



## Council

Advance Unedited Version  
6 March 2026

English only

---

### Thirty-first session

Council session, part I

Kingston, 9-20 March 2026

Item 13 of the provisional agenda\*

**Report of the Chair of the Legal and Technical  
Commission on the work of the Commission at its  
thirty-first session**

## **Report of the Chair of the Legal and Technical Commission on the work of the Commission at the first part of its thirty-first session**

### **I. Introduction**

1. The first part of the thirty-first session of the Legal and Technical Commission of the International Seabed Authority was held from 23 February to 6 March 2026. A total of 33 members participated in the meetings. Mark Alcock contributed to the consideration of agenda items via email.

2. The Commission noted that, despite the resignation of 2 members, the participation of 33 members represented a significant increase compared to its previous meeting. The Commission reiterates its request to member States to ensure that nominated members remain actively engaged in its work and are provided with adequate time and resources to fully participate in each two-week meeting of the session.

3. On 23 February, the Commission elected Sissel Eriksen (Norway) as Chair and Edwin Egede (Nigeria) as Vice-Chair. The Commission thanked Mr Erasmo Lara Cabrera (Mexico) who successfully concluded his term as the Chair of the Commission. On the same date, the Commission reviewed and took note of intersessional activities relating to its work carried out between July 2025 and February 2026.

### **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**

4. On 23 February, the Commission took note of the report of the Secretary-General on the status of contracts for exploration, including the review of

---

\* ISBA/31/C/L.1

contractors' five-year periodic reports, updates regarding extension agreements, and the status of relinquishments.<sup>1</sup>

5. The Commission was also updated on the submission by UK Seabed Resources Ltd (UKSR) of its revised programme of activities for the third five-year period under the UKSR I contract, as well as the submission of a periodic review report in respect of the UKSR II contract.

6. The Commission provided suggestions aimed at strengthening and clarifying the periodic report review processes undertaken by the Secretariat. The Commission was also briefed on the outcomes of the eight annual contractors meeting held in Goa, India in September 2025, and was provided feedback on the items relevant to its work.

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

7. On 23 February, the Commission was briefed on the status of implementation of training programmes since July 2025. It noted that since 1994, a total of 568 training opportunities has been offered to personnel of developing States and the Authority through contractors training programmes. Of this figure, 46 per cent of placements went to the African Group, 34 per cent went to the Asia and Pacific Group; 1 per cent to Eastern European Group; and 19 per cent to the Group of Latin American and Caribbean States. A breakdown by gender shows that cumulatively 61 per cent of training placements went to men and 39 per cent to women.

8. The Commission noted that for 2025, 64 training opportunities were offered, for which, 513 applications were received. 26 per cent of applicants were women. Cumulatively, 48 per cent of the selected candidates were duly qualified women representing a near 50/50 per cent gender balance in keeping with the mandate to gender and geographical balance, to the extent possible, as well as in line with the Authority's commitment under the Women in Deep-Sea Research (WIDSR) project.<sup>2</sup>

9. Between July 2025 to February 2026, the Commission selected 29 first-ranked candidates and 23 reserve candidates for training placements. During the present session, the Commission continued its selection process in respect of four additional training opportunities under three contracts for exploration for polymetallic nodules, namely: one master's fellowship offered by Tonga Offshore Mining Ltd.; one master's fellowship offered by Nauru Ocean Resources Inc.; and two professional training placements offered by Global Sea Mineral Resources NV. A breakdown of the selection of candidates by training programme under plans of work for exploration for the period from July 2025 to March 2026 is contained in document ISBA/31/LTC/5.

## **C. Consideration of annual reports of contractors**

*Assessment of Contractors whose performance may not be fully aligned with their contractual obligations*

10. The Commission continued 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. On 23, 26, 27

---

<sup>1</sup> See ISBA/31/C/3

<sup>2</sup> One of the eight **Voluntary Commitments** registered by ISA at the 2017 and 2022 UN Ocean Conferences **#OceanAction40786** towards **"Enhancing the Role of Women in Marine Scientific Research."**

February, 2, 3 and 4 March the Commission reviewed responses from the nine contractors identified at its previous session as requiring specific attention. It noted that whilst some contractors had provided satisfactory responses, others required further clarification and review.

11. The Commission agreed to transmit additional questions to the relevant contractors, requesting that all written responses be submitted to the Secretariat by 31 May 2026. The Commission will continue consideration of this matter as part of the review of the annual reports during the second part of its meetings and report to the Council accordingly.

*Implementation of the Council's decision relating to a request of additional information from contractors at risk of non-compliance with their contractual obligations*

12. The Commission was informed of the steps undertaken by the Secretariat to implement paragraphs 9 and 10 of the decision of the Council in relation to the report of the Chair of the Legal and Technical Commission (ISBA/30/C/19). The key findings by the Commission in relation to the responses received from all Contractors are contained in an addendum to the present report ISBA/31/C/4 Add.

#### **D. Consideration of applications for extension of contracts.**

13. The Commission took note that eight applications for extension of approved plans of work for exploration for polymetallic nodules had been received from the following contractors; listed in the order of receipt: (i) Interoceanmetal Joint Organization, (ii) JSC Yuzhmorgeologiya, (iii) the Government of the Republic of Korea, (iv) China Ocean Mineral Resources Research and Development Association (COMRA), (v) Deep Ocean Resources Development Co. Ltd. (DORD), (vi) Institut français de recherche pour l'exploitation de la mer (Ifremer), (vii) Federal Institute for Geosciences and Natural Resources (BGR) and (viii) Nauru Ocean Resources Inc (NORI).<sup>3</sup> The Commission dedicated 23, 24, 25, 26 and 27 February, and 2, 4 and 5 March to the consideration of these extensions in the order of receipt, however owing to the limited timeframe and workload of the Commission for this part, it concluded its review of six out of the eight applications; noting that both of the remaining applicants have their contracts expiring after the second part of the thirty-first session of the Commission.

14. The Commission used its extant three working groups to review the geological and technological aspects, the legal, financial and training aspects and the environmental aspects, of the applications. In reviewing the applications, the Commission adopted a two-stage approach. The first considered reasons for extension and whether these were beyond the contractors' control, which served as the basis for its overall recommendation. The second consideration was the comments, questions and recommendations on aspects on how the applications should be improved, especially in relation to the Programme of Activities.

15. Following extensive deliberations in the plenary meeting held on the first week, members of the Commission raised various questions in relation to applications in fulfilment of the requirements set out in decision ISBA/21/C/19\*. Further details were requested regarding specific, measurable, and contract-area-based plans, enhancements to gap analysis quality, technology development planning, and baseline data reporting, inter-alia. Additional information was also sought concerning under-expenditure and insufficient at-sea training. The Commission's questions, comments and recommendations were transmitted to the

<sup>3</sup> SBA/31/LTC/3/Rev.1

six applicants addressing the financial, technical, scientific, and environmental information previously submitted.

16. The Commission recalled that, pursuant to paragraph 12 of the procedures and criteria, if it considered that a contractor had made efforts in good faith to comply with the requirements of the contract for exploration, but that, for reasons beyond its control, had been unable to complete the preparatory work necessary for proceeding to the exploitation stage, or if the prevailing economic circumstances (such as those encountered in the global markets and low metal prices) did not justify proceeding to the exploitation stage, then it was to recommend the approval of the applications.

17. It noted that the formulated questions, comments and recommendations to the respective contractors would be reflected in the proposed programme of activities for the extension period, giving due account to the issues raised by the Commission to each request for extension. These will be progressed through interaction between the Secretary-General and contractors to finalise the programme of activities as an annex to the extension agreement. Such matters included, inter-alia, for contractors to provide checklist tables indicating key gaps in information affecting their plans to progress to exploitation in terms of technical or environmental requirements. Noting that this would provide a clear context for the description of methods and activities to be done during the extension period as per their respective annual schedules.

18. The Commission further noted that in justifying their request for extension, contractors referred to two issues. The first was the absence of a regulatory framework for exploitation and the associated legal uncertainty and impacts on key financial and institutional matters, insurance issues. The second was that of economic considerations, and they described the volatility in international mineral markets and prices. Having concluded that the information provided by the applicants met the criteria set out in decision ISBA/21/C/19 and that all applicable procedures had been complied with, the Commission recommends that the Council approve the six applications. The recommendations of the Commission in respect of each of the reviewed applications are contained in documents ISBA/31/C/6-11.

#### **E. Review of the environmental impact statements submitted by contractors**

19. The Commission took note that on 9 February 2026, the Secretary-General received from the Federal Institute for Geosciences and Natural Resources (BGR) its Environmental Impact Statement (EIS) in relation to the proposed small-scale testing of an AI-controlled nodule collector “Eureka III” to be tested in the eastern part of its polymetallic nodule contract area in the Clarion-Clipperton Zone in the third quarter of 2027.

20. The Commission noted that the Secretariat will undertake a completeness check in line with ISBA/25/LTC/6/Rev.3 following which the Commission will undertake its evaluation of the EIS during the intersessional period for completeness, accuracy and statistical reliability and thereafter report its findings to the Council during the second part of the session.

21. The Commission adopted a guidance note to aid its work with the support of the Secretariat in the review process for EIS for exploration. The guidance note will also be provided to the Contractors for their information.

### **III. Consideration of applications for approval of plans of work for exploration**

22. On 8 September 2025, the Secretary-General received an application for approval of a plan of work for exploration in the Clarion-Clipperton Zone in the

Pacific Ocean, from Impossible Metals Bahrain W.L.L. (IMB). An executive summary of the application is available in document ISBA/31/LTC/2.

23. The application was presented to the Commission by the applicant on 24 February (remotely) and 5 March 2026 (in-person). A list of questions and comments were sent to the applicant in writing and responses were provided on 3 March 2026. Following the meeting of 5 March, further questions and comment were prepared by the Commission for the applicants. The Commission agreed to continue its consideration during the second part of its meetings in the thirty-first session.

#### **IV. Regulatory activities of the Authority**

##### **A. Development of environmental threshold values**

24. On 27 February, the Commission took note of the progress made in the development of environmental threshold values relating to toxicity, turbidity and the settling of resuspended sediments, as well as underwater noise and light pollution, by the subgroups of the intersessional expert group (IEG). The Commission noted that the co-chairs of the respective subgroups met in Kingston from 18 to 20 February 2026 to further refine the IEG report on the development of environmental threshold values.

25. The Commission further took note of key methods and findings to support the development of ecological reference points that may be used in the development of environmental threshold values for mineral exploitation in the Area. It noted that a zone of impact approach was used in this, building on existing practices from other industries. The IEG report is intended to provide a science-based framework to inform the Commission's development of Standards and Guidelines, whilst recognising the need for social and economic considerations in informing decisions of the Council regarding the level of harm that would be considered acceptable in relation to the definition of specific threshold values.

26. The Commission noted that the IEG report on the development of environmental thresholds will be released for public stakeholder consultation during the intersessional period of the thirty-first session. The Secretariat will assist the Commission with the consultation process in terms of collating the comments and feedback on the text. The Commission is expected to consider the IEG report and the outcomes from the stakeholder consultation process in the last quarter of 2026 and make its recommendation to the Council during the thirty-second session in 2027.

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

27. On 27 February and 5 March, the Commission considered the status of work relating to the development of standards and guidelines to support exploitation activities in the Area. The Commission agreed to continue work during the intersessional period for the purposes of mapping the proposed list of standards and guidelines, identifying updates to the existing drafts as well as possible duplications. This exercise will allow the Commission to stand ready to start work on the matter, once it receives guidance from the Council on what next steps are required and the nature of them. For those reviews, the Commission noted that sufficient resources would need to be allocated. It considered that the existing three-phase, outcome-oriented approach continues to be the right one and would allow for structured and timely completion of the relevant standards and guidelines.

## **V. Environmental management planning**

### **A. Development, establishment and review of regional environmental management plans.**

28. On 2 March, the Commission took note of the recent developments related to Regional Environmental Management Plans (REMPs), and planned activities to advance the development and review of REMPs for the next three years.

29. In particular, the Commission was briefed about the progress made by its drafting group in formulating the draft REMP for the north-west Pacific Ocean, and preparations towards a workshop to be held in Busan, Republic of Korea in May 2026. The workshop will focus on management approaches, in line with the standardized procedure for the development, establishment and review of the REMPs (ISBA/31/C/21). The workshop will also provide opportunities for experts and representatives of different stakeholder groups to share information and views on the proposed management measures as identified in the latest draft REMP for the north-west Pacific Ocean, before the draft is finalized and released for a stakeholder consultation, tentatively scheduled for the second half of 2026.

30. The development of the REMP for the Indian Ocean will follow similar steps, with an indicative timeline to complete the Commission's work in 2027. The Commission will further consider the review of the environmental management plan for the Clarion-Clipperton Zone and the draft REMP for the northern mid-Atlantic Ridge (ISBA/27/C/38) as requested by the Council.<sup>4</sup>

31. The Commission noted that the Recommendations on technical guidance for the development of REMPs in support of the Standardised Procedure and Template (ISBA/29/LTC/8) will be aligned with the REMP standardized procedure and revised as required.

## **VI. Data management**

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

32. On 24 February the Commission welcomed the progress made under the 2025 workplan of the Data Management Strategic Roadmap for 2023–2028 and endorsed the directions and priorities of the 2026 workplan. The Commission also noted the progress made regarding the assessment of the Authority's data infrastructure and management; further review of which will continue during the intersessional period.

33. The Commission emphasized prioritizing financial resources for data management, recognizing its critical role in effective data collection, analysis, monitoring and compliance.

---

<sup>4</sup> [ISBA/27/C/38](#), para. 13.

## **VII. Matters referred to the Commission by the Council**

### **Development of an election mechanism for the Economic Planning Commission.**

34. The Commission took note and discussed the report by the Secretariat on the procedural mechanisms for the election of the Economic Planning Commission on 26 and 27 February and 4 March. The Commission's recommendation to the Council following its review is contained in the annex to this report.

## **VIII. Other Matters**

### **The potential implications and opportunities of the operation of the Agreement on Marine Biological Diversity of Areas beyond National Jurisdiction on the work of the International Seabed Authority**

35. On 6 March, the Commission took note of the report by the Secretariat on the potential implications and opportunities of the operation of the Agreement on Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement) on the work of the International Seabed Authority.<sup>5</sup> It noted the Authority's future engagement in several processes under the BBNJ Agreement, including activities related to contractors' sampling of marine genetic resources, consultations on area-based management tools, collaboration on environmental impact assessment standards, capacity-building initiatives, and information exchange mechanisms.

36. The Commission noted the need for proactive engagement with the bodies established under the BBNJ Agreement to ensure the development of procedures to support timely technical input, particularly in relation to proposals for area-based management tools that may intersect with the Authority's mandate.

### **Further Revised Consolidated Text of the draft Regulations on Exploitation of Mineral Resources in the Area**

37. On 6 March, the Commission took note of updates on the status of negotiations within Council in relation to the Further Revised Consolidated Text of the draft Regulations on Exploitation of Mineral Resources in the Area. Noting that since 2019 when the Commission submitted the first draft to the Council, the draft regulations have undergone extensive negotiations and revisions. The commission took note of the broad changes as well as the key outstanding issues such as matters related to environmental externalities in the royalty system, financial incentives, liability, inspections and compliance mechanisms, confidentiality, and the development of standards and guidelines, inter-alia.

### **ISA Mentorship programme "SEE HER EXCEED (S.H.E)"**

38. On 6 March, the Commission was briefed by the Secretary-General on the S.H.E. (See Her Exceed) Programme within the context of the Authority's mandate to promote capacity-building and gender empowerment initiatives. The Commission took note of the successful pilot cohort of S.H.E. programme which contributed to advancing the careers of women experts from developing countries in deep-sea-related fields. They provided feedback on the potential launch of a legal track within the S.H.E. Mentorship Programme,

<sup>5</sup> ISBA/31/C/2

as well as guidance on the wider dissemination of the Gender Practical Guidance to Promote the Safe Participation of Women in At-Sea Activities.

---

**Annex****Draft Recommendation of the Legal and Technical Commission on an election mechanism for the members of the Economic Planning Commission**

1. The Legal and Technical Commission has considered the note by the Secretariat ISBA/31/LTC/4 on the proposed mechanism for the election of the members of the Economic Planning Commission, submitted pursuant to paragraph 2 of Council decision ISBA/30/C/17. In such decision, the Council requested the secretariat to prepare a proposal for election mechanisms of the Economic Planning Commission, in consultation with the Legal and Technical Commission for technical input only, for consideration by the Council during the first part of its thirty-first session.
2. The Commission recalls that, in accordance with articles 163 and 164 of the United Nations Convention on the Law of the Sea, as modified and supplemented by sections 1 and 7 of the annex to the 1994 Agreement, the Economic Planning Commission is a subsidiary organ of the Council and, as provided for in the Convention, shall be composed of 15 members elected by the Council from among candidates nominated by States parties, with appropriate qualifications in the area of competence of the Commission, taking due account of the need for equitable geographical distribution, the representation of special interests, and the representation of developing States whose economies are substantially affected by exports of the relevant categories of metals.
3. The Commission notes that, pursuant to the 1994 Agreement, it has to date performed the functions of the Economic Planning Commission and, in that capacity, has accumulated institutional experience relevant to the phased operationalization of the Commission, including the establishment of its membership. In that sense, the Commission highlights the importance of the work of the Economic Planning Commission, *inter alia*, for the “purposes of considering the potential impact of mineral production from the Area on the economies of developing land-based producers of those metals that are likely to be most seriously affected, with a view to minimizing their difficulties and assisting them in their economic adjustment, taking into account the work already done by the Preparatory Commission”.<sup>6</sup>
4. The Commission considers that the approach proposed by the Secretariat for the first election of the members of the Economic Planning Commission, based *mutatis mutandis* on the Authority’s established practice for elections to subsidiary organs of the Council, is technically sound, consistent with the Convention and the 1994 Agreement, and appropriate to ensure transparency, inclusiveness and sufficient time for States parties to nominate suitably qualified candidates<sup>7</sup>.
5. The Commission is of the view that, from a legal, technical and institutional perspective, the proposed elements of the election mechanisms — including the nomination timeline, qualification requirements, including a suggested indication of the areas of expertise required, circulation of candidates’ information, application of geographical distribution criteria and safeguards to ensure compliance with article 164, paragraph 1, of the Convention — provide a coherent and workable framework for the election of the members of the Economic Planning Commission.

---

<sup>6</sup> 1994 Agreement relating to the Implementation of Part XI of United Nations Convention on the Law of the Sea of 10 December 1982, annex, sect. 1, para. 5 (e)

<sup>7</sup> Paragraph 18 of ISBA/31/LTC/4

6. The Commission further underscores the importance of the Council establishing a clear formula for the allocation of seats among the Authority's established regional groups, on the basis of equitable geographical distribution, the representation of special interests, and the representation of developing States whose economies are substantially affected by exports of the relevant categories of minerals. In this connection, the Commission refers to paragraph 15(d) and (e) of section 3 of the annex to the 1994 Agreement as providing relevant guidance for such allocation, particularly with respect to the application of equitable geographical distribution and the representation of special interests.

7. Taking into account its own experience in election processes and in performing the functions of the Economic Planning Commission, the Legal and Technical Commission recommends that the Secretary-General transmit the proposed election mechanisms to the Council for consideration during the first part of its thirty-first session, in accordance with paragraph 2 of decision ISBA/30/C/17, including the rationale referred to in this recommendation.

8. The Commission stands ready to provide any additional legal and technical clarification that the Council may request in the context of its consideration of the election mechanisms for the Economic Planning Commission.