



GSR

Global Sea Mineral Resources

Response to the comment received through the public participation organized by the Belgian Authorities

Natuurpunt



Introduction

On 14 January 2013, the International Seabed Authority (ISA) and Global Sea Mineral Resources NV (GSR) signed a 15-year contract for exploration of polymetallic nodules. Under the contract, GSR will have the exclusive rights for exploration for polymetallic nodules over 76,728 square kilometres of the seabed in the eastern part of the Clarion-Clipperton Fracture Zone (CCFZ) of the central-east Pacific Ocean (GSR contract area is located between 122°W and 128°W longitude and between 13°N and 16°N latitude and an average water depth of about 4,500m).

After the successful trial of the Track Soil Testing Device (TSTD), GSR developed 'Patania II', integrating nodule collection and driving components. This pre-prototype vehicle will be trialled for the first time in the *in-situ* environment of the deep sea in April 2019.

Aligned with the ISBA/19/LTC/8 "*Recommendations for the guidance of contractors for the assessment of the possible environmental impacts arising from exploration for marine minerals in the Area,*" GSR recently submitted the prior EIS to the International Seabed Authority (ISA) and to the Belgian Authorities and decided to publish the prior EIS in the interests of transparency. The prior EIA was open for comment during two months (from 1 July 2018 to 31 August 2018) on the website of the Federal Public Service Economy Government of Economy, SMEs, Middle Classes, and Energy. Five of the received reviews were considered.

The following document includes the official response by GSR to the review by the Natuurpunt (contact: Krien Hansen, krien.hansen@natuurpunt.be). The comments are addressed as written in the document *20180830_reactieNatuurpunt_OOtestGSR.pdf* (30/08/2018), one by one. The initial remarks by Natuurpunt are set out in italics and grey and the response by GSR in non-italics and black to allow contrasts if printed in black and white.

It has to be noted that the majority of the comments/remarks sent by Natuurpunt concerns the procedure and its link with the decision making process. Therefore, GSR is not in the best position to answer these remarks.

GSR appreciates the remarks received and considered the exercise really constructive. All the lessons learnt will be the basement of the next Environmental Impact Statement submitted for the deep sea mining technology development and trial during the exploration phase.

Remarks and responses

- 1. Natuurpunt waardeert het feit dat de federale overheid en Global Sea Mineral Resources NV de milieueffectenverklaring onderwerpen aan een openbaar onderzoek. De milieueffectenverklaring heeft een specifieke techniciteit, waarvoor binnen Natuurpunt de kennis ontbreekt om die te kunnen evalueren. De onderstaande opmerkingen hebben daardoor enkel betrekking op de verdere procedure voor de evaluatie en eventuele uitvoering van deze test.*

GSR appreciates this acknowledgment.

- 2. Welke onafhankelijke instantie zal de gebruikte methodologie en uitwerking van deze milieueffectenrapportage beoordelen?*

GSR, as a contractor, does not have the authority to answer this remark. It should therefore be directed by the reviewer to the International Seabed Authority being the regulator in the first instance, with a copy to Belgium and Germany as Sponsoring States.

3. *Op basis van welke criteria zal bepaald worden of deze test onomkeerbare milieuschade zal veroorzaken of niet?*

This is a fundamental part of this experiment and will be managed by the scientific independent JPI-O MI2 assessment/monitoring, by sampling through the gradient of plume. An important part of the project is dedicated to (1) identify suitable indicators for ecosystem health and (2) define threshold values for harmful effects on the environment. The results will assist the ISA in the further knowledge building and creating a qualitative evaluation framework.

4. *Zal de Belgische overheid op basis van een in opdracht van haar uitgevoerde onafhankelijke beoordeling beslissen over haar steun voor de uitvoering van de test?*

GSR, as a contractor, does not have the authority to answer this remark. It should therefore be directed by the reviewer to the International Seabed Authority being the regulator in the first instance, with a copy to Belgium and Germany as Sponsoring States.

5. *Indien uit een onafhankelijke beoordeling zou blijken dat er onherstelbare milieuschade zou optreden tijdens de test, zal de Belgische overheid haar steun voor de test dan intrekken?*

GSR, as a contractor, does not have the authority to answer this remark. It should therefore be directed by the reviewer to the International Seabed Authority being the regulator in the first instance, with a copy to Belgium and Germany as Sponsoring States. Please also refer to the answer of the *Remark 3* regarding the independent assessment by the JPI-O MI2 consortium.

6. *Indien uit een onafhankelijke beoordeling zou blijken dat er onherstelbare milieuschade zou optreden tijdens de test, zal de Belgische overheid de International Seabed Authority dan vragen de test niet te laten plaatsvinden?*

GSR, as a contractor, does not have the authority to answer this remark. It should therefore be directed by the reviewer to the International Seabed Authority being the regulator in the first instance, with a copy to Belgium and Germany as Sponsoring States. Please also refer to the answer of the *Remark 3* regarding the independent assessment by the JPI-O MI2 consortium.

7. *Naast deze opmerkingen over de evaluatie en opvolging van deze milieueffectenverklaring, pleit Natuurpunt ook voor een grondig maatschappelijk debat over de noodzakelijkheid van diepzeemijnbouw, gebaseerd op wetenschappelijke kennis.*

GSR, as a contractor, does not have the authority to answer this remark. It should therefore be directed by the reviewer to the International Seabed Authority being the regulator in the first instance, with a copy to Belgium and Germany as Sponsoring States. In addition, we believe this remark has no relevance to the object of the review, which is to evaluate the scientific merits of the environmental tasks GSR proposes to undertake to measure the effects of its collector component trial.

8. *Natuurpunt rekent er op dat de federale overheid met de huidige transparantie zal verder werken en de reacties en antwoorden van dit openbaar onderzoek ook zal publiceren.*

GSR, as a contractor, does not have the authority to answer this remark. It should therefore be directed by the reviewer to the International Seabed Authority being the regulator in the first instance, with a copy to Belgium and Germany as Sponsoring States.