Introduction

Th precautionary approach must be applied
Deep seabed mining would pose manifold significant risks to the ocean, including through causing irreversible harm to the marine environment and its ecosystem services and the extinction of entire species. The scientific gaps related to the deep sea, including its ecosystems and species, are large and will take many years, if not decades, to fill. Without such knowledge, impacts of deep seabed mining cannot be fully understood.

The lack of scientific knowledge and understanding of the deep sea is also starkly evident in the current state of the draft Mining Code/Consolidated text, presented by the ISA Council President in February 2024 for negotiation at the Council. A recent paper points out that over 30 major regulatory issues remain outstanding due to not receiving sufficient time for discussion, divergent views amongst member states, and a lack of information and input to progress negotiations.

WWF policy asks at the March 2024 ISA Council meeting

1. Call for a global moratorium on deep seabed mining
Due to the lack of science and the high risk to the ocean environment from deep seabed mining, WWF urges countries to join the growing call for a global moratorium on deep seabed mining, and to express this request in the formal ISA meetings of both the Council and the Assembly.

2. Ensure that the current Consolidated text is retracted, and no negotiations be based upon this version
States must request that the new Council President does not proceed with the text negotiations at the March Council meeting, until a comprehensive compilation text is established as the main basis for negotiations. This text should transparently and inclusively encompass all input made both orally and in writing and attributable to the proponent of the particular language and information.

3. Ensure no licence / plan of work to mine is approved
No licence / plan of work should be approved, given the lack of scientific knowledge and projected serious impacts upon the ocean from deep seabed mining.

4. Ensure that the mining regulations are not adopted
As you cannot manage what you cannot measure, adoption of any regulations for deep seabed mining would be premature before the massive gaps in scientific knowledge have been closed. Hence, WWF urges governments not to finalise or adopt the rules, regulations and procedures until such time.
This lack of scientific knowledge calls for a precautionary approach. Extraction must not go ahead until the environmental, social and economic risks are understood, all alternatives to deep-sea minerals have been explored and it is proven that deep seabed mining can be managed in a way that protects the marine environment and prevents biodiversity loss, habitat degradation and species extinctions. **Until then, a global moratorium on deep seabed mining is needed.**

Governments must ensure that their decision-making processes at the Council are not subject to voting structures weighted in favour of granting mining contracts. Should a licence to mine be submitted, Council could, for example, exercise its powers to issue a directive that the Legal and Technical Commission should refrain from making any recommendations on any pending mining applications.

**Responsibility to ensure negotiations are transparent and inclusive**

Until a formal review of the functioning of the ISA can take place, it is **of utmost importance that basic principles of transparency and inclusivity are upheld**. States are negotiating hugely important issues pertaining to the Common Heritage of Humankind, and have a duty to ensure that all voices are heard and that all contributions are both included and identifiable in the text to be negotiated. The Council negotiations should remain in plenary and working groups. Any other practice undermines the credibility of both the ISA and its member states.

**Importance to attend the ISA to uphold sustainable development commitments**

WWF urges all governments to attend the ISA meetings during 2024 (and 2025), and to raise their voices to defend the ocean and its biodiversity and uphold commitments made towards sustainable development. In addition, we urge developed countries to consider providing financial support, as appropriate, to ensure that all states are able to participate in the important decisions pertaining to the Area, designated under UNCLOS as the Common Heritage of Humankind.

**Growing concern across the world**

Deep seabed mining is risky, not only for the ocean and its climate regulatory functions but also for fisheries, and many companies are seeing it as too risky and too costly to invest in.

Across the world, calls for a moratorium, a precautionary pause, or a ban, are increasing. In 2021, the IUCN Conservation Congress passed a resolution calling for a global moratorium, and since then a number of countries have expressed concerns and joined the call, as have community groups, indigenous leaders, human rights advocates, scientists and NGOs, as well as businesses - many of whom are would-be customers of these minerals.

Tuna fishing companies are concerned, and most recently, a leading Pacific tuna fisheries expert called for caution around deep seabed mining due to concerns over impacts upon fisheries, saying ‘the uncertainty around the way forward in developing deep seabed mining highlights the need for caution and thorough scientific research before proceeding with any deep seabed mining operations’.

**Deep seabed mining in the global context**

**The value of a healthy ocean**

A healthy ocean, where human activities are managed sustainably, is worth a staggering USD24 trillion as an asset, conservatively estimated. The sustainable ocean economy, which excludes deep seabed mining and other extractive industries, yields USD 2.5 billion annually in goods and services to humanity. Today, this enormous value is at risk due to years of mismanagement and resulting ocean health decline.
Instead of adding additional stressors further impacting ocean health, it is imperative that we work toward ocean protection and restoration, to ensure a healthy ocean that can provide social, economic and cultural benefits for humanity into the future.

Deep seabed mining would also go against many of the commitments governments have made to each other, e.g., in the Sustainable Development Goals, including SDG14 on Oceans and SDG12 on Responsible Production and Consumption, as well as the newly adopted Global Biodiversity Framework under the Convention of Biological Diversity and commitments to protect species under the Convention on Migratory Species (CMS).

The Circular Economy
The necessary transition to a fossil free economy, the ‘Green Transition’, does not need minerals from the deep sea. The International Resource Panel’s latest Global Resources Outlook Report 2024 calls for urgent investments in the Circular Economy, as a key action to ensure the achievement of the SDGs.

A 2022 report, The Future is Circular, commissioned by WWF, sets out pathways for how the switch to a fossil free economy can be done with less material footprint, avoiding opening up the deep sea to mining. The report shows that demand for the studied seven critical minerals can be reduced by 58 per cent by: technological choices, recycling and circular economy measures. Through product-life extension and materials recovery among others, governments can lead the way towards a “closed-loop” economy that works with nature, not against it.

The circular economy is not a distant vision. It is a US$4.5 trillion opportunity that is spurring more and more companies across industries to adopt circular principles to reduce costs, increase revenues, and manage risks. It is also increasingly being adopted in national economic plans.

Residual demand can be covered by responsible mining on land following the Initiative for Responsible Mining Assurance (IRMA) principles, including the mining of existing mining waste.

Get in touch!
WWF representatives attending the ISA meeting would welcome meeting with your delegation to discuss further. Please contact us to set up a meeting (see box for detail).

About WWF
WWF’s mission is to stop the degradation of the planet’s natural environment and to build a future in which humans live in harmony with nature, by conserving the world’s biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

WWF’s vision is a Sustainable Blue Economy, that:
● provides social and economic benefits for current and future generations;
● restores, protects and maintains the diversity, productivity and resilience of marine ecosystems, and;
● is based on clean technologies, renewable energy, and circular material flows.

Our commitment
WWF will work with partners across government, industry, and civil society including indigenous people, coastal communities, women and youth to implement this vision into practice.

WWF is a member of the Deep Sea Conservation Coalition (DSCC)