

Deep Sea Conservation Coalition Open Letter to ISA Secretary-General Carvalho

Dear Madam Secretary-General,

On behalf of the **Deep Sea Conservation Coalition**, an alliance of over 130 member organizations worldwide, we write to express deep concern over recent [public statements](#), which we believe neither accurately reflect the current state of negotiations at the International Seabed Authority (ISA) nor the moratorium or precautionary pause positions held [by a large and diverse](#) group of stakeholders, including 40 States, Indigenous Peoples, scientists, UN Human Rights leaders, businesses, financial institutions and more.

Rushing Regulations under commercial or political pressure undermines ISA's credibility

The ISA was established to safeguard the global commons and to benefit humankind as a whole. Pushing to adopt the exploitation regulations as a response to the threat of unilateral action, is not only unrealistic, it risks undermining the very multilateral system it aims to protect, including States' obligations under UNCLOS to ensure the effective protection of the marine environment. The ISA's credibility depends on demonstrating that the institution is capable of acting decisively to protect its jurisdiction, not by succumbing to coercion. To **safeguard multilateralism and the ISA's credibility** in the wake of unilateral attempts, the ISA and its member States should instead **deploy their existing powers under UNCLOS to render unilateral deep-sea mining unviable**.

Far from being close to adoption, the reality is that the list of 32 outstanding issues within the regulations, recently published by the Secretariat, remain the subject of intense debate. Furthermore, the list does not include crucial elements of the full regulatory and governance framework, such as a benefit sharing mechanism, a system of compensation for land-based mining economies, or the Economic Planning Commission, to name but a few. The ISA also published a list of 46 Standards and Guidelines, almost all of which are unfinished, and many of which have not yet been started. These include environmental thresholds, designed to prevent harm to the marine environment and damage to marine flora and fauna, that can only be established on the basis of sufficient evidence – evidence which independent scientists estimate is 10–15 years away from being gathered. All these elements are inherently interrelated, meaning that a mining code cannot be adopted without all the other elements alongside it. The DSCC issued a [briefing](#) showing major gaps for human rights, equity, and environmental protection in the Revised Consolidated Text ([ISBA/31/C/CRP.1/Rev.2](#)).

A Moratorium or Precautionary Pause is essential to responsible governance

Calls for a moratorium or pause on mining exploitation are grounded in **science, international law, equity, and stewardship**. [Independent legal opinions](#) find that a moratorium is not only consistent with UNCLOS, it is in fact **required by it**. States are **obligated to ensure the effective protection of the marine environment from harmful effects**. Best available science today shows mining would lead to permanent and irreversible damage to the ocean.

Deep-sea research, decoupled from mining interests, is already taking place, and independent, transparent science is essential – **more is needed**. A moratorium or precautionary pause preserves the very object of scientific interest: intact deep-sea mid-water and seabed ecosystems that play a central role in **climate regulation** and house an abundance of marine **genetic resources**. It would create the necessary space and momentum for independent, transparent, and equitable science to advance, rather than relying on research shaped by commercial interests.

A postponement of mining exploitation does not mean work at the ISA stops. It gives States and the ISA time to continue the work of the Authority free from pressure. The ISA could also use this time to **evolve into a nature positive institution** and a constructive contributor to responsible global ocean governance, supporting the protection of the ocean and the sustainable management of global commons. For more info see: [Delivering Benefits to Humankind: Opportunities for the International Seabed Authority under a Deep-Sea Mining Moratorium](#)

Madam Secretary-General, this is a pivotal moment. The world is looking to the ISA to uphold its duty of care to the deep ocean, and to act for the benefit of present and future generations, with **neutrality, diligence, and due process**. We look at your leadership to ensure these principles are upheld, and reaffirm our continued commitment to constructively contributing to this effort. We look forward to discussing these matters further with you at the Council meeting.

Sincerely,

Sofia Tsenikli



**Director
Deep Sea Mining Moratorium Campaign
Deep Sea Conservation Coalition (DSCC)**