



LDAC-NWWAC-PELAC-SWWAC ADVICE

Recommendations on Deep-Sea Mining (DSM) and its impacts on fisheries

- **Response to the Draghi Report on the “Future of European Competitiveness”**
- **Impacts of DSM on fisheries in the high seas and Norway’s plans to advance exploration and exploitation activities in the Arctic**

Adopted on 4th of November 2024

Ref. R-05-Ej.18 (2024-2025)/WG5

Rationale and general remarks

The Long Distance Fisheries, North Western Waters, Pelagic Species and South Western Waters Advisory Councils have reviewed the recommendations in the Draghi Report on the Future of European Competitiveness¹, particularly the suggestion that the EU “*carefully explore the potential of environmentally sustainable deep-sea mining*”² (DSM) to secure minerals for the green transition.

While we support as idea to promote innovative thinking and efforts to enhance European competitiveness and ensure the success of the green transition and blue economy, we have significant concerns about both the environmental and the socio-economic risks associated with DSM. Additionally, the Draghi report's claim about DSM potential relies on a study from over 11 years ago, warranting a reassessment of its relevance to the green transition.

In line with the [LDAC, NWWAC and PELAC’s joint opinion adopted in 2021](#), we reaffirm - in accordance with the precautionary approach - that if there is insufficient evidence to determine the full impact of DSM on the marine environment and unless it can be proven that no marine biodiversity loss nor degradation of marine ecosystems are the result of these activities, a moratorium or total prohibition on exploitation of deep-sea minerals should be implemented. Despite increasing efforts from marine scientists, the current understanding of deep-sea ecosystems and the potential risks associated with DSM is not well-developed yet, as [highlighted in scientific literature](#) and stated by a group of more than [800 marine scientists and marine experts](#), which emphasise the knowledge gaps regarding deep-sea ecosystems and potential detrimental effects of DSM.

¹ https://commission.europa.eu/topics/strengthening-european-competitiveness/eu-competitiveness-looking-ahead_en

² p. 54 of the Draghi report:
https://commission.europa.eu/document/download/97e481fd-2dc3-412d-be4c-f152a8232961_en?filename=The%20future%20of%20European%20competitiveness%20%20A%20competitiveness%20strategy%20for%20Europe.pdf



Potential impacts of deep-sea mining on fisheries

The risks to fisheries, in particular, are alarming. Several studies have documented the significant negative impacts that DSM could have on marine ecosystems, including fisheries. Sediment plumes in different parts of the water column, noise pollution, and discharge from mining vessels could severely impact commercial species, in particular to highly migratory and widely distributed stocks such as tropical tuna, as noted in recent studies in the Pacific ([van der Grient and Drazen, 2021](#); [Amon et al., 2023](#)). These activities pose a threat not only to the species directly affected but also to the broader food webs and ecosystem services on which sustainable fisheries depend ([Drazen et al., 2021](#)).

Furthermore, various institutions have already raised concerns about the necessity of DSM and the potential negative implications on fisheries. The [European Academies Science Advisory Council](#) (EASAC) has stated that the claim that DSM is essential for meeting climate goals is misleading, noting further that any economic benefits of mining must be justified by the high risk and the long-term nature of the harm.

Similarly, the [Parties of the Convention on Migratory Species](#) at their meeting in 2024, highlighted that “the impacts of DSM mining on migratory species and their prey could be extensive and long-lasting.”

In light of the risks and in response to Norway’s recent decision to open their seabed for DSM, the [European Parliament expressed concerns](#) and stated that the impacts “could be detrimental to fish stocks and fisheries, and could impact the access of EU Member States’ vessels to the fishing grounds in the area”. Correspondingly, the [Council of the EU voiced concerns](#) over Norway’s decision, recalling international commitments for a thorough assessment process of the environmental impacts³. Furthermore, we recall that, in line with the precautionary principle, the [EU Commission has so far advocated to prohibit deep-sea mining](#) “until scientific gaps are properly filled, no harmful effects arise from mining and the marine environment is effectively protected” and the [EU Parliament](#) calls “to promote a moratorium [...] on deep-seabed mining”.

Fisheries organisations, including the [Norwegian Fishing Vessel Owners Association](#) (Fiskebåt) and [The Norwegian Fishermen’s Association](#), have criticised plans to open areas for DSM as have fishery groups in Africa as well as in Asia and the Pacific, such as the [LMMA Network and CAOPA](#). These organisations have highlighted the risk to the marine sector, particularly fisheries, and have called for a moratorium on DSM until a better understanding of the long-term consequences is established.

³ The [Norwegian Environment Agency concludes](#) in their public consultation comments that the impact assessment does neither meet the requirements of national legislation (Subsea Mineral Act § 2-2) nor international legislation (SEA Protocol under the Espoo Convention). Further international fishing interests, including EU fisheries, were not considered in the impact assessment, as was also highlighted in the [EU Parliament resolution P9_TA\(2024\)0068](#).



An increasing number of countries are speaking out against the introduction of DSM, including 11 EU member states. [The UN High Commissioner for Human Rights](#), [financial institutions](#), [indigenous peoples](#), [civil organisations](#), and million signatories of petitions are calling for a stop. [Major industrial companies](#) are also already calling for a moratorium on deep-sea mining and are excluding these minerals from their supply chains.

Recommendations:

Given the above-mentioned arguments and concerns, the LDAC, NWWAC, PELAC and SWWAC:

- **Express their strong support for the EU Commission’s reaffirming its position to advocate to prohibit deep-sea mining until robust scientific evidence can demonstrate that it will not negatively impact marine ecosystems or jeopardise the livelihoods of those who depend on the sea, including fisheries.**
- **Ask all EU Member States to follow this advice to avoid taking premature steps into deep-sea mining. The risks of irreversible harm to marine ecosystems and long-term disruptions to fisheries are too great. The precautionary principle must guide EU decisions.**
- **Encourage prioritising the reuse of materials and the implementation of circular economy strategies, so that the European Commission can optimise resources and enhance EU competitiveness through genuinely sustainable and responsible practices.**

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