Erik G. Milito
President

NATIONAL OCEAN INDUSTRIES ASSOCIATION

1201 Pennsylvania Ave, NW
Suite 530
Washington, D.C. 20004
202-347-6900
www.noia.org

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Mr. Mike Needham
Senior Director for International Economics and National Security
National Security Council
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mike:

We understand that industry has already approached the National Security Council to request the formation of an interagency working group on the emerging U.S. deep seabed minerals industry. Writing on behalf of the National Ocean Industries Association, we wanted to share our own perspective on why we believe that request deserves serious and swift consideration. NOIA represents the entire supply chain of companies working in the offshore energy and resource development industry, including project developers and equipment and service providers.

For the better part of two decades, the United States has long debated critical minerals policy in and lost ground with every year of debate. China now controls over 60 percent of global critical mineral extraction and roughly 85 percent of refining capacity, a dominance built not by accident but by a deliberate, decades-long industrial strategy that Washington is still working to counter. That contest is now moving offshore, into a new domain where the rules, the infrastructure, and the balance of power are still being written.

The Clarion-Clipperton Zone, a stretch of international seabed in the Pacific, spanning roughly 4.5 million square kilometers, holds an estimated 21 billion tons of polymetallic nodules rich in cobalt, manganese, nickel, and copper. China has taken notice. It holds more seabed exploration contracts in international waters than any other nation and continues to commit over one billion dollars to seabed technology and infrastructure to close the technological gap with the West. The United States can no longer standby and cede this critical ground.

Executive Order 14285, “Unleashing America’s Offshore Critical Minerals and Resources,” marks a historic pivot in what is becoming a new arms race in the deep sea between the United States and China. Following this executive action by President Trump, U.S. companies have begun submitting exploration license and commercial recovery permit applications to the Departments of Commerce8 to begin deep sea mining operations. Those operations would do far more than reduce U.S. dependence on foreign critical mineral sources. Deep sea mining opens the opportunity for the expansion of the U.S.-flagged fleet, autonomous underwater vehicles, remotely operated vehicles, acoustic positioning networks,

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and persistent asset and sensor coverage from seafloor to surface, in the very waters where China is racing to establish its own presence. This emerging industry carries strategic value including:

1. Reducing U.S. and allied dependence on Chinese-controlled extraction and refining of cobalt, nickel, manganese, and copper; the same minerals underpinning energy and defense systems, and advanced manufacturing.
2. Building a domestic and allied midstream processing base for these minerals, reducing reliance on Chinese refining capacity.
3. Expanding the collection of dual-use oceanographic, environmental, and seabed data in under-characterized areas of the Pacific.
4. Providing commercial platforms for testing and accelerating the development of subsea technologies and autonomous systems.

As the United States enters a period of sustained commercial activity in the deep Pacific, the opportunities and risks this industry presents span multiple federal agencies and require sustained, coordinated interagency attention. An NSC-led interagency working group would give the government a mechanism to assess these issues systematically, coordinate federal policy, and determine how the United States can best leverage the emergence of a strategically important American offshore industry. Left uncoordinated across the agencies, this opportunity risks being managed too slowly or too narrowly, while China's effort proceeds on schedule.

We would welcome the opportunity to brief your staff further on our perspective and how this working group could be structured. The window to lead and shape how this industry develops will not stay open indefinitely and it is important for the U.S to act now.

Thank you for your consideration.

Sincerely,



Erik Milito
President
National Ocean Industries Association