TEMPLATE FOR COMMENTS

Document reviewed		
Title of the draft	Draft Standard and Guidelines for environmental impact assessment	
being reviewed:	process	
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General Comments		
Public participation is a well-established requirement in EIA procedures, therefore stakeholder consultations should be made mandatory by inclusion in the standard for EIAs.		
Regulation 47 and Annex IV of the draft regulations does not specifically include or exclude stakeholder consultation in the preparation of EIAs. Since the purpose of the draft standard and guidelines is to elaborate on the requirements of an EIA, the inclusion of stakeholder consultation in the standard is not inconsistent with the draft regulations on exploitation of mineral resources in the Area.		
Stakeholder consultation in the preparation of EIAs is also important to ensure that the process is transparent and accountable, and that the resulting decision made based on the EIA and EIS is legitimate.		
The guidelines include that an external review of the EIS will include a stakeholder consultation procedure by the ISA. The process and timeframe for external review is not elaborated on.		
EIAs represent one (1) of four (4) work packages currently being negotiated under the Biodiversity Beyond National Jurisdiction (BBNJ) Agreement. The agreement is seeking to achieve <i>inter alia</i> , a coherent framework for EIAs in areas beyond national jurisdiction. Stakeholder consultation and dissemination of information throughout the EIA process under the BBNJ Agreement is proposed.		

Specific Comments		
Page	Line	Comment
24	811	Specifically include the views of local and indigenous people
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Comments should be sent by e-mail to ola@isa.org.jm