

Template for the review of the draft standards and guidelines associated with the draft regulations on exploitation of mineral resources in the Area

I. <u>Background</u>

- 1. The draft regulations on exploitation of mineral resources in the Area (ISBA/25/C/WP.1) require that certain issues are addressed in accordance with, or taking into account, standards and guidelines to be developed by the organs of the Authority. The standards will be adopted by the Council and will be legally binding on Contractors and the Authority, whereas the guidelines will be issued by the Legal and Technical Commission or the Secretary-General and will be recommendatory in nature.
- 2. Stakeholder consultation is an integral part of the process decided upon by the Commission for the development of the standards and guidelines (ISBA/25/C/19/Add.1).
- 3. The Legal and Technical Commission will consider the comments received through stakeholder consultation during its current session.
- 4. The drafts include a cover page containing background and contextual information on the approach taken by the Legal and Technical Commission in developing each standard and guidelines. Please note that stakeholder comments are not sought on this cover note.
- 5. Issues of format and consistency across the standards and guidelines will be reviewed by the secretariat and the Legal and Technical Commission once the content of the various standards and guidelines is finalized following stakeholder consultation.

II. Submitting Comments

- 6. To ensure that your comments are given due consideration, please send them by e-mail to ola@isa.org.jm, at your earliest convenience but no later than the date announced on the ISA website for the relevant draft standards and guidelines.
- 7. When submitting comments, please adhere to the following guidance as much as possible:
- a. Please provide all comments in writing and in an MS Word .doc or .docx format using the table provided below.
- b. The table format allows for an unlimited number of comments to be added. To add more comments, you may add more rows.

- c. Please provide full contact information for the individual/Government/organization submitting the comments.
- d. Please avoid commenting on issues related to format, grammar, spelling or punctuation, unless it affects the overall meaning of the text, as the document will be formatted and edited when the final draft is prepared by the Legal and Technical Commission.
- e. To facilitate the revision process please be as specific as possible in your comments. In areas where you feel additional or alternative text or information is required, please suggest what this text may look like or what information should be included.
- f. Text may be copied from the draft into the table if stakeholders wish to use "track changes" in editing text (this is encouraged to ensure accuracy and avoid numbering errors).
- g. If you refer to additional sources of information, please include these with your comments when possible or provide a complete reference or hyperlink.
- h. All review comments will be posted on the ISA website, unless otherwise requested by the submitting entity.
- 8. Should you have any questions regarding the review process, please contact ola@isa.org.jm.

III. Template for Comments

- 9. Please use the review template below when providing comments.
- 10. Line and page numbers have been provided in the drafts. Please use these as a reference as illustrated in the table below.

TEMPLATE FOR COMMENTS

Document reviewed		
Title of the draft being reviewed:	Draft Standard and Guidelines for the safe management and operation of mining vessels and installations	
Contact information		
Surname:	Charlet	
Given Name:	Francois	
Government (if applicable):		
Organization (if applicable):	Global Sea Mineral Resources nv (GSR)	
Country:	Belgium	
E-mail:	Charlet.francois@deme-group.com	

General Comments

GSR commends the LTC on the development of this standard and guidelines and appreciates the opportunity to provide feedback.

In general, these guidelines are in line with what GSR would expect to see for such a guideline, with one specific (strong) suggestion below.

Specific Comments		
Page	Line	Comment
2	26	With respect to Item 3 of the Draft Standard that "The Contractor shall ensure the development of a Safety Management that Is developed by applying recognised international standards and systems including the approaches adopted by ISA standards and guidance, in particular ISO 19901-6:2009 - Petroleum and natural gas industries - Specific Requirements for offshore structures - Part 6: Marine Operations": this particular standard is not one GSR is familiar with. We use different O&G standards and note hazards and risks associated with the oil and gas industry are different to deep seabed minerals and the need for specific requirements for offshore superstructures is different to a moving vessel and "dredge-like" operation. We suggest deleting reference to ISO 19901-6:2009 or adding the words ", or equivalent" after the word "operations"

Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"

Comments should be sent by e-mail to ola@isa.org.jm