

Commissioner Vella
Commissioner for Environment, Maritime Affairs and Fisheries
Rue de la Loi 200
1049 Brussels

Brussels, 26 July 2017

Call on the Commission to cease its support to deep sea mining

Dear Commissioner Vella,

We are writing to you to share our deep concerns about the role the European Commission is playing in supporting the development of deep sea mining. We would like to request the Commission to 1) cease the promotion of deep sea mining via the blue growth strategy; 2) champion sustainable alternatives; 3) conduct an independent scenario study on future demand and supply needs for raw materials and the need - or not - for deep sea mining; and 4) ensure a strong EU position on protection of the deep sea, with the precautionary principle in mind, in the upcoming annual session of the International Seabed Authority.

During the recent UN Oceans Conference, and supported by 38 NGOs world-wide, Seas At Risk called on the international community to stop deep sea mining in its tracks, and to focus on sustainable alternatives instead. The latter can be found in a full transition to sustainable consumption and production, a path on which the EU is already showing international leadership. Attached you find our statement for your consideration.

In the recent review of the blue growth strategy the Commission reaffirmed deep sea mining of one of the priority sectors. This came as a surprise to us, as EU funded research in the past years has beyond any doubt established that deep sea mining imposes a serious threat to global sustainability, and conflicts with several Sustainable Development Goals (the goals on oceans as well as the one on sustainable consumption and production). Many scientific warnings indicate that a strong application of the precautionary principle is urgently needed to; protect the deep sea from this emerging sector.

The deep sea is a fragile and vulnerable ecosystem, and the environmental impacts of deep sea mining will result in biodiversity loss, with the risk to be significant, wide spread and lasting for thousands of years, possibly forever. [Biodiversity losses from deep sea mining are unavoidable](#) and possibly irrevocable, an international team of 15 marine scientists, resource economists and legal scholars argue in a letter published recently in the journal Nature Geoscience.

Contrasted to this, the socio- economic benefits (if any) are bound to be short lived. Huge gaps in scientific knowledge and the many uncertainties call for a strong precautionary approach, starting with a search for more sustainable alternatives.

Deep sea mining is not needed to meet future demand for minerals - it is merely driven by geo-political considerations. Sustainable alternatives are available. Reducing the demand for raw materials through better product design, sharing, re-use, repairing and recycling and development of new materials is key to the solution. As are changes in lifestyles. Every year in the EU, 100 million mobile

phones go unused, less than 10% are recycled. This represents an enormous quantity of gold and other precious metals gone to waste. These figures indicate the huge potential of policies to increase resource efficiency world-wide.

To further underpin future discussions among stakeholders on the need or not for deep sea mining, we would like the Commission to conduct an independent future scenario study on future demand and supply of metals. Such a scenario study should be conducted in cooperation with stakeholders, and we would be happy to contribute to this. The study by JRC 'Assessment of potential bottlenecks along the materials supply chain for the future deployment of low-carbon energy and transport technologies in the EU: Wind power, photovoltaic and electric vehicles technologies, time frame: 2015-2030' is already a good first basis to this. Also the analysis by the Institute for Sustainable Futures at the University of Sydney will be useful: it found that a 100% transition towards renewable energy by 2050 can take place without having to source metals from the deep sea for renewable technology.

We would also like to see the EU take a strong role in the upcoming annual session of the International Seabed Authority. In August the member countries of the International Seabed Authority will vote on the recommendations regarding the review of the International Seabed Authority, as well as on the procedure for developing environmental regulation for exploitation. We hope the EU will defend a strong precautionary approach in this. The consultancy report about the 2016 periodic review of the International Seabed Authority pointed to severe structural shortcomings in terms of its transparency, environmental expertise and capacity, calling into question its ability to govern the deep sea effectively.

According to UNCLOS, the resources of the deep sea are the common heritage of humankind. We trust on your good stewardship to safeguard this heritage for future generations.

We would much appreciate a meeting with you to further clarify our request.

Yours sincerely,



Dr. Monica Verbeek
Executive director Seas At Risk
mverbeek@seas-et-risk.org

C.C. Elżbieta Bieńkowska, Commissioner Internal Market, Industry, Entrepreneurship and SMEs

Enclosed: Deep-sea mining has no place in a future shaped by the 2030 Agenda for sustainable development. Statement for the Ocean Conference United Nations, New York, 5-9 June 2017