

17 February, 2025

Mr. Costas Kadis
Commissioner of Fisheries and Oceans
Directorate-General for Maritime Affairs and Fisheries
European Commission
1049 Bruxelles/Brussel, Belgium

RE: Call for evidence - European Oceans Pact
Submitted via EC website

Dear Commissioner Kadis:

The [Carbon Business Council](#) (CO2BC) is a coalition of more than 100 innovative carbon management companies with over \$16.5 billion in combined assets working across six continents. We appreciate this opportunity to submit comments for the current Call for Evidence regarding the European Oceans Pact.

The Carbon Business Council – with our mCDR Coalition, which represents over 40 commercial marine carbon dioxide removal (mCDR) companies and civil society organizations – applaud the European Commission's commitment to the world ocean, and the efforts of the Commission to seek consensus on and provide guidance for a comprehensive European policy.

The Intergovernmental Panel on Climate Change (IPCC) has clearly stated that CDR – alongside a strong global prioritization on emissions reduction of carbon dioxide (CO₂) and other greenhouse gasses – is “unavoidable,” and in fact will be required at multi-gigatonne (Gt) scale by mid-century for us to reach net zero and have a chance to limit warming to 1.5 or even 2°C.¹ Covering 71% of the planet's surface and serving as (by far) the largest global sink for anthropogenic CO₂,² the world ocean has an outsized role to play in scaling carbon removal to the level we will need in the coming decades.³

In 2024, the CO2BC published an [Issue Brief](#), developed with a working group of CO2BC member companies and ecosystem partners, outlining the massive opportunity for climate mitigation that mCDR represents. The brief additionally highlights the significance of mCDR to the blue economy, as well as the co-benefits many mCDR approaches offer, including local mitigation of ocean acidification, which can contribute to the protection and potential restoration of critical near-shore marine ecosystems and fisheries, as well as to enhanced productivity of commercial aquaculture.

¹ [IPCC AR6 Synthesis Report](#) p 50, 2023.

² Friedlingstein et al., [Global Carbon Budget 2022](#). *Earth Systems Science Data*, 2022.

³ [Research Strategy for Ocean Carbon Dioxide Removal and Sequestration](#), NASEM, 2022.



mCDR constitutes a range of specific methods and technologies, including:

- Cultivation of [macroalgae](#) and [microalgae](#), for sinking to the deep ocean, or harvested for incorporation into long-lived products;
- Restoration of seagrass, mangroves, and other coastal marine ecosystems (coastal “[blue carbon](#)”);
- [Ocean alkalinity enhancement](#) via the deployment of electrochemical systems or physical application of clean alkaline minerals to coastlines, coastal watersheds, through existing and permitted ocean outfalls (e.g.wastewater treatment plants), or the open ocean; and
- [Direct ocean removal of CO₂](#) via electrochemical systems, which can reduce acidification without addition of material to the ocean.

Given mCDR’s great potential to contribute significantly to climate mitigation as well as the blue economy, the CO2BC and the CO2BC mCDR Coalition strongly encourage the Commission to include mCDR as a significant workstream and area of focus in the upcoming deliberations relating to the European Oceans Pact. Many thanks for the important work that you do, and we and our membership would be pleased to serve as a resource to you as you develop this important Pact .

Sincerely,

Benjamin Rubin

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