

Chronology of activities in 2021 to 2023 related to the conduct of the Environmental Impact Statement evaluation by NORI for a polymetallic nodule collector system component test campaign as well as supervisory activities by the Secretariat, including the investigation of the overflow event

SECTION I:

NORIS' CSCT EIS: evaluation process and timeline

Presented below is the timeline for the processing of NORI's EIS for the CSCT campaign. The dates have been previously reported in two addendums of the **Report of the Chair of the Legal and Technical Commission on the work of the Commission at the second part of the twenty-seventh session**¹.

Date	Description
30-Jul-21	NORI submitted the EIS to the Secretary-General.
1 to 27 Aug 2021	The Secretariat checked the EIS for completeness against the template as contained in annex III of the Recommendations for the Guidance of Contractors for the Assessment of The Possible Environmental Impacts Arising from Exploration for Marine Minerals in the Area ISBA/25/LTC/6/REV.1 and CORR.1.
30-Aug-21	The Secretary-General sent NORI the report of outcomes of the review for completeness, including requests for additional information.
30-Sep-21	The Commission took note of the EIS and set up a working group to review it intercessional.
Dec-21	The Commission's working group met to consider the EIS.
23-Dec-21	NORI informed the Secretary-General that it had collaborated with the Government of Nauru to develop a stakeholder consultation process and sought permission to submit an amended EIS incorporating amendments as a result of the stakeholder consultation process no later than 14 March 2022, given the number of comments received.
24-Dec-21	The Secretary-General requested NORI to submit the amended statement as soon as possible but no later than 1 March 2022, without prejudging the action that the Commission would take when it considered the matter at its next meeting.
24-Dec-21	Secretariat informs the Commission Working Group on the EIS not to finalise its comments until it has had the opportunity to review the revised EIS document and the responses to the stakeholder consultation.
01-Mar-22	Following a public consultation, NORI submitted an updated EIS to the Secretary-General, which was shared with the Commission.
14 - 18 Mar 2022	The Commission conducted an initial review of the updated EIS during Part I of the 27th Session.
21-Mar-22	The Secretary-General wrote to NORI, providing the Commission's feedback on a provisional review of the EIS submitted on 1 March in relation to the CSCT campaign.

¹ ISBA/27/C/16; [ISBA/27/C/16/Add.1](#) ; [ISBA/27/C/16/Add.2](#)

- 02-May-22 NORI responded to the Commission's feedback by submitting an Environmental Monitoring and Management Plan (EMMP).
- 4-15 Jul 2022 The Commission continued its review of the EIS, particularly the EMMP, during Part II of the 27th Session and determined that more information was required from NORI. A list of questions was provided to NORI with 30 days to respond. Taking into consideration that NORI would only be able to respond after the end of the 27th session, the Commission decided that a working group of the Commission would be tasked with continuing the review and reporting back to the Commission.
- 15-Jul-22 The Secretary-General wrote to NORI, providing the Commission's feedback on the EMMP, including the request for additional information.
- 01-Aug-22 NORI submitted the additional information requested by the Commission.
- 08-Aug-22 The working group of the Commission met virtually to review the submitted information and decided to meet with NORI.
- 11-Aug-22 The working group of the Commission met NORI virtually. The working group produced recommendations for consideration by the whole Commission. The Chair of the Commission put the recommendations on the silence procedure for the Commission's review.
- 30-Aug-22 The Commission's silence procedure began.
- 02-Sep-22 The Commission's silence procedure concluded and in the absence of any objection, the recommendations of the working group were adopted.
- 05-Sep-22 The Secretary-General notified NORI of the recommendations adopted by the Commission.
- Sep – Nov 22 NORI conducts integrated nodule collection system test. This includes three campaigns: one during the test and two after the test. (Two pre-test campaigns were conducted earlier in the year)
- 12-Jan-23 NORI emails the Secretariat notifying it of the status on how NORI is addressing ISA's recommendations in letter dated 05/09/2022, regarding: a) mid-water discharge plume, b) benthic sampling, c) post-disturbance monitoring (reproduced in annual report on 2022 activities)
- The Secretariat took note of the information.

SECTION II:

Supervisory activities carried out by the Secretariat in relation to the CSCT campaign

The Secretariat, through CARMU conducted a series of supervisory activities for the CSCT campaign. The inspection started on 23 June 2022 and concluded on 20 January 2023. The inspection activities included a pre-inspection planning phase, the review of documents and three separate visits on board to the two vessels involved in the campaign. Two of the visits were made before the offshore campaign started.

Date	Description
23-Jun-22	The inspection process was formally launched by the issuance of a formal notification of inspection by the Secretary-General to NORI.
13-Jul-22	The first inspection visit took place on board the Island Pride, a research vessel contracted by NORI for environmental monitoring activities in the NORI-D area in the CCZ. The visit took place in the port of San Diego, USA.
02-Aug-22	The second inspection visit took place on board the Hidden Gem, which was moored in Manzanillo, Mexico. This allowed the Inspection Team to visit the vessel before the start of the CSCT campaign.
18-Nov-22	The final inspection visit was conducted by three members of the Secretariat on board the Hidden Gem vessel immediately after its return to the port in Manzanillo, Mexico.
21-Feb-23	The inspection report (INSP/2023/NRU/001) was published on the website of the Authority. ²

² [Inspection report – Mining collector test – Feb 2023](#)

SECTION III:

Investigation of the overflow event occurred on 12 October 2022

Date	Description
12-Oct-22	A temporary overflow of water occurred during the production ramp-up sequence for the NORI collector test on board the Hidden Gem.
28-Oct-22	CARMU was informed verbally about the incident by NORI's strategic partner Allseas. The contractor notified that the incident was classified as minor based on an internal risk assessment against requirements from Annexes I, II, II and IV of the International Convention for Prevention of Pollution from Ships (MARPOL). The contractor assessed that the incident had not caused and did not represent a threat of serious harm to the marine environment with reference to Regulation 33 from Regulations on Prospecting and Exploration for Polymetallic Nodules in the Area
03-Nov-22	CARMU met with a NORI representative in Kingston, where a verbal summary of the incident was provided, which prompted a request to send a formal notification to the Secretariat.
04-Nov-22	The Secretariat received NORI's formal notification. The contractor stated that it was a temporary overflow with minor impact on the environment and that a more detailed report would be submitted as part of the NORI CSCT campaign report.
07-Nov-22	The Secretariat evaluated the information provided by NORI. Based on this information, it was determined that the spill was dominated by bottom seawater and not considered harmful to the marine environment. It was, however, concluded that the Secretariat required more specific information and therefore decided to include the incident in the scope for the upcoming post-collector test inspection vessel visit to Manzanillo, Mexico, to understand better how the event had occurred and what corrective action had been taken.
18-Nov-22	The ISA Inspection team conducted the final inspection on board the Hidden Gem. As part of the inspection, the team was provided with a presentation of the overflow event and NORI's evaluation of the potential effects on the environment.
20 & 24 Jan 2023	Upon request from CARMU, NORI provided additional information about the volume of overflow and estimated time for restoration to natural conditions of the environment and information about its risk assessment process and information about the sediment concentration in the overflow water.
27-Jan-23	An external expert (atdepth LLC) was contracted by the Secretariat to conduct an evaluation of the overflow based on the information provided by NORI.
10-Feb-23	atdepth LLC delivered a preliminary assessment with an evaluation of the spatial and temporal extent of the resulting plume for three different background concentration thresholds as published in the scientific literature using a scenario-based approach. atdepth LLC's assessment is included in annex 3 to the Investigation Report (INV/2023/NRU/001/Supp.1 ³)
15-Feb-23	A meeting was held between CARMU and NORI to obtain further clarification into NORI's initial estimates of water volumes and sediment concentration. NORI provided a

³ [Investigation report – Overflow event – Apr 2023](#)

presentation which elaborated on some of the initial estimates and provided answers to questions raised by the Secretariat in the time since the on-board visit on 18 November 2022. The presentation did not contribute significantly to improving available data quality. NORI explained that the Danish Hydraulic Institute (DHI) was working to compile and assess data from the spill and that assessment results would be provided at a later stage.

- 01-Mar-23 At depth LLC confirmed that new information from NORI did not alter its preliminary conclusion and submitted its final report with its advanced assessment to the Secretariat.
- Mar-23 An external scientific peer review was conducted by five external international scientists. They all supported the conclusion provided by atdepth LLC and did not identify any non-compliances. The peer reviews are included in annex 3 to the Investigation Report (INV/2023/NRU/001/Supp.1)
- 24-Apr-23 The Investigation Report was sent to NORI with an invitation to comment on the draft document by close of business on 26 April. No comments were received.
- 28-Apr-23 The Investigation Report (final version), INV/2023/NRU/001/Supp.1,[2] was sent to NORI and made publicly available on the Authority's website on 1 May.
- 01-May Investigation Report published on the Authority's website.