

15 -ാം കേരള നിയമസഭ

13 -ാം സമ്മേളനം

നക്ഷത്ര ചിഹ്നം ഇല്ലാത്ത ചോദ്യം നം. 5537

24-03-2025 - ൽ മറുപടിയ്ക്ക്

കടൽ മണൽ വനം

ചോദ്യം		ഉത്തരം	
ശ്രീമതി കെ. കെ. രമ		ശ്രീ. പിണറായി വിജയൻ (മുഖ്യമന്ത്രി)	
(എ)	കേരള തീരത്ത് കടൽ മണൽ വനം നടത്തുന്ന വിഷയത്തിൽ സംസ്ഥാനത്തിന്റെ എതിർപ്പ് കേന്ദ്രത്തെ അറിയിക്കുകയുണ്ടായോ; ഏതൊക്കെ മാർഗങ്ങളിലൂടെയാണ് സംസ്ഥാനം കേന്ദ്രത്തെ എതിർപ്പ് അറിയിച്ചിട്ടുള്ളത്; ഇത് സംബന്ധിച്ച് സംസ്ഥാനം കേന്ദ്രത്തിന് അയച്ച കത്തുകളുടെയും യോഗ മിനിട്ട്സുകളുടെയും പകർപ്പ് ലഭ്യമാക്കുമോ;	(എ)	അറിയിച്ചിട്ടുണ്ട്. കേന്ദ്ര നിയമമായ 2002 - ലെ ഓഫ് ഷോർ ഏരിയാസ് മിനറൽ ഡെവലപ്മെന്റ് ആന്റ് റഗുലേഷൻ ആക്ടിൽ വരുത്തുവാൻ ഉദ്ദേശിക്കുന്ന ഭേദഗതികളുടെ അഭിപ്രായ സ്വരൂപണ വേളയിൽ കടൽ വനം സംബന്ധിച്ച സംസ്ഥാനത്തിന്റെ എതിർപ്പ് രേഖാമൂലം കേന്ദ്രസർക്കാരിനെ 11.03.2023 - ൽ അറിയിക്കുകയുണ്ടായി. എന്നാൽ കേന്ദ്ര സർക്കാർ, ആക്ടിന്റെ ഭേദഗതിയുമായി മുമ്പോട്ട് പോവുകയും 11.08.2023 - ൽ ഭേദഗതി വിജ്ഞാപനമാവുകയും ചെയ്തു. ടി വിഷയം സംബന്ധിച്ച് കേന്ദ്രസർക്കാർ 11.01.2025 തീയതിയിൽ കൊച്ചിയിൽ സംഘടിപ്പിച്ച റോഡ് ഷോയിൽ കേന്ദ്ര മൈൻസ് സെക്രട്ടറി മുൻപാകെ സംസ്ഥാനത്തിന്റെ നയപരമായ നിലപാടും കടൽ വനം സംബന്ധിച്ച എതിർപ്പും ആശങ്കയും അറിയിക്കുകയും ഓഫ് ഷോർ മിനറൽ ഡ്രൈഡ്ജിങ് ഉയർത്താവുന്ന വിവിധ പാരിസ്ഥിതികവും സാമൂഹികവുമായ വിഷയങ്ങളിൽ സംസ്ഥാനത്തിന്റെ താല്പര്യങ്ങൾ സംരക്ഷിക്കുന്നതിനാവശ്യമായ നടപടികൾ കേന്ദ്ര സർക്കാരിന്റെ ഭാഗത്തുനിന്നും ഉണ്ടാകണമെന്ന് ആവശ്യപ്പെടുകയും, ടി വിഷയവുമായി ബന്ധപ്പെട്ട് വ്യവസായ വകുപ്പ് പ്രിൻസിപ്പൽ സെക്രട്ടറി 11.01.2025 ന് കൊച്ചിയിൽ നടന്ന റോഡ് ഷോയിൽ ഒബ്ജക്ഷൻ നോട്ട് അവതരിപ്പിക്കുകയും ചെയ്തു. ഒറീസ്സയിലെ ഭൂവനേശ്വരിൽ 19.01.2025 -ൽ ചേർന്ന 64-ാം സെൻട്രൽ ജിയോളജിക്കൽ പ്രോഗ്രാമിന്റെ ബോർഡിൽ ഓഫ് ഷോർ വനം സംബന്ധിച്ച് കേരളം ഉന്നയിച്ച പാരിസ്ഥിതികമായ ഉത്കണ്ഠകൾ ചർച്ചയ്ക്ക് വരികയും ആയത് സംബന്ധിച്ചുള്ള പഠനം നടത്തുവാൻ നാഷണൽ ഇൻസ്റ്റിറ്റ്യൂട്ട് ഓഫ് ഓഷ്യാനോഗ്രാഫി എന്ന സ്ഥാപനത്തിനോട് കേന്ദ്രം സെക്രട്ടറി നിർദ്ദേശിക്കുകയും ചെയ്തു. കൂടാതെ

		<p>സംസ്ഥാനത്തിന്റെ ആശങ്കകൾക്ക് അടിസ്ഥാനമാകുന്ന വിവിധ ഘടകങ്ങളെ ബന്ധപ്പെടുത്തി പ്രസ്തുത ആഴക്കടൽ മണൽ വനനമെന്ന പ്രോജക്ട് പൂർണ്ണമായും ഉപേക്ഷിക്കണമെന്നാ വശ്യപ്പെട്ടു കൊണ്ട് വിശദമായ കത്ത് 13.02.2025 ൽ കേന്ദ്ര വനി സെക്രട്ടറിക്കു അയച്ചിട്ടുണ്ട്.</p> <p>ആഴക്കടൽ ധാതു വനനവുമായി ബന്ധപ്പെട്ട വിഷയത്തിൽ സംസ്ഥാനത്തിന്റെ എതിർപ്പും, വനനം നടത്തുന്നതിനുള്ള നടപടികൾ നിർത്തിവയ്ക്കണമെന്നും കേന്ദ്ര മത്സ്യ ബന്ധന വകുപ്പ് മന്ത്രിക്കും, വനി വകുപ്പ് മന്ത്രിക്കും സംസ്ഥാന ഫിഷറീസ് വകുപ്പ് മന്ത്രി 27.02.2025 - ൽ കത്ത് നൽകിയിട്ടുണ്ട്.</p> <p>കേരളത്തിന്റെ സമ്പദ്ഘടനയേയും പാരിസ്ഥിതിക സത്തുലനത്തേയും പ്രതികൂലമായി ബാധിക്കുന്ന ആഴക്കടൽ ധാതുവനനം ഉപേക്ഷിക്കണമെന്ന് കേന്ദ്ര സർക്കാരിനോട് ആവശ്യപ്പെട്ടുകൊണ്ട് 04/03/2025 - ൽ കേരള നിയമസഭ ഐക്യകണ്ഠേന പ്രമേയം പാസാക്കിയിട്ടുള്ളതാണ്. 10.03.2025-ൽ ഇക്കാര്യത്തിൽ തുടർനടപടികൾ നിർത്തി വയ്ക്കണമെന്ന് ആവശ്യപ്പെട്ടുകൊണ്ട് മുഖ്യമന്ത്രി പ്രധാന മന്ത്രിക്ക് കത്തയച്ചിട്ടുണ്ട്.</p> <p>സംസ്ഥാനം കേന്ദ്രത്തിനയച്ച കത്തുകളുടെ പകർപ്പുകൾ അനുബന്ധമായി ചേർക്കുന്നു.</p>
(ബി)	കടൽ മണൽ വനനം എതിർത്തുകൊണ്ട് കേന്ദ്രസർക്കാരിന് നൽകിയ അറിയിപ്പുകളിൽ സംസ്ഥാനം ഏതൊക്കെ ഘടകങ്ങളാണ് ചൂണ്ടിക്കാണിച്ചിരുന്നത്; വ്യക്തമാക്കാമോ;	(ബി) കേന്ദ്ര സർക്കാരിന്റെ അധീനതയിലുള്ള ആഴക്കടൽ മേഖലയിലെ ധാതു വനനത്തിനു സ്വകാര്യമേഖലയെ പ്രോത്സാഹിപ്പിക്കുന്നതിനോടൊപ്പം പര്യവേഷണവും അതിനെതുടർന്ന് വനനാനുമതിയും കരസ്ഥമാക്കുവാൻ പര്യാപ്തമാക്കുന്ന വിധത്തിൽ കോമ്പസിറ്റ് ലൈസൻസിങ് സമ്പ്രദായം നടപ്പിൽ വരുത്തുന്നത് വളരെയധികം ആശങ്കാജനകമാണ്. കേന്ദ്ര സർക്കാർ പുതിയ നിയമ നിർമ്മാണ പ്രകാരം നടത്താൻ ഉദ്ദേശിക്കുന്ന കടലിന്റെ അടിത്തട്ടിലെ ധാതു വനനം ടെറിട്ടോറിയൽ മേഖല, പ്രത്യേക സാമ്പത്തിക മേഖല (Exclusive Economic Zone), ആഴക്കടൽ മേഖല എന്നിവിടങ്ങളിലാണ് നടക്കുന്നത്. ഈ മേഖലകളിലെ ധാതുവനനം ആവാസ വ്യവസ്ഥയ്ക്കും തനതു മത്സ്യ സമ്പത്തിനും ആഘാതമുണ്ടാക്കുന്നതും, കടലിലെയും ഉൾനാടൻ ജലാശയങ്ങളിലെയും മത്സ്യ ഉത്പാദനം ഗണ്യമായി കുറയാൻ കാരണമാകുന്നതാണ്. ധാതു വനനം കടലിന്റെ അടിത്തട്ടിൽ അധിശോഷണാവസ്ഥയിൽ അടിഞ്ഞുകൂടിയ വിഷവാതകങ്ങളെ സ്വതന്ത്രമാക്കുന്നതിന് ഇടയാക്കുന്നു. ഇത് കടൽ

			<p>ജലത്തിന്റെ മലിനീകരണത്തിനും ആതുരമൂലം മത്സ്യങ്ങൾ ഉൾപ്പെടെയുള്ള ജീവജാലങ്ങളുടെ വ്യാപകമായ നാശത്തിനും കാരണമാകും. അതുപോലെ അടിത്തട്ടിലെ ധാതു ഖനനം കടൽ ജലം കലങ്ങുന്നതിന് കാരണമാകുന്നു. പ്രത്യേകമായി രൂപീകരിക്കുന്ന ഓഫ്ഷോർ ഏരിയ മൈനിംഗ് ട്രസ്റ്റിൽ സംസ്ഥാനത്തുനിന്ന് പ്രതിനിധികളെ ഉൾപ്പെടുത്തുവാൻ വ്യവസ്ഥയില്ലാത്തതും സർക്കാരിന്റെ താൽപര്യങ്ങൾക്ക് ഗുണകരമല്ലെന്നും ചൂണ്ടിക്കാട്ടുകയുണ്ടായി.</p> <p>കൂടാതെ കടൽ മണലിനൊപ്പം കൊല്ലം തീരപ്രദേശത്ത് കാണപ്പെടുന്ന ബീച്ച് സാന്റിൽ ഉൾപ്പെട്ട അപൂർവ്വ ധാതുക്കളും കാണുമെന്നും ആയത് സ്വകാര്യവ്യക്തികൾക്ക് ലഭിക്കുന്നത് രാജ്യത്തിന്റെ സുരക്ഷയെ ബാധിക്കുന്നതാണെന്നും കേന്ദ്രത്തിന് മുന്നറിയിപ്പ് നൽകിയിട്ടുണ്ട്.</p>
(സി)	<p>പ്രസ്തുത ഖനനം സൃഷ്ടിക്കുന്ന പരിസ്ഥിതി ആഘാതങ്ങളെ സംബന്ധിച്ച് സംസ്ഥാനം ഔദ്യോഗിക പഠനങ്ങൾ എന്തെങ്കിലും സംഘടിപ്പിക്കുകയുണ്ടായോ; ഉണ്ടെങ്കിൽ എന്തൊക്കെ ആഘാതങ്ങൾ ഉണ്ടാകുമെന്നാണ് സർക്കാർ കരുതുന്നത്; വിശദമാക്കാമോ;</p>	(സി)	<p>ഇതു സംബന്ധിച്ച് പ്രത്യേക പഠനങ്ങൾ നടത്തിയിട്ടില്ല.</p>
(ഡി)	<p>കടൽ മണൽ ഖനനം പവിഴപ്പുറ്റുകൾക്കും പാറക്കെട്ടുകൾക്കും നാശമുണ്ടാക്കുമെന്ന് പഠനങ്ങളിൽ കണ്ടെത്തിയിട്ടുണ്ടോ; എങ്കിൽ ഏതൊക്കെ പഠനങ്ങളിലാണ് ഇത് കണ്ടെത്തിയിട്ടുള്ളത്; വിശദമാക്കാമോ?</p>	(ഡി)	<p>ഇതു സംബന്ധിച്ച് പ്രത്യേക പഠനങ്ങൾ നടത്തിയിട്ടില്ല.</p>

സെക്ഷൻ ഓഫീസർ



GOVERNMENT OF KERALA

Fisheries and Ports (B) Department

No. B3/71/2023-FandPD

11-03-2023, Thiruvananthapuram

From

The Principal Secretary to Government

To

Sri. Mustaq Ahmad,
Director, Ministry of Mines,
Room No.313,
D-Wing, Shastri Bhavan,
Dr Rajendra Prasad Road,
New Delhi -- 110001

Sir,

Sub: Fisheries - Amendment of the Offshore Areas Mineral (Development and Regulation) Act, 2022 - submitting comments/suggestions - reg.

Ref: Your Notice No. M.VI-1/1/2022-Mines VI-Part (1) dated 09/02/2023

Kind attention is invited to the reference cited. The suggestions/comments of the State Government with respect to Amendment of the Offshore Areas Mineral (Development and Regulation) Act, 2022 - are as follows;

We express our deep concern and anguish and request you impose a moratorium on mineral mining in the ocean because of the catastrophe it would cause to marine and estuarine fisheries and to thwart an impending environmental crisis. We also request you to thoughtfully assess the full impact before such a decision is taken. We are of the firm opinion that mineral mining in the marine environment if allowed would lead to a total collapse of the marine fisheries in the Country.

The fisheries sector has demonstrated an outstanding double-digit average annual growth of 10.87% since 2014-15. The sector has reached a record fish production of 142 lakh tons in the financial year 2019-20 and has immense potential for further growth. India is the second largest fish-producing country in the world accounting for 7.56% of global production and contributing about 1.24% to the country's Gross Value Added (GVA) and over 7.28% to the agricultural GVA. Export earnings from the fisheries sector have been Rs.46,662.85 crores during 2019-20. However, of late, the fisheries sector of the country is in the throes of a severe crisis principally on account of resource depletion, spiralling fuel costs, and climate change.

It is in this context that one should examine the decision to allow mineral mining in the ocean as an opportunity to extract rare earth metals to support renewable energy infrastructure, such as wind turbines and solar panels. Ocean mining or seabed mining operations target metals like nickel, cobalt, and copper, which have previously not been exploited because of their isolated locations in the deep sea, as well as technological and financial restraints. Proponents of ocean mining say it is necessary to produce the minerals needed for renewable energy in a way that is less destructive than land mining. Opponents counter that these minerals can indeed be generated with minimal environmental impact, such as through recycling electronics. One must also pay a closer look at the adverse impact it may bring to the socio-economic condition of the fisher folk community.

The Act of 2002 envisages providing an exploration license, composite license, or production lease for undertaking reconnaissance operation, exploration operation, or production operation in the "offshore areas". According to Section 4 (n) of the Act, "offshore" area means the territorial waters, continental shelf, exclusive economic zone, and other maritime zones of India. It means that mineral mining will also take place in the territorial sea and adjacent areas in the exclusive economic zone.

Further, the Act envisages every lessee to pay to the Central Government in advance, in addition to other payments required under this Act, the amount to be paid to the International Seabed Authority in respect of the offshore area granted under his production lease falling in such part of the continental shelf extending beyond 200 nautical miles from the baseline from which the breadth of the territorial sea is measured, towards the fulfilment of the obligation of the Central Government under Article 82 of the United Nations Convention on the

Law of the Sea, 1982. To avoid payment of this huge amount to the International Seabed Authority and also to reduce the transportation cost mining companies will generally prefer to locate their mines within the EEZ areas including the territorial waters which will lead to a collapse of the marine fisheries of this area.

Notably, the areas being explored for ocean mining are also fishing grounds for some of the world's most economically important pelagic and demersal fisheries, including sardines, mackerel, anchovies, shrimps, cuttlefishes, and squids. etc., Thus ocean mining has the potential for far-ranging and severe impacts on coastal fisheries, which would result in a decline in marine catches. Additionally, studies on benthic organisms like corals, sea urchins, bivalves, and crabs, have shown irrecoverable decreases in biomass and species diversity as a result of seabed mining.

Mineral mining in the ocean leads to a reduction in the biomass of the free-floating and benthic organisms which impacts the rate at which they trap carbon in our ocean.

Further at the bottom of the sea, sucking up nodules would involve the destruction of the bottom habitat leading to the potential extinction of many benthic species. The nodules themselves support complex ecosystems, which would be lost.

Stripping seamounts of the outer layer of 'crusts' containing cobalt and other metals would destroy deep-sea sponge and coral ecosystems that are likely to have taken thousands of years to grow. Mining hydrothermal vents also would destroy vent habitats and kill the associated organisms before the biodiversity of these unique and fragile ecosystems is well understood.

Sea bottom mining will lead to the cloudiness of water which will prevent light penetration reducing the euphotic zone of the sea. Any reduction in the euphotic zone will reduce the primary productivity which is the source of energy for all forms of life in the sea including fishes and shellfishes. A reduction in primary productivity will directly reduce fish abundance in the sea.

Plumes of sediment will be created as mining stirs up the seafloor, possibly spreading tens of thousands of square kilometres beyond the mining sites. This will have a direct effect on filter-feeding fishes like sardines, mackerel, etc., and other organisms such as corals and sponges, etc. Wastewater containing sediment and mine tailings (or mining 'fines') pumped back into the ocean would also form plumes that may travel hundreds of kilometres or further which may be toxic and cause water cloudiness, impacting species that use bioluminescence to hunt or find

mates.

Noise, light pollution, and sediment plumes could seriously impact species, such as fishes, whales, etc. that use noise, echolocation, or bioluminescence to communicate, find prey and escape predators. Constant loud noise and intense light will also make many fishes leave the fishing area to safer places thereby affecting fish catch.

The practice of ocean mining involves excavating the ocean floor and collecting metals, like manganese nodules, from the seabed. These metals are pumped from the seabed to the surface through a pipe, while wastewater and debris are dumped into the ocean, forming large sediment clouds underwater. As a result of these practices, there is potential for ocean mining to release sediment and toxins into the water which could cause contamination of the seawater and loss of productivity of the ocean.

Large seabed mining machinery would remove or destroy sponges, corals, and other marine life. Sediment clouds, some capable of traveling long distances, could smother or negatively impact the feeding of other marine life, including plankton, deep-diving marine mammals, and both benthic and pelagic fish. Seabed mineral extraction, which ranges from dredging to far more destructive techniques such as removing the top 12 inches of the seafloor off seamounts, could additionally affect seaweed forests and other marine habitats that nurture commercially and recreationally important fish. Also at risk are the breathtaking beaches, tide pools, and rocky reaches that help support a multi million-dollar tourism industry.

Since estuaries and backwaters are directly connected with the sea any decrease in the productivity of the ocean will directly affect the fish abundance in the estuaries and backwaters as well.

Decline in fish catch in the marine and inland areas will undoubtedly affect the socio-economic condition of the fishers and deteriorate their quality of life.

Apart from mining in the nearshore waters (territorial and exclusive economic zone), mining in the deep sea is also a risky proposition. It will interrupt the fishing of deep-sea fishes like tuna and billfish. Studies have indicated three main impacts of ocean mining on deep-water fisheries: (1) species like tuna may face food shortages if midwater ecosystems, which tuna rely on for forage, are impacted by sediment plumes; (2) water discharged from ocean mining operations may have higher concentrations of metals, including toxic elements like mercury, which can contaminate seafood resources; and (3) the noise and sediment

plumes created by ocean mining might result in avoidance by commercial species like tuna, altering migration patterns. A blue paper commissioned by the High-Level Panel for a Sustainable Ocean Economy found that ocean mining is a potentially risky proposition to deep sea fish diversity.

These impacts could cause seafood contamination or a reduction in the biomass of tuna and billfish. Another concern is the spatial scale of mining impacts, which is currently unknown. As water naturally moves and flows, it is impossible that the impacts of mining operations will remain isolated to only the area where mining is taking place. However, the impacts, including the discharge of unwanted sediments, could enter the marine ecosystem, stretching for hundreds of kilometres and remaining in the water for weeks or months.

In short, deep sea mining would lead to a wide range of environmental impacts would have to be expected from seabed mining. Next to direct physical ecosystem destruction through mineral collection vehicles, major damage, and disturbance would likely arise from light, noise, and sediment pollution. It is particularly important to consider these risks not only at a project level but at a cumulative scale since deep seabed mining would impact areas of continental scale. The most imminent impacts are:

1. Loss of habitat and life-supporting substrates, killing fauna and flora
2. Sediment plumes swirled up from mining, impacting species and habitats
3. Exposure of seabed life to toxic metals released during mining operations
4. Harm to genetic links between different populations of deep-sea animals
5. Habitat alteration and fragmentation through sediment, light, and noise
6. Impacts on primary production in the water column and food webs
7. Impacts on ecosystem functions through disruption of key processes
8. Alteration of large-scale ocean cycles including carbon, nutrients, and trace metals.

According to the Seventh Schedule of the Indian Constitution (Article 246) “fisheries” is a state subject (List II, entry 21), and “fishing and fisheries beyond the territorial waters” alone is placed in the Union list

(List II, entry 57). It means that the development of fishing and fisheries in the inland waters (freshwater, brackish water including estuaries and backwaters) and the sea upto 12 nautical miles from the baseline is a state subject. Mineral mining in the territorial waters will negatively affect fishing in the territorial waters and the inland waters as well leading to its extermination. It means the present attempt by the Ministry of Mines to allow mining in the territorial waters is a direct intrusion into the jurisdiction of the States.

Fishing at sea is probably the most dangerous occupation in the world. India has 252658 crafts fishing in her maritime waters. This includes 142206 motorised crafts, 63481 mechanised boats, 46873 non-mechanised boats, and 98 deep-sea fishing vessels. Incidents of ships colliding with fishing boats are on the increase in recent times which causes great concern and there is a need to ensure the safety of fishermen at sea. With large-scale mineral mining in the sea near the coast, the number of ships/ boats that ply in the area will increase tremendously leading to an increase in collision with the fishing vessels and the loss of lives of fishermen in large numbers.

Subsection 9 of Section 12 and Subsection 3 of Section 13 of the Act envisage issuing the license for fifty years to the Companies. Providing sea areas on lease for such a long period amounts to a “permanent” transfer of ocean resources to big companies.

According to Section 16A of the Act, the Central Government shall, by notification, establish a Trust, as a non-profit autonomous body, to be called the Offshore Areas Mineral Trust. The composition and functions of the Trust shall be such as may be prescribed by the Central Government. There is no representation of the State Governments and the fisher community in the Trust.

The development of the blue economy, which refers to the sustainable use of ocean resources for economic growth, improved livelihoods, and marine ecosystem health, has become a bit of a buzzword in recent years. In the effort to grow the “blue economy,” more mineral mining contracts would be granted in the coming days and the threat of ocean mining to fisheries will become more significant.

We are surprised that fisheries stakeholders were not consulted about the impact of ocean mining on fishing, seriously. Serious deliberations are required at the national level on what kind of overlap there might be with fishing industries and what new industries might be dangerous to other industries in our blue economic portfolio. However, the development of ocean space and resources is something that the fisheries industry should

be getting more involved in. There is an imperative need for fisheries industry stakeholders to get involved in conversations about ocean mining to ensure their interests are protected and fisheries remain productive through this stage of blue growth. We need to make some hard decisions that some industries are not compatible with our blue economy. Ocean mining might be one of those hard-to-fit new industries.

Given the present effects of rising ocean temperatures and acidification, nearshore marine waters and coastal communities cannot absorb another threat. India should close its waters to seabed mining. Such a careful conservation approach is feasible, far-sighted, and reasonable and is the need of the hour. And for the coastal towns, cities, and fishing and tourism industries that depend on these valuable but vulnerable waters for their livelihoods, it is a necessary precaution.

Deep-sea mining is not a distant threat—it's a clear and present danger. Urgent action by the Government of India is critical to stop ocean floor mining.

In this context, there is an urgent need to drop the idea of seabed mining in the country, calling for a deep-sea mining moratorium, saying there isn't enough understanding about the potential impacts.

Yours faithfully,

K S SRINIVAS
PRINCIPAL SECRETARY



No.A3/1/2025-IND

Dated, 13.02.2025.

To

**The Secretary
Ministry of Mines,
Room No. 320 'A' Wing, Shastri Bhavan,
Dr. Rajendra Prasad Road, New Delhi- 110 001.**

Sir,

Sub: Industries Department-Mining & Geology-Auction of offshore
mineral blocks- opinion of the State Government-forwarding of-reg.

Kind attention is invited to the above mentioned subject. Union Government, based on the report submitted by the Geological Survey of India have decided to auction offshore blocks on construction grade sand. State Government express our deep concern and anguish on this matter and request that the **programme of auctioning the offshore sand blocks may be renounced** on following reasons.

1.The norms and provisions of the Offshore Mineral (Development and Regulation) Act, 2002 **and the amendments made therein in 2023 are not fully in consonance with the interest of the States.** Through the 2023 amendment (Section 5), the private sector has also been given participation in the mining sector. The State's dissent was conveyed to the Union Government during the opinion poll on the amendment of the Act after examining the lacuna and limitations in the Act.(Copy enclosed) In the past, offshore exploration and mining was carried out under the supervision of Central Government agencies such as the Geological Survey of India, the Indian Bureau of Mines and the Atomic Minerals Directorate. However, this power has been removed in the 2023 amendment [Section 5 (2)]. Composite license is issued to successful bidders for a period of 50 years as per Sections 12(9) and 13(3) of the Act helps the bidder to continue the mining for 50 years in offshore without any clutches of authority.

2. It is estimated that about 745 million tonnes of construction grade sand is available in Ponnani sector, Chavakkad sector, Alappuzha sector, Kollam North sector and Kollam South sector in the off coast of Kerala. Identified blocks of Kollam region is located at a distance of about 40km from the sea shore and the depth of the sea in this zone ranges from 48 to 62 meters. Since there is no effective mechanism to monitor the activities of offshore mining, **State Government expresses its deep concern regarding the chances of extracting other minerals like Beach sand minerals that are abundantly seen in coastal regions of Kollam, in the guise of permission to extract construction grade sand, which ultimately affect the National Security also.**

3. **The royalty on mining of mineral wealth is entirely due to the Union Government (Section 16). The glaring lacuna in the amendment to the Act relating to offshore mining is that it does not take into account any environmental aspects.** Offshore mineral deposits and the delicate habitat of underwater creatures are located in a symbiosis. Since it has been stipulated in Section 18 that the extraction beyond 200 nautical miles requires an amount to be paid to the International Seabed Authority, the mining companies will generally prefer to locate within the Exclusive Economic Zone and Territorial Waters. Besides, by concentrating on EEC and TW, the companies can reduce the cost of transportation. It will lead to a collapse of marine ecosystem, which ultimately affects the fishery wealth.

4. It has been introduced by Section 16A, to establish a non-profitable Offshore Areas Mineral Trust to monitor the activities related to offshore mining. But the Trust Rules do not permit the involvement of State in the selection of members neither in the Governing body nor in the Executive Committee of the Trust **and hence it is believed that the Trust will be embedded with the representatives only of the Union Government to promote and implement unidirectional policies and guidelines.**

5. The impact of mineral mining on the ecosystem and its own fishery needs to be addressed. It has been identified that the region proposed for ocean mining are rich in pelagic and demersal fisheries like sardines, mackerel, anchovies, shrimps, squids, etc. In addition to that the recent studies showed that there has been irrecoverable decrease in biomass and species diversity in benthic organisms like corals, sea urchins, bivalves, crabs, etc due to sea bed mining. The sea is supposed to be one of the largest carbon sequestration pools and oxygen producer due its benthic organisms and photosynthetic planktons. Sucking up of minerals, especially the sand, disrupts the habitat, reduces the biomass and causes the extinction of benthic species. Besides, the sea bottom mining will increase turbidity, which will prevent light penetration. Reduced light causes reduction in

euphotic zone, which will reduce the primary productivity. A reduction in primary productivity will cause direct reduction of fish wealth. Studies have shown three main impacts due to ocean mining as far as fisheries are concerned. They are (1). Species like tuna may face food shortages if relied marine ecosystems are impacted by sediments plumes or turbidity, (2). Water discharge from ocean mining operations may have higher concentrations of metals, including toxic elements like mercury, which may result in bio-accumulation in sea-foods, and (3). Noises, turbidity and abnormal situations created by ocean mining might result in migration of commercial species like tuna.

6. In 2022, when the Ministry of Mines has sought public opinion on amendment of Mines and Minerals (Development and Regulation) Act, 1957, State has objected to group the Beach Sand Minerals in Part D and the Ministry of Mines has taken into consideration of the objection of the State and the proposal to group the beach sand minerals in Part D has been dropped while publishing the final amendment of 2023. In the above mentioned circumstances, Ministry of Mines is requested to give up the programme of auctioning the offshore blocks of construction grade sand since it badly affects the very fragile marine ecosystem of Kerala.

Yours Faithfully,

A P M MOHAMMED HANISH

SAJI CHERIAN

MINISTER FOR FISHERIES,
CULTURE & YOUTH AFFAIRS
GOVERNMENT OF KERALA



THIRUVANANTHAPURAM

27.02.2025

Date

Spl. Secy (Fish.)

Add to file

SAJI CHERIAN
Minister for Fisheries

Harbour Engineering, Culture &
Youth Affairs, Govt. of Kerala

D.O.No.33/VIP/2024/M(F, C & YA)/Fish

Dear Shri. G. Kishan Reddy ji,

**Subject: Urgent request for a moratorium on Deep - Sea Mineral
Mining to Safeguard Marine Fisheries and the
Environment**

I extend my warm regards and take this opportunity to bring to your esteemed attention my deep concern and strong opposition to the proposed mineral mining in India's offshore waters, particularly due to its potential catastrophic impact on marine and estuarine fisheries and the broader marine ecosystem. The decision to allow seabed mining threatens to destabilize the fishing sector that has demonstrated remarkable growth and provides livelihood to millions of fishers in the country.

India's fisheries sector has exhibited an impressive annual growth rate of approximately 8% over the last decade. The total fish production in India has now reached a record high of 174 lakh metric tonnes in the financial year 2022-23, making us the second-largest fish-producing nation globally. The sector contributes about 1.07% to India's Gross Value Added (GVA) and approximately 6.72% to agricultural GVA. Additionally, marine product exports have surged, with export earnings exceeding ₹ 63,969 crores in 2022-23. However, despite this progress, the fisheries sector faces formidable challenges, including resource depletion, escalating fuel costs, and climate change-related adversities.

In this context, the proposal to permit mineral mining in our territorial waters and Exclusive Economic Zone under the Offshore Areas Mineral (Development and Regulation) Amendment Act, 2023, is alarming. The introduction of auction-based allocation for offshore mineral resources significantly increases the risk of commercial-scale mining operations in ecologically sensitive areas.

Deep-sea mining primarily targets critical metals such as nickel, cobalt, and copper, essential for renewable energy technologies. While proponents argue that this method is less damaging than terrestrial mining, scientific studies have shown that seabed mining causes irreversible harm to marine biodiversity. The mining process disrupts fragile deep-sea habitats, depletes benthic organisms that form the base of marine food webs, and generates vast sediment plumes that can travel thousands of kilometres, smothering marine life and disrupting fisheries.

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Furthermore, these areas targeted for seabed mining are vital fishing grounds for economically significant species such as sardines, mackerel, anchovies, shrimp, cuttlefish, and squid. Disruptions in these habitats will lead to a significant decline in marine catches, directly affecting the livelihoods of millions of fishers and coastal communities. Research has also highlighted that deep-sea mining releases toxic elements such as mercury into the marine ecosystem, potentially contaminating seafood resources and affecting human health.

The environmental consequences of deep-sea mining extend beyond marine biodiversity loss. The destruction of deep-sea coral and sponge ecosystems, which take thousands of years to develop, could lead to the extinction of unique marine species. Noise and light pollution from mining activities threaten migratory species like tuna and billfish, altering their movement patterns and reducing fish availability in traditional fishing zones. Additionally, deep-sea carbon sequestration mechanisms are at risk, potentially exacerbating climate change.

The urgency of this matter cannot be overstated, as the proposed deep-sea mining activities threaten to undermine the foundational principles of sustainable development. India has committed itself to international conventions on biodiversity conservation and sustainable ocean management, such as the United Nations Convention on the Law of the Sea (UNCLOS) and the Convention on Biological Diversity (CBD). Allowing deep-sea mining in ecologically sensitive areas contradicts these global commitments, jeopardizing the health of our oceans and the myriad services they provide, from food security to climate regulation. We must ensure that economic progress does not come at the expense of long-term environmental sustainability.

Moreover, the livelihoods of millions of fisher folk and coastal communities are directly tied to the health of our marine ecosystems. These communities, already vulnerable to the impacts of climate change, rely on the natural bounty of our seas for sustenance and income. Deep-sea mining operations not only pose a threat to marine life but also have the potential to displace local fishers, destabilizing their already precarious economic situation. It is imperative that any development policies prioritize the protection of these vulnerable populations and uphold their rights to a safe and sustainable environment.

Department of Fisheries in Government of Kerala vide letter dated 11/03/2023 (copy enclosed) have already submitted objections in this regard to the Ministry of Mines. To the dismay, the Ministry of Mines have organised a road show by name '*Offshore mineral blocks auction*' at Kochi, Kerala on 11/01/2025 and Government of Kerala have conveyed deep concern and anguish of fisher folk, during the event. It is shocking to hear that the Ministry of Mining is planning to conduct auction for **sand mining in the Kollam sector, which is a traditional fishing ground**. The Kollam

Parappu or Kollam Bank is one of the most productive fishing grounds on the southwest coast of India.

Government of Kerala stands firmly against the exploitation of our oceans in a manner that endangers fisheries, marine biodiversity, and the livelihoods of millions of Indian fishers. Given these significant risks, I urge the Union Government to impose an immediate moratorium on all forms of deep-sea mineral extraction in India's Exclusive Economic Zone (EEZ) and territorial waters. A comprehensive, multi-stakeholder impact assessment must be conducted before any decision is taken in favour of seabed mining. Sustainable alternatives, such as enhanced recycling of critical minerals from electronic waste and investments in land-based sustainable mining practices, should be prioritized.

We request your urgent intervention to safeguard our marine resources for future generations and to ensure that environmental sustainability remains at the forefront of our nation's development agenda.

Thank you for your time and consideration. I look forward to your support in addressing this critical issue.

With Regards,

Yours sincerely,



Saji Cherian

Shri. G.Kishan Reddy,

Hon. Minister of Coal & Mines,
Government of India, New Delhi.

SAJI CHERIAN

MINISTER FOR FISHERIES,
CULTURE & YOUTH AFFAIRS
GOVERNMENT OF KERALA



THIRUVANANTHAPURAM

27.02.2025

Date.....

Spl. Secy (Fish.)

Add to file

D.O.No.33/VIP/2024/M(F, C & YA) Fish

Dear Shri. Rajiv Ranjan Singh alias Lalan Singh ji,

Subject: Urgent request for a moratorium on Deep - Sea Mineral Mining to Safeguard Marine Fisheries and the Environment

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In this context, the proposal to permit mineral mining in our territorial waters and Exclusive Economic Zone under the Offshore Areas Mineral (Development and Regulation) Amendment Act, 2023, is alarming. The introduction of auction-based allocation for offshore mineral resources significantly increases the risk of commercial-scale mining operations in ecologically sensitive areas.

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The urgency of this matter cannot be overstated, as the proposed deep-sea mining activities threaten to undermine the foundational principles of sustainable development. India has committed itself to international conventions on biodiversity conservation and sustainable ocean management, such as the United Nations Convention on the Law of the Sea (UNCLOS) and the Convention on Biological Diversity (CBD). Allowing deep-sea mining in ecologically sensitive areas contradicts these global commitments, jeopardizing the health of our oceans and the myriad services they provide, from food security to climate regulation. We must ensure that economic progress does not come at the expense of long-term environmental sustainability.

Moreover, the livelihoods of millions of fisher folk and coastal communities are directly tied to the health of our marine ecosystems. These communities, already vulnerable to the impacts of climate change, rely on the natural bounty of our seas for sustenance and income. Deep-sea mining operations not only pose a threat to marine life but also have the potential to displace local fishers, destabilizing their already precarious economic situation. It is imperative that any development policies prioritize the protection of these vulnerable populations and uphold their rights to a safe and sustainable environment.

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We request your urgent intervention to safeguard our marine resources for future generations and to ensure that environmental sustainability remains at the forefront of our nation's development agenda.

Thank you for your time and consideration. I look forward to your support in addressing this critical issue.

With Regards,

Yours sincerely,


Saji Cherian

Shri. Rajiv Ranjan Singh alias Lalan Singh,

Hon. Minister of Fisheries,
Animal Husbandry and Dairying,
Government of India, New Delhi.