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Report to Stakeholders (ISBA/Cons/2015/1)
International Seabed Authority
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To whom it may concern:

Dear Sir or Madam,

I wish to comment the

Developing a Regulatory Framework for Mineral Exploitation in the Area

as follows:

1. General comment

I miss recommendations according to the applied technology, e.g. a discharge depth of tailings from board of the mining platform after first processing before transport to the land based processing unit. **Do not allow on sea metal processing!**



Tailings discharge should be done close to the seafloor to prevent impacts of the water column and the living fauna and flora therein.

Additionally it would save a lot of money and time consuming monitoring of the water column. A baseline study of the ecological conditions of the water column will be necessary to evaluate impacts after possible incidents which can happen during the exploitation and need monitoring.

2. Page 17: Size and location of exploitation area(s) covered by the plan of work

This information is absolutely necessary for the ISA to allow mining according to the arrangement of the mining blocks to minimize the impacts. The average size and the size of the smallest and largest mining block should be given as well as the distances between the mining blocks.

Information about the grade of metals is not necessary for the impact creation and evaluation!

3. Page 21: Independent technical expert working group / sub-committees

Consider setting up expert working groups or sub-committees to support the work of the Commission. Yes – I think it is necessary – detailed knowledge of experts required!

4. Page 24: Conservation of the natural resources of the Area

Visibility of processing and treatment of the ore should be stipulated – *this is not enough!*

Up to now less is said or published about processing and what will happen with the remains!

No mining should be allowed before these problems are solved!

5. Page 25: Vessels operating in the Area

Need to establish clear line of duties and responsibilities and co-operation between the Authority and the International Maritime Organization (IMO).

Absolutely necessary - see also part IV, page 29!

6. Page 30: Environmental management

Existing guidelines like OSPAR should be applied but adapt to new regulations/methods every second year.



7. Page 31: Emergency orders

As long as metal processing at sea will not happen larger accidents at sea will probably not occur. Unprocessed nodules or massive sulfides will not cause a major problem for the environment. Ship accidents or accidents on the mining platform will cause environmental problem – but not more or even less than during oil – and gas exploitation.

8. Page 32 and 34: Environmental bonds and performance guarantees and Seabed sustainability fund

Both are good ideas and hopefully feasible!

I hope this will help for further efforts to set up the regulations.

Kind regards

Dr. Gerd Schriever
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