

Submission by Global Sea Mineral Resources nv (GSR)

RE: Strategic Plan for the International Seabed Authority for the period 2024-2028

Global Sea Mineral Resources nv (GSR) would like to thank and express its appreciation to the Secretary-General for the preparation of the draft 2024-2028 Strategic Plan and for the opportunity to provide comments.

GSR believes a well thought out and widely communicated Strategic Plan and accompanying action plan, including key performance indicators, can serve to assist the Authority in achieving its deliverables and align expectations among stakeholders.

General questions

1. Does the Draft Strategic Plan for the period 2024-2028 clearly encapsulate the mandate and responsibilities set out for the Authority by the Convention and the 1994 Agreement?

The focus on the protection of the marine environment (strategic direction 3) certainly encapsulates an important part of the mandate and responsibilities set out for the Authority by the Convention and the 1994 Agreement.

The Draft Strategic Plan also puts focus on the development of rules, regulations, Standards, and Guidelines and GSR considers this to be of utmost importance to, among other things, ensure the effective protection for the marine environment while also allowing/managing the responsible use of seafloor resources.

We are pleased to see a focus on marine scientific research (strategic direction 4)

We agree it is important to recognize the “context and challenges”.

We agree with the inclusion of strategic directions 8.2 and 9.4, covering inclusive decision making and open, meaningful, and constructive dialogue, including on stakeholder expectations.

2. How do you think the Strategic Plan and associated High-Level Action Plan have contributed to fulfil the mission of ISA (as per the mission statement)?

We aren't entirely certain how these Plans have contributed to fulfill the mission of the ISA, however we also recognize the Plan for 2019-2023 overlapped with a global pandemic which may have influenced the ISA's ability to meet all the desired outcomes of the Plan.

If not already done, it may be worth conducting a review / gap analysis of actions completed and not completed during the 2019-2023 period to inform future work and planning. It may also be

appropriate to disseminate this analysis to ISA stakeholders and the public (e.g., by posting the results on the ISA’s website).

3. To what extent do you think the work of ISA provides a useful model for sustainable management of the global commons as Steward of the Area and its resources?

While we are unsure how this question relates to the Strategic Plan specifically, we do feel that the ISA model could or should be seen as a responsible way of managing the world’s resources – i.e., multiple countries having a say in how resources are developed, rather than just one (with just one typically being the case with terrestrial and coastal resources).

4. What should be the priorities of the Authority for the next five years?

GSR believes the immediate priority should be the completion of the regulations on exploitation, including the associated Standards and Guidelines.

Other priorities should include the elaboration of environmental goals, objectives, and principles.

Another priority could be to work on facilitating open, constructive dialogue between stakeholders with varying points of view. With this in mind, we are pleased to see the inclusion of strategic directions 8.2 and 9.4, covering inclusive decision making and open, meaningful, and constructive dialogue, including on stakeholder expectations.

GSR acknowledges and welcomes the text regarding the need to “further develop and reinforce the operational capabilities of DeepData”. In light of the large volumes of data that ISA contractors are collecting and will continue to collect, it may be worth conducting a review, if not done already, of whether DeepData will be fit for purpose in the longer term – i.e. is it “future proofed”?

Specific questions

5. Does the ‘Mission Statement’ (unchanged from the first strategic plan) continue to accurately reflect the mandate of the Authority?

Yes, we believe the Mission Statement accurately reflects the mandate of the Authority.

6. How do you consider that the context and challenges identified remain relevant? Should there be any new elements identified?

With respect to the context and challenges identified, it may be worthwhile adding text about projected metal demand and the sustainability paradox that we (global we) face. i.e., to transition to clean energy and keep up with metal demands associated with population growth and increasing urbanization, we will need a large amount of metals, including from new sources. Extracting new sources of metal will create environmental impacts. We need to minimize the environmental and social impact of obtaining these metals, and there is an opportunity for marine minerals and the ISA to play an important role in helping to achieve this goal. We believe this could provide some important context.

We note that the context and challenges section is silent on moratorium calls and the polarization that has developed among stakeholder groups, resulting in difficulties with respect to the ability to have a constructive dialogue.

7. Are the “Results and Priority Outputs” appropriate and is there a clear link between the “Strategic Directions” and the “Results and Priority Outputs”?

There does not appear to be a “Results and Priority Outputs” section. Does this question refer, instead, to “Section V. Expected outcomes”?

With respect to 35 (c), which states “*The ability to promote and encourage the conduct of marine scientific research in the Area and to coordinate and disseminate the results of such research and analysis when available, as required under article 143 (2) of the Convention*”, we wonder if the “ability to promote and encourage” is the most appropriate phrasing. Should the text perhaps read: “*The promotion and encouragement of marine scientific research in the Area and the co-ordination and dissemination of available results and analysis of such research, as required under article 143 (2) of the Convention.*”?

With respect to specific outcomes, one suggestion is to include the adoption of Regional Environmental Management Plans (REMPs) for each management area / exploration region.

8. Are there any specific observations or comments that Member States and other stakeholders wish to make in connection with any other aspect of the Draft Strategic Plan for 2024-2028

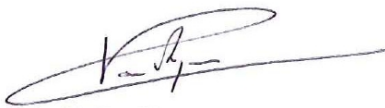
We commend the priority that is placed on providing open access to environmental data and the need to facilitate its user-friendliness.

Additional comments:

- Section 4.
 - ⇒ We support the guiding principles of the strategic plan.
 - ⇒ 4 (c) - Should this include the establishment of a legal regime, as well as its implementation?
 - ⇒ We wonder if there is overlap between items 4 (e) and (f).
 - ⇒ 4 (g) could read: “To provide public access and facilitate the use of environmental information for the benefit of humankind”
- Section 16.
 - ⇒ It may be appropriate to acknowledge the role of Contractors in conducting/supporting marine scientific research in the Area.
- Section 19.
 - ⇒ It may be appropriate to acknowledge the role of Contractors in capacity development and technology transfer.
- Section 24
 - ⇒ We prefer 24bis over 24.
- Strategic Direction 2
 - ⇒ 2.1 - we suggest adding “in a timely manner”

- Strategic Direction 4
 - ⇒ It may be worth including/mentioning the role of ISA Contractors with respect to marine scientific research.
 - ⇒ It may be worth adding consultation with ISA Contractors in this section, with an aim to increase consistency, facilitate collaboration amongst contractors and increase scientific knowledge.

Kris Van Nijen
Managing Director GSR

A handwritten signature in black ink, appearing to read 'Kris Van Nijen', with a long horizontal line extending to the right.