

Report to Stakeholders (ISBA/Cons/2015/1)
International Seabed Authority
14-20 Port Royal Street
Kingston
Jamaica

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Date
24.04.2015

Dear Sir or Madam

Developing a Regulatory Framework for Mineral Exploitation in the Area – Report to Members of the Authority and all stakeholders of 13 March 2015
Draft Action Plan Annex II Contract for exploitation - Insurance

The German Insurance Association (GDV) is the umbrella organisation for all private insurers and reinsurers in Germany. Its 467 member companies, with about 216.000 employees, offer comprehensive coverage to private households, trade, industry and public institutions, through more than 458 million insurance contracts.

Member companies currently provide insurance to corporate clients active in prospecting and exploration of minerals in the Area, and aim to insure their clients as and when exploitation activities commence once the legal framework has been set down.

We thank the International Seabed Authority for the opportunity to comment on the design of insurance-related provisions to be incorporated in exploitation contracts. GDV will be happy, should the Authority find it to be potentially of assistance, to provide detailed input on any aspects concerning the workings of our national and the international insurance markets, fundamentals of risk appraisal and risk management relating to deep-sea mining, principles of liability insurance, relevant underwriting instruments and insurance policy wordings.

At this time we would however limit ourselves to a general observation, especially following on from experience gained with Section 16.5 of Annex IV of the Regulation on Prospecting and Exploration for Polymetallic Nodules.

Any insurance-related rules the Authority may consider should

- define minimum requirements of cover clearly and unambiguously so as to provide a level playing field for all prospective contract partners irrespective of their home jurisdiction.

Gesamtverband der Deutschen
Versicherungswirtschaft e. V.

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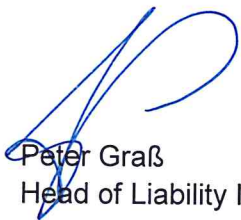
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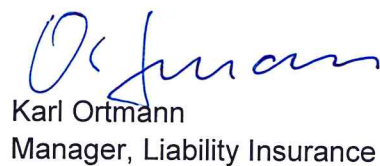
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- take into account the scope of cover and the capacities that national and international insurance and reinsurance markets are able to provide so these rules can be complied with by prospective contract partners. Insurance required by contract partners should be economically viable while providing a high level of protection for the environment and third parties' interests.
 - be in compliance with regulatory requirements in insurers' home jurisdictions.

GDV would welcome the opportunity to comment in detail on any insurance-related issues as and when they come under consideration by the Authority.

Yours faithfully



Peter Graß
Head of Liability Insurance



Karl Ortman
Manager, Liability Insurance