



UNIVERSITY OF
PLYMOUTH

Secretariat,
International Seabed Authority
14-20 Port Royal Street
Kingston, Jamaica
(submitted via email to ola@isa.org.jm)

3 July 2021

RE: Stakeholder Consultation - Draft Guidelines for the Preparation of Environmental Management and Monitoring Plans

Dear Sir/Madam,

Please find below our Commentary on the Draft Guidelines for the Preparation of Environmental Management and Monitoring Plans, as issued in May 2021.

As Group Lead, I submit on behalf of the Marine Conservation Research Group, of the University of Plymouth. The list of contributors is presented at the beginning of the document. Express Consent for sharing is granted.

Sincerely,

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TEMPLATE FOR COMMENTS

Document reviewed	
Title of the draft being reviewed:	Draft guidelines for the preparation of environmental management and monitoring plans
Contact information	
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General Comments	
<p>The following experts from the University of Plymouth’s Marine Conservation Research Group contributed to this response:</p> <p>Prof. Kerry Howell Dr. Sian Rees Dr. Holly Niner Dr Kirsty McQuaid</p> <p>Below we outline general concerns that apply across the document, followed by a list of specific comments.</p>	
<p><i>Coherence and complementarity across all Standards and Guidelines</i></p> <p>Many of the comments we provide herein likely have bearing on the detail in the other documents under consultation. We advise that these comments are considered across the full portfolio of Standards and Guidelines to ensure cohesion, complementarity and future ease of application.</p>	
<p><i>Definition of terms</i></p> <p>Throughout the text, there are multiple references to “<i>Best available techniques</i>” and “<i>Good Industrial Practice</i>”, with no clarity on where information on these should be sought or what this refers to. There are lessons to be learned from existing practices, including other deep-sea or offshore industries. However, a new industry such as DSM should be seeking to build and expand on this experience with a view to halting trends of environmental degradation that continue to occur under current practices.</p> <p>Further it is not clear who will uphold standards for “<i>Best available techniques</i>” and “<i>good industrial practice</i>”.</p>	
Specific Comments	

Page	Line	Comment
2	118	Regulation 2 mentions “ <i>ecological integrity</i> ” – a definition is required for this term. Some work has been done to define this in the framing of the EU Habitats Directive. Rees et al. (2013) demonstrate that ‘ <i>site integrity</i> ’ is the maintenance of ecological processes and functions that support the wider delivery of ecosystem services. ‘ <i>Site integrity</i> ’ can be influenced by SAC management. Management that seeks to support ‘ <i>site integrity</i> ’ may include the use of buffer zones or connecting areas that extend beyond the SAC site’s designated features (See Rees et al., 2013). This has then led to ‘ <i>the whole site approach</i> ’ (See Rees et al., 2020).
<p>References</p> <p>Rees S.E. et al. 2013. ‘A legal and ecological perspective of ‘site integrity’ to inform policy development and management of Special Areas of Conservation in Europe’. <i>Marine Pollution Bulletin</i>, 72, 1, pp. 14-21.</p> <p>Rees S.E. et al. 2013. ‘Emerging themes to support ambitious UK marine biodiversity conservation’. <i>Marine Policy</i>, 117,</p>		

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