



September 2, 2025

The Honorable Pete Stauber
Chairman
Subcommittee on Energy & Mineral Resources
House Natural Resources Committee
Washington, D.C. 20515

The Honorable Yassamin Ansari
Ranking Member
Subcommittee on Energy & Mineral Resources
House Natural Resources Committee
Washington, D.C. 20515

RE: Surfrider Foundation Opposition to H.R.4018 - *To Unleash America's Offshore Critical Minerals and Resources*

Dear Chair Stauber, Ranking Member Ansari, and Members of the Subcommittee,

The Surfrider Foundation (“Surfrider”) submits these comments on H.R. 4018 - *To Unleash America's Offshore Critical Minerals and Resources*. Surfrider is a grassroots environmental organization dedicated to the protection and enjoyment of the world’s ocean, waves, and beaches for all people through a powerful activist network. We submit these comments on behalf of our U.S. network of 200 chapters and clubs and more than 350,000 members and supporters.

Surfrider strongly opposes H.R. 4018. Seabed mining has the potential to cause enormous harm to marine ecosystems, wildlife populations, and human communities who depend on these resources. The bill would promote a dangerous international precedent for seabed mineral extraction and create serious geopolitical risks for the nation. Finally, the bill contradicts growing opposition to deep-sea mining from U.S. states and territories, countries, Indigenous Peoples, and science and policy experts.

The ocean is the largest and least explored habitat on Earth, and plays a crucial role in supporting the planet. The U.S. must exercise leadership at the global level to protect the marine environment, communities, and industries from the severe risks of seabed mining by supporting moratoria on mining until its consequences are understood and appropriate regulations are established both within and beyond U.S. national waters.

Below is a further summary of the issues associated with H.R. 4018.

Risks and impacts to fragile ecosystems: The deep sea is the Earth’s least explored ecosystem, with enormous biodiversity and habitats that are easily disturbed. The ocean also provides vital services like carbon storage, nutrient cycling, primary food production, and generation of a

significant portion of the Earth's oxygen. Commercial seabed mining operations could cause significant harm to these public resources and benefits.

Impacts to recreation, tourism, and fisheries industries: Ocean recreation, tourism, and fisheries industries generate hundreds of billions of dollars for the U.S. economy and fundamentally depend on a clean and healthy ocean environment. Seabed mining could put these industries at risk by damaging marine and coastal ecosystems.

Conflict with international law: The bill's requirements undermine the United Nations Convention on the Law of the Sea and disregard the International Seabed Authority's ongoing regulatory process. Ignoring these frameworks reduces the United States' ability to enforce compliance on issues such as illegal fishing and maritime navigation.

This bill goes against widespread opposition: Nearly all U.S. Pacific states and territories (California, Washington, Oregon, Hawai'i, American Samoa, and Guam) have restricted or banned deep-sea mining. At the global level, 37 countries, 65+ corporations, 37 financial institutions, and over 940 marine scientists have called for a moratorium, citing environmental destruction and economic uncertainty.

The technology is unproven: Commercial-scale deep-sea mining operations have never been successfully carried out anywhere in the world and would represent a new industry globally. Significant questions exist as to the technological and economic feasibility of deep-sea mining operations.

Sustainable alternatives exist: Offshore mining is not a sustainable solution to critical mineral needs. It could cause enormous ecological damage to public resources, and recent studies show that battery innovation is already moving beyond the need for the minerals. The U.S. should invest in more responsible mineral pathways and recycling to reduce the need for virgin mineral resources.

Surfrider Foundation urges you to oppose H.R. 4018 and instead support science-based policies that advance renewable energy, responsible resource use and recycling, and ocean stewardship. We appreciate the opportunity to provide this testimony on behalf of Surfrider's U.S. network.

Sincerely,

Pete Stauffer
Ocean Protection Manager
Surfrider Foundation