

TEMPLATE FOR COMMENTS

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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. 5) Other general comments. 		
<p>1) In general, the structure and layout of the draft REMP is appropriate. However, Spain suggests that account be taken of the proposal for the standardization submitted by Germany and the Netherlands, co-sponsored by Costa Rica (ISBA/26/C/6 and ISBA/26/C/7) with the support of other members of the Council as Spain (See Council decisions ISBA/26/C/10 and ISBA/26/C/57, par. 17)</p> <p>2) Regarding the level of detail, the draft REMP includes a large number of activities aimed at protecting the marine environment of the Area, however, it lacks a time frame in which to place them and in which to identify the relationship between them. With regard to the periodic reviews of the plan, it should be pointed out that, although it is included in the plan, it is poorly elaborated. It would be advisable to indicate the procedure to be followed, whether some activities will be total or partial, their duration, whether there is a prioritization of activities, etc.</p> <p>3) The draft REMP must present a logical cycle of operation, based on science as a basis for action (already included), but with a circular methodology of initial assessment (state of the environment), gap analysis, environmental objectives (operational as they are called in the text) and programmes of measures according to objectives to restore/conservate the marine environment. Furthermore, the goals and objectives in the draft REMP should include the protection of other legitimate uses such as fishing (see specific comments).</p> <p>4) There is a need to clarify different implications of SINPs and AINPs. Both shares very similar objectives and are subjected to zoning but it is not clear what are the different implications for contractors (see specific comments for more detail). Furthermore, in our opinion, working by SINPs does not exclude that there are a number of baseline protection measures for the whole area covered by the plan.</p> <p>5) The objectives and measures to be taken into account, as well as the strategy for implementing the plan will have costs for which the contractor should be held responsible, or at least it should be made clear who will bear them. This type of practical analysis is not included in the plan, but remains a theoretical analysis of the potential protection scheme.</p> <p>6) The “thresholds” should be determined by the Authority, not by the contractor. They should be based on a scientific comparative study. The contractor may have a vested interest in ensuring that the thresholds are not too restrictive for his activity.</p>		
Specific Comments		
Page	Line	Comment
5	91	To add “and accountability” after transparency
6	103	We propose to expressly include a new goal: d) Prevent impacts on benthic and pelagic ecosystems, including on mid-water fish stocks
6	114	We propose to expressly include after sponsoring State, “competent international and regional organisations”
6	122	To add at the end of the paragraph 13 “and serves to manage potential conflicts between different human activities occurring in the same region”.

11	277-278	We propose to expressly include after scientific community “competent international and regional organisations”
11	298	There is a need to specify what the implications for contactors in each of the zones are (as it has been done for SINP in paragraph 40 d).
13	358	In S/A Precaution, When scientific information from further research and direct observation becomes available, protection measures should be applied by the contractor without waiting to the review of the REMP. This should be foreseen in the project.
16	532	We propose to use “competent international and regional organisations”
32	Annex IV	The definition of the different criteria is different for the identification of SINP and AINP. We think the definition of criteria should be the same and the distinction between SINP and AINP should consist on they fulfill the definition of each criteria.