

**INTERNATIONAL TRIBUNAL FOR THE LAW OF THE SEA
SEABED DISPUTES CHAMBER**

**CASES 34 & 35 CONCERNING INQUIRIES BY THE INTERNATIONAL SEABED
AUTHORITY (*NAURU OCEAN RESOURCES INC / TONGA OFFSHORE MINING
LTD v. INTERNATIONAL SEABED AUTHORITY*)**

FINAL SUBMISSIONS OF THE INTERNATIONAL SEABED AUTHORITY

For the reasons set out in the Authority's Statement in Response of 25 June 2026 and elaborated upon at the hearings in Hamburg on 2 and 3 July 2026, the Authority respectfully requests the Seabed Disputes Chamber:

- (1) to reject all of the requests made by NORI and TOML for the prescription of provisional measures;
- (2) to withdraw the direction made by the President of the Seabed Disputes Chamber pursuant to Article 90(4) of the Tribunal's Rules before 9a.m. (Kingston, Jamaica time) on Monday 6 July 2026; and
- (3) to order NORI and TOML to bear, in equal share, the Authority's costs of responding to their requests for the prescription of provisional measures and attending the hearings in Hamburg on 2 and 3 July 2026.



Steven Dietrich

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of the International Seabed Authority

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Hamburg, Germany

3 June 2026