

Summary of Comments Received and Secretariat Responses

Prepared for the Virtual Intersessional Meeting of National Focal Points, 18–19 August 2026

13 July 2026

1. Purpose of this Document

This document accompanies the revised draft Guidelines for the Establishment and Operation of Regional Activity Centres (RACs) and Regional Activity Networks (RANs), circulated in both a clean version and a version showing all tracked changes and reviewer comments. It provides Contracting Parties with a concise overview of the scope and nature of the comments received during the review process, and how each category of comment has been addressed, without requiring a paragraph-by-paragraph review of the tracked-changes file.

Comments were received from a number of Contracting Parties and other reviewers over the course of the review process. In total, 238 individual comments are recorded in the tracked-changes file; every comment has received a substantive response, whether by way of a textual amendment or a clarifying explanation. This includes two items initially set aside pending verification of precise legal and historical citations, which have since been confirmed against primary sources and incorporated (see Section 2 below).

Section 2 below summarises this work by theme, without attributing individual comments to their source, since a number of Parties raised closely related points and the value of this overview lies in the pattern of issues raised and how they were resolved. Section 3 sets out additional substantive comments received from Mexico and from Trinidad and Tobago which, for the reasons explained, are not reflected directly as textual amendments in the current draft, together with the Secretariat's reflection on each.

2. Overview of Comments Received and How They Were Addressed

The table below groups the comments received into themes, rather than listing all 238 individually. Full detail, including the specific wording of each comment, its source, and the Secretariat's reply, remains available in the tracked-changes version of the Guidelines.

Theme	Nature of comments	Status	How addressed
Terminology & institutional naming	Consistent use of “CCS”, “Annex” (not “Appendix”), spelled-out protocol names, and correction of a “Communication Principles” heading that could be misread as carrying legal weight.	Resolved	Terminology standardised throughout; “Communication Principles” renamed “Communication Guidance” to avoid any implication of binding legal principles.

Theme	Nature of comments	Status	How addressed
Paragraph numbering, Table of Contents & cross-references	Numbering gaps and a stale Table of Contents following the restructuring of Part IV, with requests to verify numbering throughout.	Resolved	Full renumbering cascade applied and cross-checked against the final structure; Table of Contents corrected to match.
Delegation of COP oversight	Several related comments noting that COP oversight of RACs/RANs may in practice be exercised through a Protocol COP, STAC or Steering Committee, rather than only by the Convention-level COP, and asking the Guidelines to say so explicitly.	Resolved	New general clause added in Section III stating that COP oversight may be exercised directly or through a delegated body; this is now the standard reference point wherever delegation was raised elsewhere in the text.
Institutional character of RANs & reporting flow	Concerns that RANs – as informal networks rather than legal entities – cannot literally “report” or “provide expertise” as an institution, and that a RAC should not end up reporting to itself where it is also the coordinating entity.	Resolved	Provisions revised so RAN members prepare the substantive content, with the coordinating RAC or CCS responsible for channelling it forward; an explicit carve-out prevents a RAC from having to report to itself.
Language that could read as legally binding	Requests to soften wording that could be read as imposing obligations beyond the Guidelines’ non-binding character, and to correct an imprecise description of RANs as “non-binding.”	Resolved	Wording softened where appropriate – for example the RAC dissolution procedure was rewritten to state clearly who may propose dissolution and who decides, rather than reading as circular; the imprecise “non-binding” language was removed from the RAN definition.
“Re-designation” terminology	The term “re-designation” appeared in several places without ever being defined, creating ambiguity against the clearly defined “dissolution” process.	Resolved	“Re-designation” removed throughout and replaced with the existing “continuation, modification or adjustment” language already used for evaluation outcomes; a clarifying sentence now links an evaluation’s

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			“discontinuation” recommendation to the COP’s formal “dissolution” decision.
Annex sequencing	Request that the Evaluation Framework and the Evaluation Model (the template that operationalises it) sit next to one another, rather than being separated by an unrelated Annex.	Resolved	Annexes reordered so the Evaluation Model immediately follows the Evaluation Framework; all cross-references, numbering and Table of Contents entries updated to match.
Emphasis on external/global frameworks	Concern that the draft placed undue emphasis on RACs’/RANs’ role in supporting external global or regional frameworks, beyond implementation of the Cartagena Convention and its Protocols.	Resolved	A stand-alone “Global Context” section and a related preface sentence were removed; remaining references to external objectives were scoped explicitly to the Convention and its Protocols, or made conditional on the approved Work Plan and COP Decisions.
Precision and consistency edits	A series of smaller, discrete wording-precision comments – numbering checks, capitalisation, singular/plural, and similar – several of which turned out to already be resolved incidentally by other structural fixes.	Resolved	Each item reviewed individually; wording tightened where a genuine ambiguity existed (for example, “thematic area(s)” to allow for cross-cutting RANs), or confirmed already resolved by earlier corrections.
Substantive additions accepted	Discrete proposed additions found to close real gaps: a rationale for the “RAC-first” coordination model; a standard “voluntary and mutually agreed terms” qualifier wherever technology transfer is mentioned; explicit CCS responsibility to conduct and report the periodic review of the Guidelines; and a softened requirement so that not every national or regional project needs individual COP approval.	Resolved	Each added as a targeted, minimal insertion at the relevant point in the text.
Legal and historical citations	Two requests for precise legal/historical citations: the Cartagena Convention article (and/or founding COP decision) establishing the legal basis for RAC/RAN designation; and the formal reference number of the 2008 Guidelines being superseded.	Resolved	Both citations verified against primary sources – the CEP’s own IGM decisions record and historical documentation – and inserted. A new paragraph in Section IV

Theme	Nature of comments	Status	How addressed
			now cites Article 15.1(e) of the Cartagena Convention together with Article 9 of the Oil Spills Protocol (1983) as the treaty-level basis; notes that RAC/REMPEITC-Caribe (1995) was the first RAC to become operational under this authority; and traces the general RAC/RAN framework from its first Concept Paper (6th Intergovernmental Meeting, 1992) through its formal endorsement (10th Intergovernmental Meeting, 2002) to the 2008 Guidelines this revision supersedes (cited by COP Decision UNEP(DEPI)/CAR IG.28/4.IV.1).

All eleven themes above are considered fully resolved in the current draft. The substantive comments discussed in Section 3 below remain outstanding and should be treated as requiring a decision or further input from Contracting Parties at the intersessional meeting.

3. Additional Substantive Comments Not Reflected Directly in the Document

The comments below raise substantive policy questions that go beyond textual drafting – touching on programmatic priorities, financial arrangements, and the Guidelines’ relationship to external monitoring, statistical and biodiversity frameworks. Rather than resolve these unilaterally through drafting choices, the Secretariat considers that they are better placed before Contracting Parties for direct discussion and guidance at the intersessional meeting. Each comment is reproduced below, followed by the Secretariat’s reflection on how it relates to the overall approach taken in this revision.

3.1 Comments from Mexico

Mexico – Comment 1 (data validation and information security)

It is suggested that internal validation and information security measures be applied, in accordance with respective national laws, in scientific communications involving the exchange of raw or processed data derived from official oceanographic, cartographic, hydrographic, or meteorological databases of the Contracting Parties.

Secretariat reflection: This raises a legitimate data-governance concern, but one that engages each Contracting Party’s own national law on data classification and security – a matter the Guidelines cannot resolve on Mexico’s behalf without risking inconsistency with other Parties’ legal frameworks. Throughout this revision, the Secretariat has been careful not to create new procedural obligations for RACs, RANs or CCS without a clear, shared basis in the Convention or an existing COP Decision. A general data-security clause of this kind would be a meaningful addition, but is best developed and agreed with input from all Contracting Parties’ competent national authorities, rather than drafted by the Secretariat alone.

Mexico – Comment 2 (technical validation of early environmental alerts)

For the issuance of early environmental alerts by RACs, it is proposed to include a technical validation requirement by official monitoring agencies of the Contracting Parties located in the affected area prior to their international public dissemination.

Secretariat reflection: This proposal would add a mandatory approval step to a RAC’s technical and scientific outputs. Elsewhere in this revision – including in response to other comments received – the Secretariat has deliberately preserved RACs’ technical autonomy as agile, independent technical partners, on the basis that this is precisely what allows them to respond rapidly to emerging transboundary threats. A mandatory national validation step, however well-intentioned, sits in some tension with that principle and could materially slow time-sensitive alerts. This is a substantive trade-off between speed of response and national oversight that the Secretariat considers should be weighed and decided by Contracting Parties directly, rather than resolved through a drafting choice.

Mexico – Comments 3, 5 & 6 (statistical standards and indicator frameworks)

In the absence of identified international statistical standards or indicator frameworks, it is recommended to incorporate references to the System of Environmental-Economic Accounting, as well as to the guidance of the High-Level Panel for a Sustainable Ocean Economy... The Guidelines document does not mention international statistical standards or indicator frameworks, which represents a clear opportunity for strengthening. It would be valuable to incorporate references to the System of Environmental-Economic Accounting – the global standard for measuring the relationship between the economy and the environment.

Mexico – Comments 4 & 7 (linkage to SDG 14, Kunming-Montreal Framework and national statistical institutes)

It is considered a priority that RACs and RANs strengthen and support initiatives aimed at the conservation and management of protected areas, the restoration of coastal and marine ecosystems, the protection of migratory species, and the shared governance of coastal ecosystems with indigenous communities... it is recommended that the Guidelines explicitly promote collaboration between RACs and national statistical institutes in the region.

Secretariat reflection: These comments raise a genuine and recurring tension in this revision. A separate line of comments received during the review (reflected in Section 2 above, under “Emphasis on external/global frameworks”) specifically asked that references to external global and regional frameworks be reduced, on the basis that RACs and RANs under the Cartagena Convention are not responsible for supporting the implementation of frameworks external to the Convention and its Protocols; a stand-alone “Global Context” section was removed on that basis. Mexico’s comments point in the opposite direction – recommending that the Guidelines explicitly reference the System of Environmental-Economic Accounting, the Kunming-Montreal Global Biodiversity Framework, SDG 14 indicators and collaboration with national statistical institutes. Both positions are coherent policy choices; they simply reflect different views on how far RACs’ and RANs’ mandates should extend beyond the Convention itself. Given that the revision has already applied the more restrictive reading in response to the other comments received, the Secretariat has not unilaterally reintroduced the broader framing Mexico proposes, but considers this an important scope question for Contracting Parties to resolve directly at the intersessional meeting.

3.2 Comment from Trinidad and Tobago

Trinidad and Tobago – opening remarks

Trinidad and Tobago commends the Cartagena Convention Secretariat and the drafting partners for producing a comprehensive, forward-looking framework that masterfully builds upon three (3) decades of regional experience... the formalization of the “RAC-first” coordination model and the introduction of a proportional evaluation framework for Regional Activity Networks (RANs) represent excellent structural upgrades that prevent excessive bureaucratic burdens on resource-constrained host institutions and Small Island Developing States (SIDS).

Secretariat reflection: The Secretariat notes this assessment with appreciation. Both features highlighted – the RAC-first coordination model and the proportionate RAN evaluation framework – were reinforced during this revision, including by adding an explicit rationale for RAC-first coordination (see Section 2 above) precisely to make clear why the model exists and how it avoids placing undue burden on RACs, RANs or CCS.

Trinidad and Tobago – substantive comment on Paragraph 31, Financial Arrangements

Trinidad and Tobago notes a significant systemic vulnerability in Paragraph 31 regarding Financial Arrangements (p. 6). Placing the primary financial burden for core operational costs exclusively on individual Host Governments, while explicitly absolving the Caribbean Trust Fund (CTF) and the Secretariat of baseline financial responsibility, risks institutionalizing an unstable, project-to-project existence dependent on volatile external grants... Accordingly, Trinidad and Tobago recommends amending Paragraph 31 to establish a baseline, core-funding allocation from the CTF specifically earmarked to finance basic administrative continuity and multilingual obligations for all designated RACs.

Secretariat reflection: This is one of the most substantive comments received in this review, and the Secretariat considers it merits direct consideration by Contracting Parties rather than a Secretariat-drafted amendment. The proposal would commit CTF resources to a baseline, core-funding allocation – a resource-allocation and Trust Fund governance decision with real budgetary implications for the Convention, and one that affects burden-sharing among all Contracting Parties, not only the RAC host governments directly concerned. Throughout this revision the

Secretariat has consistently avoided placing new financial or administrative burdens on RACs, RANs or CCS without a clear decision-making basis – the same principle applies in reverse here: a change of this magnitude to CTF financial commitments should be adopted, if at all, by COP or intersessional decision, informed by the CTF's own financial position and the views of all Contracting Parties, rather than embedded in the Guidelines as a drafting change. The Secretariat recommends this comment be put before Contracting Parties for substantive discussion at the intersessional meeting.