

Hand Off Mother Alliance (HOME Alliance)

To: UNFCCC Ocean–Climate Dialogue Coordination Team

Re: Submission to the SB62 Ocean Dialogue

Date: June 29th, 2025

Subject: Marine Geoengineering and mCDR—A Dangerous Distraction from Real Climate Solutions

Dear Co-facilitators,

We thank the UNFCCC Secretariat and the Parties for convening the Ocean–Climate Dialogue at SB62 and for continuing to provide a space for discussing ocean-based climate measures. As an organization committed to protecting the ocean–climate–biodiversity nexus, we are writing to express our serious concerns regarding the inclusion and advancement of marine geoengineering, particularly marine-based carbon dioxide removal (mCDR), within UNFCCC processes.

We welcome and strongly support the Information Note’s recognition that “interventions reiterated the use of the precautionary approach on mCDR.” This acknowledgement is both timely and essential, and we urge Parties to build upon it with clarity and resolve.

#### 1. mCDR Undermines Climate Action, Ocean Health, and International Law

Marine geoengineering does not address the root causes of the climate crisis. Rather, it risks delaying real emissions reductions and prolonging fossil fuel dependency by promoting false technical “fixes.” Framed as mitigation, mCDR distracts from proven, urgent actions and creates the illusion of future removals that cannot be delivered at scale without devastating consequences.

We emphasize:

Marine geoengineering is inherently transboundary, posing serious risks of ecological harm across jurisdictions, and is incompatible with the precautionary principle, the obligation not to pollute the marine environment as outlined in UNCLOS, and internationally recognized human rights obligations.

The scale of proposed interventions is unprecedented: achieving 10 Gt of CO<sub>2</sub> removals per year, often modeled as a “climate-relevant” target, would necessitate technologies functioning over [approximately 10% of the ocean’s surface](#) for a century, posing immense risks to biodiversity, food systems, and marine livelihoods.

The ocean is already under immense stress from warming, acidification, overfishing, and pollution. mCDR would add significant and avoidable pressure to an already fragile system.

#### 2. CBD Moratorium Must Be Respected Across All UN Processes

We recall that at CBD COP16 in Cali, Parties reaffirmed the de facto moratorium on geoengineering, explicitly including mCDR, citing concerns over outdoor experiments. The CBD has consistently warned against activities like ocean fertilization and has excluded commercial elements or offset sales from “legitimate scientific research.”

We urge the UNFCCC to respect this consensus and refrain from reversing or undermining decisions adopted under other Conventions. Policy divergence between the UNFCCC and CBD would fragment governance and weaken global environmental protections.

### 3. UNOC3 Signals a Turning Point: Rejecting Marine Geoengineering

At the 2025 UN Ocean Conference, Ocean Action Panel 7 identified the risks of mCDR. The Political Declaration did not endorse mCDR, but instead called for reinforcing, rather than duplicating or undermining, existing legal frameworks, such as the CBD and the London Protocol. This silence, despite heavy lobbying and side events promoting mCDR, signals growing political caution.

We commend this restraint and urge Parties at SB62 to build on UNOC3 by taking a clear stand: Reject marine geoengineering outright.

### 4. NDC Integrity: No mCDR under “Ocean-Based Mitigation”

We are deeply concerned that vague references to “ocean-based climate mitigation” may serve as an entry point for mCDR into Nationally Determined Contributions (NDCs). We urge Parties to:

Exclude marine carbon dioxide removal from NDCs and the Article 6 framework; Avoid legitimizing speculative removals through climate finance or certification schemes.

Reinforce alignment with international law, especially UNCLOS, the CBD moratorium, and the LC/LP regulatory regime.

We also call on the European Union to honor its Oceans Pact commitment to precaution by excluding mCDR from the EU Carbon Removals Certification Framework, and by supporting a ban on outdoor experiments within EU jurisdiction and Member States' NDCs.

### 5. The Most Credible Climate Solution: Cut Emissions Now

Finally, we stress: climate ambition must not come at the cost of ocean integrity. The most immediate, effective, and just climate mitigation strategy remains rapid emissions reductions, along with the protection and restoration of natural marine ecosystems.

The ocean is not a testing ground. It is our greatest ally in fighting climate change. To protect it, we must say no to marine geoengineering.