Deep sea mining poses an unjustifiable environmental risk

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19 20 21 22 23	Standfirst: Deep sea mining could provide a globally significant supply of metals we urgently need to decarbonise our society, yet its environmental impact remains intractable. We argue that considering the abundance of on-land resources, and lower environmental risk of terrestrial mining, deep marine mining cannot currently be justified.
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- 26 The international seabed is host to a globally significant mineral resource, however the
- 27 prospect of deep-sea mining (DSM) in this environment is a controversial proposition. In
- recent years substantial advances in DSM technology have been realised but its large-scale
- 29 application has not yet been demonstrated and environmental regulations remain unresolved.
- 30 Despite these challenges there are a variety of positions on DSM within the 167 International
- 31 Seabed Authority (ISA) member states; only 24 currently support a moratorium on the
- 32 granting of DSM exploitation licenses. This raises the alarming prospect of commercial
- mining in the deep ocean without adequate environmental impact assessment, transparency,
 scrutiny or accountability. We contend that the magnitude and gravity of this consideration
- 54 scrutiny of accountability, we contend that the magnitude and gravity of this consideration 55 requires a more precautionary approach, the anyironmental risks which large costs DSM
- requires a more precautionary approach; the environmental risks which large-scale DSM currently poses are simply too great.
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Schematic diagram of the three main ore deposit types currently proposed for deep-sea mining and likely environmental impacts of such activity



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- 41 At present three main types of DSM are proposed: polymetallic nodules from deep-sea
- 42 abyssal plains; cobalt-rich ferromanganese crusts from seamounts, and polymetallic
- 43 sulfides formed at hydrothermal vents near mid-ocean ridges and back-arc basins¹.
- 44 While DSM is mostly planned for beyond national exclusive economic zones (EEZs), a
- 45 significant fraction of both ferromanganese crusts and polymetallic sulfides are located
- 46 within EEZs, such as the Norwegian Sea. Though any moratorium on DSM in
- 47 international waters would not directly apply to these locations, it would protect huge

expanses of the deep ocean and stimulate greater environmental scrutiny and accountability within and adjacent to EEZs.

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Here we set out three main questions that must be addressed before any DSM takes place: (1)
Is there a coherent economic and net zero carbon argument for DSM? (2) What are the likely

environmental impacts? and, (3) Can the impacts be mitigated sufficiently to justify the risks?

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55 Is there a coherent economic and net zero carbon argument for DSM?

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57 Much of the current debate centres around the Clarion-Clipperton Zone (CCZ), a stretch of

the North Pacific between Hawaii and Mexico hosting polymetallic nodules on the seabed.

Notable technology metals within CCZ polymetallic nodules include Mn, Cu, Ni and Co, with concentrations turically approximately $20 \pm 1 \pm 1$ and 0.2 at 0^{\prime} are set 10^{\prime} .

with concentrations typically approximately: 30, 1, 1 and 0.2 wt.%, respectively². Although the total potential resource within the CCZ is globally significant, with conservative estimates

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approximately 20 Gr, such grades are not considered particularly light. As a result, given of
 land resources of such metals remain abundant, with total Mn, Cu, Ni and Co reserves

100 rand resources of such metals remain abundant, with total Win, Cu, Ni and Co reserves

- currently approximately 1700, 890, 100 and 8 Mt respectively³, a compelling resource
- argument for DSM is lacking.
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67 Proponents also argue that DSM is needed to allow sufficient upscaling of metal production

for timely decarbonization of our society. However, the total global annual production of Mn,

69 Cu, Ni and Co is currently approximately 20, 26, 3 and 0.2 Mt respectively³, which is only a

70 fraction of the available on-land reserve mass. Indeed, while profound further expansion of

71 Mn, Cu, Ni and Co supply must be realised to achieve the Paris Agreement with existing net-

zero technologies, environmentally and socially responsible development of our abundant
 existing on-land resources, and investment into new and geographically distributed

73 existing on-land resources, and investment into new and geographicall

- 74 processing facilities, can achieve this future without DSM.
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76 CCZ polymetallic nodules also lack the raw material diversity required for net zero carbon.

Elements which are either absent or at relatively low concentrations include: He, Li, Be, C

(namely graphite), Al, P, Cr, Pd, W, Sn, Bi, U². If DSM is adopted, even at large-scale, it will

therefore have to occur alongside terrestrial mining. Future demand for certain metals within

80 CCZ nodules may also prove lower than currently predicted, e.g. due to the mass adoption of

LiFePO₄ batteries, which do not require Co or Ni. In this scenario, future generations would

inherit quasi-permanently disrupted deep-sea and wider ocean ecosystems which has

liberated metals that were only considered temporarily vital for net-zero carbon.

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85 Instead, redirecting investment from DSM into responsible terrestrial metal mining may

afford better results because the latter is technologically mature, predictable and is therefore

likely to be upscaled more quickly, using well understood methods and risk management.

88 Although it has been suggested that DSM may generate lower direct climate change impacts⁴,

89 waste production and freshwater usage⁵ than terrestrial mining, such models must be

reevaluated as DSM technology matures and the environmental impacts are better quantified.
 To date, no large-scale DSM trials have been completed, so key operational parameters

92 remain unverified^{$\underline{6}$}.

93

- 94 There are also plenty of alternative terrestrial ore deposits, many of which are high grade but
- small, such that they do not offer an adequate return on investment in the current economic
- ⁹⁶ mining paradigm⁷. If DSM does not get the go-ahead, these deposits could be developed with
- a smaller spatial footprint, provide direct social community benefit, and be more readily held
- accountable. In this scenario, we must carefully balance the need for expansion of terrestrial
- 99 metal mining whilst maintaining the highest environmental, social and governance (ESG)100 standards.
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102 There is wide agreement that environmentally responsible primary ore mining must continue 103 to provide sufficient raw material mass to tackle the Climate Emergency⁸. However, the 104 industry remains responsible for profound environmental and social damages worldwide. Our 105 ultimate goal is to displace such activity with a circular economy. Metals are infinitely 106 recyclable; we may never need to resort to DSM.

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108 What are the likely environmental impacts of DSM?

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110 When considering likely DSM impacts, it is important to appreciate the magnitude of what is

proposed. Since 2001, 31 DSM contracts have been signed spanning all the major ocean

basins, including 19 in the CCZ, which cover a total area of over 1.3 million km^{29} . If

implemented such activity would directly impact several thousand km^2 of ocean floor per

114 year¹. This footprint, combined with the inherent world-wide connectivity of the ocean, 115 means impact, using surrent DSM technology, will be falt over large distances and server

means impacts, using current DSM technology, will be felt over large distances and across international borders.

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118 It is now well documented that biological impacts to benthic communities in DSM-impacted

regions will be severe, including extinctions of rare and geographically restricted species¹⁰.
Such change is predicted to be irreversible on human timescales, due to the slow growth of

both the organisms and the substrates being mined. While these ecosystems may be far

removed from human civilization, they are amongst the largest on Earth. DSM would perturb

these systems, with unpredictable and possibly severe consequences for wider ocean health

and function, causing impacts that propagate into terrestrial environments.

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Beyond the direct ecological impact, it is important to consider the change that large-scale DSM could pose to natural oceanic biogeochemical systems. By virtue of their deep-water

DSM could pose to natural oceanic biogeochemical systems. By virtue of their deep-water

setting, proposed DSM locations are invariably floored by fine-grained sediments that loft

129 upwards to form turbid plumes when disturbed. Published models of DSM sediment plumes

- have typically focused on their proximal impacts following a single disturbance event $\frac{11}{1}$.
- 131 However, disturbance of the ocean floor in multiple continuous mining operations will result
- in incremental, cumulative increases in sediment flux transported by deep ocean currents over potentially thousands of km, and high into the water column¹². This effect would be

potentially thousands of km, and high into the water column¹². This effect would be compounded if tailings from DSM are also released. Ecological impacts may include oxygen

depletion, release of toxic metals, gill clogging and physical disruption of mesopelagic

assemblages that play a major role in the movement of carbon from shallow to deep waters¹³.

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138 The cumulative geochemical impacts of widespread DSM on bottom waters are significant,

but currently unconstrained, because deep ocean currents operate as complex conveyors of

140 heat, oxygen, carbon and nutrients. Deep marine sediments also exhibit total organic matter

- content generally less than 0.5%, albeit with significant local variability $\frac{14}{14}$. Despite this 141 relatively low concentration, the substantial mass of sediment which large-scale DSM could 142 mobilise through upwelling has the potential to perturb the carbon cycle. This possibility has 143
- not yet been adequately addressed by science or acknowledged by industry or the ISA. 144
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Can the impacts of DSM be mitigated sufficiently to justify the risks? 146

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Should DSM be given the green light it will be imperative that such activity is phased in 148 gradually and causes the least environmental harm. There is a scientific consensus, however, 149 that uncertainties in both predicting and monitoring the environmental impact of DSM remain 150 intractable^{$\frac{6}{6}$}. Effective design of remediation or no net loss strategies are therefore not 151 currently possible. 152

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The scope of environmental impact statements relating to DSM often consider individual 154 mining operations in isolation, and for a limited number of impacts. However, approval of a 155 first deep sea mine is likely to lead to much greater development as entrepreneurs and 156 governments seek to enter new markets and gain access to resources in a competitive arena. 157 The scope of DSM impact assessment modelling should therefore be based on diffuse and 158 widespread contamination across larger volumes of deep-water circulatory systems than often 159 considered¹². Any approach towards DSM that does not consider the planet-wide implications 160 of plural mining projects occupies a high-risk, immature safety culture with potential 161

- repercussions for all Earth inhabitants. 162
- 163

Effective monitoring of DSM may prove difficult. Whilst terrestrial mining operations are 164 highly visible and accessible, it will be much harder for environmental damage to the sea 165 floor or the overlying water column to be monitored; we will likely be more reliant on 166 companies monitoring their own impacts. The ISA has many nation members and so has the 167 potential to set strong global standards, but the present inclusion of those with a direct 168 financial incentive to promote DSM does not provide the impartial framework required for 169 robust compliance and enforcement. To mitigate this the ISA will require exclusive access to 170 ocean-going vessels or submersibles to allow robust and independent monitoring of DSM 171 environmental impacts. 172

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The urgent case for a global moratorium rests on the following: if DSM is allowed, it will be 174 very hard to reverse that decision. The importance of the oceans to the processes that regulate 175 planetary habitability demands a precautionary approach. We must ensure decisions are taken 176 in the interests of everyone on Earth, not just a narrow constituency of a few mining 177 companies or countries. DSM will affect ecosystems that are less understood than those on 178 land, but whose intrinsic characteristics make them highly vulnerable. Further study is 179 urgently needed to address this knowledge gap; DSM should not be initiated until a reliable 180 and acceptable mitigation hierarchy can be established. Precaution is of the utmost 181 182 importance. We urge all nations that have not yet joined the moratorium on DSM to do so without delay, and that the United Nations adopt this position within international law. 183 184

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189 **Competing interests**

190 The authors declare no competing interests.

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- 225 **Competing interests:** Authors declare that they have no competing interests.

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