

**Meeting of the Council of the International Seabed Authority
27th Session, Part II (July 2022) – Informal working group (Environmental)**

Intervention by the IUCN (21 July 2022, Afternoon Session)

[Submission by Germany: Normative environmental thresholds for deep-seabed mining \(ISBA/27/C/30\)](#)

Thank you, Madam Facilitator.

As this is the first time the IUCN takes the floor, we would like to express our utmost confidence in your facilitation of this informal working group and assure you of our full support. The IUCN welcomes this submission by Germany on the development of normative environmental thresholds for deep seabed mining. This submission is not only timely but also urgently needed. We have a few comments in support of this submission.

Firstly, we are pleased with Germany's initiative to compel the Council to confront this important theme and develop environmental thresholds as a priority. Indeed, our delegation is extremely concerned with the potential environmental harm of deep seabed mining activities. At the IUCN's recent World Conservation Congress in September 2021, a resolution ([WCC-2020-Res122-EN](#)) was adopted with overwhelming support stating that deep seabed mining activities should not commence until and unless the environmental risks of these activities are comprehensively understood and the effective protection of the marine environment can be ensured. Developing environmental thresholds and indicators is a necessary step in this direction.

Secondly, the development of environmental thresholds and indicators requires large amounts of environmental baseline data, which remains inadequate at this point in time. Sufficient and high-quality environmental baseline data is needed not just to ensure contractors meet their contractual obligations with respect to the protection and preservation of the marine environment, but also for the Authority to function effectively and proactively as a regulator that acts on behalf of humankind as a whole.

Thirdly, we fully support the text that speaks to the importance to exercise circumspection in the face of uncertainties and the implementation of the precautionary principle and would add that implementing the ecosystem approach is also relevant here.

Fourthly, we would like to point out that this submission is an important step to facilitate informed decision-making at the Council and could lend support to understanding and effectuating terms such as "effective protection", "harmful effects", "risk of serious harm" and "serious harm".

Fifthly, we wish to note that while this submission is made under agenda item 11 on the draft exploitation regulations, we believe that such thresholds should also be

relevant to exploration activities, including test mining activities conducted at that stage.

Sixthly, we welcome the part of the text relating to the establishment of intersessional working groups that are inclusive and transparent with a view to developing these science-based environmental thresholds. We would like to express our hope that all input and options that are raised in these groups will then feature in the recommendations that such working groups eventually present to the Council, including ambitious ones that may be inconsistent with existing or future commercial interests, as well as to note down instances where there are points of scientific disagreement. This ensures that all options are on the table for the consideration of the Council.

Lastly, it may be useful to add procedures for the periodic review and updating of these thresholds, given that these thresholds would need to be regularly updated as scientific knowledge improves.

Thank you.