

**Template for the review of the draft regional environmental management plan for the Area of the northern Mid-Atlantic Ridge with a focus on polymetallic sulphide deposits**

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

**TEMPLATE FOR COMMENTS**

<b>Contact Information</b>	
Surname	
Given name	
Government (if applicable)	Norway
Organization (if applicable)	Norwegian Ministry of Foreign Affairs, based on input from the Ministry of Climate and Environment, the Ministry of Oil and Energy, and the Norwegian Petroleum Directorate.
Country	Norway
Email	Seksjon.for.traktat-.miljo.og.havrett@mfa.no
<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 purpose of REMPs is the protection and preservation of the marine environment in relation to deep sea mining. The goals, criteria and conditions set out in the REMP must reflect this. The degree of protection will vary depending on the environmental conditions and strict requirements can be necessary where there is reason for extra caution. The precautionary principle must form the basis for all activity in the Area.</p>	
<p>At the same time, and to effectively facilitate sustainable economic activity in the Area, the environmental considerations and required measures need to be assessed in light of the fact that the measures required can and will be time-consuming and costly for the Contractors.</p>	
<p>The classification of Areas and Sites in need of protection need to be scientifically well founded. When developing criteria for this classification, it is also necessary to develop criteria for how to refute that an Area or Site fills these conditions.</p>	
<p>It is not defined in the REMP who is in charge of achieving the goals and objectives and taking the specified measures (ie. Line 206-258, and line 381-398). It would be fruitful to specify the responsible party.</p>	

On a regional basis, it is required to implement mitigating measures when necessary, monitor possible cumulative impacts and develop threshold values for different kinds of pollution. One question is who is responsible for identifying and implementing such mitigating measures outside of a contract area?

An overarching question is whether and how the REMP contains or is meant to contain/reflect/meet the requirements of a Strategic Environmental Impact Assessment (SEA).

**Specific Comments**

Page	Line	Comment
9-10	206-258	Specify the responsible party to ensure clarity
13	381-398	Specify the responsible party to ensure clarity
13	362-363	<p><u>Comment from the Norwegian Petroleum Directorate:</u></p> <p>The potential octocoral habitat area is modelled to constitute 9800 blocks based on 86660 turning points (see supplementary material). They have a general depth limit of about 3000 meters. As a result, the map shows that octocorals are probably everywhere on all elevated areas above this depth at both sides for the axial valley, and thereby expected to be very common. Also, the model as published by Yesson et al., 2012, shows that potential octocoral habitats are even more common all over the Atlantic north of the Azores, and does not seem to be endangered. When evidently expected to be that common, why are the octocoral regarded so vulnerable that they require extra precaution?</p>
13	364-367	<p><u>Comment from the Norwegian Petroleum Directorate:</u></p> <p>A S/A Precaution must be confirmed or refuted as a SINP/AINP. The basis for a S/A Precaution should be tailored so that it is also possible to establish if the conditions for S/A Precaution are not met, without putting an unproportionally large burden on the Contractor.</p>