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Agenda item 14

Report of the Chair of the Legal and Technical Commission on the work of the Commission at its thirtieth session

Report of the Chair of the Legal and Technical Commission on the work of the Commission at the second part of its thirtieth session

I. Introduction

1. The second part of the 30th session of the Legal and Technical Commission of the International Seabed Authority was held from 23 June to 4 July 2025, with 30 members in attendance. Mariamalia Rodríguez Chaves and Joshua Tiwangye Tuhumwire contributed remotely in working groups meetings. The Commission noted that all eligible members who applied to the Voluntary Trust Fund to defray costs associated with their participation in accordance with [ISBA/23/A/12](#) received funding accordingly.

II. Activities of the contractors

A. Report on the status of the contracts for exploration and periodic reviews of the implementation of plans of work for exploration

2. On 23 June, the Commission took note of the Secretary-General's report on the status of exploration contracts, noting updates from one contractor regarding its internal corporate changes between January and May 2025; information on the status of periodic reviews conducted by the Secretariat; and the installation of submarine cables in the Clarion-Clipperton Zone.

3. The Commission requested that the Secretariat continue to keep it informed. Further discussions took place between members of the Commission and the Secretariat on its input to the review process for periodic review of contractors.¹

B. Implementation of training programmes under plans of work for exploration and allocation of training opportunities

4. On 23 June, the Commission was briefed on the implementation of training programmes since its last meeting. Members emphasized the importance of continuous assessment of the mid to long-term impacts of the Contractors' Training

¹ ISBA/30/C/2/Add.1

Programmes (CTP) on beneficiaries and their overall contribution to knowledge development and participation in activities in the Area by their respective countries.

5. Members equally emphasized the need to raise the visibility of training opportunities to encourage more applications from different regions and from women, with the aim to improve geographic balance and gender parity. The Commission underscored the vital role of Member States in promoting the CTP nationally and nominating more candidates to expand and diversify the applicant pool.

6. On 3 July, the Commission finalized the selection of 37 candidates (from a total of 319 applicants) to participate in 10 training programmes being offered by 8 contractors. A detailed breakdown of the selection of candidates for training programmes under plans of work for exploration conducted between March and July 2025 is reported in ISBA/30/LTC/8. The Commission notes that in the current rankings, progress is being made towards achieving gender parity and that the current selection ratio is 60% men to 40% women.

C. Consideration of annual reports of contractors

Identification of contractors that have responded inadequately, or failed to respond, to the calls from the Council to address issues of concern identified by the Commission in relation to their contractual obligations

7. The Commission continued work initiated during the twenty-ninth session on assessing the contractors whose performance had been identified as potentially not being fully aligned with their contractual obligations with the Authority, in accordance with the criteria outlined in ISBA/29/LTC/5.

8. During the intersessional period from 4 to 6 May, the Commission, through the Secretariat and in accordance with the applicable modalities (ISBA/29/LTC/6), held informal virtual exchanges with five of the eight contractors initially identified as requiring further clarification following the assessment of their responses to the Commission's initial questions.

9. In line with the agreed procedure, the Commission determined that the following four contractors require continued attention regarding their performance and alignment with their contractual obligations

a). Resources (UKSR) I and II: The Commission reviewed communications received from the contractors, which were also made available by the contractors to Members of the Authority. The Commission noted that the ongoing bankruptcy proceedings of the parent company of UKSR I and II have put all activities on hold, leaving the contractors unable to provide any information on future planned activities at this time. While the Commission will continue to monitor developments, it observed that the contractors are currently unable to effectively continue performing in accordance with their approved plans of work. The Commission looks forward to the resolution of the bankruptcy process, as well as information on any revised plans of work and how these revisions will ensure the contractors meet their performance obligations.

b). Marawa Research and Exploration Ltd: The Commission took note of information provided by the contractor, which is also publicly available, regarding the termination of its agreement with its implementing partner, which has rendered the contractor unable to continue performing in accordance with its plan of work. In line with section 24.1 of the exploration regulations and of the standard clauses, the contractor informed the Commission that it has requested the Secretary-General to revise its contract, whilst suspending, temporarily, its obligations until a new partner is engaged. The Commission will continue to monitor developments and the contractor's performance. It looks forward to receiving updates on the search for a new partner, as well as information on a revised plan of work outlining how the contractor will comply with its obligations.

c) Cook Islands Investment Corporation: The Commission noted that the contractor has requested the Secretary-General to adjust its five-year programme of work, citing various factors aligned with industry best practices, current economic conditions, and regulatory challenges. During its engagement with the contractor and given what was assessed as continued inadequate performance in implementing its plan of work, the Commission observed that the request for adjustment was driven, among other reasons invoked, by regulatory uncertainty stemming from the unfinished exploitation regulations, difficulties in fostering investor confidence, and the volatility of the mineral market. While the Commission will continue to monitor the contractor's performance and looks forward to receiving updates on the requested adjustment and how the contractor intends to fulfil its contractual obligations under the revised plan of work, it considers it important to bring this broader policy issue, of invoking notably regulatory uncertainty to ask for an adjustment, to the attention of the Council.

10. In this part of its meetings, the Commission continued to review instances of inadequate performance and identified additional contractors requiring specific attention for the next cycle of review and in line with the applicable modalities. To this end, the Commission requested the Secretariat communicate its concerns to those contractors, with a view to undertaking a review of the responses provided in 2026.

General comments from the evaluation of annual reports

11. During the second part of its thirtieth session, the Commission considered 30 annual reports on activities carried out by the contractors in 2024, submitted pursuant to section 10 of the standard clauses for exploration contracts. The Commission expressed appreciation to the secretariat for its support in the evaluation of the annual reports. Following extant practice, the Commission set up three working groups to review the following aspects of the annual reports: legal, financial and training; geological and technological; and environmental. It dedicated 8 out of the 10 days of its meetings to the consideration of the annual reports within the respective working groups

Legal, financial and training aspect

12. The Commission noted that expenditure levels for a number of contractors had been far lower than estimated and reminded that explanations on the variance should be made by contractors who have not done so. On the other hand, some other contractors reported much higher expenditures indicating their strong commitments to their exploration work.

13. The Commission also noted that, while contractors generally have performed adequately, a number of them have limited their offshore exploration activities, including environmental studies and sampling. Instead, they focused on desk work and data analysis, invoking reasons related, inter-alia to, the continued absence of a regulatory framework for exploitation, uncertainties in the global economic conditions, as well as best industry practices. Although this fact does not constitute an instance of inadequate performance, the Commission considered it relevant to be brought to the Council's attention. The Commission also noted that some contractors have already asked for adjustments to their Plan of Work and/or Programme of Activities. Negotiations with the Secretariat on this are ongoing.

14. The Commission noted that a number of contractors referred to their training obligations and to the difficulties that arose in addressing training commitments foreseen for 2025, due to the decision of the Secretariat to discontinue some training options that had been negotiated and agreed with such contractors, in particular the deep dive and the national expert deployment programmes. While some contractors have successfully negotiated and agreed new schedules with the Secretariat, others are in the process of doing so. The Commission is aware of this fact and has considered such a situation, beyond the contractor's control, for the assessment of their training obligations as per this reporting year. The Commission further noted with concern that some contractors systematically defer their training obligations and as a result they now have multiple pending training obligations.

Geological and technological aspects

15. The Commission notes that, in general, contractors have performed their activities in accordance with their approved plans of work. Contractors who have undertaken activities beyond their planned scope for 2024 are commended. Contractors who have not achieved their planned objectives are encouraged to reassess their strategies and take necessary steps to get their schedules back on track. The Commission notes the discovery of by a contractor of new polymetallic massive sulphide fields.

16. The Commission also noted that most contractors have provided satisfactory responses to the geological and technical questions raised in previous report reviews. Most submitted reports were structured in line with the reporting template recommended by the Commission in ISBA/21/LTC/15. The Commission notes that not all contractors are fulfilling their data deposit obligations and reminds them that they must comply fully with all requirements outlined in ISBA/21/LTC/15, particularly section III (e.g., ship track, navigation, bathymetry). It also noted that contractors should improve delivery and quality of digital data and emphasized the need to follow the reporting templates, as a critical aspect for comprehensive and efficient data management and use.

17. The Commission notes that only a few contractors have made significant progress in testing mining components. Several contractors have not provided information on mining and processing technologies. The Commission observes that several contractors approaching the final five years of their contracts have yet to undertake resource estimation or begin developing mining equipment and testing protocols in preparation for the phase of exploitation. It requests that contractors nearing the end of their contracts provide information on their strategies for transitioning to exploitation.

Environmental aspects

18. Several contractors presented robust scientific studies in their annual reports. It was however not specified how this feeds into the contractor's plans for environmental baseline assessments, which serve as the basis for environmental impact assessments..

19. The Commission noted that there were still two major baseline data requirements that have not been adequately addressed by contractors. Firstly, systematic surface observations of seabirds, marine mammals, sea turtles and other megafauna. Secondly, sampling of pelagic biological communities (in the water column). The Commission notes that, in relation to the environmental baseline studies, several contractors are still not adequately addressing the requirements for sampling effort and replication for robust statistical analyses (ISBA/25/LTC/6/Rev.3).

20. The Commission reiterates the need to improve the definition and level of description in the programme of activities included in the annual reports of some Contractors. In several instances, Contractors give no indication of the level of sampling effort and spatial distribution in the following year. Some contractors have submitted annual reports with very large and multiple appendices. While the Commission appreciates Contractors making these appendices available, we encourage these Contractors to summarize the main methods and findings in the annual report. Moreover, we would like to stress that annual reports are meant to be stand-alone and complete documents and should contain a brief account of methodology including sampling design (illustrated with maps) and applied analytical techniques even if reported previously.

D. Consideration of applications for extension of contracts in accordance with the procedures and criteria for the extension of an approved plan of work for exploration pursuant to section 1, paragraph 9, of the annex to the Agreement relating to the Implementation of Part XI of the United Nations Convention on the Law of the Sea of 10 December 1982.

21. On 3 July, the Commission took note of the anticipated applications for extension of contracts. The Commission will work within the intersessional period to ensure that the submission and review of received extension applications are carried out in line with the process established under ISBA/21/C/19. As informed by the Secretariat, a total of eight contracts for polymetallic nodules (with Interoceanmetal Joint Organization, JSC Yuzhmorgeologiya, Government of the Republic of Korea, COMRA, Deep Ocean Resources Development Co. Ltd, Ifremer, Federal Institute for Geosciences and Natural Resources, and Nauru Ocean Resources Inc.) and one for polymetallic sulphides (with COMRA) are due to expire in 2026. It is expected that between 2025 and 2026 the Commission would need to consider extension applications by such contractors. A note will be prepared by the Commission with the support of the secretariat to assist contractors with their extension applications.

E. Relinquishment of areas under contracts for exploration for polymetallic sulphides and cobalt-rich ferromanganese crusts

22. On 23 June, the Commission took note of the relinquishment of two thirds of the contract area allocated to the Ministry of Natural Resources and Environment of the Russian Federation under its contract for exploration for cobalt-rich ferromanganese crusts.²

23. On the same day, the Commission concluded its consideration of the request for deferment of relinquishment submitted by the Institut français de recherche pour l'exploitation de la mer, which it had begun examining during the first part of its meeting.³ The Commission also reviewed a request from the Government of Poland for a two-year deferment of its first relinquishment to 11 February 2028 and its second relinquishment to 11 February 2030.⁴

24. The Commission, having examined the justifications and detailed information provided by both contractors, including the impacts of the coronavirus pandemic, as well as other unforeseen exceptional circumstances arising in connection with their respective operational activities, recommends that the Council approves both requests for deferment as contained in draft decisions annexed to this report (annex I and annex II).

F. Review of the environmental impact statements submitted by contractors.

25. On 1 July, the Commission concluded its review of the Environmental Impact Statement (EIS) submitted by Beijing Pioneer Hi-Tech Development Corporation (BPC).⁵ The Commission reviewed the EIS for completeness, accuracy and statistical reliability in accordance with 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.3 (the Recommendations).⁶

² ISBA/30/C/7 (soon to be published on the website)

³ ISBA/30/LTC/2

⁴ ISBA/30/LTC/7

⁵ ISBA/30/LTC/4

⁶ ISBA/25/LTC/6/Rev.3

26. BPC submitted an EIS for testing a polymetallic nodule collector and buffer station in its contract area the Northwest Pacific in the second half of 2025. The sea trials will last approximately 30 days and will include 100.5 hours of underwater mineral collection testing. The collection trajectory will extend less than 31.5 km. The test will be conducted within a 0.25 km² test area. The depth of disturbance is expected to be about 6 cm of surface sediment. According to numerical modelling, the sediment plume from the collector test area (CTA) may have a maximum vertical dispersion to 230 m above the seafloor (though most simulations were lower) and have a maximum diffusion distance of 5.4 km. Up to 7500 tons of wet nodules will be collected, and none of these will be lifted to the surface.

27. On 14 March, the Secretariat transmitted an initial set of questions from the Commission to BPC requesting additional information. Responses were received during the intersessional period on 24 March and 10 April. Subsequently, the Commission sent a further set of questions to BPC on 19 June, to which responses were provided on 23 June 2025.

28. The Commission considered that the environmental impact statement is well organized and well written and incorporates the elements required pursuant to annex III to the recommendations (ISBA/25/LTC/6.Rev3). It was noted that the contractor had incorporated suggestions arising from public consultation and comments from the secretariat. In addition, the contractor had responded to the Commission's comments and questions and incorporated its suggestions. The Commission considered, among other things, technology of the mining system, the limited nature of the biological baseline data, the assessment provided of test impacts, and the appropriateness of the monitoring plans. To ensure that test survey design was robust, discussion involved exchanges to evaluate sampling locations, numbers and density of sampling stations and gear types in their monitoring surveys, especially in their designated impact reference zone and collector test area.

29. A number of improvements to the monitoring plan design were suggested by the Commission, which BPC took careful note and agreed to implement, including the collection of additional benthic fauna samples prior to the collector test to further supplement the environmental baseline. The Commission concluded that the contractor had evaluated the main sources of risk from the impacts of the test and was satisfied with the assessment that the impacts are sufficiently localized to not cause a risk of serious harm.

30. In conclusion, the Commission has reviewed the EIS for completeness, accuracy and statistical reliability, in accordance with the recommendations, and undertaken an exchange of questions-answers with the applicant. It recommends the Secretary-General incorporates the environmental impact statements into the programme of activities under the exploration contract of BPC. A The final revised EIS document incorporating the revisions from the Commission's interactions with the contractor will be published on the website of the Authority in due course.

III. Regulatory activities of the Authority

A. Development of environmental threshold values

31. On 30 June, the Commission took note of the progress made by the intersessional expert group (IEG) with respect to the development of environmental threshold values for toxicity, turbidity and settling of resuspended sediments, and underwater noise and light pollution.

32. The Commission took note of the proposed approach to consider levels of impact along a spatial and temporal gradient away from the source of disturbance. It noted that such an approach is based on sound scientific basis and would allow the consideration of varying levels of environmental change, as well as help identify the

effects of the pressures on ecosystems, including cumulative effects. It further noted that such approach could guide environmental monitoring and mitigation efforts. The approach would also be useful in informing decisions of the Council on the level of harm that would be considered acceptable.

33. The Commission recalled that the development and review of threshold values relates to other parts of the regulatory framework, including other standards and guidelines and the draft exploitation regulations. The Commission took note of the revised timeline for finalization of the draft report of the intersessional expert group and its release for stakeholder consultations, currently projected for the last quarter of 2025.

B. Development of standards and guidelines for activities in the Area.

34. On 24 June, the Commission took note of the status of work in relation to the development of standards and guidelines to support exploitation in the Area. It recalled that at the twenty-fifth Session in 2020, the Council endorsed the development of standards and guidelines based on a three-phase, outcome oriented, approach.⁷

35. It recalled that during the twenty-seventh session in 2022, the Commission delivered to the Council for its consideration and adoption, ten standards and guidelines from phase one as well as a report summarizing the stakeholder feedback.⁸ Such phase 1 standards and guidelines, once considered by the Council, would be important supplements to the draft exploitation regulations and, as such, already contain important elements relevant to the revision of the list of possible standards and guidelines currently being under discussion at the Council. The Commission noted that once it receives guidance from the Council on what next steps are required and the nature of review required for the existing phase one standards and guidelines, it would consider the matter, for which sufficient resources would need to be allocated. It considered that the three-phase, outcome-oriented approach, continues to be the right approach, that would allow for structured completion of the relevant standards and guidelines, once the exploitation regulations are finalised.

IV. Environmental management planning

A. Development of regional environmental management plans in priority areas.

36. On 27 June, the Commission was briefed of recent activities related to the development of the Regional Environmental Management Plans (REMP) for the Northwest Pacific and Indian Oceans.

37. The Commission took note that three expert workshops had been convened, in 2018, 2020 and 2024, to support the development of the REMP for the Area of the Northwest Pacific Ocean.⁹ The Commission also discussed the results from the intersessional work led by the co-chairs of the expert workshops to advance the description of a proposed network of area-based management tools (ABMTs), based on the outcomes from the workshops and the scientific criteria outlined in the Recommendations on technical guidance for the development of REMPs.¹⁰ It is noted that the proposed network of ABMT together with its scientific rationale, will serve as a basis for management-focused assessment in the next step of the REMP development process.

⁷ ISBA/25/C/19/Add.1, section IV.A and Annex

⁸ Phase 1-10 guidelines (ISBA/27/C/3-ISBA/27/C/12) and ISBA/27/C/2

⁹ Report of the 2018 workshop available [here](#). Report of the 2020 remote workshop available [here](#). Report of the 2024 workshop available [here](#)

¹⁰ [ISBA/29/LTC/8](#)

38. The Commission was briefed on the results from the scientific workshop on the development of the REMP for the Area of the Indian Ocean, with a focus on the Mid-Ocean Ridges and Central Indian Ocean Basin, held in Qingdao, China from 27 April to 1 May 2025. This workshop built on the results of a previous workshop held in Chennai, India, in 2023 and further reviewed scientific data and information, and on this basis, the identification of potential ABMTs for that region.¹¹

39. The Commission took note that the outcomes of these expert workshops provided a solid scientific evidence base for formulating the key elements of the REMPs for the Northwest Pacific and Indian Oceans. In light of this, the Commission discussed the next steps for the development of the REMPs and decided to work intersessionally within its REMP working group to prepare for the next phase of expert deliberations which would focus on management assessment and drafting of REMPs. Although both regions will be considered, the North West Pacific REMP discussions are more advanced and these would be progressed as the priority region. The REMP structure will be aligned with the template in the standardized procedure for the development, establishment and review of regional environmental management plans.¹²

V. Data Management

40. On 30 June, the Commission took note of a presentation from the Secretariat introducing a draft term of reference for a comprehensive study of the Authority's data infrastructure and management. The study will assess the current digital infrastructure, identify gaps and opportunities and propose a future proof framework for the Authority. The Commission emphasized prioritizing resources for data management, recognizing its critical role in effective data collection, analysis, monitoring and compliance.

VI. Other Matters

41. The Commission took note of the key outcomes of the second Expert Scoping Workshop, Charting Future Horizons: Harnessing Advanced Technologies for the Protection and Sustainable Use of the International Seabed Area, which focused on "Monitoring," hosted by Kobe University and co-organized by the secretariat and KOBEC, between 10 and 12 of June. Some members of the Commission attended this workshop either on-line or in-person. The workshop aimed to showcase new and improved technologies that can support the efficient collection of scientific information from remote areas of the seafloor. The Commission noted that such technological advancements could enable more effective execution of environmental impact studies and other testing activities by contractors. The Commission discussed transferrable industry innovations which had been successfully applied in offshore mining industries.

¹¹ Report of the Chennai workshop information available <https://www.isa.org.jm/events/workshop-on-the-development-of-a-remp-for-the-area-of-the-indian-ocean-with-a-focus-on-the-mid-ocean-ridges-and-central-indian-ocean-basin/>

¹²–ISBA/30/C/3

Annex I

Draft decision of the Council of the International Seabed Authority on the deferral of the schedule of relinquishment upon request by the Institut français de recherche pour l'exploitation de la mer.

The Council of the International Seabed Authority,

Recalling that, on 18 November 2014 the Institut français de recherche pour l'exploitation de la mer (Ifremer) entered into a contract for exploration for polymetallic sulphides in the Mid-Atlantic Ridge with the Authority,

Recalling also regulation 27, paragraph 2, of the regulations on prospecting and exploration for polymetallic sulphides in the Area,¹³ which refers to the schedule of relinquishments of the area allocated to contractors,

Noting that, according to the schedule, Ifremer was required to relinquish at least 50 per cent of the original area allocated to it by 18 November 2022, being the end of the eighth year from the date of the contract, and at least 75 per cent of the original area allocated to it by 18 November 2024, being the end of the tenth year from the date of the contract,

Noting also that by letter dated 10 May 2022, addressed to the Secretary-General, the contractor requested a one-year deferment of the relinquishment schedule to 18 November 2023 for the first relinquishment and 18 November 2025 for the second relinquishment. To that end, at its twenty-seventh Session, the Council of the International Seabed Authority, acting on the recommendation of the Legal and Technical Commission, approved the request to defer the relinquishment schedule by one year. By that decision, the first relinquishment of 50 per cent of the contract area would have been due on 18 November 2023 and the second and final relinquishment of 75 per cent of the contract area would have been due on 18 November 2025.

Noting further that by a letter dated 18 June 2024 addressed to the Secretary-General, the contractor requested a further deferment of the schedule of the second and final relinquishment by one year, from 18 November 2025 to 18 November 2026,

Recognizing that the contractor has cited the coronavirus disease (COVID-19) pandemic and its residual impacts on the scheduling of its exploration cruises, the maintenance regime of its research vessel, and the completion and operational commissioning of its autonomous underwater vehicle (Ulyx), inter alia, as exceptional circumstances justifying the deferment,¹⁴

Recalling that, pursuant to regulation 27, paragraph 6, of the regulations, the Council may, at the request of the contractor and on the recommendation of the Legal and Technical Commission, in exceptional circumstances, defer the schedule of relinquishment, and that such exceptional circumstances shall include, inter alia, consideration of prevailing economic circumstances or other unforeseen exceptional circumstances arising in connection with the operational activities of the contractor,

Considering that the Legal and Technical Commission has found that the reasons presented by Ifremer qualify as “unforeseen exceptional circumstances arising in connection with the operational activities of the contractor” and has recommended deferring the schedule of the second relinquishment by two years to 18 November 2026.

¹³ ISBA/16/A/12/Rev.1, annex.

¹⁴ ISBA/30/LTC/2, paragraphs 5-8

Acting upon the recommendation of the Commission,

1. Determines that the reasons presented by Ifremer qualify as “unforeseen exceptional circumstances arising in connection with the operational activities of the contractor”;
2. Defers the schedule of the second relinquishment to 18 November 2026, as recommended by the Legal and Technical Commission;
3. Requests the Secretary-General to communicate the present decision to the Ifremer.

Annex II

Draft decision of the Council of the International Seabed Authority on the deferral of the schedule of relinquishment upon request by the Government of Poland

The Council of the International Seabed Authority,

Recalling that, on 12 February 2018, the government of Poland entered into a contract for exploration for polymetallic sulphides in the Mid-Atlantic Ridge with the Authority,

Recalling also regulation 27, paragraph 2, of the regulations on prospecting and exploration for polymetallic sulphides in the Area,¹⁵ which refers to the schedule of relinquishments of the area allocated to contractors,

Noting that, according to the schedule, the government of Poland is required to relinquish at least 50 per cent of the original area allocated to it by 11 February 2026, being the end of the eighth year from the date on which the contract was signed, and to relinquish at least 75 per cent of the original area allocated to it by 11 February 2028, being the end of the tenth year from the date on which the contract was signed,

Noting also that, by letter dated 30 April 2025, the contractor requested a two-year deferment of the first relinquishment to 11 February 2028 and of the second relinquishment to 11 February 2030 to enable it to better examine and understand its contract area and fulfil its contractual obligations,

Recognizing that the contractor has cited exceptional circumstances necessitating the deferment, including residual impacts of the coronavirus disease (COVID-19) pandemic on its exploration activities as well as the ongoing armed conflict in Ukraine along Poland's on eastern border and its effects on Poland's economy and government priorities¹⁶,

Recalling that, pursuant to regulation 27, paragraph 6, of the regulations, the Council may, at the request of the contractor and on the recommendation of the Legal and Technical Commission, in exceptional circumstances, defer the schedule of relinquishment and that such exceptional circumstances shall include, inter alia, consideration of prevailing economic circumstances or other unforeseen exceptional circumstances arising in connection with the operational activities of the contractor,

Considering that the Legal and Technical Commission has found that the reasons presented by the Government of Poland qualify as "unforeseen exceptional circumstances arising in connection with the operational activities of the contractor", and has recommended deferring the schedule of the first relinquishment to 11 February 2028 and of the second relinquishment to 11 February 2030.

¹⁵ ISBA/16/A/12/Rev.1, annex.

¹⁶ ISBA/30/LTC/7, paragraphs 4-10

Acting upon the recommendation of the Commission,

1. *Determines* that the reasons presented by the government of Poland qualify as “unforeseen exceptional circumstances arising in connection with the operational activities of the contractor”;
 2. *Defers* the first relinquishment to 11 February 2028 and of the second relinquishment to 11 February 2030, as recommended by the Legal and Technical Commission;
 3. *Requests* the Secretary-General to communicate the present decision to the government of Poland.
- _____