Document reviewed	
Title of the draft being reviewed:	Draft Standard and Guidelines for the safe management and operation of mining vessels and installations
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General Comments	
We are aware that these draft documents refer to draft Regulations which have not yet been finalised and, in some cases, also refer to other Standards and Guidelines which may not yet have been drafted or agreed. Following consideration of stakeholder comments, the draft Standards and Guidelines will need to be reviewed again once the relevant exploitation Regulations have been agreed, and other relevant draft Standards and Guidelines are available.	

Specific Comments		
Page	**Line**	**Comment**
4	49-54	We note that this definition appears to be quite narrowly drawn – and would highlight (in the context of both the Standard and the Guideline) the extremely useful analysis in Technical Study 25, including the definitional point on "ships", and the role of other actors and organisations. .
4	82 -	It is currently unclear how the Safe Management and Operation Plan outlined here interacts with the Guidelines. An explanation in the text would be helpful.
4	89	'Facility' needs defining here.
6	113-116	The Guideline rightly expects best practice (line 58), but we note that the UKOOA guidelines are intended only to set out the good industry practice. We also note that these UKOOA guidelines are only available for a monthly fee, and we would expect any guidelines needed for consultation by stakeholders in order to understand the relevance and appropriateness of the ISA Standards and Guidelines should be open access and/or made equally accessible to all. Everyone should have equal access to interpreting and understanding the Mining Code.
6	135	We note that this paragraph on "responsibility" appears to overlook the responsibility of flag states.
Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"		

Comments should be sent by e-mail to ola@isa.org.jm