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General Comments		
<p>1. The draft lacks measures to protect the rights and interests of contractors ,</p> <p>(i) There are no stipulation regarding SINPs in the exploration regulations on polymetallic sulphides. Identifying SINPs in the contract areas requires: “the protection for SINPs from direct and indirect impact of exploitation of mineral resources”, “providing sufficient information and data that there would be no direct or indirect impacts on the SINP before any proposed exploitation activities can be approved when operating in the vicinity of a SINP”, etc. Such requirements have a serious impact on contractors’ contractual rights, especially the exploration and development rights, and add terms for contractors to apply for the development work plan in the future. The above content lacks legal basis. As stated in ISA's document <i>Relationship between the draft regulations on exploitation of mineral resources in the Area and regional environmental management plans</i> (ISBA/25/C/4, Paragraph 4), “Although the basis for the Council’s decision to establish regional environmental management plans stems from the powers and functions allocated to the Council under the Convention, the plans are not themselves legal instruments but rather instruments of environmental policy”. If it is necessary to identify SINPs in the contract areas and require the contractors to take corresponding measures, it should be stipulated in the relevant regulations of ISA.</p> <p>(ii) In the future, if SINPs are to be identified in contract areas, especially in those where regional relinquishment have been completed, it should be supported by sufficient scientific evidence. The ISA should consider compensation for contractor's losses.</p>		
2. In terms of environmental management of contract areas in the REMP draft, the preservation reference zone and impact reference zone should be specified.		
3. In Annex I, II and III of the document, the locations and distributions of SINPs, AINPs, and S/A Precaution are given without explanation on how they are selected. For each specific SINP and AINP, it is recommended that specific guidelines, data sources, and thresholds are supplemented. Each S/A Precaution selection should also be explained accordingly.		
4. It is recommended that a section on flexibility be added to better reflect the precautionary measures, referring to paragraphs 30 to 31 of REMP of CCZ. "The design of AINPs, SINPs, and S/A Precaution allows for modification of location and size based on the precise information of the mining activity site, measurements of the actual impact of mining operations, and further biological data".		
Specific Comments		
Page	Line	Comment

7	98-115	Suggest deleting it. The Overarching goals shall apply to all REMP. Since they have not been fully discussed, they should not be specified in REMP of MAR at present. It is recommended that specifying it in a generic REMP template with indicative elements to be considered by the Council.
7	116-122	It is proposed to add "seabed mining in a responsible manner for the protection of the environment" to the section of "Purpose of the REMP", as follows: The purpose of this REMP is to set in place conservation and management measures and tools across the region in the Area of the northern MAR to ensure the effective protection of the marine environment from harmful effects that may arise from activities in the Area in accordance with Article 145 of the Convention and the strategic plan of the Authority.
8-10	132-211	The spatial extent of each hydrothermal vent to be protected has not been scientifically defined
10	198	It is suggested to delete "Exploration contracts last for up to 15 years". There is no need to specify that in the document.
10	213-222	It is suggested to add "Ensure environmentally responsible seabed mining within the northern MAR" under the part of "Region-specific goals"
10	255-265	It is suggested to modify "B. operational objectives for contract areas" because that paragraph 28 refers to "the following operational objectives are related to contract areas as well as the regional scale". The operational objectives of contract areas should be targeted and different from those of the whole region.
12	291-314	It is suggested to add a paragraph under "A. areas in need of protection (AINPs)" with reference to paragraph 35 (J) of the REMP of CCZ, that is, " Avoid overlap between the contractor areas, reserved areas and any areas of Areas in Need of Protection (AINPs)".
12	291	It is recommended to clarify the conservation objectives and framework corresponding to the three types of ABMTs, especially the strategic objectives and conservation objectives of ISA.
12	305-309	The description "a buffer zone of sufficient size." of AINPs managements not clear enough, there is no specific provision, and it is not operable in the exploration stage.
13	336-339	The description "a buffer zone of sufficient size." of SINPs managements not clear enough, there is no specific provision, and it is not operable in the exploration stage.
14	367-370	Octocorals are widely distributed and occurred in many non-active hydrothermal areas. It is necessary to define the protection threshold (e.g. density) before taking conservation measures.
14	390-391	It is suggested to modify as "a) Apply a range of mitigation measures, as appropriate, to all major harmful impacts from exploitation activities". The "impacts" should be interpreted as "harmful impacts".

15	409-411	There is no need to assess the plume formed by mining. The plume in the active hydrothermal area itself is rich in metal particles. The particles formed by mining activities are essentially the same as that formed by hydrothermal activities.
13-15	376- 447	Many contents in “III Other management measures” are general rule or requirements of exploitation for the contractors rather than special provisions for MAR. Those should be issued by the regulations on exploitation and related standards and guidelines. It is suggested to specify only specific measures to be taken in response to the characteristics of the MAR. In addition, the current chapter proposes multiple thresholds that rely on expert decision-making to monitor whether the impact of related activities reaches "serious harm". However, the threshold description of each parameter is indistinct to be implemented in detail, which needs to be further clarified.