Document reviewed	
Title of the draft being reviewed:	Draft standard and guidelines for the preparation and implementation of emergency response and contingency plans
General Comments	
e.g. The draft should include…	
e.g. Term … should be used consistently throughout the draft	
Specific Comments	

Page	Line	Comment
3	34-39	The paragraph purporting to establish the relationship between the Standard/Guideline and other ISA documents appears potentially problematic. The Standard provides: "2. This Standard is to be read in conjunction with the Exploitation Regulations, as well as other relevant ISA Standards and Guidelines, including but not limited to those related to: • Environmental Impact Assessment and Environmental Impact Statement; • Environmental Management and Monitoring Plan; • Environmental Management Systems; and • Safety management."

		Page 3/line 47-48, provides "This Standard <u>shall</u> be read in conjunction with the equivalent sections in the Guidelines." These two paragraphs taken together could be read to indicate that interpretation of the Standard is dependent on certain Guidelines - which are not intended to be legally binding. The Guideline, at page 11/line 365, in turn provides that the Guideline "should be read in conjunction with corresponding sections of the Standard."
3	68	The phrase "acute pollution" is not defined and is not used in the draft exploitation regulations. Propose that the phrase "serious harm to the marine environment" be used instead.
6	186	"Significant changes" is not adequately defined.
7	206-226	The term "barrier" is not defined; propose that it be defined in the standard to ensure that there is a common understanding of the term.
12	440	"Significant consequence" is not adequately defined.
16	652	"Significant" is not adequately defined.
16	656	"Significant" is not adequately defined.
17	661	"Significant" is not adequately defined.
Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"		