

Submission Form for Comments and Feedback

NT EPA Draft Environmental Guidelines

Submissions close: **Monday 15 July 2013, 5pm**

Name:	Mark Nolen	Email:	Mark.nolen@inpex.com.au
Organisation (if applicable):	INPEX	Telephone:	08 89243131
Address:	Level 8, Mitchell Centre, 59 Mitchell Street, Darwin NT 0800		
<p>Your comments will be publicly available.</p> <p>Mark the box here <input type="checkbox"/> if you do not want your comments to be made publicly available.</p> <p>Mark the box here <input type="checkbox"/> if you do not want your identity to be made publicly available.</p>			

Guideline Name	Section / Page of Draft Guideline	Comment
Environmental Offsets and Associated Approval Conditions	Pg.3 Sec. 3	Acronym 'AMD' is not explained in document
	Pg.4 Sec.3 Final Paragraph	'dredging activity' should be replaced with a more generic term – not only dredging should be considered in determining NES matters
	Pg.4 Sec.4	Limitation statement is repeated from Page 3 Section 1
	Pg.4 Sec.5	This suggests that offsets are not or cannot be imposed under the Environmental Assessment Act. There is an existing NTG environmental offsets policy. This policy is not referred to in this document. Advice on the status of the existing NTG environmental offset policy would be appreciated.

Please complete the form and send it via one of the following by no later than **Monday 15 July 2013, 5pm**:

Email: NTEPA.Consult@nt.gov.au

Post: NT EPA, GPO Box 3675, Darwin NT, 0801

Privacy: Your personal information will be used for the purpose of collecting and collating comments received on the NT EPA draft guidelines. The NT EPA is subject to the *Information Act* and its Regulations. Information will not be disclosed to a third party, unless required by law or otherwise stated.

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
Environmental Offsets and Associated Approval Conditions	General	The other Draft Guidelines open with a 'purpose or objective' this would also be beneficial in this guideline
	General	Examples of possible or past offsets would be of assistance to an individual or company encountering these for the first time.
Development proposals submitted under the Planning Act.	Pg.6 Sec.5	It is not clear if 'fulfilled or not fulfilled' is a yes or a no
	Attachment A	Add – If Yes is applied to any of the criteria then it may require referral under the EA Act
Disposal of waste by incineration	General	Vessel incinerators are not explicitly discussed in this guideline. If they are not subject to the guideline; then this should be stated as a limitation of the guideline.
	Pg.1 Sec 1.1 Para.2	Suggest amend wording to.... This document is a guide only and the proponent is responsible for complying with all laws that relate to the proposed activity.
	Pg. 2. Sec 1.2	Suggest amend wording to.... The operational, equipment design and environmental standards surrounding the thermal destruction, by incineration of clinical, medical, pharmaceutical and general/municipal wastes have been reviewed in developing this guideline.
	Pg.12 Sec 3.3.7	Is MARPOL 73/78, Annex VI (Regulations for the prevention of air pollution from ships) not recognized under NT legislation? Annex VI of MARPOL specifically deals with certification and use of shipboard incinerators.
Environmental Assessment of Marine Dredging in the Northern territory	General	Guidelines should explicitly provide a framework for adaptive management to allow for adjustments in a dredging program within the approved impact limits, subject to monitoring information.
	General	The guideline is unclear on whether the whole guideline applies to maintenance dredging programs, or whether only specific sections of the guideline applies.
	General	Clarify whether excavation of seabed material below waterline from an excavator located onshore is classified as dredging, or whether this is not applicable as it is considered onshore works.

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	General	The guideline is not explicit on what is required for large dredging projects (i.e > 500,000 m3) and what is required for small dredging projects or maintenance dredging projects (i.e. < 500,000 m3). Suggest that a criteria of 500,000m3 is used to differentiate between a small dredging program < 500,000 m3, and a large dredging program > 500,000 m3. The guideline currently refers to 15,000 m3 which is far too small.
	Pg.4 Sec.1 Para.1	Suggest amend wording to.... Dredging involves the excavation, lifting and transport and placement of underwater or intertidal sediments and soils for the construction and maintenance of ports and waterways. Comment – dredging doesn't necessarily remove only "underwater sediments", as it can include intertidal areas.
	Pg.6 Sec. 2.3 Para. 1	<i>Best practice environmental management involves minimising impacts at and near the dredging and disposal sites.</i> Suggest referencing "PIANC No 100 - Dredging management practices for the Environment – a structured selection approach 2009" Report – as this is considered as a guide to selecting best practice dredging methodology(ies).
	Pg. 7 Sec.2.3 Para. 6	<i>Material dredged for pipeline trenches may be placed on the seabed adjacent to the trench before being placed back into the trench after the pipe has been laid.</i> Consideration of other options like pre-crushing using CSD and re-handling material with BHD or TSHD should also be included... these are also viable options available under certain circumstances.
	Pg.7 Sec. 3.1.2	Should the <i>NT Aboriginal Sacred Sites Act 1989</i> be included? <i>Fisheries Act</i> is repeated twice (once under Industry and again under Water Quality & Biodiversity). Should the NT Legislation include relevant HSE Acts? If safety is outside the scope of the guideline, then the guideline should explicitly state that safety aspects are excluded from the guideline.

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	Pg.11 Sec.4.2 Para. 2	<i>Physical interaction of dredging equipment with the seabed causes a mixture of sediment particles to be liberated into the surrounding water column at the dredge site. When all of the dredged material is not captured by the dredging equipment (e.g. fugitive loss from a cutter suction dredge cutter head or TSHD draghead, spillage from grab/bucket dredges), a proportion is liberated to the surrounding environment as suspended sediment.</i>
	Pg.12 Sec.4.2 Para 5	Suggest amend the wording to... <i>Early acquisition of high quality geotechnical data for the dredge site is important and a very good way to help reduce uncertainty in the impact prediction process. Geotechnical information will assist in the selection of 'fit-for-purpose' equipment, modeling the particle size distribution and the fate and consequence (especially transport) of sediments generated from that equipment/process/substrate combination.</i>
	Pg. 12. Sec.5.1 Para 2 and bullet points.	Suggest amend wording to.... <i>Examples of important elements of for assessing disposal options for dredged material are:</i> Include additional bullet points <ul style="list-style-type: none"> • <i><u>Are the beneficial uses able to meet the specific criteria for which the material is intended (i.e. construction grade quality)</u></i> • <i><u>Are the beneficial uses going to be needed at the time when the material is available and will there be sufficient storage capacity for the material?</u></i>
	Pg.12 Sec.5.1 Para 4	The below statement could be very costly and may not be considered as a 'best practice' approach according to PIANC 100, subject to results from contaminant testing. <i>Material unacceptable for ocean disposal is, in many cases, acceptable for onshore disposal. Contaminants of concern may not readily leach in land disposal sites and dredged material may gain a more benign inert or solid waste classification, rather than hazardous or industrial waste. Some of the principles applied in management of mine tailings can be applied to the management of dredge spoil on land.</i>
	Pg.13 Sec.5.2.1 Para 4	Suggest amend the wording to... <i>Data need to be collated and analysed, with evidence and supporting advice provided to the NT EPA. The assessment moves to Phase II where there is insufficient valid information to identify and/or characterise potential contaminants is insufficient or invalid.</i>

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	Pg.14 Sec.5.2.3 Para. 2	Does this section apply to maintenance dredging? If so it is suggest that a criteria of 500,000m3 is used to differentiate between a small dredging program < 500,000 m3, and a large dredging program > 500,000 m3. The guideline currently refers to 15,000 m3 which is far too small.
	Pg.14 Sec 5.2.3	This whole section discussing phases I, II, III, IV, V would benefit with an illustrative flow diagram to visually illustrate the NT EPA's expectations for each phase and what is required for Proponents.
	Pg.15 Sec.5.2.4 Para 5	15,000 m3 is an extremely small dredging program. Suggest 500,000m3 is used as criteria for determining a small program (i.e. < 500,000m3) or a large program (i.e. > 500,000 m3). To put the nominal value of 15,000 m3 in context, a standard back hoe dredge, as was used for the Ichthys Project, would remove 15,000 m3 of material within a few days of dredging, or a cutter suction dredge or trailing suction hopper dredge would remove it within a matter of hours. The execution timeframe for 15,000 m3 would be significantly shorter than the preparation required to adhere to the NT EPA dredging guideline.
	Pg.15 Sec.5.2.5 Para 4	<i>The proponent will need to investigate management options such as treatment, control measures and confined disposal to see if impacts can be successfully mitigated where sediments are found to be unacceptable for unconfined marine disposal after the weight-of-evidence assessment, and should the proponent, after evaluating alternatives, still wish to consider marine disposal,...</i> Sentence not complete
	Pg.17 Sec.5.5.1 Para.1	Suggest amend wording to.... <i>This reduces uncertainty in predicting areas of impact....</i>
	Pg.18 Sec.5.7.1 Para 1	Suggest amend wording to..... <i>Predicting direct impacts of dredging is relatively straightforward as these impacts are generally tightly inherently linked to the dredge area and/or disposal sites and immediately surrounding areas.</i>
	Pg.18 Sec.5.7.2 Para 3	Suggest amend wording to <i>High quality, peer reviewed information is more likely to provide reliable predictions than when all relevant proponent documentation is not provided, is ambiguous, or includes unsubstantiated conclusions, or is not relevant.</i>

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	Pg.19 Sec.5.7.4 Para.1	<p><i>It must establish a framework for monitoring in a way that informs adaptive management of dredging to minimise the impact on the environment.</i></p> <p>The way in which adaptive management is described in the above sentence is that adaptive management can only work in one direction (to minimise impact), whereas it should allow proponents the flexibility to apply adaptive management to “mitigate” impacts within the approved limits, which could result in an increase in environmental impact if the impacts measured are below those expected. This form of adaptive management is advocated in the PIANC 100 and PIANC 109 international dredging guidelines.</p>
	Pg19. Sec.5.7.4 Para.5	<p><i>“It is expected that proponents provide the EMP as part of the documentation submitted for assessment”.</i></p> <p>The formal assessment for a major Project will under most circumstances occur well before a dredging contractor has been selected by the Proponent and dredging methods finalised. A detailed EMP cannot be prepared in isolation from the dredging contractor. Contracts cannot be let before a Project has made its Final Investment Decision (FID) and an environmental approval is a pre-requisite for FID.</p>
	Pg.19 Sec.5.7.4 Bullet point 2	<p>Suggest amend wording to....</p> <ul style="list-style-type: none"> • An adaptive monitoring/management feedback loop to achieve those objectives;
	Pg19. Sec. 5.7.5 Para 1	<p>Suggest amend wording to....</p> <p><i>The framework around which to design environmental monitoring programs should be risk-based using understanding of cause dose-response pathways for key biota in the benthic communities to be monitored</i></p> <p>Consistent use of wording previously used. (dose-response)</p>
	Pg.20 Sec.5.7.7 Bullet point 2	<p>Suggest including reference to heritage (non-aboriginal and aboriginal) sites</p>

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	Pg. 21 Sec 6.1 Para 2	The NT EPA Draft Guidelines for the EA of Acid and Metalliferous Drainage (2013) make no reference to marine dredging, ASS in intertidal areas or the marine dredging guideline in general. Therefore, is it appropriate to cross reference the Acid and Metalliferous Guideline in the Marine dredging guideline? The Acid and Metalliferous Guideline seems to be specific for onshore construction activities.
	Pg.22 Sec.6.3 Para.1	It may not be practical to select the location of a spoil ground based on this criteria, particularly if Proponents need to meet the Darwin Harbour beneficial uses objectives to mitigate impacts to sensitive receptors in and around the harbour and nearshore area (informed by numerical modelling); which subsequently requires that the spoil ground is positioned several miles off the coastline, away from the dredge site (as is the case with the Ichthys Project).
	Pg.22 Sec.6.3 Para 4	The following statement will be difficult to audit <i>The last few dredge loads in the previous location should be deep abiotic sediments from greater than 50 cm and preferably deeper</i>
	Pg. 22 Sec.6.4 Para.1	<i>'The levels of nutrients are not significant for any but large dredging projects'</i> This statement must be in context to the receiving environment...
	Pg. 22 Sec. 6.4 Para.1	Suggest amend the wording to..... <i>Levels of nutrients released into the water column should be monitored where dredging must occurs during seasons in which algal blooms are likely</i>
	Pg.22. Sec.6.4 Para 2	Suggest amend wording to <i>Algae should be monitored when dredging must be is undertaken at a location and during a period where algal blooms are likely</i> Discriminating dredging induced algal blooms from natural variability is likely to be difficult and should not be considered an essential part of a monitoring program.

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	Pg. 23 Sec. 6.5 Para 1	Suggest amend wording to.... <i>Uncontaminated spoil may be disposed of in natural seabed depression or specially dredged pits, between underwater bunds, or upon flat substrate away from main shipping routes.</i>
	Pg.23 Sec 6.6	“Special care must be taken during construction of the cap to ensure that the capping material does not mix with the contaminated material below” There are no real ways to release material over a spoil disposal ground without some degree of disturbance to the underlying material.
	Pg.23 Sec.6.7 Para 1	Suggest amend wording to..... <i>Onshore disposal is preferable where spoil is either seriously significantly contaminated....</i> Consideration could be given to allowing for contingency offshore spoil ground(s) if onshore disposal is not feasible, or if the existing offshore spoil ground causes unacceptable impacts.
	Pg.23 Sec.6.7 Bullet points	Given the constraints experienced with the NTG expansion of East Arm Wharf, regarding nesting birds in the wet season preventing the use of reclamation ponds, this constraint, if applicable to dredging projects in the NT (enforced by DSEWPaC under the EPBC Act), should be mentioned in the guideline.
	Pg. 24 Sec.6.8 Para 1	This whole section reads as though all methods are required for assessing spoil-ground stability, when in practical terms, any one of the methods could be used to do it.
	Pg.24 Sec 6.10 Par 3.	<i>Protection measures for marine fauna should be incorporated into the EMP and would include monitoring and reporting on species present</i> This statement suggests that <u>all</u> fauna species need to be identified and monitored. Is this the intent and if so what is the purpose of such monitoring? <i>Monitoring of marine fauna should include the measurements of any bioaccumulation of metals or any other identified parameters resulting from dredging.</i> Monitoring for metals in fauna should only be considered if the sediments are deemed to be contaminated or have a high potential for bioaccumulation on organisms. Hence the results from the Sampling and Analysis Plan should be used to determine whether such monitoring is required. Will it be expected that marine megafauna will tested for contaminants?

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
	Pg.24 Sec.6.10 Para 3	<p>Monitoring of marine fauna should include the measurements of any bioaccumulation of metals or any other identified parameters resulting from dredging.</p> <p>This statement may not be feasible for small dredging programs. See previous comments on program size.</p>
	Pg.25 Sec.6.12.1 Bullet point 6	<p>Suggest amend wording to:</p> <ul style="list-style-type: none"> • development implementation of Noise Management Plans and Noise Management Systems
	Pg25. Sec 6.12.2 Para. 2	<p>It is generally accepted that the underwater noise levels generated by dredging are not significant. Source levels for different dredge types are published and available.</p> <p>Marine noise modeling is an unnecessary requirement.</p>
	Pg. 26 Sec.7 Para 2	<p>Suggest amend wording to.....</p> <p><i>Dredging activities must be designed, managed and monitored to minimise mitigate environmental impacts within approved limits while maintaining project feasibility. Proponents must consider methods to mitigate potential impacts of proposed dredging activities and to design appropriate best practice data collection, modelling and monitoring programs prior to dredging operations.</i></p> <p>Management focus should be on “mitigating” (not minimising) the impacts within the approved limits – which allows for flexibility / adaptive management if the measured impacts are well below the approved limits. To state that management should focus on “minimising” impacts does not provide proponents with the necessary flexibility to manage a large scale project within the approved limits.</p>
	Pg.33 Appendix 4	<p>Include a flow diagram to visually map out the processes related to the five phases discussed under Section 5.2 Assessment of sediment quality.</p>

Guideline Name	Section / Page of Draft Guideline	Comment
Economic and Social Impact Assessment		<p>1. Explicit Links to Assessment Processes</p> <p>The Guideline could add value by better defining the categories of projects that require economic and social assessment and how this determination is to be made. This may be either in project-specific guidelines from the EPA or in a similar fashion to the objective Project screening practices of funding bodies such as the European Bank of Reconstruction and Development and the International Finance Corporation).</p> <p>Given the long lead times required to prepare parts of the economy and society for the shocks of a major project, consideration should be given in an assessment framework to an early strategic economic and social assessment of the category or development. This may have the benefit of helping the Territory to present itself to potential proponent as, in principle, 'project-ready' for certain categories of projects and certain locations.</p>
		<p>2. Economic Assessment</p> <p>Consideration should be given to development by the NTG of its own economic model for strategic economic impact analysis. A model would force the discipline of requiring nominated data sets as inputs and avoid the duplication, overlap and unnecessary information that is apparent at 5.1.1. For example, it would generally be more useful to require datasets including: 'any value-adding in the NT and Australia'; 'estimated tax and royalty payments'; 'construction capital expenditure'; and 'expected annual operating expenditure' rather than 'total project revenue' (presumably the product of output and expected price during the operating life of the asset being planned). Similarly, 'expected value of NT/Australian business supply and service participation during construction and operations' duplicates the 'value-adding in the NT' data requirement.</p> <p>The Guideline does not specifically require a baseline description of the economic environment. Assumptions about 'without Project' economic trends are important elements of being able to accurately assess economic impacts and the significance of impacts – especially cumulative impacts. It would be advisable to have a consistent approach to forecasting the baseline economy and this should include a method for determining which other large projects are to be considered baseline and which are to be assessed as cumulative economic change. This objective may be met through NTG maintaining a model of the NT economy and making outputs available to proponents, and by maintaining an official database of sanctioned (rather than planned) projects.</p>

Guideline Name	Section / Page of Draft Guideline	Comment
		<p>Contribution to Employment and Training</p> <p>3. Analysis is requested on direct and indirect employment.</p> <p>The NT EPA should note that depending upon contracting strategies adopted by a proponent, it will most often be challenging to accurately forecast workforce numbers and timing of mobilisations / demobilisation until contracts are let. It should be considered that an economic assessment conducted in parallel with an environmental assessment will need to proceed in the early planning (often Front End Engineering Design) phase of a project. This is well before the investment has been sanctioned and contracts awarded and when a project relies on preliminary engineering and resourcing assumptions. For this reasons, care should be taken in the public positioning of economic impact assessments and consideration should be given to allowing proponents to shield some commercially sensitive assumptions and impact assessment outcomes until better quality information is available.</p>
		<p>4. Enterprise Risk Management Framework AS/NZS ISO 3100:2009</p> <p>The NT EPA should carefully consider the prescribing of this standard. Risk management approaches to economic and social impact management are often limited by a risk management framework that defines risk as an uncertainty affecting the organisational objectives. Rather than placing the receptor of impact in the centre of the analysis, such frameworks tend to focus on impacts to project schedules and costs and changes to corporate reputation. Such an indirect characterisation and prioritisation of the effects of change on communities can work against precision and brevity in documentation.</p> <p>Risk matrices with banded definitions for consequence and likelihood also tend to deal poorly with significance of impacts to particular interest groups. Determining the significance of social impacts often depends very much depends upon the unit of analysis: regional, local, family group and individual. Similarly, definitions of consequence in corporate risk tools tend to deal poorly with potential positive impacts and opportunities presented by projects and as a result these tend to be under-analysed or under-reported.</p> <p>If risk methodologies are pursued, it is reasonable that further guidance be provided to proponents on the risk tolerance of government decision-makers so that objective performance criteria can be established for social impact mitigations. In their own enterprise risk management framewroks, proponents will tend to have rules about what risks are acceptable to its project, but</p>

Guideline Name	Section / Page of Draft Guideline	Comment
		<p>cannot objectively forecast what level or residual risk is tolerable to decision-makers on behalf of the community at large.</p> <p>It may be more advisable to refer to accepted principles of social impact assessment (eg Social Impact Assessment International Principles, IAIA Special Publication Series No. 2, May 2003) and allow the concrete form of an impact to be determined and justified by the proponent.</p>
		<p>5. Social Assessment</p> <p>The Guideline recognises the benefit of retaining a social impact assessment specialist to conduct consultation but should distinguish more clearly between 'consultation' and 'social assessment': clearly they are not the same. Whilst consultation is required for both environmental and socio-economic assessments, consultation without robust social science analysis will likely result in a superficial analysis and ultimately a mitigation plan that is either unworkable, ineffective or both.</p>
		<p>6. Description of the Local and Regional Social Environment</p> <p>The Guideline should require a process whereby a proponent must identify and justify the potentially-affected communities at a screening level before such communities are profiled. This will focus greater attention on the key characteristics and functioning of subject communities; drawing out specific expected interactions, a sense of resilience to expected changes, and highlighting both vulnerabilities and community assets that can be developed with appropriate strategies.</p> <p>The NT EPA should consider mandating use of GIS to capture spatial data on community place use and values and, overtime, making this pre-competitive information available to other proponents to the benefit of the profiled community.</p> <p>It is noted that the requirements to profile do not specifically include a community health, safety and security profile or governance arrangements. It may be the likely value of such work is decided on a project by project basis.</p>

Guideline Name	Section / Page of Draft Guideline	Comment
		<p>7. Potential Social Impacts</p> <p>Social impact assessments in Australia can cover a broad range of impacts some of which are highly regulated by complementary processes and legislation. The NT EPA should re-consider the prescribed list of issues to be assessed for impacts for (a) duplication of other statutory assessment and licensing, and (b) a process of determining the scope of impacts to be assessed at some screening level social assessment (perhaps informing project-specific assessment guidelines). The existing list if not exhaustive and seems to capture issues that can be well-managed by other statutory processes without increased bureaucracy, costs and potential delays to major projects.</p> <p>It is noted that cultural assets are not listed for analysis and this is an example of where adequate regulation appears to be in place. Other notable absences are community health, safety and security; occupational health and working conditions; gender; and governance.</p> <p>This list of impacts categories should be linked to relevant legislation at Section 3 and specific guidance provided as to what constitutes appropriate assessment and acceptable mitigated outcomes.</p>
		<p>8. Economic and Social Impact Management Plan</p> <p>The document is to incorporate responsibilities of government and other stakeholders as the point-in-time summary of an ongoing process of collaborative problem-solving and consultation. The NT EPA should consider the relative merits of: (a) describing existing actions of governments and other stakeholders as context (in the description of socio-economic environment/community profile) to an assessment of the significance of impacts and the likely effectiveness of proposed mitigations; or (b) describing third-party mitigations to address impacts of the proposed action in a commitments register and subsequent reporting to NTG. Note there is the risk that stakeholders will object to a perception that government expenditure is being used to manage the impacts of a large capital project rather than the work government does to facilitate orderly growth across the economy. There are also likely to be formidable administrative challenges to synchronise reporting of mitigations by third parties through the proponent's reporting to government.</p> <p>A distinction should be made in the ESIMP between reporting past stakeholder engagement strategies and the outcomes of this engagement: that is, what views were expressed and what design changes or commitments resulted from the engagement. Similarly, a distinction should</p>

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
		<p>be made between a communication strategy in the ESIMP and an engagement strategy as part of active monitoring for changes in predicted impacts and evaluation of mitigation measure effectiveness and what communications are required around that engagement.</p>
		<p>9. Implementation</p> <p>The NT EPA should consider if the ESIMP should contain a description of the management system (including policy framework, relevant procedures, resourcing, and training and capability development) that will be used to implement the plan. This description might also inform the decision-maker about the most significant implementation challenges. As noted in the guideline, the management system description should include procedures for incident management, notifications and reporting, and management of grievances.</p> <p>If a concrete template is proposed for the 'mitigation table' it is not explained and it would be useful to attach it to the Guidelines.</p>

General comments