

IUCN Key Messages

Second part of the thirtieth session of the International Seabed Authority,
Kingston, Jamaica
7 – 25 July 2025

IUCN continues to uphold the need for a moratorium on deep seabed mining, until the conditions set forth in IUCN [Resolution 122](#) “Protection of deep-ocean ecosystems and biodiversity through a moratorium on seabed mining” (2021) are met, and will continue to support its Members, including States, civil society and Indigenous peoples organisations in that direction.

More specifically, IUCN would like to convey the following messages:

For the ISA Council (7 to 18 July):

IUCN notes the perceived acceleration of efforts toward finalizing the exploitation regulations and encourages a measured and inclusive approach that allows for thorough consideration of outstanding issues.

IUCN respectfully wishes to offer the following considerations in support of informed, inclusive, and science-based decision-making:

- ✓ While recognizing the progress made in developing the draft exploitation regulations, IUCN notes that current discussions are still in the second reading phase, with several substantive issues remaining unresolved. In this context, references in the background documents—such as the President’s Briefing Paper—framing this session as the final opportunity to submit proposals may be interpreted as premature.
- ✓ IUCN further observes the proposed expanded use of *informal informals* in the programme. While such formats have proven useful in the concluding phases of other negotiations (e.g., BBNJ IGCs), their use at this stage may present challenges regarding transparency and broad participation, particularly for stakeholders with limited capacity to engage in parallel or closed processes.
- ✓ A scheduling of a third Council session in October 2025 would present resource and participation constraints for many delegations, particularly those from Least Developed Countries (LDCs) and Small Island Developing States (SIDS) and may inadvertently affect equitable participation—an essential component of the common heritage of humankind principle.
- ✓ IUCN encourages Member States to ensure that sufficient time is allocated for negotiation of the remaining substantive issues, and that consensus-building remains a priority. Parallel efforts should also be dedicated to advancing marine scientific research, which is integral to the ISA’s mandate. Strengthening the scientific foundation of the regulatory framework, including through enhanced understanding of the deep-sea environment and the water column above it, should guide, rather than follow, regulatory developments.
- ✓ IUCN further notes that Member States retain the authority to assess whether the draft exploitation regulations are sufficiently mature and rigorous enough for adoption, and that any decision to postpone adoption lies fully within their prerogative.

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- ✓ IUCN would like to recall the 2024 [ITLOS advisory opinion](#) to which IUCN experts contributed, which affirms that, “*The development of an effective common regulatory framework presupposes the existence of adequate information on the state of the marine environment based on updated scientific criteria and methods.*” Significant knowledge gaps remain, and further scientific research is essential to support evidence-based decision-making regarding activities in the Area.

For the ISA Assembly (21 to 25 July 2025):

- ✓ As the supreme organ of the ISA, the Assembly has a vital role in setting the general policy of the Authority. IUCN welcomes the proposed inclusion of a dedicated agenda item to consider a general policy for the protection and preservation of the marine environment and encourages a constructive discussion on its scope and parameters on this urgent matter.
- ✓ IUCN also welcomes the second, overdue period review of the ISA as an opportunity to put forward recommendations to improve the modus operandi of the Organization, as highlighted in [this paper](#).
- ✓ IUCN calls for better mechanisms and safeguards for public consultation throughout the decision-making process, ensuring a transparent, accountable, inclusive, effective and environmentally responsible approach to deep seabed governance.
- ✓ IUCN underscores the importance of ensuring that any future payment mechanisms under the Mining Code fully internalise environmental and social externalities. To uphold the precautionary principle, the ecosystem approach, and the polluter pays principle—as set out in IUCN Resolution 122 and consistent with UNCLOS—provisions should be carefully reconsidered to avoid transferring environmental, legal, or financial risks to the ISA or its Member States. The payment regime must ensure that all obligations are met before any disbursements to contractors, and that a substantial share of any financial benefits supports the delivery of the Common Heritage of Humankind principle.
- ✓ The recent outcomes of the 2025 United Nations Ocean Conference (UNOC3) in Nice, France, underscore growing global ambition to safeguard the ocean, including increased support for precautionary approaches to deep seabed mining with four new countries joining the call for a moratorium on deep seabed mining. In this spirit, IUCN encourages Member States to consider how decision-making within the ISA can align with and not undermine commitments made in other multilateral fora, including under the BBNJ Agreement, the Convention on Biological Diversity, and the UN Framework Convention on Climate Change as conveyed in [this paper](#).
- ✓ Finally, IUCN would like to underline that in addition to UNCLOS, several United Nations General Assembly Resolutions have declared the Area as common heritage of humankind under the remit of the International Seabed Authority as far back as the early seventies (for instance with [UNGA Resolution 2749](#)), which is arguably now customary law. As such, the ISA is the only legitimate and responsible framework under which deep seabed mining activities in the Area can be regulated, as highlighted at ISA30 in this [IUCN statement](#) as well as in [this paper](#) and has a critical responsibility to uphold this principle in the interest of present and future generations.

IUCN will continue to support its Members, including States, other non-State actors and intergovernmental organizations, civil society, academia and Indigenous peoples’ organisations to enable independent scientific assessments, transparent and participatory discussions, and the adoption of robust environmental and human rights legal and institutional frameworks at the International Seabed Authority.