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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 first part of its thirtieth session

I. Introduction

1. The first part of the thirtieth session of the Legal and Technical Commission of the International Seabed Authority was held from 3 to 14 March 2025. A total of 26 members participated in the meetings, with Malcolm Clark (New Zealand) contributing to agenda items remotely by email. The Commission noted with concern that this represented the lowest attendance at the meetings since the beginning of its tenure. The Commission would welcome increased support from member States in ensuring that nominated members are provided with adequate time and resources to fully participate and engage in the work of the Commission.

2. On 3 March, the Commission re-elected Erasmo Lara Cabrera (Mexico) as Chair and Sissel Eriksen (Norway) as Vice-Chair for a third term. The Commission reviewed and took note of intersessional activities relating to its work carried out between July 2024 and February 2025.

II. Prospecting

3. On 3, 4 and 7 March, following on from its consideration of prospecting at its twenty-ninth session, the Commission noted that Argeo Survey had submitted a 2024 prospecting report.¹ It considered the key findings and noted that the survey undertaken by Argeo in April 2023 had been conducted with an autonomous underwater vehicle, which had collected a wide range of data including bathymetric and environmental data over 55 km². It further noted that during the survey, no mineral discoveries had been made; however, the survey had provided valuable data that would contribute to geological knowledge. The data collected had been submitted to the Authority.

* [ISBA/30/C/L.1](#).

¹ See [ISBA/29/C/7/Add.1](#).



4. The Commission noted that the prospector had complied with the regulations on prospecting and exploration for polymetallic sulphides in the Area. No additional surveys had been conducted in 2024.

III. 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

5. On 3 March, the Commission took note of the report of the Secretary-General on the status of contracts for exploration, the review of contractors' five-year periodic reports, updates with respect to extension agreements, and the status of relinquishments ([ISBA/30/C/2](#)). It welcomed the report and noted that the review of one periodic report had been completed, eight were in progress and one was delayed. Five reports are expected to be submitted to the Secretary-General in 2025.

6. The Commission asked the secretariat to keep it updated, particularly on the progress and timeliness of the periodic review processes for contractors.²

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

7. On 3 March, the Commission was briefed on the status of implementation of training programmes since its previous meeting in July 2024. During the intersessional period, based on the recommendations of the training subgroup, the Commission had selected 33 first-ranked and 19 reserve candidates. A breakdown of the selection of candidates by training programme under plans of work for exploration from July 2024 to March 2025 is contained in [ISBA/30/LTC/6](#).

8. The Commission noted that the Capacity Development Alumni Network (iCAN) plays a key role in monitoring the impact of the contractors' training programme and its other capacity development initiatives. The Commission commended the secretariat for holding a second call for applications in 2024, which led to the incorporation of 38 new members from 22 countries, bring the total to 118 alumni, of which 86 had been beneficiaries of the contractors' training programme. The Commission recommended leveraging the diverse geographical and disciplinary representation of iCAN members to enhance outreach and dissemination efforts related to the contractors' training programme.

C. Consideration of annual reports of contractors

9. The Commission continued the work initiated during the twenty-ninth session on assessing the performance of contractors in accordance with the criteria outlined in [ISBA/29/LTC/5](#), including the checklists and associated processes.

10. On 3, 5, 6, 10 and 11 March, the Commission reviewed responses from the eight contractors identified at its previous session as requiring specific attention. It noted that while some contractors had provided satisfactory responses, for others, further clarification and review was required.

11. To that end, the relevant contractors will be invited, through the secretariat and following the modalities set out in [ISBA/29/LTC/6](#), to a virtual exchange of views

² [ISBA/30/C/2](#), para. 6.

with the Commission in May 2025. The objective is to facilitate a detailed exchange of views on ongoing concerns, in line with the modalities, and enhance mutual understanding and expectations regarding the implementation of plans of work for exploration.

12. The Commission will report to the Council on the outcome of the exchange of views at the second part of its session in July 2025.

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

13. On 3, 11 and 12 March, the Commission considered requests to defer relinquishment from the Government of India ([ISBA/30/LTC/3](#)) and the Institut français de recherche pour l'exploitation de la mer ([ISBA/30/LTC/2](#)).

14. The Commission considered the request by the Government of India to defer its second relinquishment by two years. The Government noted that exceptional circumstances relating to the residual effects of the coronavirus disease (COVID-19) pandemic had adversely affected its exploration activities. The Commission accepted that there were reasonable grounds for the request and recommended that the Council approve the request for deferment submitted by the Government of India (see annex).

15. The Institut français de recherche pour l'exploitation de la mer requested to further defer its second relinquishment by one year, indicating the residual impacts of the COVID-19 pandemic and other operational challenges. The Commission considered it appropriate to request further details from the contractor regarding its request. The Commission will liaise with the contractor through the secretariat and revisit the matter at the second part of its thirtieth session.

E. Review of the environmental impact statements submitted by contractors

16. The Commission dedicated 8 out of 10 days to the consideration of two environmental impact statements submitted by China Minmetals Corporation (CMC) and Beijing Pioneer Hi-Tech Development Corporation (BPC). The Commission reviewed the environmental impact statements 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](#)).

17. On 7 March, a list of questions requesting additional information was sent to CMC, which responded on 12 March. After reviewing the responses, the Commission formulated an additional set of questions seeking further clarification. On 14 March, an initial set of questions requesting additional information was sent to BPC. The Commission noted that, in order to provide enough time for the consideration of the environmental impact statements from BPC, it would continue its analysis in the intersessional period, with a view to finalizing it at the second part of the current session.

18. On 13 and 14 March, the Commission considered the outcome of its review of the environmental impact statement submitted by CMC. It noted that the contractor plans to carry out testing of its prototype nodule collector vehicle from July to October 2025 in Block A-5 of the Contract Area in the Clarion-Clipperton Zone, in order to test the prototype collector vehicle and monitor and assess its environmental impact. The planned test comprises two separate sets of underwater operations. The total area of disturbance for the two tests is expected to be 0.1 km² in a collector test

area of 0.6 km². The total wet weight of nodules that will be collected is estimated at 1,300 tonnes, and that lifted alongside the collector vehicle to the surface platform is expected to be no more than 10 tonnes. The maximum impact range of the plume is expected to be 2.1 km horizontally and 124 m vertically. The range of sediment plume redeposition with thickness greater than 0.1 mm is expected to be no more than 1 km². The plume is expected to last for up to 3.5 days after the test.

19. The Commission considered that the proposed environmental impact statement is well organized and well written and incorporates the elements required pursuant to annex III to the recommendations. It was noted that the contractor had incorporated suggestions arising from 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, collector operations, the limited nature of the biological baseline data, the assessment provided of test impacts, and the appropriateness of the monitoring plans. To improve measurement of impacts relative to natural variability and to ensure that test survey design was robust, discussion with CMC 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. In synthesis, the Commission concluded that the contractor has 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.

20. In conclusion, and after the Commission reviewed the environmental impact statements for completeness, accuracy and statistical reliability, in accordance with the recommendations, it recommends the Secretary-General incorporates the environmental impact statements into the programme of activities under the exploration contract of CMC.

IV. Regulatory activities of the Authority

A. Development of environmental threshold values

21. On 7 and 13 March, the Commission took note of the progress made with respect to the development of environmental threshold values for toxicity, turbidity and settling of resuspended sediments, and underwater noise and light pollution by the subgroups of the intersessional expert group. It also took note that an alternate co-chair had been designated for the toxicity subgroup, Ellen Pape (Belgium). The Commission noted that, following the in-person meeting of the intersessional expert group held in Kingston in June 2024, the subgroups worked collaboratively during the intersessional period to prepare three chapters of the intersessional expert group report describing the work undertaken to date on evaluating thresholds for these three areas.

22. The Commission took note of the highlights of the intersessional expert group discussions, related to existing methodologies, approaches and data requirements from other industries and regulatory frameworks for the development of threshold values. The need to adopt an evolutionary approach in the development and review of threshold values, including adaptive management measures, was also noted. The intersessional expert group report is expected to identify scientific research needs and approaches for future review and development of thresholds.

23. The Commission noted the need to further consider appropriate spatial and temporal scales of plume effects and sound and light attenuation, as well as cumulative effects among these environmental pressures, and how the development

of threshold values relates to other parts of the regulatory framework, including other standards and guidelines and the draft exploitation regulations.

24. The finalization of the draft report of the intersessional expert group will continue to be a priority for the Commission, with a view to releasing a draft for stakeholder consultations at the thirtieth session, following which all comments received will be reviewed by the Commission and reported to the Council.

V. Environmental management planning

A. Development of a standardized procedure for the development, establishment and review of regional environmental management plans

25. At its twenty-ninth session, the Council requested the Commission to submit a revised standardized procedure for the development, establishment and review of regional environmental management plans to the Council before the first part of the thirtieth session, after consideration of the written comments received from the member States and observers of the Authority.³

26. The Commission noted that a total of nine submissions were received from member States and two observers, including one joint submission from three member States.⁴ The Commission worked during the intersessional period and dedicated 6 of its 10 days of meetings to considering and implementing the comments received from the stakeholder process. The Commission divided the comments into two categories: comments of a scientific and technical nature, and comments of a legal nature.

27. The Commission noted that, to the furthest extent possible, most substantive scientific and technical comments have been incorporated into the draft revised standardized procedure (ISBA/30/C/3), including overarching environmental goals and objectives for regional environmental management plans, criteria for the selection of experts to participate in scientific and management-focused workshops, and details related to the review process for regional environmental management plans. The Commission decided to recommend to the Council the consideration and adoption of the revised standardized procedure and the template.

28. On 13 March, the Commission considered other overarching issues that were raised in some of the written comments that fall within the remit and agenda of the Council, namely the nature of the regional environmental management plans and the standardized procedure, the role of an independent expert committee, and responsibilities in relation to regional monitoring:

(a) In relation to the nature of regional environmental management plans, the Commission noted that three member States and an observer had suggested that the standardized procedure and the plans should be legally binding. The Commission recalled that the Clarion-Clipperton Zone environmental management plan had been adopted pursuant to a decision of the Council, with legal effects deriving from the terms of that decision, such as on decision-making of the Authority, particularly in

³ ISBA/29/C/24, para. 12. The Council requested the Commission to develop a standardized approach for the development, approval and review of regional environmental management plans in the Area in its decisions ISBA/26/C/10, ISBA/27/C/44 and ISBA/29/C/24.

⁴ See <https://www.isa.org.jm/protection-of-the-marine-environment/regional-environmental-management-plans/standardized-approach/>.

approving plans of work. The Commission noted that the nature of regional environmental management plans remains an ongoing discussion in the Council.⁵

(b) In relation to the role of an independent expert committee, the Commission noted that five delegations (three member States and two observers) had emphasized the need for the creation of such a committee. The Commission noted that in the exercise of its competence, and in accordance with article 163 of the United Nations Convention on the Law of the Sea, it had the possibility to resort to external expertise. In that regard, the Commission recalled its practice of engaging effectively and inclusively with external experts and other stakeholders on regional environmental management plans, standards and guidelines, environmental thresholds and other similar scientific and technical processes, through workshops and public consultations.⁶ The Commission also recalled that the existing practice of the Commission leading such expert processes had proven to be effective, inclusive and in conformity with the cost-effectiveness principle stipulated in the Agreement relating to the Implementation of Part XI of the Convention.⁷

(c) With regard to responsibilities for regional monitoring among different organs of the Authority, the Commission recognized that regional environmental management plans aim to promote collaboration and cooperation as broadly as possible for managing and monitoring vast regional areas. The Commission requests that the Council consider how resources are to be allocated to support regional monitoring, noting that it would be a difficult issue to address without clarity on the legal nature of regional environmental management plans. The Commission recognized the importance of collaboration with scientific organizations and initiatives in carrying out monitoring at a regional scale and decided to further consider regional monitoring from a scientific and technical perspective in the recommendations.

29. The Commission noted that the standardized procedure would need to be aligned with the regulations on exploitation of mineral resources in the Area once these have been adopted. It noted that further definitions and descriptions by the Council would not constitute an obstacle for the adoption of the standardized procedure as recommended by the Commission. The Commission also noted that written comments had been received on the recommendations; the Commission agreed to revisit and revise the recommendations (ISBA/29/LTC/8) after the adoption of the standardized procedure by the Council.

B. Development of regional environmental management plans in priority areas

30. On 4 March, the Commission took note of recent activities related to the development of regional environmental management plans in the Indian and Northwest Pacific regions. The Authority will convene a scientific workshop in Qingdao, China, from 27 April to 1 May 2025 on the development of a regional environmental management plan for the Indian Ocean, with a focus on the mid-ocean ridges and Central Indian Ocean Basin. The workshop will be held in collaboration with the China Deep Ocean Affairs Administration, the First Institute of Oceanography of the Ministry of Natural Resources of China, and the secretariat of the Indian Ocean Rim Association.

⁵ See [ISBA/29/LTC/8](#).

⁶ See [ISBA/29/C/7/Add.1](#), annex.

⁷ See annex, sect. 1, para. 2.

VI. Data management

Review of the workplan of the strategic road map for data management of the Authority for the period 2023–2028

31. The Commission welcomed the progress made under the 2024 workplan of the strategic road map for data management of the Authority for the period 2024–2028 and endorsed the directions and priorities of the 2025 workplan. The workplan emphasizes the critical role of data in fulfilling the mandates of the Authority for effective management of seabed mineral resources and protection of the marine environment in the Area for the benefit of humankind.

32. The Commission noted that additional resources would be needed to deliver the workplan and increase the quality, availability and accessibility of data on the Area. It underlined that such efforts are necessary for effective governance of the Area and to advance deep-sea research, including through the entry of contractors' historical data into the DeepData database, which is important to support evaluation of both temporal and spatial variability in environmental parameters. In addition, the Commission recommended enhancing the interoperability and interconnection with other relevant global databases through integration of metadata on some of those other relevant data sources and sets. The Commission considered it important to draw this to the attention of the Council so that it may consider exploring options for securing the necessary resources and mobilizing support to ensure these objectives are successfully achieved.

VII. Matters referred to the Commission by the Council

Identification of criteria which the Commission could use to decide whether to hold open meetings in accordance with its rules of procedure

33. The Commission noted that during the twenty-ninth session, the Council, in its decision on the reports of the Chair of the Legal and Technical Commission, reiterated the importance of transparency and urged the Commission to hold open meetings where appropriate and in accordance with the relevant rules of procedure, while ensuring the confidentiality of sensitive data and information (ISBA/29/C/24). To that end, on 7 and 11 March, the Commission discussed extensively the best approaches and criteria for implementing the Council's request within the scope of its current work schedule and priorities.

34. The Commission agreed on the importance of the matter and will continue to hold open meetings where appropriate and in accordance with its rules of procedure. Such meetings provide ample opportunity for the Commission to engage with members of the Authority, experts and other stakeholders. Open meetings would be held when issues of general interest to members of the Authority, which do not involve the discussion of confidential information, are being discussed, in line with rule 6 of the Commission's rules of procedure. In addition, in accordance with rule 53, the Commission will invite a member of the Authority to send a representative to attend meetings when a matter particularly affecting that member is being discussed. It may also invite any State or entity conducting activities in the Area for the purposes of consultation and collaboration, as deemed appropriate.

35. The Commission reaffirmed its commitment to its current practice of presenting the Chair's report to the Council and engaging in dialogue during sessions. It also intends to continue with its practice of holding side events during the second part of

the Council's sessions, as these have proven valuable over the past two years in strengthening dialogue with member States and stakeholders. The Commission discussed ways to further utilize and possibly expand this approach to enhance engagement, openness and transparency in its work.

36. The Commission recognized that several of its recent initiatives have contributed to increased transparency and engagement. These include the establishment of expert groups, such as technical working groups involved in drafting standards and guidelines and the organization of technical workshops on specific matters, such as the development of regional environmental management plans. Such initiatives continue to serve as valuable platforms for engaging experts and stakeholders. Lastly, the Commission will continue to explore cost-effective options such as the holding of informal webinars to engage with stakeholders on non-confidential aspects of its work.

Annex

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

The Council of the International Seabed Authority,

Recalling that, on 26 September 2016, the Government of India entered into a contract for exploration for polymetallic sulphides in the Central Indian Ocean with the Authority,

Recalling also regulation 27, paragraph 2, of the regulations on prospecting and exploration for polymetallic sulphides in the Area,¹ which refers to the schedule of relinquishments of the area allocated to contractors,

Noting that, according to the schedule, the Government of India was required to relinquish at least 50 per cent of the original contract area allocated to it by 26 September 2024, being the end of the eighth year from the date of the contract, and at least 75 per cent of the original contract area allocated to it by 26 September 2026, being the end of the tenth year from the date of the contract,

Noting also that the Government of India, by letter dated 11 May 2023, requested a deferment of the schedule of the first relinquishment from 26 September 2024 to 30 September 2026 and the Council considered this request during the twenty-eighth session, acting on the recommendation of the Legal and Technical Commission, and approved the request for deferment,² and that, as a result, the contractor would be required to submit its first relinquishment of at least 50 per cent of the original area allocated to it by 30 September 2026, and its second relinquishment of at least 75 per cent of the original area allocated to it by 26 September 2026,

Noting further that the Government of India, by letter dated 28 November 2024, requested a two-year deferment of the schedule of the second relinquishment from 26 September 2026 to 30 September 2028,

Recognizing that the contractor has cited residual impacts of the coronavirus disease (COVID-19) pandemic and the overlapping schedules of the first and second relinquishments as exceptional circumstances necessitating the deferment,

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 India 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 30 September 2028,

¹ ISBA/16/A/12/Rev.1, annex.

² ISBA/28/C/22.

Acting upon the recommendation of the Commission,

1. Determines that the reasons presented by the Government of India qualify as “unforeseen exceptional circumstances arising in connection with the operational activities of the contractor”;
 2. Defers the schedule of the second relinquishment to 30 September 2028, as recommended by the Legal and Technical Commission;
 3. Requests the Secretary-General to communicate the present decision to the Government of India.
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