



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

Frankfurt am Main, 6 June 2025

Statement re Draft regulations on exploitation of Mineral resources in the Area ISBA/30/C/CRP.1

Dear Ms. Leticia Reis de Carvalho,
Honourable Delegates,

On behalf of the Senckenberg Society for Nature Research, we commend the efforts of the International Seabed Authority (ISA) and its Council in further refining the Draft Exploitation Regulations. We support the commitment to ensuring that activities in the Area are conducted for the benefit of humankind and in accordance with the principles of environmental protection enshrined in UNCLOS and the 1994 Agreement.

This protection must be based on "the best available science and scientific information". As a global leader in biodiversity research, we are compelled to note that current state of knowledge is insufficient to support several critical elements of the Draft Regulations, particularly those outlined in Regulation 55.2(c), which requires environmental standards that define indicators, thresholds and values related to toxicity, habitat loss and biodiversity status. We draw the Council's attention to Regulation 44, which requires the Authority, sponsoring States, enterprises and contractors to take all necessary measures to ensure the protection of the marine environment from the harmful effects of exploitation activities.

Senckenberg is one of only 13 external partner organisations of the IUCN Red List of Threatened Species—and the only one with a major focus on marine species. A review of the IUCN Red List reveals that assessments in areas targeted for mining are alarmingly incomplete. As a result, the baseline data required for adequate Environmental Impact Assessments (EIAs), as required by Regulation 46.1, simply do not exist. Regulation 46.1.3(h) rightly acknowledges these gaps. No meaningful EIA can be conducted without reliable and representative environmental baselines.

The lack of clarity in the definition of "biodiversity status and ecosystem structures, functions and services" hinders the effective implementation of safeguards. We urge the Council to treat these

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elements as distinct and essential metrics, each requiring individual attention and scientific scrutiny. Given these knowledge gaps, we believe it is neither scientifically sound nor ethically justifiable to proceed with the award of exploitation contracts.

In the spirit of precaution and in line with international environmental governance principles, we urge the Council to adopt a moratorium or precautionary pause on deep-sea mineral exploitation until independent, long-term studies provide the necessary data to inform protective standards.

Only by proceeding with scientific integrity can we ensure that decisions taken today do not irreversibly damage ecosystems that are part of the common heritage of humankind.

Sincerely,

Professor Dr Klement Tockner
Director General

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