

## Nautilus Response December 11, 2017

Thank you for the opportunity to comment on the recent report by Caritas.

It is disappointing to see that the section on Seafloor mining (section 3) contains almost no facts, is full of emotive language and claims, and is riddled with errors.

The more substantial errors that need correcting are;

1. On page 33 they claim that *“the environmental impact assessment was not available to stakeholders, and local communities had not given their consent”*. These two claims **are false**. Our EIS has been on our website since April 2009, and has been provided to various stakeholders in both electronic and hard copy format on request. The Executive summary was also translated into Pigin Language (PNG’s most common spoken language apart from their native language and English) to facilitate better dispersal and understanding amongst local communities. The EIS is also available at the Conservation Environment Protection Authority (CEPA) for collection by the interested parties and public. The application for the companies Mining Lease included 3 large public hearings in POM, Rabaul and Kavieng, attended by well over 300 people. As well as these, the company has also had numerous public engagements and education session with people throughout New Ireland (Consultation has reached over 30,000 people in the past 10 years).

It is important to note that under PNG law the granting of both exploration and mining licences requires regular stakeholder consultation, and the company has been consulting with nearby communities since 1997.

2. The claim on page 31 that *“We also don’t know how long it will take for the ocean to heal itself after the destruction the seabed mining will cause”* **is false**. Estimates for recovery of the vent sites at Solwara 1 from independent experts range from 3 to 5 years for most functions, with full ecosystem function likely restored well within 8 to 10 years.
3. The Caritas position on deep sea ecology (page 31) is not supported by the facts. Solwara 1 is probably the best studied deep sea ocean site on the entire planet. The companies work has been reviewed by external experts for the PNG government, the International Seabed Authority, and for external sources (eg Earth Economics, Cardno (for SOPAC), etc). All of these reviews have confirmed that seabed mining has limited environmental impacts, and has positive net benefits. The studies also have confirmed the companies projections that;
  - There will be no impacts from mining above 1,300m bsl, or beyond the Mining Licence
  - There will be no impact on tuna fisheries, or reefs.
  - The area directly impacted by mining will comprise ~0.1km<sup>2</sup>
  - There will be no tailings or engineered waste dumps, unlike land based mining

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- No communities are directly affected (the site is ~35km offshore from West Coast of New Ireland and ~50km from Rabaul, East New Britain)
- No local communities require resettlement, and
- Sea floor mining will have a positive net benefit, even after calculating ecosystem function impacts.

The Minerals Recourse Authority (MRA) in PNG along with Nautilus Minerals have requested to meet with Cardinal Sir John Ribat on numerous occasions to discuss Seafloor Mining but to date he has not accepted any of these attempts to meet in person to discuss the topic.

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