



**EUROPEAN COMMISSION**  
 DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES  
 International Ocean Governance and Sustainable Fisheries  
**The Director**

Brussels

MARE.B.1

We thank you for your views on the ongoing developments related to seabed mining and for the article “The Risks and Impacts of Deep Seabed Mining to marine Ecosystems” and its recommendations.

We would like to share with you some elements on the Commission and the EU’s work, showing that our actions when it comes to deep-sea mining and current developments at the International Seabed Authority are based on the precautionary principle and the ecosystem-based approach, in line with the EU's commitment to sustainability.

The European Commission is following very closely the ongoing process at the International Seabed authority (ISA) to develop the regulations for exploitation of the mineral resources in the Area (the mining code), which would enable contractors to move from exploration to exploitation. We believe it is important to make sure that the activities of the ISA take into account the broader context of the balance of rights and obligations within the Law of the Sea and that a high level of protection of marine environment is ensured in line with obligations under UNCLOS, including the need to undertake prior environmental impact assessments. Ensuring high-level environmental safeguards is a priority and this is why the European Commission has also been an active partner in the context of the development of Regional Environmental Management Plans, identified as ISA priorities for 2019-2023.

On seabed mining in general, it is crucial for the European Commission to ensure that deep-sea mining, if carried out at all, will be fully in line with the EU's commitment to sustainability and based on the best available science, and the application of the precautionary principle and the ecosystem-based approach. In that regard, we share your position on the importance of research. The knowledge of deep-sea ecosystems and related organisms remains limited. This is why the European Union has been funding a number of research projects, such as MIDAS and Blue Nodules, to improve the understanding of the possible environmental impacts of deep-sea mining activities and how to best mitigate these impacts, and, to develop environmentally friendly technologies. In this respect, more than EUR 40 million have been invested in recent years (under FP7 and H2020). The main findings of these projects show that current understanding of ecosystem functioning, recoverability, connectivity and recruitment in the deep sea is limited and that there is considerable uncertainty about the effects of mining on these processes. Therefore, long-term studies are still needed to gauge the full range of impacts of mining on benthic and deep ocean biodiversity and ecosystem services and their potential for recovery.

As you might know, the European Commission launched last year the European Green Deal, our new growth strategy for making the EU's economy sustainable. To support its objectives and to become the first climate neutral continent, the European Union has the ambition to lead globally on the conservation and protection of our environment, including seas and oceans, through developing a circular economy and clean technologies.

At European Union level, resource security of raw materials should be addressed through diversifying supply and circularity. The importance of the circular economy is reflected in the Commission's new Circular Economy Action Plan. This Action Plan aims to create a well-functioning EU market for secondary raw materials, which face a number of challenges in competing with primary raw materials for reasons not only related to their safety, but also to their performance, availability and cost.

At international level, the European Union is committed to finalise a legally binding instrument to ensure conservation and sustainable use of marine biodiversity in seas areas beyond national jurisdiction (the BBNJ negotiations) by 2020, which aims at improving governance of these areas that is currently fragmented and mainly sectorial.

We trust that these elements assure you of the European Commission's engagement to the protection of the marine environment.

Yours sincerely,

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