



28 February, 2025

California Ocean Protection Council  
715 P Street, 20th Floor  
Sacramento, CA 95814

RE: Comment on 3/3/25 Meeting, Agenda item 7 - mCDR Considerations for California  
Submitted via email to [COPCpublic@resources.ca.gov](mailto:COPCpublic@resources.ca.gov)

Dear Council Chair Secretary Crowfoot and Councilmembers:

The [Carbon Business Council](#) (CO2BC) is a coalition of more than 100 innovative carbon removal companies with over \$16.5 billion in combined assets working across six continents. We appreciate this opportunity to submit comments on agenda item 7 at your 3/3/25 meeting, "Marine CDR Considerations for California."

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 California Ocean Protection Council's commitment to protect California's coast and ocean by advancing innovative, science-based policy and management, making strategic investments, and catalyzing action through partnerships and collaboration.

The Intergovernmental Panel on Climate Change (IPCC) has clearly stated that CDR – alongside a strong global prioritization on emissions reduction of carbon dioxide (CO<sub>2</sub>) 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.<sup>1</sup> Covering 71% of the planet's surface and serving as (by far) the largest global sink for anthropogenic CO<sub>2</sub>,<sup>2</sup> the world ocean has an outsized role to play in scaling carbon removal to the level we will need in the coming decades.<sup>3</sup>

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 highlights 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. mCDR additionally represents a significant economic development opportunity for coastal communities and the state of California as a whole.

---

<sup>1</sup> [IPCC AR6 Synthesis Report](#) p 50, 2023.

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

<sup>3</sup> [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 CO<sub>2</sub>](#) via electrochemical systems, which can reduce acidification without addition of material to the ocean.

Given mCDR’s significant potential to contribute to climate mitigation as well as to California’s economy, the CO2BC and the CO2BC mCDR Coalition strongly encourage the Council to include responsible research, development, and pilot deployment of mCDR as a significant workstream and area of focus for 2025 and beyond. 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 consider the opportunity that mCDR represents for California.

Sincerely,

*Benjamin Rubin*

Ben Rubin  
Executive Director, Carbon Business Council

*Isabella Corpora*

Isabella Corpora  
Director, Carbon Business Council