COMMENTS

Document reviewed	
Title of the draft being reviewed:	Draft standard and guidelines on the development and application of Environmental Management Systems developed by the Legal and Technical Commission
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General Comments	

Specific Comments		
Page	**Line**	**Comment**
2	4	An important aspect of having an Environmental Management System is having a tool for communicating/reporting to authorities and stakeholders. This should be reflected in the definition.
2	28	Are these 4 steps the plan-do-check-act (PDCA) approach? How has this selection of 'the four key steps of the core process' been made? Can this be explained a bit more?
2	31	Where does the adoption of objectives/targets fit? We suppose this is a crucial part of the EMS.
4	98-101	Are 'leadership' and 'resources' the only framing requirements? This question, because 'framing requirements' is followed by only these two components of the EMS, as outlined below in the text.
4	105	Later on in this document, when the subitems of the 'Audits and management review' are fleshed out, 'external audits' are evoked. Therefore, we suggest to add 'external audits' in the picture under 'Audits and management review'.

4	117	Not only the senior management, the management as a whole plays an important role. Therefore: suggestion to delete 'senior'.
5	141-146	We suggest to use the SMART model.
5	148	The long term should go beyond 3-5 years. We know this period has only been mentioned as an example, but we want to make sure that the order of magnitude is not misunderstood. Therefore, we suggest to bring that 'example period' on 10 years.
5	153	We suggest to delete 'ideally': a strategy without an implementation plan is worthless.
6	162	In line with our former comments on the (non-exclusive) role of the 'senior management, we propose to delete 'The senior management of the' and thus to start the sentence with 'The Contractor...'
7	216	Why has the ALARP principle been chosen? Can this be explained a bit more?
7	219-225	This doesn't seem to be a well-defined management approach (cf. PDCA), more a list of important activities (exhaustive?). We wonder whether a better defined approach exists for this type of process.
7	237	What about personal protective equipment, as a last step in the hierarchy of controls? We think this PPE should close the list.
8	263-264	The verification of the implementation should be put in para 30, as it is an essential part of the response to the nonconformity, PDCA alike.
8	274	For the sake of clarity, we suggest to remind contractors, in this part of the text, of their responsibility/liability for the actions committed by their subcontractors.
10	337	We suggest to add 'and the Sponsoring State' after 'ISA'. The evaluation of the performance is essential for the Sponsoring State to control the activities of the Contractor and take measures, as needed.
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