

The Republic of Nauru's Stakeholder Consultation Process for the NORI Collector Test Campaign Environmental Impact Statement Summary Report

October 2021 - March 2022

I. Overview

NORI Collector Test Campaign & Environmental Impact Statement

The Nauru Ocean Resources Incorporated (NORI) Collector Test [Environmental Impact Statement](#) (opens new site in a new tab; EIS) describes NORI's planned test of the polymetallic nodule collector system in the NORI-D lease area¹. The proposed approximately 60-day Collector Test is key to inform NORI's operational Environmental and Social Impact Assessment (ESIA)². The one-fifth scale Prototype Collector Vehicle will collect polymetallic nodules from the seafloor at a depth of 4,000 to 5,500 meters within the eight square kilometers test area. The Collector Test will monitor the system's performance and the ecological and environmental conditions. The scientific, environmental, and engineering data collected and knowledge gained during the Collector Test will increase understanding of the performance of the technology and potential impacts on the deep-sea ecosystem. If the EIS is approved by the International Seabed Authority (ISA)³, the Collector Test is scheduled to begin in the third quarter of 2022.

The NORI Collector Test EIS provides the ISA, its sponsoring State (the Republic of Nauru) and the global stakeholder community with a clear description of the Collector Test, including:

- Potential environmental impacts, risks, and hazards as well as the impact assessment methods and risk management prioritization and measures;
- The legal and regulatory framework, policy, standards, and guidelines;
- Uncertainties and assumptions;
- Details about the stakeholder consultation and review process; and
- Conclusions and recommendations.

¹ The NORI-D lease area is located in the eastern Clarion Clipperton Zone of the Pacific Ocean, between Hawaii and Mexico.

² Socio-economic issues are not addressed in the NORI Collector Test EIS and will be addressed in the operational ESIA.

³ The ISA is the governing body that organizes, regulates, and controls all mineral-related activities in international waters beyond the limits of national jurisdiction. The Collector Test will take place in international waters.

The EIS concludes that the Collector Test will not result in significant impacts or serious harm to the marine environment at a regional scale and should therefore proceed under the conditions described in the EIS.

Stakeholder Consultation Process

As the Sponsoring State to NORI, the Republic of Nauru conducted a stakeholder consultation from October 2021 through March 2022. This process provided the global stakeholder community with the opportunity to review, discuss, comment, and guide revisions to the NORI Collector Test EIS. The Republic of Nauru designed the consultation process with the intention for the process to be transparent and inclusive, including the diverse knowledge and expertise of the stakeholder community.

The stakeholder consultation process included two stakeholder community webinars on October 5, 2021 and March 7, 2022 and a 45-day public comment period from October 5, 2021 through November 19, 2021. In addition, third-party, neutral facilitators supported the design and facilitation of the stakeholder consultation process.

The Republic of Nauru developed the [Republic of Nauru's Stakeholder Consultation Portal](#) (opens new site in a new tab) website to make information and materials publicly available, including the original and revised NORI Collector Test EIS; public comment submissions and summary of NORI responses to comments; and the Republic of Nauru's formal notification to the ISA of intention for stakeholder consultation as well as response letter to EIS revisions. During the consultation period, the website provided stakeholders with options for submitting written comments using an electronic form or by downloading and emailing the form to a Republic of Nauru representative. Stakeholders could also RSVP to the webinars and access webinar agendas, presentations, and recordings via the website. Before the consultation process closed, NORI established a [NORI-D Project — Nauru Ocean Resources Inc.](#) website (opens new site in a new tab) to support ongoing information sharing.

II. Consultation

October 5, 2021 Stakeholder Community Webinar #1

On October 5, 2021, the Republic of Nauru, in partnership with NORI, convened the first of two stakeholder community webinars, [“An Introduction to the NORI Collector Test EIS and Stakeholder Consultation”](#) (opens new site in a new tab). The goal of this [webinar](#) was to initiate the stakeholder consultation period and address stakeholder questions about the opportunity to provide public comments on the Collector Test EIS.

Agenda

H.E. Ms. Margo Deiye, Ambassador of Nauru to the United Nations and Permanent Representative of Nauru to the ISA, welcomed webinar participants and shared her perspective on the importance of the Republic of Nauru as the Sponsoring State. Michael Clarke, Environmental Manager at The Metals Company (NORI's parent company), introduced the planned Collector Test EIS, including testing activities, anticipated impacts, and impact management measures and risk assessment. Corey McLachlan, Head of Stakeholder Engagement at The Metals Company, invited stakeholders to provide feedback on the NORI Collector Test EIS through the consultation process. Webinar participants had the opportunity to ask questions and share comments. At the close of the webinar, Ambassador Deiye thanked webinar participants and next steps were shared.

Discussion

During the webinar, several questions were asked about the potential impacts of the Collector Test on climate change and greenhouse gas emissions. NORI clarified that these impacts are crucial components of the operational ESIA as opposed to the Collector Test EIS based on the relatively small scale of this information-gathering experiment. In response to a question from a webinar participant, NORI stated that the test field for the Collector Test is 8 square kilometers (footprint of disturbed seabed <0.5 square kilometers). Given this scale, the EIS concludes that the potential environmental impacts of this study are negligible at the regional scale whether this scale is considered to be the NORI-D lease area or the broader CCZ.

Webinar attendees were interested to learn more about the environmental monitoring program. NORI shared that the environmental monitoring program is still under development. Scientists from the University of Hawaii, the UK National Oceanographic Centre, and the National History Museum will be engaged in long-term research to understand the impacts of operations, including those to the benthic ecosystem and marine mammals.

There was a discussion around the disturbance of seabed sediment. NORI shared that the amount of sediment entrained and released will be measured on board, and that it is anticipated that 90% of sediment that is captured during nodule collection will be discharged. In reference to a publication, NORI shared that flocculation is important for the benthic sediment plume. Engineering options and emergency response plans were also discussed with respect to minimizing sediment that is returned to the seafloor.

Two questions related to stakeholder engagement were posed. NORI confirmed that public comments would be submitted to the ISA and made available publicly. NORI also shared that stakeholders were engaged in the Collector Test EIA process 18 months prior

to this webinar, and that COVID-19 presented additional challenges for further engagement.

Questions about information submitted as part of The Metal Company's Security and Exchange Commission (SEC) filing were raised, but it was clarified that these were outside the scope of this discussion and interested participants were directed to Mr. McLachlan.

Public Comment Submissions

The Republic of Nauru received 19 [public comment submissions](#) (opens new website in a new tab) containing more than 600 individual comments on the EIS during the consultation process. Comments were provided by governmental and non-governmental agencies, academic scientists, industry representatives, and interested members of the public, submitted online via an electronic form or via email to a representative of the Republic of Nauru. Organizations and stakeholders not affiliated with an organization that submitted public comment are listed in alphabetical order in Table 1 in *V. Appendix*.

NORI identified 24 common themes among the public comment submissions and responded to those that were "valid, relevant, and novel" in a high-level [summary](#) (opens new website in a new tab). The decision-making process for categorizing comments is outlined in the summary.

Following the 45-day public comment period, the Republic of Nauru and NORI worked in partnership to review and respond to stakeholder comments and integrate stakeholder feedback into a revised EIS.

March 7, 2022 Stakeholder Community Webinar #2

The global stakeholder community was invited to a second webinar "[A Review of Stakeholder Feedback and NORI Collector Test EIS Revisions](#)" on March 7, 2022. This [webinar](#) (opens new website in a new tab) focused on summarizing responses to public comments that were received as well as sharing EIS revisions that considered public feedback. This webinar closed the consultation process.

Agenda

Ambassador Deiye welcomed webinar participants and provided a reminder of the stakeholder consultation goals and process. Mr. Clarke briefly introduced the planned Collector Test EIS and spoke about the common themes among stakeholder comments. In addition, Mr. Clarke detailed NORI's responses and relevant EIS revisions. Webinar participants engaged in a Q&A with representatives of the Republic of Nauru and NORI

and were provided information on how to stay informed and engaged following the close of the stakeholder consultation.

Discussion

Webinar participants were interested to learn about next steps and the role of stakeholders moving forward, with a desire for additional opportunities to inform the NORI-D project and Collector Test expressed. NORI commended the Republic of Nauru on the stakeholder consultation process and shared that the revised EIS was currently under review by the ISA's Legal and Technical Commission (LTC). While stakeholders would not have the opportunity to review the revised EIS, NORI informed attendees that public comment submissions and NORI's responses to comments were shared with the LTC to inform their evaluation. NORI encouraged stakeholders to stay engaged in the process and announced that there will be additional stakeholder community webinars and other opportunities to discuss and guide aspects of the project.

There was broad interest by webinar participants to understand the approach to environmental monitoring. While the scope is still being determined, NORI shared that the short- and long- term monitoring programs would include monitoring of the benthic mega-, macro-, and meio- fauna before and after the Collector Test disturbance as well as the mid-water and benthic plumes. In response to a question, NORI shared that the resources were allocated to those impacts that have the potential for causing significant harm. Light, for example, was not identified as a factor with the potential for significant harm for the Collector Test based on the application of a screening tool. The operational ESIA may include an assessment of additional impacts (such as light).

NORI also reflected on how the Republic of Nauru's stakeholder consultation process and interactions with the ISA will help to inform the ISA's development of EIS guidelines and protocols. NORI learned from some stakeholders during this process that the ISA recommendations could benefit from additional clarity. The current protocol is that sponsoring states work with stakeholders on the consultation process for proposed EISs.

Stakeholder Community Webinar Series Participation

In total, 143 stakeholders representing 89 organizational entities participated in the two-part stakeholder community webinar series. Participant organizations, in alphabetical order, are listed for the first and second webinar in Table 2 and 3 respectively in *V. Appendix*.

The results of an optional and anonymous poll conducted at the beginning of the webinars revealed participation from Africa, Australia, Europe, North America, Pacific Islands, and South America. Across both webinars, participants who responded to the poll self-identified as:

- 23% ISA observer or ISA member state
- 16% member of industry
- 22% scientist/researcher
- 23% civil society or interested individuals
- 16% government representative

III. Follow Up

The revised EIS, public comment submissions, and summary of NORI responses to comments were submitted to the ISA on March 2, 2022 for their consideration. This summary was shared with the ISA on May 23, 2022.

Ongoing Engagement Opportunities

NORI plans to host additional webinars to continue to engage the global stakeholder community and keep interested parties apprised of updates and progress related to the NORI-D project beyond the Collector Test. Engagement opportunities will be shared with the public on the NORI-D Project website. Stakeholders and interested members of the public who participated in the stakeholder community webinar series and/or submitted public comment will be notified via email of upcoming opportunities.

IV. Contact Information

After March 2021, please visit the NORI-D Project website at <https://metals.co/nori/> for informational updates. Please direct questions regarding the NORI-D project and upcoming stakeholder engagement opportunities to stakeholders@nori.nr.

V. Appendix

Table 1. Organizations (left column) and stakeholders not affiliated with an organization (right column) that submitted public comment are listed in alphabetical order.

Organizations	Non-affiliated Organizational Stakeholders
<ul style="list-style-type: none">● Deep-Ocean Stewardship Initiative: Patricia Esquete● Deep Sea Conservation Coalition: Ronna Mercado● Deep Sea Defenders: Carl van Warmerdam, Michael Drebert● Deep Sea Mining Campaign: Helen Rosenbaum● Federal Republic of Germany: Clemens Wackernagel● Government of the United Kingdom: Jack Collier● Government of the United States: Gregory O'Brien● MiningWatch Canada: Catherine Coumans● The Pew Charitable Trusts: Anindita Chakraborty	<ul style="list-style-type: none">● Christyne Cherry● Josh Diamond● Caleb Haynes● Jeff Hoffman● Andrew Nelson● Elisabeth Robson● Boris Wu

Table 2. Participant organizations, in alphabetical order, are listed for the first webinar “An Introduction to the NORI Collector Test EIS and Stakeholder Consultation” held on October 5, 2021.

Organizations	Organizations, Continued
<ul style="list-style-type: none"> • Advisory Committee on Protection of the Sea • Belgian Federal DG Environment • Blue Globe Solutions/ Global Sea Mineral Resources • CIIC Seabed Resources Limited - Cook Islands Seabed Minerals Authority • Deep Ocean Resources Development Co., LLC • DEME / GSR • Embassy of Mexico in Jamaica • Flanders Marine Institute • Globelaw • Griffith University • INGEN • International Association for Shell and Spatial Structures • International Seabed Authority • Krylov State Research Centre • Lalanga 4Cs Network • LBEG - State Authority for Mining, Energy and Geology (Germany) • MAR Ventures • Megalodonix • MiningWatch Canada • Ministry of Environment 	<ul style="list-style-type: none"> • Ministry of Lands & Natural Resources (Tonga) • MMS • National Deep Sea Center • Natural Resources Defense Council • Oceans For Generations • Pacific Network on Globalization • Pew Charitable Trusts • Picton Group • Republic of Nauru • The Metals Company • Toganivalu Legal (Fiji) • Tonga Offshore Mining Ltd • U.S. Department of Commerce, National Oceanic and Atmospheric Administration • U.S. Department of Interior, Bureau of Ocean Energy Management • U.S. Department of State • U.S. Geological Survey • University of Manchester • VNIIOkeangeologia • Woods Hole Oceanographic Institution • York University

Table 3. Participant organizations, in alphabetical order, are listed for the second webinar “A Review of Stakeholder Feedback and NORI Collector Test EIS Revisions” held on March 7, 2022.

Organizations	Organizations, Continued
<ul style="list-style-type: none"> • Advisory Committee on Protection of the Sea • Aveiro University • Belgian Public Service Economy • BGR - Geoscientific Authority Germany • Bigelow Laboratory for Ocean Sciences • BioConsult-SH • Blackbeard Biologic • Blue Globe Solutions/ Global Sea Mineral Resources • Boston University • Canada Fisheries and Oceans • Civil Society Forum of Tonga • Commonwealth Secretariat • Deep Ocean Resources Development Co., LLC • Deep Sea Conservation Coalition • Deep Sea Defenders • Deep Sea Mining Campaign • Deep-Ocean Stewardship Initiative • DEME / GSR • Duke University • E & E Solutions Inc. • Eigigu Solutions Corporation (Nauru) • Embassy of Chile in Jamaica • Embassy of Mexico in Jamaica • Florida State University • French Research Institute for Exploitation of the Sea • German Environment Agency 	<ul style="list-style-type: none"> • Ministry of Fisheries and Marine Resources Development (Kiribati) • Ministry of Lands & Natural Resources (Tonga) • Ministry of Tourism • Mission Structure for the Extension of the Continental Shelf • National Institute of Water and Atmospheric Research • Natural Resources Division (Tonga) • NSMA • NuROCK UK • Oceans For Generations • Opes Oceani • Pacific Network on Globalization • Permanent Mission of Kiribati to the United Nations • Pew Charitable Trusts • Prizma Solutions • Republic of Nauru • Royal Netherlands Institute for Sea Research • Ryan Rare Coins • Scripps Institution of Oceanography • SWR • TAP Investing • The Metals Company • The Ocean Foundation • The Pacific Community • Tonga Offshore Mining Ltd

<ul style="list-style-type: none"> • German Ministry for Economic Affairs and Climate Action • Globelaw • Griffith University • IGEBA - CONICET (University of Buenos Aires) • INGEN • International Seabed Authority • Japan Oil, Gas, and Metals National Corporation • Loke Marine Minerals • MarineSpace Ltd 	<ul style="list-style-type: none"> • U.S. Department of Commerce, National Oceanic and Atmospheric Administration • U.S. Department of Interior, Bureau of Ocean Energy Management • U.S. Department of State • U.S. Marine Corps • UK Centre for Environment, Fisheries and Aquaculture Science • UK Department for Environment, Food & Rural Affairs • UK Seabed Resources • University of New South Wales • VNIIOkeangeologia • Woods Hole Oceanographic Institution
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