



Law

Feedback from: Carbon Gap

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5. Feedback from:

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‘Carbon Gap sees a strong need of improving the coherence and effective implementation of EU ocean governance, especially when it comes to marine carbon dioxide removal (mCDR) The ocean represents a critical and still under-developed pillar of the EUs carbon removal strategy. Europe is particularly well placed to lead on marine CDR, given its favourable geography, strong research base, and existing maritime infrastructure. But doing so will require timely and targeted policy support to address the key scientific, environmental, and scaling uncertainties that remain. In this context, the Ocean Act has the potential of supporting a fit-for-

purpose governance of mCDR in the EU across three main pillars:

1. Improving coherence and implementation of maritime governance Today, mCDR lacks a dedicated and coordinated policy framework. It is scattered across biodiversity, marine, and climate legislation, without a clear strategic vision or governance structure at EU level. The OA could address this gap by recognising the need for a dedicated EU mCDR strategy that explicitly covers both nature-based and engineered approaches, while ensuring alignment with biodiversity protection, marine environmental objectives, and climate targets. Such a strategy would help reduce fragmentation, clarify responsibilities, and provide a coherent framework for responsible research, assessment, and potential future deployment. In addition, there is currently limited legal clarity at EU level regarding engineered mCDR approaches. Existing international frameworks only partially address these activities, and no comprehensive EU regulation sets out how such methods may be researched, assessed, or, if proven safe and effective, deployed responsibly. Ecosystem restoration and blue carbon frameworks tend to favour nature-based solutions, while marine protection, waste, and anti-dumping rules can create barriers for permitting research pilots and demonstration projects involving engineered methods. The Ocean Act offers an opportunity to provide EU-level clarity on governance principles, permitting pathways, and safeguards, grounded in precaution, scientific evidence, and transparency.

2. Ocean observation, MRV, and knowledge systems Robust ocean observation and monitoring systems are a prerequisite for any responsible approach to mCDR. Robust MRV remains a challenge, and without it, mCDR cannot be credibly integrated into EU climate targets or markets. The European Ocean Observation System is therefore highly relevant for mCDR. The OA should ensure that emerging climate-relevant uses of the ocean, including mCDR, are explicitly considered within ocean observation governance. This includes supporting data collection, modelling, and monitoring capacities needed to inform and support the development of methodologies under the CRCF.

3. Strengthening research and innovation support Scientific

questions remain open for mCDR, including regarding environmental impacts, MRV, permanence, and scalability. EU research and innovation funding remains fragmented and insufficient to address these challenges in a timely manner. Without a more coordinated R&I framework, the EU risks falling behind in generating the evidence base needed to develop these methods. The OA could support the development of a dedicated marine CDR research and innovation agenda leveraging the FP10 and the EU Ocean R&I Strategy, and formulating recommendations for national funding schemes, with clear milestones linked to monitoring, reporting and verification (MRV) and certification needs under the CRCF. This would help ensure that policy, science, and funding evolve in a coordinated and mutually reinforcing way. Carbon Gap encourages the Commission to ensure that the OA provides a coherent governance framework that enables precautionary, science-led, and well-coordinated approaches to study and develop the potential of mCDR, while safeguarding marine ecosystems and supporting EU climate objectives.'

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