

June 26, 2025

Re: Ocean Visions Statement UNFCCC Ocean and Climate Change Dialogue 2025

Dear Co-Facilitators Mr. Lenaerts and Mr. Cozendey,

Meeting the goals of the Paris Agreement and maintaining the functional integrity of ocean systems requires addressing the excess carbon dioxide already present in the atmosphere and upper ocean. The consequences of this legacy pollution are rapidly intensifying, including rising acidification, deoxygenation, thermal stress, and the destabilization of marine ecosystems. Marine carbon dioxide removal, or mCDR, may contribute to mitigating these impacts if developed through scientifically grounded and socially legitimate pathways.

The 2025 report from the High-Level Panel for a Sustainable Ocean Economy, *Principles for Responsible and Effective Marine Carbon Dioxide Removal Development and Governance*, offers a constructive roadmap for advancing this work. In line with its findings, we encourage Parties to the UNFCCC to pursue the following priorities:

1. Invest in foundational research, development, and demonstration, including MRV systems: Governments should fund and coordinate open, transparent research initiatives that include field trials and the development of credible measurement, reporting, and verification systems. The report highlights the value of establishing pre-permitted test beds to enable learning under clear regulatory and environmental safeguards.
2. Apply high public interest standards to all publicly supported efforts: Public funding for mCDR research must be contingent on high standards for environmental integrity, transparency, and public engagement. Co-development with Indigenous Peoples, local communities, and other rights-holders is essential to ensure that diverse perspectives are reflected in both research design and evaluation.
3. Update national legal frameworks to enable responsible governance: Governments should review and modernize permitting systems to ensure they can accommodate the responsible testing and potential future application of mCDR approaches, upholding international legal principles.

4. Promote international collaboration and capacity building: Avoiding fragmented or duplicative governance will require strong international coordination. Mechanisms for scientific exchange, joint standard setting, and regional cooperation should be prioritized. Special attention must be paid to building technical and institutional capacity across geographies to ensure equitable participation in shaping mCDR pathways.

Central to these efforts is the careful application of the precautionary principle. Precaution should not imply prohibition, but rather a dynamic process of risk management that supports iterative learning and adaptive governance. The principle must be applied in coherence with other foundational norms of international environmental law, including the obligation to prevent environmental degradation, the duty to protect ecosystems for present and future generations, and the imperative to act cooperatively in response to global environmental risks.

We also underscore the need for comparative risk assessment. This approach allows for a more comprehensive evaluation of emerging climate technologies by comparing the risks of action with the risks of inaction. In the case of mCDR, this means considering the controlled and measurable risks of research and experimentation alongside the accelerating harms of ocean acidification, warming, and ecological disruption. Comparative risk assessment enhances the precautionary principle by grounding decisions in scientific evidence and the relative risks of different options. It provides a foundation for informed and adaptive governance.

Finally, we urge Parties to pursue greater coherence across multilateral frameworks. Alignment between the UNFCCC, the Convention on Biological Diversity, the United Nations Convention on the Law of the Sea, and the London Protocol is essential to ensure that climate action, biodiversity conservation, and technological governance are mutually reinforcing. Without such coherence, we risk regulatory gaps, overlapping or conflicting processes, diminished public trust, and the discouragement of responsible research and innovation.

Ocean Visions remains committed to supporting this dialogue and contributing to the development of evidence-based, equitable, and transparent approaches to ocean-based climate solutions.

On behalf of Ocean Visions, thank you.

Brad Ack
CEO
Ocean Visions