

From: CF Goldblatt [chris@fishreef.org]

Sent: 01 September 2018 16:23

To: Consultation

Subject: Draft Regulations -FISH REEF PROJECT (EXTERNAL)

Hello,

Our comments are follows

Thank you for a wonderful new set of draft regulations. UNCLOS, including Article 61 is very clear that restoration for impacts to the seafloor is required as a function of restoring populations of marine species. As such, we request that language be included in the environmental portion of the next draft regulations as follows :

“Restoration to the seafloor for impacts caused by deep sea mining is required and to be executed within five years of the initial impact occurrence. When not practicable to do so in the Area, in lieu means of restoration shall be accepted. Such means may include but are not limited to the restoration or enhancement of nearshore marine habitats for the purpose of fisheries enhancement. All restoration methods must include a transparent system to measure and qualify the exact benefits that occur, be third party verified and provide annual scientific reports tendered to the ISA. Qualified projects must utilize only time tested methods and materials. Approved methods and materials must have been tested and studied in at least 50 nations prior and over at least 20 years with a minimum of 50 peer reviewed studies to prove efficacy before than be used for the stated application.”

Thank you,

Chris Goldblatt

Fish Reef Project

310-488-6100