? What if nominees or selected individuals do not have the financial opportunities to participate in the workshop?

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More specificity on 2.2.1.2.(i) is needed

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Provide descriptions of areas and sites that could be protected from exploitation in order to aid in achievement of the effective protection of the marine environment

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For specific REMPS, there may be mention to specific sites, in addition to or instead of areas that should be protected.

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In para 2.2.2.2 we suggest to include a short paragraph explaining how the outcomes of the workshops are compiled in reports. That should include information on Who writes them, whether the participants involved in the writing or proofreading of the reports, what is the availability of these reports and how they will be used to develop the draft REMP.

We also suggest the textual proposal below

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After the scientific and management workshops, the report will be provided to the Commission for further consideration and subsequent development of the draft REMP

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This avoids any confusion that the report will only be based on the management workshop.

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The Formal Stakeholder Consultation paragraph 2.2.3 is not in line with the correspondent paragraph F in the ISBA/29/C/10.

Para F states that the consultation is public, while para 2.2.3 reads “the commission should identify stakeholder consulted”. Please clarify in the guidance document that the consultation is publicly available for 90 days. How it is announced and facilitated.

Both documents do not explain what happens to the stakeholder comments. A public response to the comments should be provided after the stakeholder engagement.

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Stakeholder consultation ~~should~~must take place to ensure that concerns and interests of stakeholders are ~~considered and acknowledged~~incorporated during into the preparation and drafting of the REMP..

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It should be clear that stakeholder consultations are mandatory for the development of every REMP (and the revision of every REMP) - this mirrors what is contained in ISBA/29/C/10. Stakeholders comments must not only be considered but also specifically incorporated into the REMP, as appropriate, as this will improve the REMP and ensure it meets its object and purpose

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In the standardized procedure document, section IV clearly explains the phases of the process: (A) Recommendations by the LTC and (B) Approval by the Council. However this clarity is not reflected in the guidance document.

Para 2.3 of the guidance document talks about implementation of the REMP after the approval, but in a vague manner. It lacks a proper definition of implementation and it is hard to understand what is the main message of this paragraph.

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Clarifications and complementarity between the two documents are needed for the section: Establishment of a Regional Environmental Management Plan.

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In the last sentence of the review of the REMP process, it is stated “Where necessary, expert deliberations will be organized to support the review.”

However, it is not specified what criteria would make such deliberations necessary. To improve transparency, DOSI propose to include text that clarifies this point.

We also propose including textual clarification on whether this would also include a public consultation process.

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3.2.1.2 Geological characteristics -

Geological setting

b) For oceanic ridges, the REMP should identify and describe any geological structures within the region, including morphology, depth range, variations in topography including slope and flank characteristics, the geometry of the ridge and the geological setting of sulphide deposits.

...

Characterization of seabed substrate

...

b) For polymetallic hydrothermal sulphide deposits, this may include information on depth and location of the site, distance to the ridge axis, characteristics and distribution of deposits, hosting rocks and hydrothermal vents (active or inactive or extinct), the temperature and composition of the hydrothermal fluids. The age of the oceanic crust should be taken into account as well.

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The geometry of the ridge is of most relevance from a geological, geomorphological and ecological point of view. It determines the species and biological communities that can inhabit the different parts of the ridge, their potential sensitivity and/or resilience to disturbances, and therefore must be described in a REMP. In addition, the distinction of extinct vents is important here. The implications of disturbance of an active, inactive or extinct vent that affects their structure are significantly different and therefore their state must be clarified. For example, it has been demonstrated that inactive vents can be re-activated by drilling of the substrate,

dramatically affecting the ecosystem around and also the access capacities to the minerals.

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3.2.1.4 Natural stressors. This section should include details of any region-scale natural stressors, of any nature (e.g., volcanic activity, extreme seasonal changes, regional oceanographic oscillations such as El Niño and La Niña, algal blooms on the surface, ect.).

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We consider that the original wording, specifying with the example of solely a geological stressor may lead to confusion. More specificity will allow better understanding and consideration of a wider range of possibilities.

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4.1.1

(1) network or regional criteria that provide guidance on the representativity, adequacy, spatial configuration, connectivity and other broader criteria guiding the development of the entire collection of areas and sites; and (2) criteria that provide guidance on the priority, size, shape, and orientation of individual areas and sites. The scale of benefits derived from individual protected areas will depend on their location, design, size, and relationship to other forms of management. Protected area networks magnify the benefits of individual areas and sites ~~and~~ to protect the large-scale processes that maintain healthy populations, such as connectivity, gene flow, and genetic diversity.

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Given that in REMPS there is a distinction between protected areas and sites, it is important to include both terms here, to avoid confusion and/or these criteria to be applied to sites only.

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Area-based management in REMPs:

Fracture zones are mentioned as examples of APEI. However, in the history of REMP development Fracture zones have never been assessed against the network criteria that are listed in Table 1.

It would be informative to include that SPEI, as a fine filter tool, allows the identification of sites of particular rarity, high value, or high risk also within or in the close proximity of exploration contract areas.

Moreover, due to the nature of these sites, which are easily recognizable, general provisions on an avoidance mechanism in case of an on-site discovery should be included in the technical guidance.

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