

Comments for consideration for inclusion into the future exploitation code

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Mitigation via near shore offsets shall be required for all impacts to the marine environment resulting from deep sea mining exploitation and or prospecting in the area. The accepted offset mechanism is artificial reefs made from igloo-shaped, hollow materials already tested in more than 50 nations over 25 years with at least 50 peer reviewed studies and accepted within the international marine mitigation (IMMB) framework.

Offsets shall be a function of metric tons of extracted minerals. For manganese nodules : .25 kilograms of biomass is considered impacted for each metric ton of nodules extracted. A 4 x offset is required, thus one kilogram of new biomass must be purchased via credit trading system for each ton of nodules extracted. 3rd party verification is required for all biomass creation. The ISA must sign off on all credits traded as offsets. Each kilogram of biomass is traded at a fixed price of \$12.50 USD

Revenues from the offsets shall be shared as followed:

- a) 5% to ISA to subsidize travel to ISA sessions for developing nations
- b) 20% to host nations where reef assets are placed
- c) 20% to ISA environmental fund- such a fund and the offsets combined will be considered the total environmental efforts and costs for all ISA related deep sea mining thus capping total environmental related expenditures at above stated rate. The ISA environmental fund shall be administered by the ISA staff.

Mining entities shall furnish an annual report showing number of tons extracted and issue payment for offsets within 30 days of report being issued.

【Further comments received on 3 January 2017】

"For marine environmental impacts occurring within jurisdiction or influence of UNCLOS, liable parties are required to offset such impacts via the International Marine Mitigation Bank (IMMB). Offsets must be sufficient to compensate the ocean for the insult to the marine ecosystem."