

PERMANENT MISSION OF THE REPUBLIC OF THE UNION OF MYANMAR TO THE UNITED NATIONS, NEW YORK

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The Permanent Mission of the Republic of the Union of Myanmar to the United Nations present its compliment to the Secretariat of the International Seabed Authority and, with reference to the latter's Note No. ISA/EOSG/2020/118 dated 21st August 2020, has the honour to forward herewith the comments from the authority concerned of the Republic of the Union of Myanmar on the draft standards and guidelines as follows:

- Amongst draft standards and guideline, it should also be mentioned in Article (4), Paragraph (20) that "More sustainable funds are needed and allocated for training and educational programmes focused on improving our understanding of the deep sea environment and marine fauna" in addition to the "the Guidelines the scope and standard of baseline data collection provide guidance on how the Contractor should identify the current status of the Seabed (e.g. physical, geological, biological, chemical, sediment properties) before starting and mining activities.
- The usage of the term "environmental management system" is found inconsistent. For example, Annex I, Page 2 and Annex II, page 1.6 and other pages. The term "environmental management system" should be used consistently either in title case of lower case throughout the document.
- The definition of "ISA" is not found in this document. The acronym "ISA" should be defined in Section IX. DEFINITIONS and ABBREVIATIONS, alternatively it may be described in the very first statement as International Seabed Authority (ISA).

The Permanent Mission of the Republic of the Union of Myanmar to the United Nations avails itself of this opportunity to renew to the Secretariat of the International Seabed Authority the assurances of its highest consideration.

New York, 20th October 2020

Secretariat of the International Seabed Authority 14-201 Port Royal Street, Kingston, Jamaica.