



23rd October 2024

Statement on Proposed Marine Geoengineering Resolution at the 46th Consultative Meeting of Contracting Parties to the London Convention/19th Meeting of Parties to the London Protocol (LC 46/LP 19).

On the eve of the consultative meeting of the London Convention and Protocol (LC/LP), we are writing to urge Contracting Parties to refrain from taking any action on the draft resolution tabled by the Legal Intersessional Correspondence Group on Marine Geoengineering (LC 46/5/1), which would add certain marine carbon dioxide removal (mCDR) techniques to Annex 4 of the London Protocol.

Action on the draft resolution would have a direct negative impact on the growing efforts on research, development & demonstration (RD&D) for mCDR. While we recognize the legitimate concerns driving this proposal - particularly regarding the potential environmental impacts of these methods - those very concerns underscore the need to expand RD&D efforts. Only through rigorous scientific investigation can we gather the evidence necessary to inform future decisions about large-scale deployment or possible prohibition. It is equally important that these RD&D efforts include the private sector, which has played—and must continue to play—a pivotal role in advancing scientific understanding and innovation in this emerging field.

Action on the proposed resolution would also risk undermining ongoing international efforts to address climate change, particularly those under the UNFCCC and the IPCC. The long-term goals of the Paris Agreement rely heavily on the successful deployment of large-scale carbon dioxide removal, as evidenced in all IPCC scenarios that limit global warming to 1.5°C or 2°C. Prematurely classifying emerging mCDR methods under Annex 4 will certainly hinder the research and innovation that will be needed to achieve these targets.

The intersection of this resolution with the ongoing UNFCCC process under Article 6.4 of the Paris Agreement is also critical. In October 2024, the Article 6.4 Supervisory Body approved standards for carbon dioxide removal (CDR), paving the way for the development of methodologies for high-quality, permanent removals, including mCDR, and their governance. Similarly, the IPCC is expanding guidelines for CDR to potentially include mCDR techniques.

Moving restrictions forward under London Protocol now risks at best misalignment and at worst contradiction with these processes, potentially complicating the development of coherent and robust standards that are essential for mCDR's contribution to the Paris Agreement.

The recent advisory opinion from the International Tribunal for the Law of the Sea (ITLOS) on Climate Change and International Law must also be part of the context for assessing this proposed resolution. ITLOS has recognized greenhouse gases, including CO₂, as a form of marine pollution, obligating states to take all necessary measures to prevent, reduce, and control marine pollution from anthropogenic GHG emissions. The ITLOS ruling opens the door to considering mCDR's role in mitigating this ubiquitous form of marine pollution. Some mCDR methods also have the co-benefit of potentially abating ocean acidification, a major threat to marine ecosystems.

We fundamentally disagree with the rationale presented in paragraph 7 of the proposed resolution which calls for adding these methods to Annex 4 based on the "current state of knowledge." This approach imposes a legal definition of scientific merit, rather than leaving that determination to expert bodies that rely on rigorous evidence and peer-reviewed research like the IPCC. The proposed resolution would disrupt ongoing research and development, stifle one of the major pathways for new research, and reduce the likelihood of getting the critical evidence that we need so that we can make wise decisions about use.

Ocean Visions has advocated for some time for a [comprehensive research program to prove or disprove mCDR techniques by 2030](#). This includes the development of permitting systems, comprehensive social and environmental impact assessments, and rigorous monitoring, reporting, and verification (MRV) frameworks for mCDR techniques as essential prerequisites for any activity—from small-scale trials to larger-scale deployment—if deemed safe and effective.

Instead of doing anything that might preemptively limit progress, our position is that we must focus on ensuring that mCDR research is conducted with the highest scientific and ethical standards, allowing for a balanced exploration of their potential to contribute to global climate solutions. [400 of our scientific colleagues agree and signed a letter that opens with this statement](#): "Society must advance responsible research, development, and field testing of ocean-based carbon dioxide removal techniques to determine their potential to help restore the climate and the ocean.

Placing mCDR techniques under Annex 4 imposes an unnecessary burden and limits the ability to move forward with accelerated and scaled RD&D, potentially delaying the development of crucial tools to address climate change at a time when urgent action is needed.

We are also concerned about the timing of this proposed resolution, which has been submitted before we have seen either the follow up report from GESAMP Working Group 41, or the report

from the Marine Geoengineering Correspondence Group, both expected for 2025. These reports will, among other tasks, update technical definitions and guidance for marine geoengineering technologies, assess the need to incorporate new categories to the technologies under assessment; provide information on activities currently underway; and assess the need to update the 2010 Ocean Fertilization Assessment Framework. We would argue that these critical pieces of scientific advice are needed before any action can be taken on the current proposed resolution.

To be clear, Ocean Visions **does not support** widespread commercial deployment of mCDR methods at this stage. **However, we fully support accelerated RD&D and recognize the critical role of the private sector in advancing that RD&D.** Collaboration between public institutions, research entities, and private companies has always been essential to driving technological innovation. Allowing this collaboration to continue in the mCDR field will enable us to more quickly get the information we need for informed climate action.

In conclusion, we urge the Contracting Parties to take a measured approach, and allow sufficient time for scientific, technical, and policy processes to mature before moving forward with further regulatory decisions on mCDR. Rushing regulatory decisions could stifle innovation and limit our ability to develop climate solutions that also prioritize ocean health and biodiversity.

Thank you for your attention to this important matter.

Ocean Visions