Canadian Companies Deep Seabed Mining

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Canada's Extraterritorial Obligations:

Canadian Companies and Deep Seabed Mining

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1. INTRODUCTION

Deep seabed mining poses serious environmental threats to the ocean, ocean systems, marine eco-systems, all forms of marine life and species biodiversity. The environmental risks of deep seabed mining are manifold and include disrupting the critical role of deep sea ocean systems in storing and recycling carbon, thereby regulating the earth's climate; destroying marine habitats, wiping out species including millions yet to be discovered, and causing irreparable harm to insufficiently understood deep sea ecosystems. Deep seabed mining also poses risks to ancient cultural practices of indigenous people in the Pacific region/Oceania such as shark-calling, threatens national fisheries industries as well as food security, food safety, and the marine-based semi-subsistence livelihoods on which a majority of ocean-dependent people in the Pacific, and elsewhere in the world, survive.

The ocean sustains women across and beyond the Pacific by providing food, resources, and employment. Through seaweed farming, aquaculture, harvesting and processing, women play important roles in the fisheries industry which is a source of livelihood for many. Women often work in post-harvest activities and make up nearly 50% of the workforce in small-scale fisheries in many coastal communities. In some areas, women make up almost 90% of the workforce.

Canada-registered, venture capital start-up companies have been persistent and shady first movers in pushing to open the door to high risk experimental seabed mining, and a handful of individuals within them have been key players in this pursuit. Initially centered on mining metal deposits at hydrothermal vents on the seafloor of the Bismarck Sea within the territorial waters of Papua New Guinea (PNG), their interest turned to mining polymetallic nodules in the deep seabed of the Clarion Clipperton Zone in a region of the Pacific Ocean beyond national jurisdiction governed by the International Seabed Authority (ISA).

An autonomous intergovernmental regulatory body established under the UN Convention on the Law of the Sea (UNCLOS), ISA has a dual and conflicting mandate: to 'organise, regulate and control' all mineral-resource related activities in the Area ('the seabed and ocean floor and the subsoil thereof, beyond the limits of national jurisdiction') 'for the benefit of humankind as a whole' and 'ensure the effective protection of the marine environment from harmful effects that may arise from deep seabed related activities.' Within the ISA the latter mandate is given lower

priority, with more attention paid to preparing for the commencement of mining.

Mining the deep seabed, however, has become highly contentious. As ISA member states grapple with trying to complete negotiations on regulations and rules to govern mining activities in the deep seabed area, a steadily growing number of states are declaring moratorium positions to slow the rush to open up the deep seabed to this new, high risk, experimental extraction industry. Their concerns echo those articulated by conservation and environment groups, scientists and other professionals, sustainable development and human rights advocates, citizens' organisations and indigenous groups which have been campaigning for almost a decade, with some support from big corporations, to stop seabed mining commencing in what has come to be recognized as the last wilderness on the planet. By end of July 2024, the number of ISA member states which had announced a moratorium or precautionary pause position (in the case of France, an outright ban) reached 32.

Alongside the serious environmental concerns of member states supporting a moratorium or precautionary pause on deep seabed mining, there has been growing disquiet within and outside of the ISA about corporate capture of the regulatory body, the over-representation and undue influence of contractors, irregularities in decision-making and practices, and soft-pedalling on the marine protection mandate. Beyond the ISA, the continued propagation of a litany of falsehoods by the Canada-registered company at the forefront of the corporate push within ISA to commence mining in the CCZ – including confident announcements that mining the deep seabed is about to commence –is evidently inspiring the rise of other venture capital start-ups, similarly eager to join an expected imminent gold rush.

In July 2023 Canada became the 18th ISA member state to declare support for a moratorium on deep seabed mining. Despite its strongly articulated moratorium position, Canada is implicated in deep seabed mining in the Pacific Ocean through the activities of Canada-registered companies intent on profiting from deep seabed mining. The British Columbia-registered venture capital start up, The Metals Company Inc. (TMC), which has been fronting the profit-driven push to commence mining in the CCZ for several years and advancing disinformation to rationalize deep seabed mining, puts Canada under a spotlight since its activities directly conflict with Canada's official moratorium position.

This Shadow Report raises attention to Canada's extraterritorial obligations under international human rights laws to ensure that the activities of companies domiciled or registered in Canada but operating in territories beyond Canada's territorial borders do not cause environmental harm or violate the human rights of persons in other jurisdictions.

2. CANADA'S MORATORIUM POSITION

Canada's moratorium position on DSM began to emerge with a first statement on February 9, 2023, underlining the vital importance of protecting the global ocean, and committing to safeguarding its integrity, protecting marine ecosystems and wildlife and improving ocean governance:

'The protection, conservation, restoration, and sustainable and equitable use of the global ocean is essential for all life on earth, and we must continue to safeguard its integrity and connectivity. Canada will continue to lead global and national efforts toward enhancing the protection and restoration of vulnerable marine ecosystems and wildlife, including through active international engagement to improve oceans governance.

The February 2023 Statement declared that Canada had 'not taken part in the exploration of mineral resources in areas beyond national jurisdiction', [emphasis added], adding that:

'Canada believes that knowledge of the deep sea marine environment and of potential impacts of deep-sea mining is critical for any decision to authorize any seabed mining…. Seabed mining should only take place if effective protection of the marine environment is provided through a rigorous regulatory structure, applying precautionary and ecosystem-based approaches, using science-based and transparent management, and ensuring effective compliance with a robust inspection mechanism."

Canada would

'continue to uphold the principles, rights, duties, and obligations in the United Nations Convention on the Law of the Sea and negotiate in good faith on regulations to ensure that seabed activities do no harm to the marine environment

and are carried out solely for the benefit of humankind as a whole'[emphasis added].

On July 10 2023, as the 28th Meeting of the ISA Council in Jamaica opened, Canada announced a strong moratorium position, and clearly signaled its opposition to any attempt within the ISA to provisionally approve a plan of work for exploitation:

'in the absence of both a comprehensive understanding of seabed mining's environmental impacts and a robust regulatory regime' Canada 'supports a moratorium on commercial seabed mining in areas beyond national jurisdiction,' and would 'not support … provisional approval for a plan of work' [emphasis added]:

Addressing ISA member states, Canada's statement said:

"As we begin council meetings for Part II of the 28th International Seabed Authority (ISA) session, it is critical that the international community recognize its collective responsibility to safeguard the health and integrity of our shared global ocean for future generations. The Government of Canada is committed to the responsible and sustainable management and use of ocean resources. This requires the advancement of strong environmental, social and governance principles, and an adherence to science-based policy and decision-making. We recognize the importance of marine ecosystems as a climate regulator, and will continue to take and advocate for a precautionary approach to development—an approach that aligns with efforts to combat climate change and pollution, and to protect biodiversity and habitats." [Emphasis added]."

Canada's moratorium position is strong and unequivocally centred on a commitment to protecting the ocean, marine eco-systems and marine life; emphasizing that knowledge of the deep sea environment and of the potential impacts of deep seabed mining is critical to any decision to permit any mining; and flagging precautionary and eco-system based approaches and ensuring that deep sea mining is only permitted if it does no harm to the marine environment and is carried out solely for the benefit of humankind as a whole.

How Canada is implicated in deep seabed mining

Canada's statement that it had 'not taken part in the exploration of mineral resources in areas beyond national jurisdiction' suggested no knowledge or sense of responsibility for the activities of The Metals Company Inc. (TMC), the leading, high-profile, Canada-registered company in the vanguard of the corporate push to open the doors to the CCZ, and very well-known to ISA member states as its bold CEO, Gerard Barron, addressed the ISA Council in 2019 from the seat of one of its three state sponsors.

Canada may not have any links to companies registered in its tax-free jurisdiction, but as a State Party to several human rights treaties including the CEDAW, Canada has extraterritorial responsibility for the commercial and other activities of Canada-registered companies operating beyond national jurisdiction, where such activities cause or carry risks of causing serious environmental harm and/or violating the human rights of persons in other jurisdictions.

4 . CANADIAN COMPANIES PUSHING TO MINE THE DEEP SEABED

Over the last decade, 4 Canada-registered companies with ambitions of making massive fortunes from mining the deep seabed have been actively pursuing their interests in dubious ways. All four were established as venture capital start-ups and are inter-related. They secured licenses for underwater mineral explorations within the EEZs of several Pacific Islands states through rather devious means, and accessed tenements in the CCZ by targeting small Pacific Island states to sponsor them through what could be described as predatory partnerships.

Nautilus Minerals Inc., the first company to stake seabed mining claims in the territorial waters of Pacific Islands states was not initially Canada registered. It was founded by Australian geologist, Julian Malnic who had obtained claims to undersea exploration rights in PNG in 1995, established Nautilus Minerals Niugini Ltd and then filed for exploration rights from the PNG government. After geologist and prospector David Heydon joined the company in 2002, bought out Malnic's stake, and became CEO, he linked up with big mining companies in 2004 and 2006 through a joint venture with Placer Dome and merger with Canada's Orca Petroleum. The latter enabled Nautilus Minerals Inc. to register in Vancouver, British Columbia, in 2006, and list on Canada's TSX Venture Exchange.

In 2011 Nautilus secured a controversial mining license from the Papua New Guinea (PNG) government covering an area or 154,000 square kilometers of seabed within PNG's exclusive economic zone. Nautilus had also secured

(through Malnic) undersea exploration rights in the Kingdom of Tonga. The company went on to acquire exploratory licenses to huge swathes of the seabed in the EEZs of several other Pacific Island states, resulting in the acquisition of claims or prospects over a total of 370,000 square kilometers in Tonga, Fiji, Solomon Islands, and New Zealand'.

Nautilus 'had ambitions to be the world's first producer of copper, gold and silver mined in the deep', but its project to mine for metal deposits at hydrothermal vents within PNG's Bismarck Sea was highly controversial and triggered major community protests in PNG and a number of court actions. Communities in the affected area reported impacts on marine life disturbed by 24/7 noise and lights of operating vessels conducting exploration.

In 2019, before actual mining in PNG's seabed had begun, Nautilus went into administration. The company had however enjoyed a boom in investment backing triggered by big mining companies buying shares. After listing on the London Stock Exchange the company raised $100 million from public shareholders. Going public raised $300 million in all. Heydon was said to have 'almost singlehandedly ignited a …rush to mine mineral deposits on the ocean floor'. Before the company closed, Heydon, Barron and other early investors 'cashed out' and Nautilus sought protection from its creditors. Barron reportedly turned a $226,000 investment into $32 million. The PNG government which had been forced by Nautilus through arbitration in Australia to take a 15% stake, was left with a debt of AUD154 million.

Nautilus is no more, but those who led it profited hugely, raising suggestions that they were 'miners of markets and profits.' Its legacy continues in the Pacific Islands, where an inheritor of its many exploration rights in Pacific Islands states, is reactivating Nautilus' exploitation license to mine in PNG's EEZ. Former Nautilus' principals are in the forefront of the push to open mining in the CCZ.

DeepGreen Metals Inc., founded by David Heydon and his son Robert initially under the name DeepGreen Resources, was registered in British Columbia in 2011. Before leaving Nautilus, David Heydon had laid the groundwork for his mining ambitions in the CCZ by helping Nautilus set up wholly-owned subsidiaries in Tonga and Nauru, with a view to securing tenements in the CCZ through sponsorships from both Pacific Island states. In April 2008, Nauru and Tonga had sponsored applications to the ISA on behalf of Nauru Ocean Resources Inc. and Tonga Offshore Mining Ltd respectively. The sponsorships were deliberately sought by Heydon to enable his new company, to which both subsidiaries were later transferred, to access sites reserved for developing states.

Documents leaked to The New York Times, indicated that Heydon had benefited from being shown confidential data by ISA on the sites in the CCZ with the richest deposits of polymetallic nodules, and having sites he selected held for him while he 'went to find sponsors.' The sponsorship agreements between the Pacific Island sponsoring states and the company are confidential, although it is known (and confirmed by Barron) that Tonga, one of three sponsoring states under DeepGreen's predatory partnership arrangements, stands to earn $2 per tonne of recovered metals.

The Metals Company (TMC), the 3rd Canada-registered company actively invested in mining the seabed, evolved from DeepGreen Metals Inc., following a calculated merger in 2021 with US-registered Sustainable Opportunities Acquisition Corporation (SOAC), a recently formed shell company or SPAC (Special Purpose Acquisition Corporation), aimed at accessing US capital markets. TMC Inc was registered in British Columbia in 2021.

TMC holds "exclusive exploration and commercial rights to three of the 17 polymetallic nodule contract areas in the CCZ through its subsidiaries Nauru Ocean Resources Inc. ("NORI") and Tonga Offshore Mining Limited ("TOML"), sponsored by the Republic of Nauru ("Nauru") and the Kingdom of Tonga ("Tonga"), respectively. It also holds exclusive commercial rights through its subsidiary, DeepGreen Engineering Pte. Ltd.'s ("DGE") arrangement with Marawa Research and Exploration Limited ("Marawa"), a company owned and sponsored by the Republic of Kiribati ("Kiribati")".

TMC has been the most forceful of all Canada-registered companies, particularly on the PR front, repeatedly advancing a litany of arguments for deep seabed mining: the minerals from the seafloor are crucial for producing batteries for electric vehicles and other technologies needed for a green transition to renewable energy, and therefore a solution to climate change; mining the deep seabed is less destructive than terrestrial mining which devastates forests and eco-systems, displaces communities and entails child labour; biodiversity-wise the deep seabed is a desert; deep seabed mining offers development prospects for resource-poor Pacific Islands states. More recently, TMC has added 'defense' to its justification for mining the seabed, citing China's control of terrestrial supplies of

critical metals.

Within the ISA, TMC has been flouting established processes and procedures and employing all means at its disposal to speed up the commencement of mining in the CCZ. The deliberate action taken by the Republic of Nauru on June 30, 2021, on behalf of TMC's Nauru-registered but wholly-TMC-owned subsidiary, NORI, to jump start the commencement of mining in the CCZ even without regulations in place, put ISA member states under pressure to try and finalize mining regulations. Nauru's action has opened a side door to NORI/TMC to submit its plan of work and possibly have it approved provisionally, enabling mining in the CCZ to commence. This could see other mining companies following suit. Canada's statement that it would 'not support … provisional approval for a plan of work', indicated clearly that Canada will act to try and prevent any provisional approval decision being made.

In October 2022, TMC made a backdoor application to test its nodule collector vehicle on the seafloor, which was controversially approved by ISA's Legal and Technical Commission through mis-use of the 'silence procedure'- a closed 3-day process of decision-making introduced during the Covid period of lockdowns and meeting restrictions and intended for decision-making on administrative matters. The testing operation, which took place without proper compliance with environmental protection requirements, involved further rogue behaviour by TMC, which made 'a haul of 3,000 tons of the polymetallic nodules, mounded up in a glistening black pyramid nearly four stories high', over which Barron crowed, saying 'This is just the beginning'.

In its filings with the United States Securities and Exchange Commission (US-SEC) for the fiscal year ending December 31, 2022 TMC did not declare that it had already engaged in 'test mining' its nodule collector vehicle in the CCZ. Complaints were lodged against TMC for deliberate non-disclosures in its earlier US-SEC filings.

TMC's aggressive push to commence mining in the CCZ from 2023 is motivated by its determination, as the first mover seabed miner, to amass a fortune from mining the nodules on the deep seabed (estimated to be worth billions, if not trillions, of dollars) or else from selling the company after it has generated massive investor interest. TMC lost shareholders and PIPE investors after it merged with SOAC, and was trading around and below a $1 for many months. Obtaining provisional approval to commence mining is likely seen as a way to re-attract investors.

As the continuing and urgent work of scientists in the present UN Decade of Ocean Science reveal more and more about the critical importance of protecting this last undisturbed region of the planet that has been earmarked for plundering, TMC continues to disparage concerns about the serious environmental risks posed by deep seabed mining to deep sea ecosystems, and to the ocean's important climate regulating function. The company ignores growing calls for a moratorium from leading conservation and environmental organizations, including government and NGO members of IUCN; 827 marine science and policy experts; environmental and human rights lawyers; peoples' movements and parliamentary leaders in Pacific Island countries; environmentally conscious corporate entities; and a steadily increasing number of ISA member states. Meanwhile, a few more venture capital start-ups are emerging, likely encouraged by TMC's PR and offering new technology, like Impossible Metals, which has developed a robotic collection system.

Circular Metals Corp., registered in Toronto on 19 August, 2021, is the fourth Canada-registered company set up to mine the polymetallic nodules in the deep seabed by accessing a tenement through a small Pacific Island member state. Circular Metals was a completely unknown entity until a representative of the company quietly entered the capital of Tuvalu late in 2022. He managed to talk a government representative into agreeing to lodge an application with the ISA in December 2022 for an exploration contract on behalf of Circular Metals Tuvalu Ltd, a locally-registered but undoubtedly wholly-owned subsidiary of Circular Metals Corp. Following news of this development reaching Tuvalu's civil society groups and swiftly organized public resistance, the government rescinded the agreement and cancelled the application. Tuvalu joined moratorium supporting states in 2024.

From the foregoing, it should be clear that the Canada-registered companies pursuing seabed mining ambitions have been unscrupulous, predatory and single-mindedly profit -seeking in their activities. There is no regard shown for the environment or respect for marine life or concern for how the lives of people whose ocean their schemes will seriously impact, will be affected.

5. CANADA'S EXTRATERRITORIAL ENVIRONMENTAL AND HUMAN RIGHTS OBLIGATIONS

As Canada knows, deep seabed mining is fraught with serious risks of causing permanent, irreparable harm to the ocean, to ocean systems, to climate regulation, deep sea ecosystems and marine biodiversity. The transboundary environmental harm it will cause, affecting all forms of marine life in the midwater column, will profoundly affect the economic, social and cultural rights of communities which live closely and in kinship with the ocean, and are dependent on its bounty. Such rights which are at risk of violation include the right to life, the rights to food, food safety and food security; the right to a livelihood; the right to the highest attainable standard of physical and mental health; the right to an adequate standard of living, the right to development and the right to a clean, safe, healthy and sustainable environment.

For indigenous Oceanic people of the Pacific region, the Ocean holds profound spiritual, cosmological and historical significance. Causing irreparable harm to the ocean, ocean systems and marine life with which Oceanic people share kinship, not only violates their fundamental human rights, it disrespects and desecrates their intangible cultural heritage.

As a full supporter of the UN Declaration on the Rights of Indigenous Peoples, as announced in May 2016, Canada understands that recognition of the rights of indigenous peoples under UNDRIP applies to indigenous peoples everywhere. The rights of indigenous Oceanic people in the Island states of the Pacific region/Oceania include the right of self-determination over their resources, which first and foremost means the ocean, and marine life; and the right to free, prior and informed consent over developments that impact them. These rights are being ignored by profit-seeking companies determined to mine the deep seabed, and the states which support them.

Canada has extraterritorial obligations to ensure that its corporations operate with integrity in intergovernmental institutions and do not violate or put at risk the human rights of people living in countries beyond Canada's territorial borders by causing environmental harm.

Canada's obligations include ensuring that Canadian corporations positioning

themselves to profit from mining the deep seabed in international waters are brought into line with Canada's carefully considered moratorium position on deep seabed mining.

Canada has a responsibility to regulate the activities of transnational corporations registered in Canada but operating in territories - including international waters - beyond national jurisdiction, so that their activities do not violate the human rights of persons intergenerationally or cause transboundary environmental harm in regions beyond national jurisdiction.

Canada must meet its obligations under international human rights law to ensure that people and communities are protected from human rights violations committed by multinational business enterprises.

At its 3rd Universal Periodic Review (UPR), Canada accepted recommendations made by Thailand and Philippines respectively, that it

142.91 Take further steps to prevent human rights impacts by Canadian companies operating overseas, as well as ensuring access to remedies for people affected, and share Canada's practices as appropriate (Thailand); (Accepted)

142.92 Ensure that Canada's mining, oil and gas companies are held accountable for the negative human rights impact of their operations abroad (Philippines); (Accepted).

At its 4th Universal Periodic Review, in November 2023, the Republic of the Marshall Islands (RMI) made two requests of Canada, to:

"1. Prohibit Canadian-registered companies from conducting deep sea mining related operations in the Pacific Ocean; and

2. Hold the said companies accountable for environmental damage to oceans, marine life, and the seabed."

Disappointingly, Canada responded by stating that Canada has not sponsored any company seeking to mine the seabed beyond national jurisdiction.

The Republic of Marshall Islands knew that Canada had not sponsored a mining company seeking to mine the deep seabed, and very clearly referred to 'Canadian- registered companies'. By turning a blind eye to the Canadian company leading the push to open the door to deep seabed mining in international waters under the ISA's jurisdiction, even without robust mining regulations in place, Canada is surely abrogating its extraterritorial obligations.

6. SPECIFIC VIOLATIONS OF THE OBLIGATIONS CONTAINED IN CEDAW ARTICLES

There is heightened attention today to the extraterritoriality of human rights obligations. The CEDAW Committee in General Recommendations 28 and 30 clarified that 'States parties are responsible for all their actions affecting human rights, regardless of whether the affected persons are in their territory.'

The CEDAW Committee has recognized that environmental degradation threatens the enjoyment of many of the human rights explicitly protected under the convention.

These include:

(a) the right to the highest attainable standard of physical and mental health;

(b) the right to an adequate standard of living, including the rights to adequate food and safe and clean drinking water;

(c) the right to development.

In the spirit of Article 12 the Committee recognized the relationship between general environmental harms and the right to health in its Concluding Observations to Kazakhstan, expressing its "concern about the degree of environmental degradation in the country and its extremely negative impact on the health of the whole population, in particular women and children."

The Committee has further stated that the full enjoyment of all human rights under CEDAW can be impaired by general environmental degradation…

Article 14 of CEDAW recognizes the right to an adequate standard of living. Interpreting this right in relation to environmental harms, the Committee has focused on three particular forms of harm: climate change, general environmental degradation and environmental pollution.

The UN Independent Expert of the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment has reiterated that Human rights obligations relating to the environment include inter alia procedural obligations of States:

1. to assess environmental impacts on human rights and to make environmental information public, and

2. to facilitate inclusive participation in environmental decision-making

[States] have additional obligations to members of groups particularly vulnerable to environmental harm, including women, children and indigenous peoples, to protect them against environmental harm that interferes with the enjoyment of human rights, including harm caused by private actors.

Human rights under CEDAW that are implicated by environmental degradation and exploitation and State parties' procedural and substantive obligations relating to the protection of the environment that have been recognized by the Committee, include specific duties that are owed to members of particularly vulnerable groups, including women.

CEDAW has no explicitly stated definitive right to a healthy environment. However, the Committee has recognized that the Convention mandates State parties to undertake specific actions to safeguard a range of rights when these are jeopardized or compromised due to harm to the environment. State parties are therefore bound by clear substantive and procedural obligations to ensure the non-discrimination and inclusion of women in the development and execution of measures and policies aimed at protecting the environment.

Article 3 of CEDAW expressly provides for the right to development. It has emphasized the need for women to be part of all decision-making processes that seek to develop specific measures to counteract environmental

degradation.

The CEDAW Committee has also called for policies and measures addressing climate change and other environmental harms to incorporate the perspective of indigenous women. In doing this the Committee has sought to protect the rights of indigenous women to access the natural resources of their lands, water and natural resources.

Deep seabed mining poses serious threats to the enjoyment of all of the rights raised above. Women in coastal communities whose fisheries livelihoods and daily food depend on a healthy ocean have not been consulted, are not at the decision-making table, and are the least considered in discussions and decisions made at the ISA.

7. QUESTIONS FOR CANADA

1. What is Canada prepared to do to bring The Metals Company into line with Canada's moratorium position?

2. What steps is Canada prepared to take to elicit details of the predatory partnerships of Canadian companies with the Pacific Island States that have sponsored them to secure tenements in the CCZ and exploratory licenses from the ISA?

3. Can Canada verify and report back to the Committee the total number of ISA-issued exploration contracts held by Canada-registered companies in the Clarion Clipperton Zone?

4. Is Canada also willing to investigate how The Metals Company (TMC) came to secure so many exploration licenses for its wholly-owned subsidiaries from allotments reserved for ISA member states in developing countries?

5. Can Canada explain how it will hold deep seabed mining companies accountable for environmental damage their activities cause to oceans, marine life, and the seabed."

6. Will Canada undertake to ensure that their companies provide adequate insurance for their sponsoring Pacific Island states to cover the liability sponsoring states primarily hold under ISA contracts for any resulting transboundary harms caused by the mining activities of contractors?

7. Can Canada explain what it will do to ensure that any mineral exploitation to be carried out on the deep seabed in international waters by a Canadian company will be 'solely for the benefit of humankind as a whole' (bearing in mind 'intergenerational benefits' as well as transboundary risks), and not for the short-term, private gain of a venture capital, Canadian company?

8. How would Canada ensure access to remedies for men and women in island and coastal communities affected by the harm Canadian companies mining in the CCZ may cause?