













Position on bulk sediment mining of marine minerals

Responsible Fisheries Alliance

The Responsible Fisheries Alliance (RFA), a partnership between environmental NGOs (WWF South Africa and BirdLife South Africa) and five major fishing companies (Irvin & Johnson, Oceana Group, Sea Harvest, Viking Fishing and Pioneer Fishing), is calling for a moratorium to be placed on all new and existing prospecting and mining applications related to the practice of bulk sediment seabed mining.

The RFA believes that in the absence of sufficient research on the potential impacts of this activity, no alternative option exists.

There is a precedent – a lack of information on the environmental impact of bulk seabed mineral extraction has meant that moratoria have been enforced in Namibia, Australia, New Zealand and environmental authorisation was refused in Mexico. In places where extraction has been granted or is being considered, such as in the waters of some Pacific island states, it is being done so due to an inadequate regulatory framework and in spite of opposition from various sectors. The RFA urges government to follow 'best practice' international examples and adopt a precautionary approach in South Africa.

A recent report commissioned by the Centre of Environmental Rights (with support of the RFA) confirms that bulk marine mineral extraction is likely to have a detrimental effect on the benthic environment. Indeed, mineral extraction has the potential to compromise the ability of marine ecosystems to perform critical functions, many of which humans rely on, such as food provision through fisheries resources, concentration of organic material, carbon sequestration, storage of pollutants, sediment mixing, and oxygenation.

The (CER 2016) report also suggests that due to the overlap between the prospecting areas and current fishing grounds, mining is likely to have adverse impacts on the socio-economic ability of the local fishing industry. South Africa's fishing industry has a wholesale value of between R6 to 8 billion, and in 2015, fish products exports generated R5.3 billion in revenue for the country.

It is against this backdrop that the RFA is of the view that, when assessing applications to extract marine minerals, consideration must be extended to unique biodiversity hotspots, as well as existing fishing grounds and habitats or ecosystems that are vital to various life-stages of the fishery species.

Editor's Notes

The commercial fishing industry creates an estimated 27 000 direct and 100 000 indirect jobs. In contrast to this, the number of direct jobs that bulk marine sediment

mining will create is limited to between 40 and 50 per mining vessel and many of these jobs will be temporary and is expected to go to foreign workers. Additional estimated 100-150 permanent jobs is likely to be created for onshore processing should beneficiation take place in South Africa (CER 2016). The assessment further detailed that the fisheries sector does not exist in isolation, but is impacted by – and has an impact on – many other sectors.

Therefore marine bulk sediment extraction has the potential to not only undermine the socio-economic value created by the fishing industry but may also influence a plethora of other commercially important sectors.

Recommendations

The RFA believes that bulk sediment mining of marine minerals should not be permitted in South African waters until the following activities are completed:

- 1. A cost-benefit analysis to estimate the strengths and weaknesses of alternative uses of the marine environment;
- 2. An in-depth ecosystem study that includes a broad GIS analysis of the overlap between fishery grounds and prospecting application areas;
- 3. Comprehensive analyses of alternatives to deep-sea mining for phosphate minerals:
- 4. Strategic Environmental Assessments taking into account the cumulative impact on the environment and other human activities;
- 5. The implementation of improved ocean governance policies and regulations that:
 - a. Collect adequate baseline information on the marine environment;
 - Define standards for the marine environment around mining operations to minimise environmental impacts and avoid significant and irreversible adverse impacts;
 - c. Enable Environmental Impact Assessments for each potential project, including a full identification, assessment and treatment of risks;
- 6. Financial provisions that cover restoration costs once mining has concluded; and
- 7. A contractor-independent public assessment of the permit conditions and the continuous monitoring of potentially impacted ecosystems.

Responsible Fisheries Alliance

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References:

CER (2016) Centre for Environmental Rights Socio-Economic Assessment: Bulk marine sediment mining, Environmental-Economics Policy Research Unit, UCT.