

**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.im

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

Ireland

2. Please provide general comments where applicable here:

- In Sections I-III the need for the Regional Environmental Management plan to set the scene for the overarching environmental policy and environmental objectives should be made more explicit. Environmental policy and objectives are discussed further down in the REMP template but should also be included in Para 2 of the Introduction and Para 3(a) of the Introduction.
- With regard the stakeholder mapping exercises that is mentioned under Section C on Scientific Assessment, this should include adjacent coastal states and any neighbouring Regional Seas Organisations.
- Clarity should be given to Para 11(e): "Evaluate effects (including cumulative) at the regional scale". Is the intention here for the REMP to evaluate the potential effects of mining and/or other legitimate uses? What is meant by cumulative? Cumulative effects of mining or mining with the other activities?
- In Para 18 - clarity here would be useful on how comments received during the stakeholder consultation would be included in future drafts. The paragraph only states that comments would be "taken into account". Will there be a report on how the comments were used or not and why?
- In Part V on the Review of the regional environmental management plan – an additional bullet could be added in Para 23 to include a review/update of any climate change effects (e.g. ocean acidification, changes in ocean temperature and currents) and related impacts.
- In Para 5.1.3 under Area-based management it is unclear what these "Conditions imposed on mineral resource-related activities by the International Seabed Authority" refer to. Are these the exploration/exploitation regulations? Contracts?

- In Para 5.2 on Non-spatial management – it is not clear what management measures related to equipment or operations are and how this relates to an regional environmental management plan. This could perhaps be further elaborated.

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.

Below suggested track changes:

- In 1. Introduction Para 3(c) Provide those areas with ~~appropriate~~the necessary levels of environmental protection from mineral resource exploitation activities.
- In Para 14 (a) ~~Environmental m~~Management goals and environmental objectives at a regional scale;
- In the Annex, Section 1: It should include a short description of the regional environmental management plan, including its overarching environmental objectives, policy, legal and administrative context, a summary of scientific and management expert deliberations and the data report and regional environmental characterization produced, the region covered by the plan and the mineral resources under consideration in the plan.
- Heading 4.1.2. Geological and Geomorphological characteristics
- In Para 4.1.4 ‘This section should include details of any regional-scale natural stressors (e.g. volcanic activity) or naturally occurring extreme events (e.g. underwater landslides).

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

We consider the above text proposals to be relatively minor and self-explanatory, but we are happy to provide any further information or clarifications if necessary.