



INTERNATIONAL MARINE MINERALS SOCIETY

Secretary General
International Seabed Authority
14-20 Port Royal Street,
Kingston, Jamaica

15 October 2019

Dear Secretary General,

IMMS Comments on the Draft Regulations for the Exploitation of Mineral Resources in the Area

The International Marine Minerals Society (IMMS) commends the ISA on the progress it has made to date on the draft exploitation regulations. IMMS represents a number of marine minerals stakeholder groups from around the world, such as academia including students, government, civil society and industry. Expertise and fields of study of the membership base are diverse and broad reaching, with emphasis on oceanography, ecology and policy, for instance, in addition to mineralogy, shipping and economic geology. IMMS membership comprises members from 26 countries, both developing and developed, with all continents apart from Antarctica represented. IMMS does not represent any one stakeholder group or region of the world, but rather many.

IMMS is committed to providing feedback intended to assist the ISA in developing regulations that achieve both commercial viability and environmental responsibility. At this time, IMMS members see the draft regulations as substantive and do not have suggestions for major revisions.

The table below outlines the questions and/or suggestions raised by IMMS Membership.

Reference	Comment
Regulation 2, Fundamental Policies and Principles	How is this to be implemented?
Regulation 11 (2)	Is 30 days to respond long enough to fully respond?
Regulation 12 (4) b	How are independent competent persons defined to review exploitation proposals? Who selects them?
Regulation 13 (1) f	How are independent competent persons defined to review economic viability of a project? Who selects them?
Regulation 19 (2)	How is independent control of the activities executed if the ISA is a partner in the exploitation project through the Enterprise?
Regulation 39, Books, records and Samples	What will happen to the maps, etc, after the contract ceases? Should these be returned to the Secretary General? Or, is this already the case through annual reporting ?
Regulation 54	Who decides how money from the Environmental Compensation Fund is paid or distributed? On what basis?
Regulation 91	Is this vague?
Annex IV EIS	Has the geodynamic aspect been fully encompassed?
Annex IV EIS, 4.5 Geological Setting	Should “topographic” be “bathymetric” OR “seafloor topography”? Some concerns were raised about the term “bedrock”. Suggestion is to change wording to “Describe the geological setting, the nature and extent of the mineral resource and its host-rock or substrate. Provide a description of the regional geology, local geomorphological elements and bathymetric features of the site, including bathymetric maps”
Annex IV EIS, 4.8 Sediment substrate characteristics	This is geology. Consider including in Section 4.5 on host-rock or substrate
Annex IV, 7.4 Geological Setting	Consider changing the term “topography” to “bathymetry” or “seafloor geomorphology” or “bathymetric features”
Annex IV, 7.7, Seabed Substrate Characteristics	Should this be part of Section 7.4?
Appendix 1, Notifiable Event	Should a significant displacement of the seabed be included, such as a submarine landslide, caused either naturally or due to contractor disturbance? Such a disturbance could disrupt cable communications or cause tsunamis, for example.

IMMS appreciates the opportunity to provide comment and is pleased to grant its consent to the Authority to disclose the information in this document. IMMS welcomes the opportunity to participate in future aspects of ISA work and looks forward to continued progress and completion of the Mining Code. Only with this work complete can the world truly begin to benefit from the marine minerals of the international seabed area.