



Mr Michael Lodge  
Secretary-General  
International Seabed Authority  
Kingston  
Jamaica

23.03.23

Dear Secretary-General,

**Re: Application for NGO observer status**

On behalf of the Environmental Justice Foundation, I would like to express my congratulations for your work chairing the ISA Secretariat and leading the regulation of mining activity in the Area, for the benefit of all mankind and considering the effective protection of the marine environment from the harmful effects that may arise from seabed activities.

As the mining code rulemaking process is at a crucial stage this year, EJF requests to obtain observer status in accordance with article 169 of the United Nations Convention on the Law of the Sea, rule 82, paragraph 1 (e), of the Rules of Procedure of the Assembly of the International Seabed Authority and the guidelines for observer status of non-governmental organizations with the International Seabed Authority.

EJF exists to protect the natural world and defend our basic human right to a secure environment. We work internationally to inform policy and drive systemic, durable reforms to protect our environment and defend human rights. We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our campaigns aim to secure peaceful, equitable and sustainable futures.

The focus areas of EJF's work are human rights and the environment, marine biodiversity and coastal protection, strengthening environmental governance and public participation, and the reduction of factors that drive climate change.

EJF is working to protect our oceans, primarily by ending illegal fishing and stamping out the human rights abuses driven by this illicit activity. By doing so we aim to protect the millions of people that depend on our oceans and for the magnificent and varied wildlife that call them home.

We are also working to conserve marine habitats such as mangroves, and are actively removing ghost fishing gear from the seas of Ghana, Thailand and Indonesia. We now include deep-sea mining as one of our core areas of focus, and are advocating for a science-based and precautionary approach.

We believe that our experience and the work we have developed over more than 20 years to protect our oceans will be an important contribution to the current stage of development of the Mining Code regulation. We anticipate contributing our expertise to the Authority's work on the effective protection of the marine environment, as well as the equitable benefit sharing of deep-sea resources.

Yours sincerely,

Steven Trent

A handwritten signature in black ink that reads "S. Trent". The signature is written in a cursive style with a large, looped 'S' and a trailing flourish.

CEO/Founder  
Environmental Justice Foundation

## Information about the organization

1. Name of organization  
Environmental Justice Foundation
2. Address of headquarters  
EJF, Unit 417, Exmouth House 3/11 Pine Street, Farringdon, London, EC1R 0JH
3. Addresses of all branches and/or regional headquarters  
Belgium - Rue de l'Industrie 10, Brussels, 1000  
Germany - Spielfeld Digital Hub | Skalitzer Str. 85/86, 10997 Berlin  
Ghana - H/No. 4, 8th Close, North Ola, Cape Coast  
Liberia - 5 Johnson Compound, Tubman Boulevard, Congo Town, Monrovia  
Korea - #301, 130 Seonyu-ro, Yeongdeungpo-gu, Seoul, Korea  
Taiwan - 10667 No3, Lane 265, Section 2, Heping East Road, Taipei, Taiwan
4. Telephone number  
+44 (0) 207 239 3310
5. Fax number:  
n/a
6. Email address  
[steven.trent@ejfoundation.org](mailto:steven.trent@ejfoundation.org)
7. Name, title and contact details of focal point  
Steven Trent CEO/Founder. [steven.trent@ejfoundation.org](mailto:steven.trent@ejfoundation.org)
8. Background information on the organization  
The Environmental Justice Foundation (EJF) exists to protect the natural world and defend our basic human right to a secure environment. EJF works internationally to inform policy and drive systemic, durable reforms to protect our environment and defend human rights. We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our campaigns aim to secure peaceful, equitable and sustainable futures.

9. Is the organization a member of, affiliated to or otherwise associated with another organization that has been granted observer status with the Authority?

EJF is a member of the Deep Sea Conservation Coalition

10. Is the organization affiliated to consultants of the Authority, contractors with the Authority, entities in connection with the law of the sea, the offshore and deep-sea mining industry, research institutes or the mineral marketing and processing industry?

No

11. Relationships with intergovernmental organizations

EJF has UN ECOSOC status, observer status for UN COPs and the Southern Indian Ocean Fisheries Agreement, participated in the 2022 UN Ocean Conference and is registered to the FAO Committee on Fisheries. EJF recently [hosted an event](#) in collaboration with UNEP's COBSEA (Coordinating Body on the Seas of East Asia), the UN Office on Drugs and Crime regularly [cites our work](#), as does the International Labor Organisation.

12. List of publications and/or other relevant documentation

Most recently EJF published a report on deep-sea mining: [Towards the abyss: how the rush to deep-sea mining threatens people and our planet.](#)

EJF hosted a webinar as part of the Europe Calling series, which featured, alongside EJF's CEO Steven Trent, the German Federal Environment Minister Steffi Lemke, Franziska Brantner, German State Secretary in the Federal Ministry for Economic Affairs and Climate Protection, marine researcher Lisa Levin and Claudia Becker from BMW. [You can see the recording of the event here.](#)

Our full list of published reports can be found here: <https://ejfoundation.org/reports>

Our films can be found here: <https://ejfoundation.org/films>

### **B. Interest in matters under consideration by the Assembly**

13. Briefly outline how your organization intends to demonstrate its interest in matters under consideration by the Assembly, including by answering questions 14 to 17 and by providing any other relevant information related to the application for observer status.

14. Briefly outline whether and how the purposes or activities of the organization relate to the work of the Authority.

EJF campaigns to protect the marine environment, its biodiversity and the livelihoods dependent on it. This is aligned with the Authority's mandate to ensure the effective protection of the marine environment from harmful effects that may arise from deep-seabed-related activities.

To date EJF has been sharing information related to the environmental implications of deep-sea

mining with policymakers in Germany, the UK, and key departments within the EU. EJF also recently wrote to a number of council delegates with [this statement](#), with the aim of protecting biodiversity and marine ecosystems.

15. Briefly outline whether and how your organization intends to contribute to the work of the Authority, for example by providing specialized information, advice or expertise, or by identifying or helping to procure the services of experts or consultants.

EJF intends to contribute to the work of the authority by representing the best interests of the marine environment, its biodiversity and the livelihoods dependent on it. Our team of expert researchers have recently synthesized an extensive literature review covering the potential impacts of deep-sea mining, and EJF has been sharing this information with relevant stakeholders. We intend to contribute to the Authority's work by championing environmental protections and sharing well-researched information with relevant decision makers.

16. Briefly outline whether and how your organization has the expertise and the capacity to contribute, within its field of competence, to the work of the Authority, in particular in connection with the law of the sea, the protection of the marine environment, the offshore and deep-sea mining industry, technology, minerals processing and marketing, activities in the Area and marine scientific research in the Area.

EJF has campaigned for the protection of marine environments, its biodiversity and the livelihoods dependent on it for over 20 years. Our international teams of researchers, investigators, campaigners, grassroots liaisons, film teams and policy experts have worked to end the injustice of some of the biggest threats to our oceans, in particular those posed by illegal, unregulated and reported fishing. We've exposed the modern-day slavery propping up Thailand's seafood sector, provided irrefutable evidence of illegal fishing in West Africa, secured protection for unique coastal forests in Brazil and gathered powerful first-hand testimonials from those living on the frontlines of climate change.

17. Briefly outline whether and how your organization intends to contribute to the capacity-building programmes and initiatives of the Authority (e.g., Secretary- General's award, voluntary commitments of the Authority).

EJF is experienced in capacity-building programming in initiatives across multiple countries in Western Africa. EJF can and will contribute to capacity building at the ISA in whatever way is helpful and necessary. Specific areas where our expertise will be helpful is in providing scientific and legal input, participating in discussions surrounding the development and adoption of environmental regulations, and the establishment of an equitable benefit sharing regime.

Environmental Justice Foundation (EJF) is an international environmental and human rights non-profit organisation with representation in:  
Belgium - Brazil - Cameroon - France - Germany - Ghana - Indonesia - Japan - Liberia - Philippines - Senegal - South Korea - Taiwan - Thailand - UK  
**Global HQ: Unit 417, Exmouth House, 3/11 Pine Street, London, EC1R 0JH, UK** (Charity: 1088128) - EU Transparency Registration 817535514065-10  
[info@ejfoundation.org](mailto:info@ejfoundation.org) - [www.ejfoundation.org](http://www.ejfoundation.org) - @ejfoundation