

## TEMPLATE FOR COMMENTS

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<b>General Comments</b>		
<p>When preparing the general comments, stakeholders are invited to consider the following:</p> <ol style="list-style-type: none"> <li>1) The structure and layout of the draft REMP.</li> <li>2) The level of detail of the draft REMP, while avoiding being too prescriptive.</li> <li>3) The goals and objectives in the draft REMP in providing for long-term, effective protection of the marine environment in the Area of the northern Mid-Atlantic Ridge.</li> <li>4) The management measures and their ability to achieve the goals and objectives in the draft REMP.</li> </ol>		
<p>The relations between the REMP and Regulations on Exploitation are unclear. We consider the REMP as a policy document. In this case, it cannot be prescriptive or restricting the rights of contractors: this is a prerogative of the Regulations</p>		
<p>We presume that there is a collision in the draft REMP between the recognition of the rights of contractors under existing contracts for exploration and the provision that active vent ecosystems, which are located within the existing contract areas for exploration, will be protected from direct and indirect impacts of exploitation of mineral resources as SINPs (paragraph 40(a)).</p> <p>Recognizing the need to ensure protection of the marine environment during exploitation, we presume that such restrictions should be regulated at the level of the Regulations on exploitation, and not REMP. We propose to finalize the relevant provisions of the draft REMP (in particular, paragraphs 28, 40), taking into account this comment</p>		
<p>The paragraph 33 states: “Areas in need of protection (AINPs) are large-scale areas of ecological importance due to their uniqueness and/or biodiversity. They are described using, in the context of ISA, the scientific criteria outlined in Annex 4”.</p> <p>It is unclear, where such descriptions of the AINPs will be contained: in the text of the REMP or in other document? In which document and who will adopt it, if in other? In addition, it is unclear whether the AINPs must meet all or part of the criteria.</p> <p>The same questions are about the paragraph 37: “SINPs are fine-scale sites, where vulnerable marine ecosystems have been identified. They are described on an individual basis, using, the scientific criteria provided in Annex 4”</p>		
<p>The draft REMP uses a term “significant megafauna/fauna communities” (paragraphs 28(a), 49(a), 49(c)). According paragraph 49, the REMP will apply measures: “(q)Develop thresholds for categorization of significant faunal communities”. It is unclear, who will adopt such thresholds, will they be a part of the REMP or not, etc.</p> <p>The same question is about other thresholds and criteria (paragraphs 26(g), 32, 48(c), 49(e), 49(g), 49(l))</p>		
<p>List of non-spatial management measures in the paragraph 49 looks chaotic: part of these measures will be applied by contractors and other part, apparently, not (e.g., develop thresholds for categorization of significant faunal communities)</p>		
<b>Specific Comments</b>		
Page	Line	Comment

6	118-119	It is recommended to change of “The MAR is an elevated area of seafloor that runs roughly north-south through the middle of the Atlantic Ocean” to “The MAR is a segment of the global Mid-Ocean Ridge system in the Atlantic Ocean from Bouve triple junction at the South and Gakkel Ridge at the North”
6	121	It is recommended to change “shoulders” to “ridge flanks”
7	132-134	It is recommended to change “not only the rocky ridge, but also rift valleys, fracture zones, seamounts, submarine volcanoes, hydrothermal vents, sedimented slopes, sedimented plains and pelagic oceanic complexes” to “and adjacent mountain structures on the flanks, transform faults, seamounts and sedimented plains”
7	140	It is recommended to change “broken” to “displaced”
7	142	It is recommended to change “active volcanism associated with” to “combination of processes of magmatism with highly fractured oceanic crust in”
7	142	It is recommended to change “has created” to “resulted in formation of”
8	177-178	It is recommended to change “In the northern MAR, distribution of the known twenty two sites of PMS deposits is heterogeneous and distances between sites vary considerably (from 10 to more than 100 km)” to “In the northern equatorial MAR, there are twenty two sites of PMS deposits are discovered. Distances between hydrothermal sites vary considerably (from 10 to more than 100 km)”
8	180	It is recommended to change “evaluation” to “assessment”
9	195	Please insert “essentially” before “differ”
10	253	It is unclear what “sustainability” means in this phrase. Clarification is required.
12	320-324	It is recommended to change “The SINPs will be protected from direct and indirect impacts of exploitation of mineral resources. Contractors operating in the vicinity of a SINP will be required to provide sufficient information and data that there would be no direct or indirect impacts on the SINP, including negative impacts on any subsurface fluid flow to active vent features, before any proposed exploitation activities can be approved” to “The SINPs will be protected”.
12	325	It is unclear what guidance by the LTC is meant
15	461-463	It is recommended to add “Contractors are encouraged to enhance sampling efforts and collaborate with each other and with scientific communities”
15	464-467	It is recommended to add “Contractors are encouraged to collaborate with each other and with scientific communities”