



President of the Council H.E. Duncan Laki
Secretary-General Leticia Carvalho

International Seabed Authority (ISA)

14-20 Port Royal Street
Kingston, Jamaica

Date: 25 June 2025

Subject: Objections to the working methods proposed for Part II of the 30th Session of the ISA Council

Dear Madam Secretary-General and President of the Council,

On behalf of the **WWF International, Oceans North, the Environmental Justice Foundation (EJF), Greenpeace International and the Deep Sea Conservation Coalition (DSCC)**, a global alliance of over 130 organizations committed to protecting the deep ocean, we are writing to express our serious concerns regarding the process proposed in the President's briefing paper for Part II of the 30th session of the ISA Council.

The approach outlined in the paper bypasses essential safeguards and undermines both the legitimacy of the ISA and its capacity to uphold its core mandate under the UN Convention on the Law of the Sea—to ensure the effective protection of the marine environment on behalf of humankind as a whole.

1. Unrealistic and Dangerous Pressure to Finalize the Mining Code

The timeline of July 2025 decided by Council is indicative, not definitive. The pressure to finalize the Mining Code by July or November 2025 is both unreasonable and untenable. We note that the agenda for the July session is dominated by “informal informals” focused on finalizing text, despite the fact that:

- Independent scientific assessments consistently warn that we are at least 10–15 years away from having the necessary knowledge to make informed, responsible decisions regarding deep-sea mining (DSM) and its regulation;
- More than [30 major regulatory issues](#) remain unresolved within the ISA framework—many of which have not even been substantively discussed;

Furthermore, the compressed schedule—including multiple virtual working group meetings and extended negotiating hours—would disadvantage smaller delegations, especially those with limited capacity, further compromising inclusive participation.

The expectation that delegations arrive with mandates from capitals to take binding decisions on the draft regulations is premature and untenable. The artificial urgency created by the proposed timeline is counterproductive, undermining trust and threatening the credibility of the ISA process.

2. Exclusionary Restrictions on Participation and Expression

Our organizations are extremely concerned about the restrictions placed on participation and freedom of expression, particularly regarding Observer engagement. Under the proposed methods:

- Observers are excluded from participation in the informal informals, which constitute the bulk of the July agenda. Although it remains unclear in the President's briefing whether or not Observers will be allowed in the room, the stifling of oral contributions from Observers is an unwelcome restriction, particularly in a context where Observers have made every effort to coordinate when taking the floor to ensure contributions are concise, respectful and relevant. Similarly, the limitations on speaking time for Observers in plenary are also disproportionate and inappropriate. Observers include:
 - Independent scientists whose expertise is vital to informed decision-making;
 - Indigenous representatives whose cultural and ecological knowledge must be respected;
 - Civil society organizations that represent millions of concerned global citizens.

Repressing these essential voices sends a message of exclusion and marginalization.

- The “Friends of the President” initiative creates small, non-transparent groups that only well-resourced States are likely to engage in effectively, further narrowing input and limiting diversity of views. Furthermore, the suggestion that “Friends of the President” groups might draft major parts of the annexes and schedules deviates significantly from previous descriptions of these groups as appropriate only for refining areas of existing agreement—not for developing new regulatory text.
- The prohibition of side events during the Council session eliminates critical opportunities for dialogue, transparency, and information-sharing;
- The refusal of general or political statements ignores the fundamentally political nature of these negotiations, including urgent matters related to contractor conduct, the application of the precautionary principle and the Council's response to the recent events with respect to unilateral permitting of unlawful deep-sea mining operations.

3. Disregard for Equity and Developing State Concerns

The proposal for a third session from 29 October to 7 November 2025 to adopt the regulations directly contradicts the concerns previously raised by many developing States. These States consistently cite

financial and human resource constraints as a barrier to effective participation. The same challenges are faced by many Observers. Proceeding with a third session despite their previous objections disregards equity considerations that are essential to the legitimacy of the ISA and its processes.

Our organizations urge the President of the Council and all Council members to reconsider and revise the process and pace outlined in the President's briefing paper.

The deep ocean is among the last intact ecosystems on Earth. It is humanity's common heritage and plays a crucial role in planetary health, biodiversity, and climate regulation. [37 countries now support](#) a pause, moratorium, or ban on deep seabed mining. They are joined by hundreds of scientists, civil society, [major companies](#), Indigenous leaders, and UN human rights experts, all warning that damage to the deep ocean cannot be justified.

The ISA has a legal and moral obligation to ensure that decisions regarding deep-sea mining are based on robust science, grounded in meaningful global participation, and aligned with the precautionary principle. The proposed process fails to meet these standards. Instead of a self-imposed race-against-the-clock which yields to industry pressure and is set to benefit private interests, States should implement a precautionary pause on exploitation to ensure that due process and principles of science-based decision making are respected. We call for a transparent, inclusive, and scientifically grounded process—one that truly reflects the interests of humankind as a whole.

Sincerely,

Sofia Tsenikli
Campaign Director
Deep Sea Conservation Coalition



GREENPEACE

