

17 September 2024

Ms. Ursula von der Leyen
European Commission President

NGOs' Concerns Regarding References to Deep Sea Mining in Mario Draghi's Report: The Future of European Competitiveness

Dear President von der Leyen,

We, the undersigned civil society organisations, are writing to you to express our serious concerns about a recommendation in Mario Draghi's report on the Future of European Competitiveness that the EU should “carefully explore the potential of environmentally-sustainable deep sea mining.”

The recommendation is based on eleven-year-old estimates that the materials found in the deep seabed could prove critical in satisfying EU demand for critical raw materials needed for the clean energy transition, especially in the tech and automotive industries. Furthermore, research on the role of deep-sea mining in filling the future gap in the supply of critical minerals required for the clean energy transition demonstrates that [this argument is flawed](#). By implementing circular economy strategies, the latest battery technologies, and improved recycling structures, alongside reducing overall demand, the need for relevant minerals can be [reduced by 58%](#) and the EU climate protection targets achieved without irreversibly damaging deep-sea ecosystems. Similarly, the leading scientists of the [European Academies' Science Advisory Council](#) (EASAC), following their assessment of the evidence on future needs and the expected environmental impacts of deep-sea mining, concluded that the narrative of deep-sea mining being an essential part of the energy transition is “misleading” and have called for a moratorium on deep-sea mining.

The European Commission has so far, in both the [EU Biodiversity Strategy to 2030](#) and its [international ocean governance agenda](#), advocated against deep-sea mining until the scientific gaps are properly filled and it can be demonstrated that no harmful effects arise from mining. The EU policy on critical raw materials, as reflected in the [EU Critical Raw Materials Act](#), excludes deep-sea mining projects from the possibility of obtaining Strategic Project status (Regulation (EU) 2024/1252, Recital 18). In addition, a growing number of governments, currently 32, including [Germany](#), [France](#), [Spain](#), and eight other EU Member States, are supporting a moratorium, pause or a ban on deep-sea mining.

Deep-sea mining cannot be considered part of the sustainable blue economy according to the [UNEP Finance Initiative report](#). Furthermore, the [European Investment Bank](#) considers deep-sea mining inconsistent with one of the Bank's primary public policy goals, and any such projects are deemed unacceptable in climate and environmental terms and, as such, are not eligible for EIB investment.

Over [800 marine scientists and experts have warned](#) that deep-sea mining will lead to biodiversity loss, threaten marine food webs, and potentially disrupt the oceanic carbon cycle, undermining our effort to fight global warming. Deep-sea mining will cause irreversible

damage to deep-sea ecosystems, putting transformative medical and scientific discoveries at risk. Just this past July, a groundbreaking study found that polymetallic nodules are oxygen producers, changing our understanding of nature.

We urge you to maintain the European Commission's standpoint on deep-sea mining and, in line with the precautionary principle, continue to call for a global moratorium on deep-sea mining.

Yours sincerely,

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Monica Verbeek, Executive Director, Seas at Risk

Olga Vuković, Interim Executive Director, WeMove Europe

Anaïs Berthier, Head of ClientEarth Brussels office, ClientEarth

Magda Stoczkiewicz, Programme Director, Greenpeace European Unit

Sofia Tsenikli, Global Lead, Deep Sea Conservation Coalition

Paulus Tak, Director, Government Relations, Europe, The Pew Charitable Trusts

Anna Groß, CEO, Deepwave e.V.

Nicolas Entrup, Director of International Relations, OceanCare

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Michael Reckordt, Head of Raw Materials Division, PowerShift e.V.

Niels Henrik Hooge, Campaigner, NOAH Friends of the Earth Denmark

Alex Smolinsky, President, SHARKPROJECT International

Eugénia Barroca, SOA Regional Representative for Europe & Lusofonia, Sustainable Ocean Alliance

Carolina Manhusen Schwab, President & Co-founder, Ocean Born Foundation

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