



September 13, 2024

Chairman Frank Lucas
Ranking Member Zoe Lofgren
House Committee on Science, Space, and Technology
2321 Rayburn House Office Building
Washington, DC 20515

Re: Marine Carbon Dioxide Removal Research and Development Act of 2024
Submitted by email to : allie.chapman@mail.house.gov

Dear Chairman Lucas and Ranking Member Lofgren:

The [Carbon Business Council](#) (CO2BC) is a nonprofit trade association 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 on the proposed Marine Carbon Dioxide Removal Research and Development Act of 2024 (“the Act”).

In January 2024, the CO2BC published an [Issue Brief](#), developed with a working group of over 20 CO2BC member companies and ecosystem partners, highlighting the critical importance of marine carbon dioxide removal (mCDR) towards achieving national and global climate goals. We and our members are thus pleased to see the emphasis and urgency your Committee is placing on mCDR, and thank you for your efforts to develop and advance this important legislation.

We would like to provide the following comments on the draft legislative text:

- We encourage the Committee to align the Act with the roles, responsibilities, and governance outlined in the June 2024 [Memorandum of Agreement](#) in general, and specifically relating to the joint leadership of DOE and NOAA.
- With respect to the draft Sec. 4(d)(1)(D), we do not see a clear distinction in practice across the various mCDR approaches between “demonstration” and “deployment” of mCDR in practice (or “research” and “commercial”), and encourage the Act to avoid these labels in favor of a focus on project scope, scale, climate benefit, and other impacts.
- Regarding Sec. 5, we would encourage the Act to define “Center” flexibly, particularly in terms of geographical extent. Deployment contexts for the various mCDR approaches are sufficiently heterogeneous that it would be potentially challenging to co-locate multiple demonstrations in a single limited geography.

We would be pleased to discuss these points further, and connect you with CO2BC members and partner organizations working to advance mCDR. We very much appreciate the important work that you and your colleagues do, and the opportunity to submit this input for your consideration.



Sincerely,

Benjamin Rubin

Ben Rubin
Executive Director, Carbon Business Council

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