

24 April 2023

Michael W. Lodge

### Observer Status at the International Seabed Authority

Dear Secretary-General Lodge

International Seabed  
Authority,  
14-20 Port Royal St,  
Kingston,  
Jamaica

Please find attached the International Council on Mining and Metals' (ICMM) application for observer status at the International Seabed Authority (ISA), in line with rule 82 of the ISA Assembly's Rules of Procedure and the Guidelines for non-governmental organisations (Annex, ISBA/25/A/16).

ICMM is a global leadership organisation for sustainable development, representing 26 of the world's largest mining companies and 39 national, commodity-specific and professional associations from across the world. We work collaboratively with many United Nations bodies, multilateral finance institutions, various international fora such as the OECD and the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF), and many other stakeholders to enhance the contribution of mining and metals to sustainable development. Our commitment to working with others does not stop at our industry's boundaries. We were founded on a spirit of open engagement, and we continue to champion diversity of opinions today to deliver bold leadership for our wider industry and non-resources sectors alike.

Given our commitment to responsible mining at all times, we have watched with interest the ongoing debate about whether deep sea mining can be done responsibly and without undue harm to the critical ecosystem services provided by the world's oceans, especially given the lack of scientific understanding of the world's deep oceans, the threats they face and their resilience to anthropogenic change.

Observer status of the ISA will allow us to contribute to that debate and share our collective experience of mining on land.

#### ICMM

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— No. 08164875  
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— No. 161 6686 90

If any questions were to arise or clarifications required, do not hesitate to contact ICMM's Policy & Public Affairs Lead John Lindberg ([john.lindberg@icmm.com](mailto:john.lindberg@icmm.com)) who is coordinating this application. We look forward to hearing from you.

Yours sincerely,



Rohitesh Dhawan,

President & CEO

[Rohitesh.dhawan@icmm.com](mailto:Rohitesh.dhawan@icmm.com)

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## Application details

### Information about the organization

**1. Name of organization**

International Council on Mining and Metals

**2. Address of headquarters**

4th Floor, 34-37 Liverpool Street, London EC2M 7PP, United Kingdom of Great Britain and Northern Ireland

**3. Addresses of all branches and/or regional headquarters**

Not applicable.

**4. Telephone number**

+44 (0) 20 7467 5070

**5. Fax number**

Not applicable.

**6. Email address**

[info@icmm.com](mailto:info@icmm.com)

**7. Name, title and contact details of focal point**

Hayley Zipp, Director of Environment ([Hayley.zipp@icmm.com](mailto:Hayley.zipp@icmm.com))

**8. Background information on the organization**

Since its founding in 2002, ICMM has been the preeminent sustainable development platform for the global mining industry, ICMM is a unique industry body that does not serve the commercial interests of its members, but is a global leadership organisation for sustainable development, judging success by the contribution made to creating a safe, just and sustainable world through responsibly produced metals and minerals.

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ICMM's work can be divided into five broad areas:

- **Environmental resilience**, focusing on demonstrating and promoting leading environmental practices that enable better industry-wide performance.
- **Social performance**, focusing on seeking beneficial outcomes for communities and society from mining activities and commitments that affect stakeholders and the mining sectors' relationship with them.
- **Governance and transparency**, focusing on the promotion of governance norms and systems that help realise the benefits of natural resources.
- **Innovation for Sustainability**, focusing on the creation of new products, processes or approaches that enable significant progress on key mining sustainability challenges.
- **Material stewardship**, focusing on addressing chemical and life cycle management issues for minerals, metals and metal compounds.

ICMM's member companies are required to adhere to ICMM's standard, the Mining Principles. The Mining Principles define the good practice environmental, social and governance requirements of company members through a comprehensive set of 39 Performance Expectations and eight related position statements on a number of critical industry challenges. Implementation of the Mining Principles will support progress towards the global targets of the UN Sustainable Development Goals and the Paris Agreement on climate change. Incorporating robust site-level validation of performance expectations and credible assurance of corporate sustainability reports, ICMM's Mining Principles seek to maximise the industry's benefits to host communities, while minimising negative impacts to effectively manage issues of concern to society. Further details on ICMM's Mining Principles can be found [here](#).

Today, ICMM represents 26 of the world's largest mining companies and more than 35 national, commodity-specific and professional associations from across the world. A full membership list can be found [here](#).

**9. Is the organization a member of, affiliated to or otherwise associated with another organization that has been granted observer status with the Authority?**

No.

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**10. Is the organization affiliated to consultants of the Authority, contractors with the Authority, entities in connection with the law of the sea, the offshore and deep -sea mining industry, research institutes or the mineral marketing and processing industry?**

One ICMM member holds an equity stake in a company associated with Nauru Ocean Resources Inc. and has an offtake agreement with that company.

One ICMM member's largest shareholder is undertaking deep sea mining exploration efforts.

Several ICMM members are engaged in marine-related activities including but not limited to offshore diamond recovery and tailings deposition.

No further affiliations are known.

**11. Relationships with intergovernmental organizations**

- Accredited observer status for the United Nations Environment Programme (UNEP), and active participant on the Convention on Biological Diversity (CBD), the United Nations Environmental Assembly (UNEA)
- Observer status for the Basel and Minamata Conventions
- NGO Focal point for the Strategic Approach to International Chemicals Management (SAICM)

**12. List of publications and/or other relevant documentation**

ICMM's Mining Principles can be accessed [here](#).

ICMM's work on nature-related matters can be found [here](#).

ICMM's work on mining metrics and standards can be found [here](#).

ICMM's work on mineral resource governance can be found [here](#).

ICMM's work on innovation, including circular economy, can be found [here](#).

ICMM's work on social performance, including indigenous peoples and human rights, can be found [here](#).

ICMM's work on climate change can be found [here](#), and ICMM's climate change position statement can be found [here](#).

**13. Briefly outline how your organization intends to demonstrate its interest in matters under consideration by the Assembly, including by answering questions 14 to 17 and by providing any other relevant information related to the application for observer status.**

ICMM has a long-standing commitment to driving the mining industry's sustainable development agenda and pushing for higher levels of ambition. It is ICMM's firm belief that any mining activity must be done to the high ESG standards, and this would equally apply for any potential mining in the sea beyond the Exclusive Economic Zones. Given our commitment to responsible mining at all times, we have watched with interest the ongoing debate about whether deep sea mining can be done responsibly and without undue harm to the critical ecosystem services provided by the world's oceans, especially given the lack of scientific understanding of the world's deep oceans, the threats they face and their resilience to anthropogenic change. Observer status of the ISA will allow us to contribute to that debate and share our collective experience of mining on land.

**14. Briefly outline whether and how the purposes or activities of the organization relate to the work of the Authority.**

See question 13.

**15. Briefly outline whether and how your organization intends to contribute to the work of the Authority, for example by providing specialized information, advice or expertise, or by identifying or helping to procure the services of experts or consultants.**

ICMM's corporate members are some of the leading global practitioners as far as sustainable mining is concerned, and ICMM and its membership hold considerable expertise in the many aspects that make for sustainable mining practices (environmental, socio-economical, governance, etc.), policy, as well as norms & standards. As a result of this expertise, ICMM and its members are well positioned to contribute to the work of the Authority

**16. Briefly outline whether and how your organization has the expertise and the capacity to contribute, within its field of competence, to the work of the Authority, in particular in connection with the law of the sea, the protection of the marine environment, the offshore and deep-sea mining industry, technology, minerals processing and marketing, activities in the Area and marine scientific research in the Area.**

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ICMM hold expertise in a wide range of areas that is relevant to the work of the Authority, including standard-setting, environmental protection, ESG, international policy, innovation, and indigenous peoples and human rights. ICMM acts as the international voice of industry expertise regarding sustainable development at a large number of international fora. Furthermore, ICMM holds significant convening powers, with its membership of 26 of the world's largest mining companies and 39 associations. Through its membership, ICMM has access to significant expertise relevant to issues that the ISA engages in. .

**17. Briefly outline whether and how your organization intends to contribute to the capacity-building programmes and initiatives of the Authority (e.g., Secretary General's award, voluntary commitments of the Authority).**

ICMM and its members hold significant amounts of expertise on the issues that are related to the responsible production of minerals and metals - especially in terrestrial settings but also near-shore marine mining - many of which are universally applicable to all mining operation.

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