



July 24th, 2023

**Re: Ocean Visions Submission to Ocean Justice Strategy RFI (CEQ–2023–0004)**

Dear De'Marcus Robinson,

I am writing to submit Ocean Visions' response to the Ocean Policy Committee's Ocean Justice Strategy RFI. Ocean Visions welcomes this initiative and is committed to continue participating in the process of formulating a national Ocean Justice Strategy.

**Reponses:**

- Definitions. What is ocean justice? How do you define ocean justice in the context of your community and your work?
  - For Ocean Visions, ocean justice is the equitable distribution and management of the ocean's multiple benefits and burdens, implemented through inclusive, fair, and participatory decision-making processes that emphasize the inclusion of knowledge and perspectives from Indigenous and traditional coastal communities, as well as other historically disadvantaged communities. It is fundamental for ocean justice that the resulting distributions of benefits and burdens are accompanied by a sense of legitimacy among all actors involved with clear mechanisms for adaptive management. Finally, ocean justice is underpinned by recognition and respect for the rights of Indigenous peoples and their identities and worldviews relating to the ocean and its management, including Tribal communities in the United States.
  - An Ocean justice strategy must acknowledge the role of climate change in producing ocean justice issues. It must also acknowledge the ocean's role in mitigating climate change and its impacts, including injustices related to human wellbeing and ecosystem health.
  - Ocean justice intersects with climate justice through the recognition that the burdens of climate change have disproportionately impacted marginalized ocean and coastal communities in the United States and around the world, including those who are not historically responsible for the greenhouse gas emissions that drive climate impacts.

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- Barriers to Ocean Justice. What are the barriers to realizing ocean justice? What key challenges do you face in achieving ocean justice? What ocean justice challenges do you see as central to Federal Government action?
  - The greatest barrier to ocean justice remains the continued failure to limit greenhouse gas emissions in the United States and abroad. Large-scale decarbonization should be a priority to slow and reverse the thermal and chemical stress that currently threatens the health of the ocean and harms people, ecosystems, and the global climate system. This failure perpetuates ocean injustices such as sea level rise, impacts to ocean and coastal ecosystem services, increased vulnerability to disasters, biodiversity losses, and disruptions to ocean and coastal livelihoods on which communities depend.
  - A key challenge to addressing ocean justice is the need for development and large-scale deployment of effective ocean-based solutions for climate change mitigation. A range of strategies— including ocean-based renewable energy, ocean-based carbon dioxide removal, and ecosystem repair to prevent tipping points— holds immense potential. However, the scalability of these solutions remains uncertain, while communities wait for decisive Federal Government action to accelerate and realize their potential.
  - Federal Government action to achieve ocean justice must include adequate deployment of resources to strengthen scientific programs advancing these solutions, with a strong component of international scientific collaboration. It should also include the creation of enabling policy frameworks that facilitate the advancement of a national research, development and deployment strategy at the scale required. These initiatives must include appropriate mechanisms for the inclusive participation of diverse communities in the United States and abroad with a strong focus on benefit sharing agreements.
- Opportunities for Ocean Justice. What elements, activities, and components should the Ocean Justice Strategy include? What injustices related to the ocean should the Federal Government better address? What successful regional or local efforts to remedy past harms or advance ocean justice should be applied nationwide? What examples do you have of instances when the Federal Government made a just decision related to the ocean, and how might that be scaled up or broadened? What does ocean justice in Federal actions and decision-making look like in practice?
  - Ocean justice requires the investment of Federal Government resources in the creation of knowledge, development, and deployment of comprehensive ocean-based climate solutions. This investment should strengthen multidisciplinary scientific capacity in ocean research, including through initiatives that support technological and social innovation for the inclusive design, adoption, and scaling of ocean-based climate solutions.
  - One priority is the creation of comprehensive large-scale environmental and social impact assessment frameworks for the testing and deployment of ocean-based carbon dioxide removal. These frameworks' design is fundamental

to identifying potential negative impacts and accounting for stakeholders' concerns.

- Research and Knowledge Gaps. What are the research and knowledge gaps that we need to address for the Federal Government to create and advance an effective Ocean Justice Strategy and take equitable and ambitious action?
  - An understanding of baseline community attitudes and sentiments towards ocean-based climate solutions is needed, along with tools to openly track changes in attitudes as ocean-based climate solutions continue to advance. This is crucial to ensuring that ocean-based climate solutions are deployed in communities where social license to operate has been achieved and is maintained.
- Tools and Practices. How can the Federal Government harness existing environmental justice tools and practices, such as the Climate and Economic Justice Screening Tool (CEJST),<sup>[14]</sup> EJ Screen,<sup>[15]</sup> and EnviroAtlas,<sup>[16]</sup> to answer questions about justice in ocean policy? What new tools and practices are necessary to advance ocean justice?
  - The report “Developing Model Federal Legislation to Advance Safe and Responsible Ocean Carbon Dioxide Removal Research in the United States,” prepared by the Sabin Center for Climate Change Law, could be a valuable resource to adapt legislation and tools in a manner that would enable the appropriate assessment of the Ocean justice dimensions of ocean solutions’ tests and trials.
- Partnerships and Collaboration. What ocean justice solutions can or should be led by non-Federal entities? Where and how can the Federal Government partner with Tribal, Territorial, State, and local governments, as well as external stakeholders across regions and sectors, to effectively remedy past harms and advance ocean justice?
  - The implementation of large-scale ocean-based climate solutions addressing ocean justice will require building trust and partnerships across all sectors and levels, from Federal to local. Public deliberation requires decentralized mobilization and participation of several communities of interest, including a strong role for nonprofit organizations. The Federal Government could enable this deliberation process and support ocean justice through the creation of funding mechanisms for initiatives dedicated to public understanding of ocean-based climate solutions and the collaborative design of their implementation. Non-Federal entities such as nonprofit organizations and state- and local-level governments can partner with the Federal Government to assess and facilitate social license for ocean-based climate solutions supporting ocean justice, and to facilitate the testing and deployment of these solutions in state waters.

Sincerely,

Brad Ack  
CEO, Ocean Visions