

**House Committee on Natural Resources**  
**Subcommittee on Energy & Mineral Resources**  
**Hearing on “*Deep Dive: Examining the Regulatory and Statutory Barriers*  
*to Deep Seabed Mining*”**

United States House of Representatives

January 22, 2026

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Written Comments for the Record

Submitted by: Gerard Barron

Chairman & CEO, The Metals Company USA

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These written comments are respectfully submitted for the record of the House Committee on Natural Resources, Subcommittee on Energy and Mineral Resources, in connection with the hearing entitled *Deep Dive: Examining the Regulatory and Statutory Barriers to Deep Seabed Mining* held on January 22, 2026. These comments supplement my oral testimony delivered at the hearing:

1. On several occasions, Rep. Huffman references a ‘slip’ in TMC USA production timeline to 2035 (20:08 m, 54:26 m); I attempted to correct this misinformation in my oral response during the hearing (55:12 m). Here, I cite public disclosure from June, August and November of 2025 clearly stating that the Company expected commercial production to begin Q4 2027.<sup>1</sup>
2. In his questioning, Rep. Case insinuates that TMC USA had advanced notice of NOAA’s revisions to the implementing regulations of DSHMRA (1:05 m), given the final rule was adopted on January 21, 2026 and TMC USA submitted a consolidated application for NOAA’s consideration the following day, January 22, 2026.

To clarify, NOAA published a proposed rule change regarding consolidated permitting to the federal register on July 7, 2025 as NOAA-NOS-2025-0108-0001, followed by a public comment period which closed September 5, 2025.<sup>2</sup> It is based on this draft regulation that TMC USA developed its consolidated application over the course of 6.5 months. Changes to the final adopted rule versus the draft rule published in July were not

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<sup>1</sup> [sec.gov/Archives/edgar/data/1798562/000141057825001821/tmc-20250630x10q.htm](https://sec.gov/Archives/edgar/data/1798562/000141057825001821/tmc-20250630x10q.htm);  
[sec.gov/Archives/edgar/data/1798562/000110465925078582/tm2523537d1\\_ex99-1.htm](https://sec.gov/Archives/edgar/data/1798562/000110465925078582/tm2523537d1_ex99-1.htm); [investors.metals.co/static-files/368039db-0aa1-49e9-9f64-e359ef0eb9a9](https://investors.metals.co/static-files/368039db-0aa1-49e9-9f64-e359ef0eb9a9)

<sup>2</sup> <https://www.regulations.gov/docket/NOAA-NOS-2025-0108./document>

substantive, allowing TMC USA to submit its consolidated application on January 22, 2026.<sup>3</sup>

3. In the same line of questioning, Rep. Case asks if TMC USA has provided NOAA with a 'wish list' of areas in the high seas for which the Company intends to file applications (1:06 m). My reply was clear that our communication to NOAA on targeted ground in the high seas has been communicated via our two exploration license applications posted to the federal register, a submitted commercial recovery permit, and now updated in our consolidated application.<sup>4</sup> The approximately one dozen applications currently thought to be under review by NOAA for exploration licenses in the high seas referenced in my testimony is based on based on public statements and our engagement with companies within the industry.

Thank you for the opportunity to submit these comments for the record.

A handwritten signature in black ink, appearing to read "Gerard Barron", with a horizontal line extending to the right.

Gerard Barron

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<sup>3</sup> [noaa.gov/news-release/noaa-accelerates-permitting-timeline-for-deep-seabed-mining-applications](https://www.noaa.gov/news-release/noaa-accelerates-permitting-timeline-for-deep-seabed-mining-applications)

<sup>4</sup> [regulations.gov/docket/NOAA-NOS-2025-0702](https://www.regulations.gov/docket/NOAA-NOS-2025-0702); [regulations.gov/docket/NOAA-NOS-2025-1330](https://www.regulations.gov/docket/NOAA-NOS-2025-1330)