

Date: 27.03.2024

Smt. Draupadi Murmu

Honourable President of India

Subject: Deep Sea Mining in Indian & International waters

Respected Rashtrapati ji,

We are writing to express our concern regarding your recent statements on deep-sea mining in the Indian Parliament. While we appreciate the government's focus on economic development, it is crucial to consider the potential environmental, ecological, social and economic impact of such activities, especially as a signatory to the Law of the Sea Convention (UNCLOS) and the Kunming-Montreal Global Biodiversity Framework of the Convention on Biological Diversity. 25 countries¹, including the United Kingdom, Ireland, Germany, France, Spain, Brazil, New Zealand have called for a moratorium on commercial deep-sea mining and 133 members states adopted a resolution urging countries not to engage in or support deep sea mining until sufficient and robust scientific information has been obtained to ensure that deep-sea mining exploitation activities do not cause harmful effects on migratory coral reefs, marine species, their prey and ecosystems, in COP14.

Despite these cautionary actions, India has been surging forth with its Deep Ocean Mission (DOM) with the Samudrayaan project to 'explore and exploit all living and non-living resources in the sea bed', creating exclusive economic zones and so forth. Along with other blue economy policies, this exploration for sea bed minerals, hydrocarbons, oil and gas and other biogenetic resources seems to be focused primarily in systematically financialise and corporatize ocean spaces. The recent legislative amendments and offshore block auctions are clearly an indication of this. We are also concerned that, since these strategic economic projects are protected by the naval forces, it will further restrict access and alienate fisher people from their customary ocean spaces and worse loss of lives of fisher people.

We would like to remind that studies have put India as 5th most vulnerable country out of 181 countries due to climate crisis impacts. The coastal communities are also put at high risk due to the rising sea levels, coastal erosion, increased cyclones and storms and increased floods. The ocean is one of the earth systems that if proceed and conserved correctly could be a solution to the climate crisis. Deep sea mining and other blue economy projects, unfortunately, are only increasing the risks rather than mitigating.

¹ Voices calling for a moratorium: Governments & Parliamentarians <https://deep-sea-conservation.org/solutions/no-deep-sea-mining/momentum-for-a-moratorium/governments-and-parliamentarians/>

Numerous concerns have already been raised by scientists, policy-makers, investors² and financial institutions on the impacts of deep-sea mining on climate and nature. Some reports have also established that deep-sea minerals are not needed to fuel the green transition and will provide limited financial benefits³. A recent report⁴ highlights how ‘mining the deep sea would be an ecological disaster that could cause over USD 500 billion in value destruction.’ The negative impact on the deep sea’s ecosystem services could lead to natural capital destruction of at least USD 465 billion, predominantly through habitat destruction.

As a signatory to UNCLOS, India has committed to the responsible use and conservation of marine resources and preventing harm to the marine environment. UNCLOS emphasizes the duty of states to protect and preserve the marine environment. Article 192 specifically highlights the obligation to take measures to prevent, reduce, and control pollution and other hazards to the marine environment, ensuring the conservation and sustainable use of marine resources. Deep-sea mining poses significant environmental risks that could have far-reaching consequences for our oceans, marine life, and the livelihoods of coastal communities. We must approach this issue with a sense of responsibility and ensure that our actions align with the principles outlined in UNCLOS.

We are only starting to understand the importance, value and diversity of deep-sea ecosystems. As an example, experts estimate between 88%-92% of species in the Pacific Ocean’s Clarion-Clipperton Zone (CCZ), the area where commercial mining could start the earliest, are undescribed or undiscovered. Without a better understanding of these ecosystems, UNCLOS parties are not in a position to ensure they can fulfil their obligations to prevent harm to the marine environment.

Goal 14 of the Sustainable Development Goals (SDGs) ‘Conserve and sustainably use the oceans, seas and marine resources for sustainable development’ and its targets present the challenges that the whole world has to address to attain a path for sustainability in the next few years.

In light of these commitments, we respectfully urge the government to:

- Adhere to the precautionary principle, which requires that the developmental activity be stopped and prevented if it causes serious and irreversible environmental damage.
- Put in place a moratorium on all kinds of deep-sea mining activities both in Indian waters and work with other countries to agree on a moratorium in international waters.
- Consider alternative approaches to resource management that prioritize environmental sustainability and the well-being of our oceans and its people, such as promoting reuse and recycling as well as the development of technologies that decrease the reliance on critical minerals

² Private equity investor Victor Vescovo, Deep-sea mining is "simply not a good investment", <https://www.youtube.com/watch?v=VlemroLodso>

³ Environmental Justice Foundation (2024), Critical minerals and the green transition: Do we need to mine the deep seas? https://ejfoundation.org/resources/downloads/EJF_critical-minerals-and-the-green-transition.pdf

⁴ Planet Tracker (2024), How to lose half a trillion: Deep Sea Mining, financial risk & reward, greenwashing, transparency & traceability, equity <https://planet-tracker.org/wp-content/uploads/2024/02/How-to-Lose-Half-a-Trillion.pdf>

- Prioritize innovation in battery technology (using easy-to-source and readily available elements) and circular economy strategies including increased recovery, recycling, repurposing, remanufacturing, refurbishing, repairing, reusing and reducing capacities

We strongly urge you that the issue of Deep-Sea mining cannot be approached with an economic framework, the impacts of this could be irreversible and catastrophic. Hence, we urge India to step with caution and issue a moratorium of deep-sea mining. We believe that India will remain committed to UNCLOS principles, and join hands with other countries calling for a moratorium on deep sea mining in Indian and International waters. We appreciate your attention to this matter and trust that our government will continue to uphold its international obligations for the well-being of our oceans, our children and our future generations.

Thank you for your consideration.

Sincerely,

Mineral Inheritors Rights Association	National Fishworkers Forum
Koli Yuva Shakti, Vasai	Sagar Shakti
Paryavarn Sanvardhan Samiti, Vasai	Brackish Water Research Centre
The Future We Need	Maharashtra Small Scale Fishworkers Trade Union
Goenchi Mati Movement	Paramparik Macchimar Bachav Samajik Kruti Samiti
Delhi Forum	All India Union of Forest Working People
Financial Accountability Network	Bargi Bandh Visthapit Evam Parbhavit Sangh
Coastal Action Network	Tamil Nadu Women Fishworkers Sangam