

**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](mailto:oemmr-secretariat@isa.org.jm)*

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

United Kingdom

**2. Please provide general comments where applicable here:**

**UK Comments on Draft revised standardized procedure for the development,  
establishment and review of regional environmental management plans  
ISBA/29/C/10**

**Goals and objectives**

**UK recommendation:** In relation to goals and objectives in ISBA/29/C/10 (Section III D paragraph 14 & Annex Section II), we require clarity (suggest in a dedicated section or paragraph) on how the REMP goals and objectives fit together in a framework. This should include that the high-level goals and objectives in Section II are reproduced for each REMP.

**As part of the above recommendation, we have recommended a text proposal on ISBA/29/C/10 Annex Section II which can be seen in section 3 of this submission.**

In ISBA/29/C/10, it states that the REMPs are ‘guided by principles, sets overarching goals and objectives.’ (ISBA/29/C/10 Section I, paragraph 2). The LTC has then developed a list of goals and objectives for REMPs (ISBA/29/C/10 Annex Section II paragraphs 2.1.1, 2.1.2, 2.1.3). These goals and objectives are to be implemented ‘at the regional scale’ and ‘can’ be applied to each REMP (ISBA/29/C/10 Annex Section). It further notes that there ‘may’ be region-specific objectives’ (ISBA/29/C/10 Annex Section). Finally, the document outlines ‘management goals and objectives at a regional scale’ which then inform the measures to be developed in the REMP (ISBA/29/C/10 Section III D paragraph 14).

Although we agree that the list of goals and objectives (ISBA/29/C/10 Annex Section II) is comprehensive and therefore support their inclusion, we recommend adding greater clarity in this section and ISBA/29/C/10 as a whole regarding how the framework of different levels of goals and objectives fit together, especially as references are in different sections of ISBA/29/C/10. Additionally, we recommend amending which goals and objectives are required, versus implemented ‘if applicable’. We note this clarity is especially important for future-proofing and usability of ISBA/29/C/10.

Our recommendation is that a section should be added to provide clarity by outlining the following framework:

**Level 1 - Overarching goals and objectives:**

- the list of goals and objectives (Annex Section II) are the ‘overarching goals and objectives’ for the REMP.
- Such goals and objectives ‘must’ be applied to each REMP (if LTC consider a caveat needs to be added that goals and/or objectives ‘can’ be added to this list ‘if any’ in order to implement this recommendation that these goals and objectives are mandatory across REMPs, we can accept).
- Region-specific objectives at this level ‘can’ be added to this list if any identified

**Level 2 – Region specific Goals and objectives to achieve the overarching goals and objectives:**

- Region-specific goals and objectives ‘must’ be developed that sit below the overarching goals and objectives to achieve level 1 (we can consider any naming LTC propose for this level of goals and objectives, including whether LTC clarify that ‘management goals and objectives at the regional scale’ (section III D, paragraph 14) serve this purpose).

Please see example diagram at end of this UK submission.

With regard to our recommendation that the overarching goals and objectives in Section II must be duplicated for each REMP, we have made a text proposal (see Text Proposal 1 of section 3 of this submission) for Annex Section II for suggested wording on this.

**Principles:**

**UK recommendation: We recommend it is clarified what ‘principles’ should guide the REMP development, as no principles are currently mentioned in the REMP Procedure.**

ISBA/29/C/10 Section I, paragraph 2 states that the REMPs are ‘guided by principles, sets overarching goals and objectives...’.

**Stakeholder consultation:**

**UK Recommendation: An overarching Standard or policy has not yet been developed for the Authority regarding Stakeholder consultation, we therefore propose that at a minimum additional requirements for Stakeholder consultation, as laid out in the bullet-point list below, are added to ISBA/29/C/10.** We note the improvements in ISBA/29/C/10 regarding consultation and public availability of data. We support that formal Stakeholder consultations of the draft REMP (with supporting Regional Environmental Characterisation and Data Report) shall be at least 90 days (Procedure paragraph 16). We also support the addition that such a draft REMP shall be available 90 days before the next ISA Council where the REMP will be considered by Council (ISBA/29/C/10 paragraph 19) as it is important to allow sufficient time for Council to review these highly technical documents. We also support that Stakeholder comments received will be made publicly available on the website of the Authority (ISBA/29/C/10 paragraph 17).

However, as an overarching Standard or policy has not yet been developed for the Authority regarding Stakeholder consultation, we consider that at a minimum, the following additional requirements for Stakeholder consultation need to be added to ISBA/29/C/10:

- **Stakeholders must be proactively notified by the Authority of Stakeholder consultation, including where to find all the documents, how to respond and deadline for submissions.**
- **In addition to the LTC taking into consideration Stakeholder comments received (ISBA/29/C/10 paragraph 18), it should be clear that LTC recommendations to Council**

should also detail how comments have been addressed, and where they have not been implemented, including the reasons why.

- **Stakeholder comments, when made publicly available (ISBA/29/C/10 paragraph 17), need to be available for Council to see during their 90-day (minimum) review window. It is important that Council can see such comments in time to be able to inform their decision-making regarding the adoption of any REMP.**

The above recommendations are in line with the standardised process agreed in IWG Stakeholder consultation for the draft exploitation regulations. We note that draft regulation 93bis could be a helpful basis for drafting such requirements into this REMP procedure.

### **Data compilation**

**UK Recommendation: We recommend adding the requirement to ISBA/20/C/10 that all environmental data and associated metadata used for the development, implementation and review of REMPs must be either compiled into, or discoverable through, the ISA Central Data Repository (currently 'ISA Deep Seabed and Ocean Database (DeepData)'), with appropriate caveats for what is practicable and useful.**

We support the renaming of the Regional Environmental Assessment (REA) to the Regional Environmental Characterisation (REC), as this initial step is only a data compilation and does not include any assessment of the data. We also appreciate that ISBA/29/C/10 is clear that 'all available data' is taken into account in the data compilation (ISBA/29/C/10 paragraph 9).

ISBA/29/C/10 states 'such data and information will be disseminated through the REC and the data report. Both documents will be made available on the website of the Authority' (ISBA/29/C/10 paragraph 10) which we support. We appreciate the LTC note in their LTC Chair's Report 2024 ([ISBA/29/C/7](#)) that 'uploading all data to DeepData would require significant resources given the volume and varied format of data, and that many data sets are not held by the Authority'. However, the purpose of DeepData is to "host all data related to deep-seabed activities, particularly those collected by the contractors during their exploration activities and other relevant environmental and resources-related data for the Area" ([DeepData Database - International Seabed Authority \(isa.org.jm\)](#)). Therefore, we recommend adding the requirement to ISBA/29/C/10 that all environmental data and associated metadata used for the development, implementation and review of REMPs 'must' also be either compiled into, or discoverable through, the ISA Central Data Repository (currently 'DeepData') as far as practicable with appropriate caveats for such practicability. For example:

- if DeepData at a certain time needs to be updated to in order to accommodate a data type compiled through REMPs
- to recognise that some datasets may already be hosted on other publicly accessible databases (e.g., OBIS, GBIF). In this circumstance, a simple point/shape file could be added to DeepData which provides metadata information on the external dataset and a link to where such data can be found to avoid duplication. This will mean that when maintenance or updates are made to data in the original database, these will be accessible and will remove the administrative burden on ISA to make such changes in their Data Repository.
- to take into consideration permissions granted or not granted by owners of the data. For example, some data providers may consent for their data to be used for the purpose of developing a REMP and to be seen by REMP developers only (e.g. within the embargo period

of their data) which should be respected so that we don't disincentivise the sharing of useful data.

We would accept such caveats either added to ISBA/29/C/10 or Guidance ([ISBA/29/LTC/8](#)).

### **REMP review:**

**UK Recommendation: for each REMP revision, the standardised Procedure must be followed. However, we would accept a caveat being added that the extent to which each step is performed can be altered as appropriate in proportion to the changes required of the revision (ISBA/29/C/10 paragraph 25).**

ISBA/29/C/10 paragraphs 8-21 set out the procedure steps that must be followed for developing a REMP. ISBA/29/C/10 then stipulates that “the review process could follow the above paragraphs 9 to 19, as appropriate” (ISBA/29/C/10 paragraph 25). Paragraph 8 (planning) and paragraphs 20-21 (approval) are mandatory for ‘developing’ a REMP, but are not included as part of the procedure to follow for a REMP review.

This has the result that the standardized REMP Procedure is only **required** when it is developed, but during any consequent review the standard Procedure **may** be altered.

We support the addition of the list of events in ISBA/29/C/10 paragraph 23, as it provides clarity for some common scenarios where an earlier review will be required, as long as it remains clear that a review is not limited to these events and that the LTC can decide if a REMP review is required outside of these events.

However, we do not agree that the review process ‘could’ follow the Procedure (ISBA/29/C/10 paragraph 25). For each revision, the standard Procedure should be followed. However, we can accept that the extent to which each step is performed can be altered as appropriate in proportion to the changes required (e.g., a shorter workshop with fewer experts for a review of a specific part of a REMP as opposed to multiple large multi-disciplinary workshops for the original full REMP development). Paragraph 25 should draw this caveat out clearly – without this, we cannot accept the current wording that the Procedure ‘could’ be followed.

**UK Recommendation: The Council is able to review and approve or disapprove updated REMPs (as currently included in ISBA/29/C/10 Section V), but also the recommendations of the LTC in their ‘review reports’ (not currently included in ISBA/29/C/10).**

As it currently reads, ISBA/29/C/10 Section V stipulates a review of a REMP should take place every 5 years or at an earlier stage (list of reasons ISBA/29/C/10 paragraph 23 a-c). ISBA/29/C/10 Paragraph 24 states that the Council shall receive a report ‘that summarises how new data and information have been considered by the Commission. The report should be made publicly accessible by the secretariat’. It then stipulates ‘The review process can follow paragraphs 9 to 19 above, as appropriate’ (ISBA/29/C/10 paragraph 25).

It is clear in ISBA/29/C/10 that the updated REMP should be put forward for adoption by the Council (ISBA/29/C/10) which we support.

However, if LTC do the 5 year review and their recommendations in the review report is ‘no update to REMP is required’, but Council disagree and consider a REMP update is required, there doesn’t seem to be a process outlined where Council can offer this view, as Council approval is currently only required for an updated REMP.

Therefore we recommend that Council shall review, with a view to approval or disapproval, the recommendations of the LTC in the review report, and that this is added to ISBA/25/C/10. This would mean where LTC recommend no update to REMP is required in light of review and Council disagree, the LTC would then need to reconsider as directed by Council.

**UK recommendation:** Where a revised REMP is provided to Council for its review and consideration of approval this it should be produced in line with ISBA/29/C/10. Importantly this should include the process outlined in ISBA/29/C/10 paragraphs 20 & 21, which are currently omitted from ISBA/29/C/10 Section V on the review of REMPs.

**On knowledge gaps and monitoring/research:**

**UK recommendation: Changes are required to make it clear that both environmental research and monitoring must be prioritised in a strategy within the REMP, and that this is for the purpose of assessing the performance of a REMP (e.g. adequacy and efficacy). One element of such a strategy must be to address information and knowledge gaps that have been identified and prioritised by their importance to enable effective implementation and monitoring of the REMP.**

In the new standardized REMP procedure, the scientific assessment now also includes the identification of knowledge gaps and options to address them (ISBA/29/C/10 paragraph 11). We are supportive of this addition, because in the previous version it was unclear at what stage in the process knowledge gaps had to be identified.

The management assessment step in the standardized REMP procedure includes “Priorities for environmental monitoring at the regional scale to address the information and knowledge gaps identified” (ISBA/29/C/10 paragraph 14), which in the previous version was identification of both research and monitoring priorities. It is unclear why this change has been made. Monitoring is the process of systematically observing something over a period of time to determine trends. Closing knowledge gaps may require monitoring, but also research, which differs from monitoring (e.g. experimental work).

ISBA/29/C/10 Annex Section IV clearly distinguishes between section 6.1 to address knowledge gaps and research priorities and section 6.2 environmental monitoring for monitoring the state of the environment and/or potential changes in a specific region.

However, this clarity is not provided in ISBA/29/C/10 paragraph 14, or the introductory paragraph to Section VI ‘Regional Monitoring’, and we have therefore suggested a text proposal for this paragraph (See Text Proposal 2 in section 3 of this document).

**UK General Comments on REMP Guidance document [ISBA/29/LTC/8](#)**

**Methods for scientific assessment:**

**UK Recommendation:** It is recommended that more guidance is provided on preferred methods to conduct the scientific assessment of available data, while leaving space to deviate as deemed appropriate by the expert participants. This will provide structure for the participating experts and consistency of REMP development across regions and for resource types.

The REMP Guidance (ISBA/29/LTC/8) on science-based workshop focus (2.2.1.2) reiterates the objectives of the scientific assessment process in the standardized REMP procedure (para 11) but does not provide suggestions for specific methods to be employed/preferred to ‘review, synthesize, and analyze’ the data. For example, it does not outline preferred methods for cumulative impacts

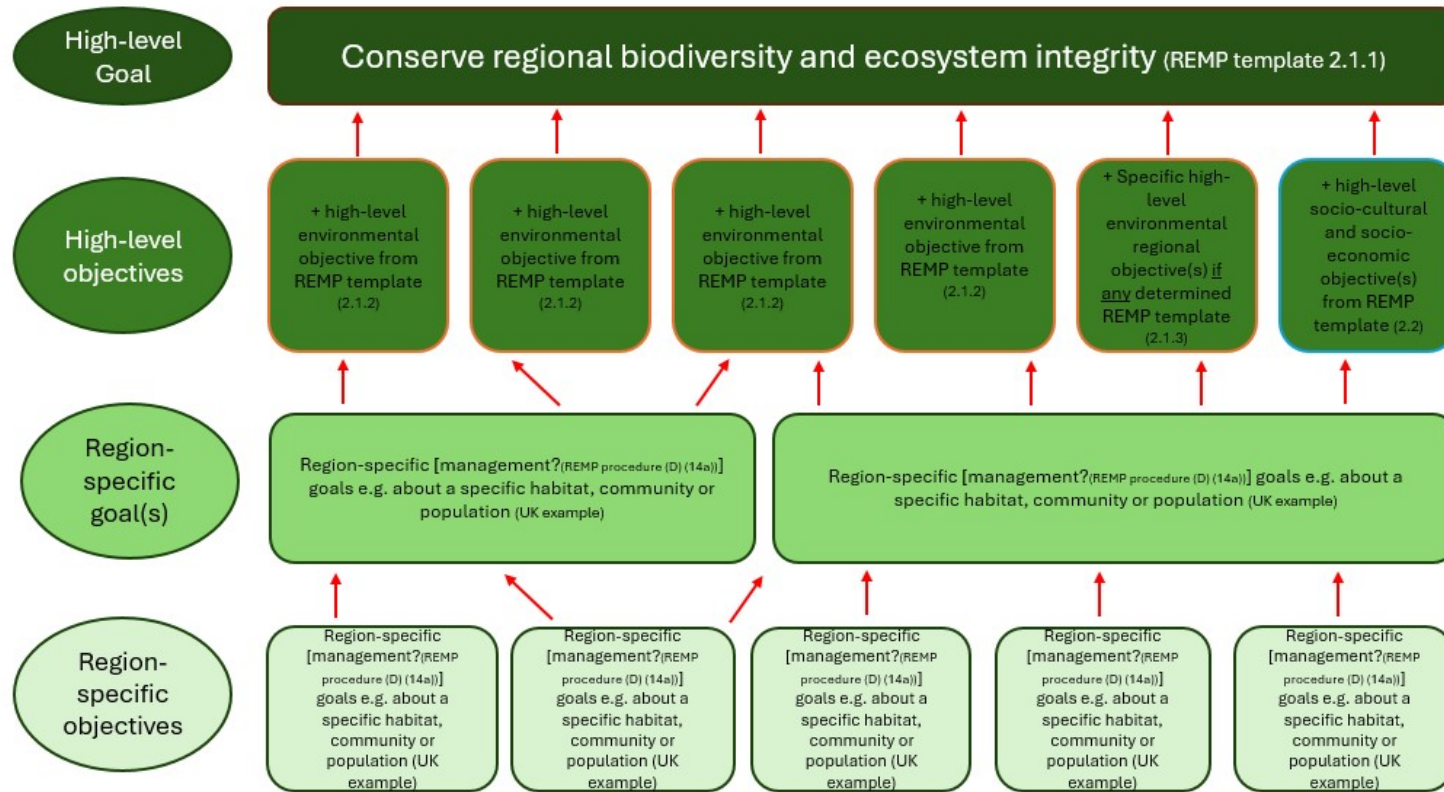
assessments, conducting gap analyses, or preferred modelling techniques for studying connectivity etc. It appears determination of such methods are left to the participating experts, but we see value in at least some level of guidance and standardization across REMPs.

**END OF UK COMMENTS**

**See next page for goals and objectives diagram Annex.**

# Systems framework of goals and objectives of REMPs (standardised process)

(examples only provided to illustrate)



Currently in ISBA/29/C/10

Currently in ISBA/29/C/10

Procedure needs clarity added on goals and objectives framework to bring out clarity of whether these sort of region-specific goals and objectives are what are referred to as 'management objectives' (REMP procedure (D) (14a)) and/OR other in the REMF procedure which would make wording of 'if any' in section 2.1.3 above acceptable

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.

**Text Proposal 1: ISBA/29/C/10 Annex Template Section II. Goals and Objectives:**

*‘This section of the template containing environmental, cultural and socioeconomic goals and objectives ~~can~~ shall be reproduced as drafted for each regional environmental management plan’.*

**Text Proposal 2:**

**ISBA/29/C/10 Paragraph 14:**

*(c) Priorities and a strategy for environmental research and monitoring at the regional scale to assess the effectiveness of the REMP. This should include addressing the information and knowledge gaps identified.*

**ISBA/29/C/10 Annex Template Section IV introductory paragraph:**

*In this section the strategy for regional research and monitoring is described. This should include:*

*> description of the main knowledge gaps in the design of the regional environmental management plan ~~are described~~,*

*> and priorities ~~are~~ identified for environmental research and/or monitoring that will address these gaps*

*> Measures for monitoring the state of the environment and/or potential changes in a specific region in order to give confidence that the regional management measures are performing effectively ~~as intended~~.*

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

See general comments for rationale.



