

<i>Document reviewed</i>	
<b>Title of the draft being reviewed:</b>	Standard and Guidelines for environmental impact assessment process
<i>Contact information</i>	
<b>Surname:</b>	
<b>Given Name:</b>	
<b>Government (if applicable):</b>	Yes
<b>Organization (if applicable):</b>	
<b>Country:</b>	China
<b>E-mail:</b>	
<i>General Comments</i>	
<p>1. Article 47 (3) of the Draft Regulations stipulates that the Environmental Impact Statement shall be prepared in accordance with the applicable Guidelines. However, the current document contains both <i>Standards</i> and <i>Guidelines</i>. Considering <i>Standards</i> and <i>Guidelines</i> are of different nature both in making procedure and binding force, we propose to only make guidelines for this document pursuant to the spirit of the Draft Regulations and the Report of LTC.</p> <p>2. This document mentioned the participation of stakeholders during the process of the environmental impact assessment, but not clearly defined the specific time point for stakeholders' participation (before, during, or after the assessment). We propose to make a clearer stipulation on this matter.</p> <p>3. The concept of “relevant experts” is mentioned several times in this document. In order to facilitate practical operation, we propose to clarify which fields of experts are required.</p> <p>4. In the Chinese version of relevant documents of the Authority, the <i>Guidelines</i> is translated into “准则”. In Chinese, “准则” is more legally binding than “标准”. For</p>	

this reason, we suggest that the Authority translate the *Guidelines* into “指南”, so that it can accurately reflect the recommendatory nature of *Guidelines*.

***Specific Comments***

<b>Page</b>	<b>Line</b>	<b>Comment</b>
2	Flow chart	The current flow chart is a one-way process. It is unclear what supplementary measures should be taken by Contractors once their EIA fails to pass the review of the Authority. We propose to make this point clear.
24	813	We propose to further clarify the specific concepts of the “other marine users” so as to facilitate practical operation.

<i>Document reviewed</i>		
<b>Title of the draft being reviewed:</b>	Standard and Guidelines for the safe management and operation of mining vessels and installations	
<i>Contact information</i>		
<b>Surname:</b>		
<b>Given Name:</b>		
<b>Government (if applicable):</b>	Yes	
<b>Organization (if applicable):</b>		
<b>Country:</b>	China	
<b>E-mail:</b>		
<i>General Comments</i>		
<p>1. Considering the building and management of the vessels should meet the corresponding design and manufacturing standards, we propose to clarify specific parameters and technical indicators in this document.</p> <p>2. In the Chinese version of relevant documents of the Authority, the <i>Guidelines</i> is translated into “准则”. In Chinese, “准则” is more legally binding than “标准”. For this reason, we suggest that the Authority translate the <i>Guidelines</i> into “指南”, so that it can accurately reflect the recommendatory nature of <i>Guidelines</i>.</p>		
<i>Specific Comments</i>		
<b>Page</b>	<b>Line</b>	<b>Comment</b>
2	12	We propose to further clarify the specific concepts and efficacy of the “international rules, regulations and standards”, so as to facilitate the practical operation of the Contractors.
6	135	This sentence stipulated “the ultimate responsibility lies with the Contractor”. However, the specific division of the responsibility should be determined by relevant laws and exploitation contracts, so we propose to delete this sentence.

<i>Document reviewed</i>		
<b>Title of the draft being reviewed:</b>	Standard and Guidelines for the preparation and implementation of emergency response and contingency plans	
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<b>Government (if applicable):</b>	Yes	
<b>Organization (if applicable):</b>		
<b>Country:</b>	China	
<b>E-mail:</b>		
<i>General Comments</i>		
<p>In the Chinese version of relevant documents of the Authority, the <i>Guidelines</i> is translated into “准则”. In Chinese, “准则” is more legally binding than “标准”. For this reason, we suggest that the Authority translate the <i>Guidelines</i> into “指南”, so that it can accurately reflect the recommendatory nature of <i>Guidelines</i>.</p>		
<i>Specific Comments</i>		
<b>Page</b>	<b>Line</b>	<b>Comment</b>
8	252-253	We propose to make specific templates for communication charts so as to provide clearer guidance for Contractors.
9	300-304	We propose to further clarify specific procedure and standard of the external audit so as to provide clearer guidance to Contractors.