



The Chartered Institution of Water  
and Environmental Management



27<sup>th</sup> March 2013

Lord de Mauley  
Parliamentary Under Secretary of State for Resource Management, the Local Environment  
and Environmental Science  
Department of Food, Agriculture and Rural Affairs  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

Dear Minister,

**Department for Business, Innovation & Skills announcement of the award of a licence and contract to explore the Pacific for mineral-rich polymetallic nodules**

*The Chartered Institution of Water and Environmental Management (CIWEM) is the leading professional and qualifying body for those who are responsible for the stewardship of environmental assets. The Institution provides independent comment, within a multi-disciplinary framework, on the wide range of issues related to water and environmental management and sustainable development.*

*The Institution of Environmental Sciences is a visionary organisation leading debate, dissemination and promotion of environmental science and sustainability. We promote an evidence-based approach to decision and policy making and are devoted to championing the crucial role of environmental science in ensuring the well-being of humanity now and in the future.*

*The Institute of Fisheries Management is the professional body for those who are responsible for managing recreational and commercial fisheries and is dedicated to the sustainable management of these resources for public benefit.*

We, the undersigned representatives of the three professional bodies referred to above, urge caution to be taken over the announcement that the Government has secured a licence and contract to explore a 58,000 sq kilometre area of the Pacific Ocean for mineral-rich polymetallic nodules.

The news that it will put Britain at the forefront of seabed mining, estimated at a value of £40bn to the economy over the next 30 years, will please those who have been championing the case for growth and jobs. The technology that is being employed for seabed mining is impressive and will excite the marine exploration community.

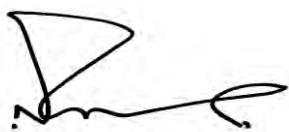
However, the question must be put: do we know enough about the marine environment to be certain that there will not be irrevocable ecological damage caused in the dash for underwater minerals? The answer is 'no'. And many will argue that having polluted the land and the skies we will now ruin the seabed, and endanger the diverse life forms that rely on it.

Instead, we need the Government to set a credible industrial strategy which ensures that strategic elements are recovered from waste materials and reused within our economy. This would reduce our need for virgin materials and to mine in waters that are not our own. Whilst Defra considers its waste prevention programme, the collaboration of BIS could not be more crucial. A resource efficient, circular economy in the UK will not only preserve the natural environment and our supply of resources, but enable us to build a resilient and dynamic economy with strong international competitiveness.

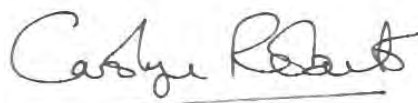
Before Britain enters the race against other countries, and before mining licenses are granted and machinery deployed, CIWEM considers the Government must commit to an independent assessment of the full impact of seabed mining and promise to be bound by its findings. We may not know enough about the marine environment, but we know enough to be careful about its management and that we need to know more. The precautionary principle must apply and we must listen to what expert marine scientists say.

We urge the government to reconsider these proposals as part of a wider review of resource management. We hope that these comments are of value to you. Should you wish us to expand on or clarify any of the points raised please do not hesitate to contact us.

Yours sincerely,



Nick Reeves OBE  
Executive Director  
CIWEM



Professor Carolyn Roberts  
Institution of  
Environmental Sciences



Dr Peter Spillet  
Institute of Fisheries  
Management

CC. Lord Green of Hurstpierpoint, Minister of State for Trade and Investment, Department for Business, Innovation and Skills,

Rt Hon Michael Fallon MP, Minister of State for Business and Enterprise, Department of Business, Innovation and Skills



**Department  
for Business  
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**The Rt Hon David Willetts MP**  
Minister for Universities and Science

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Professor Carolyn Roberts  
The Institution of Environmental Sciences  
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11 June 2013

Dear Professor Roberts,

**EXPLORATION OF THE PACIFIC SEABED FOR POLYMETALLIC NODULES**

Thank you for your letters of 27 March to Michael Fallon and to Lord Green, on behalf of the Institute for Fisheries Management, the Chartered Institution of Water and Environmental Management, and the Institution of Environmental Sciences regarding a licence issued by the International Seabed Authority to UK Seabed Resources Ltd., to explore the Pacific seabed for polymetallic nodules. I am replying as this matter falls within my portfolio and I am sorry for the delay in responding.

I am most grateful to you for highlighting the important issues of precautionary approaches to marine mineral exploitation and resource efficiency in the economy, and indeed I hope to be able to reassure you that Government is aligned with your perspectives.

I agree with your advocacy for efficient use of resources. You mention that BIS collaboration on Defra waste policy is crucial - I agree. Government clearly recognises that efficient production techniques can reduce costs, increase competitiveness, and improve environmental outcomes, and there will be opportunities for growth in new markets for technological or service solutions to reusing and recycling some of these more precious materials. We do want businesses to look at improved resource efficiency, reuse, recycling and recovery of resources, as well as examining the potential for circular business models. That is why BIS worked closely with Defra on making this a key theme of the Government's Resource Security Action Plan (published by BIS and Defra last year) where we set out a number of actions in this area.

<https://www.gov.uk/government/publications/resource-security-action-plan-making-the-most-of-valuable-materials>.

Whilst we recognise the importance, value, and potential for circular economy approaches, I'm sure you'll agree that we are not there yet, and it is not a question of 'either/or'.

We need businesses to drive progress and, with an increasing global demand for important commodities, competitive UK companies in this area are important for employment and for the economy.

We do not agree that we should not mine in waters 'not our own'. The UK is a signatory to the United Nations Convention on the Law of the Sea (UNCLOS), and as such we are committed both to the economic opportunities open to all signatories, and to the international regulatory approaches required by UNCLOS, in this case under the auspices of the UN's International Seabed Authority (ISA). The Government feels strongly that the potential benefits of exploitation of the minerals of the deep seabed are very substantial, but has been determined to ensure that the best possible environmental approaches are built in right from the start. I hope that you will be reassured to learn that the Government consulted closely with marine science experts by having the application for an exploration licence independently peer reviewed to ensure that it met the highest standards on environmental approaches as a condition of Government support. The ISA's legal and technical committee also scrutinised the application from a marine environmental science perspective, and commended it for the quality of the environmental standards applied. In addition, the licence issued by the ISA is for *exploration* (not *exploitation*), and specifically requires UKSBRL to gather environmental data for the purpose of establishing environmental baselines against which to assess impacts of any future exploitation, and also requires a monitoring and reporting regime for environmental data.

At this stage then all that is being proposed is *exploration* for deep sea minerals. The next step will be consideration of the exploitation of these minerals, and for this purpose the International Seabed Authority will need to establish mining regulations. The United Kingdom will play its full part in the negotiations on these regulations, and will argue strongly for the highest environmental standards.

I am grateful for your interest in this matter and hope that you are reassured by the importance that the Government has placed on environmental issues in considering this application, and also by the UK's position in advocating for high environmental standards as international interest in marine mineral exploitation grows.

I am writing in identical terms to Nick Reeves at CIWEM and to Dr Peter Spillett at the Institute of Fisheries Management.

Yours Sincerely  
David Willetts

THE RT HON DAVID WILLETTS MP