

TEMPLATE FOR COMMENTS

Contact Information	
Surname	Cuif
Given name	Marion
Surname	Pognonec
Given name	Alexia
Government (if applicable)	MFA
Organization (if applicable)	Ifremer
Country	France
Email	Marion.cuif@ifremer.fr & alexia.pognonec@diplomatie.gouv.fr
General Comments	
<p>When preparing the general comments, stakeholders are invited to consider the following:</p> <ol style="list-style-type: none">1) The structure and layout of the draft REMP.2) The level of detail of the draft REMP, while avoiding being too prescriptive.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.4) The management measures and their ability to achieve the goals and objectives in the draft REMP.	
<p>The notion of “inactive site” should be explicitly defined in the document. Sites can be inactive in term of fluid emission, but not necessarily in term of biological (micro) activities. Furthermore, at what threshold is a site considered inactive in terms of hydrothermal emissions?</p>	
<p>Regarding the effective protection of the marine environment, much emphasis is placed on active hydrothermal vents, coral gardens and sponge grounds but not on inactive hydrothermal vents, which are the primary target for PMS mining. The possibility of protecting inactive sites should be explicitly identified as inactive sites provide habitat for species potentially sensitive to the impacts of mining.</p>	
<p>The vast majority of management measures foreseen in the action plan underpin fundamental research questions (development of thresholds, assessment of cumulative impacts, definition of connectivity models, trophic interactions, ecosystem functions, sensitivity, etc.) and will require very ambitious knowledge acquisition and research programs to be implemented.</p>	
<p>We wish to emphasize the possible difficulty, in practice, to organize collaboration with other organizations on some aspects highlighted in the draft REMP. The protection objectives go beyond the seafloor, which is obviously necessary and welcome, and implies to study the benthic fauna in the water column up to 50m above the seabed of the crabs and lobsters, as well as the migratory connectivity of marine mammals. The document foresees that it will be necessary to work in relation with other organizations on these aspects, but it can be usefully noted that while some very efficient organizations already exist, others are not necessarily in place at this stage.</p>	

There are research and monitoring mechanisms with consultations, workshops, etc. envisaged (implementation strategy 502/503). Perhaps, as for some marine protected areas, there should be a real research and monitoring plan and stricter obligations for the contractors – at least in the long term, if they move to exploitation activities.

Specific Comments

Page	Line	Comment
8	186	Such as active AND INACTIVE hydrothermal vent systems
8	187	Several active AND INACTIVE vent systems
14	445	The term “significant biological events” should be defined here.
16	492	The notion of “habitats” should be explicitly defined here. Are we talking about physical habitat or biological habitat? The notion of “quality” should also be clarified: is it the biological quality of the habitat (i.e. good ecological status) or its quality in the sense of habitat typology? If we understand the term “quality” in the sense of good ecological status, we would point out the difficulty of defining this quality in a comprehensive manner at the scale of an entire region.
29	611	In annex II, the SINPs are located with a single coordinate (for example, for TAG the given coordinate is 88m SW of the Black smoker complex). Does it mean that MIR and Shimmering are not considered as potential SINPs? We are the contractor so we will add MIR and Shimmering in the SINPs list but what about other contractors. Will they do the same if only one point is identified as SINT in a district where several active deposits are known? We suggest that SINPs are defined as a polygon where the contractor is obliged to identify all active sites and define the boundaries of each one.