



10 June 2025

Secretariat of the International Seabed Authority  
14 - 20 Port Royal Street, Kingston  
Jamaica

**Re: Draft regulations on exploitation of Mineral resources in the Area ISBA/30/C/CRP.1**

Dear Ms. Leticia Reis de Carvalho,  
Honourable Delegates,

The credibility and scientific integrity of environmental assessments are essential to the legitimacy of decisions on seabed mining. Biodiversity assessments and baseline studies must be conducted independently and not by applicants or contractors with vested interests.

We are the **Senckenberg Ocean Species Alliance**, the leading group responsible for IUCN Red List assessments of deep-sea species. Senckenberg is an official IUCN Red List partner organisation—one of just 13 globally, and the only one focused on marine biodiversity. This role reflects our recognised leadership in the scientific assessment of deep-sea life.

We are concerned that Regulation 44's mandate to base decisions on the "best available science and scientific information" cannot be met without independent data. Allowing industry-led assessments risks confirmation bias, undermining objectivity. Regulation 55.2(c) calls for environmental standards based on robust indicators and thresholds—these require reliable, impartial baseline studies.

We urge the Council to ensure that all biodiversity assessments in the Area are led or verified by independent scientific institutions, as a prerequisite for transparency, accountability, and ecological responsibility. We stand ready to contribute our expertise in Red List assessment and marine biodiversity to support evidence-based regulation and long-term ecological stewardship.

Thank you.

Prof. Dr. Julia Sigwart  
Co-Chair, Senckenberg Ocean Species Alliance

Dr Torben Riehl  
Co-Chair, Senckenberg Ocean Species Alliance

cc: Ambassador Jan Hendrik van Thiel  
Permanent Representative of Germany to Jamaica

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