

Review of the draft regional environmental management plan for the Area of the northern Mid-Atlantic Ridge with a focus on polymetallic sulphide deposits

Please use the review template below when providing comments. Line and page numbers have been provided in the draft REMP. Please use these as a reference as illustrated in the table below.

COMMENTS

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General Comments		
<p>When preparing the general comments, stakeholders are invited to consider the following:</p> <ol style="list-style-type: none"> 1) The structure and layout of the draft REMP. 2) The level of detail of the draft REMP, while avoiding being too prescriptive. 3) The goals and objectives in the draft REMP in providing for long-term, effective protection of the marine environment in the Area of the northern Mid-Atlantic Ridge. 4) The management measures and their ability to achieve the goals and objectives in the draft REMP. 		
<p>The participation of the Regional Fisheries Management Organizations in the development of REMPs is not well defined.</p>		
<p>The precautionary approach is applied in the opposite way to that applied to environmental protection in fishing activities</p>		
<p>With the MAR generating a biomass concentrating effect, the goals and objectives of the REMP draft seem to us to be few in order to provide long-term protection.</p>		
Specific Comments		
Page	Line	Comment
9	222-223	All the species that are part of an ecosystem are important. Connectivity patterns must be considered for the complete set of species that the ecosystem contains.
10	229	The development of scientific methodologies should be in all circumstances. It is proposed to delete: ...“where feasible”

10	231	All nekton species are key: Propose to delete ... "large"
10	251	Same as above: all fauna and not just megafauna should be considered in the approach.
11	300-302	At various points in the Project, reference is made to the transport of particles derived from mining activity. It should be better detailed what compatible activities mean.
12	325-326	The limits of the SINPs should not be left in the hands of the contractors, in the same way that in fishing activity the VMAs are not defined by the sector.
12	343-345	The point should be modified to make the communication of VMEs mandatory.
13	391-398	Substitute the term "acceptable" for "safe" in all points
14	402	Active management of the mining plume should be extended even in cases without significant megafauna.
14	440	Detail reference to overburden removal.
17	568-569	Reduce the review period of the PMR by the LTC to every 2 years. A period of five or more years could be too long if additional measures are necessary.