

Sinking seaweed in the deep ocean for carbon neutrality is ahead of science and beyond the ethics

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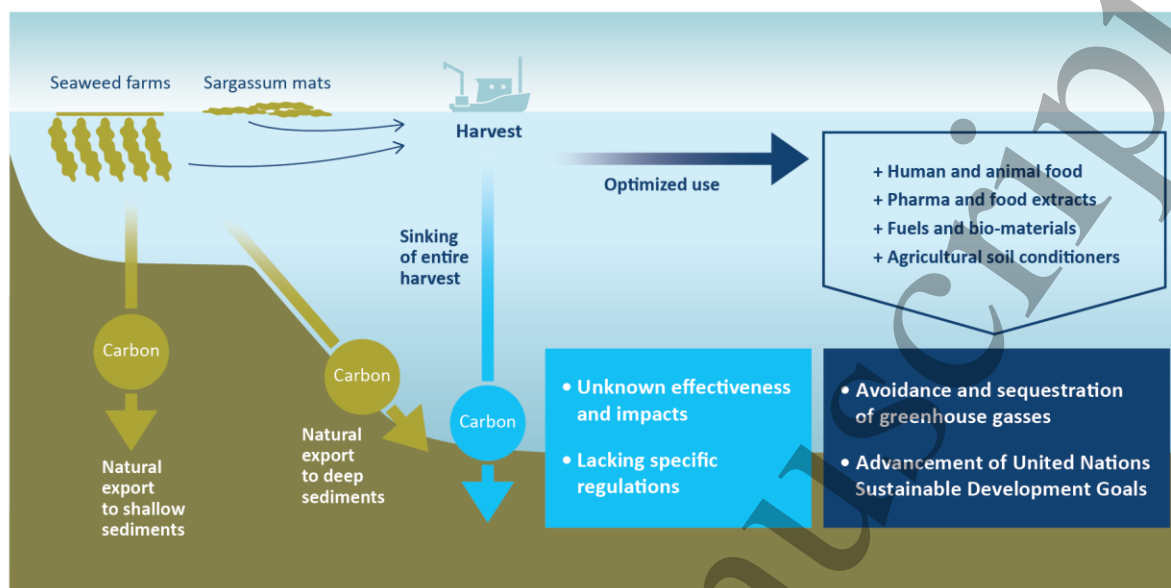
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Preface/Abstract: Sinking vast amounts of seaweed in the deep ocean is currently being proposed as a promising ocean carbon dioxide removal strategy as well as a natural-based solution to mitigate climate change. Still, marketable carbon offsets through large-scale seaweed sinking in the deep ocean lack documentation and could involve unintended environmental and social consequences. Managing the risks requires a number of urgent actions.

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3 The window to meet the goals of the Paris Agreement, measured as remaining cumulative
4 greenhouse gas (GHG) emissions to avoid trespassing the 1.5-2°C threshold of atmospheric
5 warming, is narrow and rapidly closing, leading to calls to urgently activate all options. It is
6 imperative to reduce emissions while implementing vetted carbon dioxide removal (CDR)
7 strategies to remove excess carbon dioxide (at the gigaton scale) from the atmosphere. However,
8 most direct air carbon capture technologies are still in their infancy and are operational at
9 insufficient scale and/or involve too steep financial or environmental costs. Many corporations and
10 nations, committed to achieving carbon neutrality, are in search of investable carbon credits
11 derived from nature-based CDR strategies. Ocean CDR, especially related to the expansion of Blue
12 Carbon habitats (i.e., coastal and marine vegetated habitats), are in the spotlight.
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17 In particular, seaweed farming has entered the family of Blue Carbon options with large
18 expectations due to its scalability, and the multiple socioeconomic benefits that can be derived
19 generating revenue at artisanal to industrial scales. Farmed seaweeds, as well as natural macroalgal
20 beds, can export a fraction of the carbon fixed during growth to adjacent environments (Fieler *et*
21 *al* 2021) where a portion of this carbon, either as entire thali or fragments, may occasionally sink
22 to the deep ocean, and thus become removed from the short-term carbon cycle and sequestered
23 (Krause-Jensen and Duarte 2016, Queirós *et al* 2019). Harvested seaweeds are used for human
24 consumption and animal feed. This cannot be considered for carbon sequestration in the long-term,
25 but can replace foodstuffs with higher carbon footprints, and potentially reduce enteric methane
26 emissions from ruminants (Vijn *et al* 2020). Seaweeds can also deliver high-value molecules for
27 pharma and food industries, replace carbon intensive commodities like chemical fertilizers and
28 synthetic plastics, or generate biochar and biofuels (Duarte *et al* 2021). Each of these emerging
29 markets may represent meaningful GHG emissions avoidance or sequestration opportunities
30 elsewhere in extant supply chains (Fig. 1). The best path to activate the promise of seaweed
31 farming likely is to develop it both as a CDR strategy and utilization technology of low carbon
32 footprint. However, motivated by quick investment returns from carbon credits and the desire to
33 act quickly, some are eager to purposefully sink the entirety of the harvested biomass of seaweed,
34 both farmed and wild, into the deep ocean (i.e., below 2000m for maximized efficiency based on
35 Baker *et al* 2022).
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43 We reflect on risks stemming from scientific knowledge gaps and the lack of governance related
44 to large-scale seaweed sinking, and consider ethical concerns.
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All pathways need life cycle analysis to account for total greenhouse gasses.

Fig. 1. Conceptual diagram of the pathways for seaweed as a CDR strategy. Seaweed from farms and *Sargassum* mats can naturally export carbon, where a fraction sinks into shallow and deep sediments. Harvested seaweed can be allocated for assisted sinking in deep sediments. However, scientific evidence on its effectiveness as a CDR strategy is lacking and it needs development of specific regulations to be implemented. Alternatively, uses of harvested seaweed can be optimized as a CDR strategy and utilization technology of low carbon footprint which also will help advance numerous UN SDGs.

Seaweed carbon as an emerging opportunity

Traditional natural Blue Carbon habitats (seagrass, saltmarshes, mangroves) are the focus of conservation and restoration projects for gaining carbon credits. However, these habitats are restricted to a narrow belt along the shore and occupy <0.2% of the ocean surface (Duarte *et al* 2013). Seaweed aquaculture represents a more scalable opportunity (Duarte *et al* 2017), since the areas suitable for seaweed cultivation can extend far offshore (Froehlich *et al* 2019) within precautionary limits that avoid unintended consequences on the environment (Duarte *et al* 2021). Additionally, floating *Sargassum*, which recently has been observed expanding across the tropical Atlantic Ocean causing unprecedented landings of nuisance macroalgal mats in different continents (Fidai *et al* 2020), is also attracting attention in the carbon crediting context (Bach *et al* 2021).

Hence, the deliberate sinking of seaweed in the deep-sea has been proposed as a climate mitigation strategy to capitalize on the scalability of seaweed farming, including the growing masses of floating *Sargassum* (National Academies of Sciences Engineering and Medicine 2021), and is garnering media, scientific, philanthropic, and commercial attention. Coupled with a roaring demand for carbon credits linked to the wave of carbon neutrality pledges in the private sector,

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3 many entrepreneurs and private companies are emerging that offer rapid solutions at scale from
4 sinking seaweed in the deep sea (Fig. 2).
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6 The seaweed sinking strategy appears very attractive at first blush: a natural, but manipulatable
7 solution that reduces atmospheric carbon dioxide levels, is easily measurable and can be valorized
8 (\$/ton of CO₂-equivalent or \$/kg of seaweed sunk), with expected increases in the value of carbon.
9 The increasing uncertainty surrounding terrestrial carbon capture options due to space limitations,
10 wildfires and other catastrophic events that release captured GHGs further points to farming and
11 sinking seaweed as an appealing alternative to investors. It has all the ingredients for success, and
12 so, the seaweed sinking market has already emerged. The current discussion on CDR strategies is
13 being capitalized on by Western countries, and the US and UK are at the forefront regarding the
14 number of the companies offering seaweed sinking options for carbon removal (Fig. 2). Most of
15 them have large institutional investors behind.
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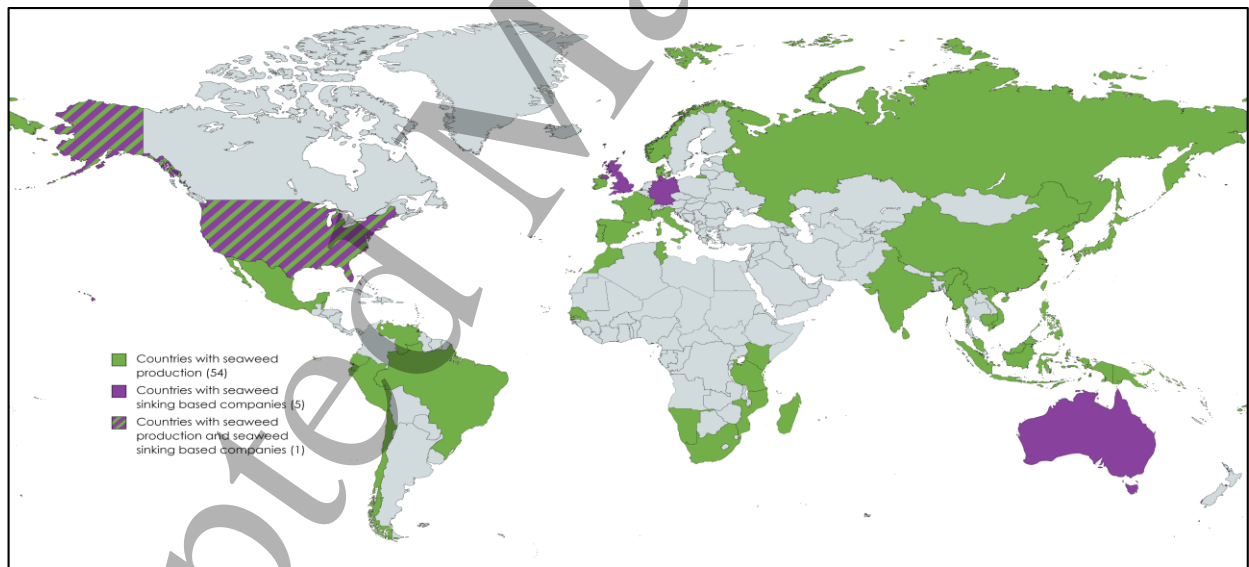
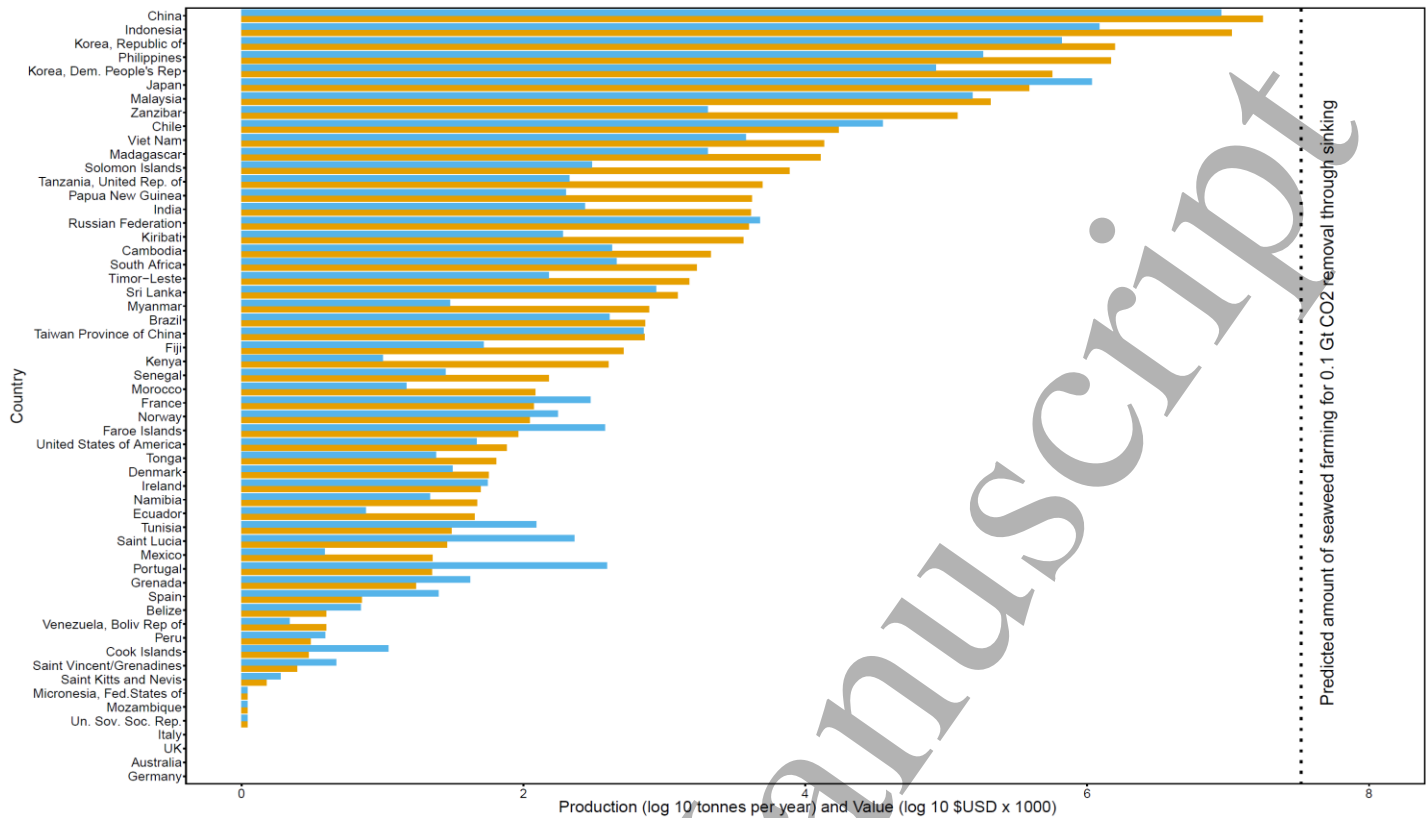


Fig. 2. Location of global seaweed aquaculture production and private companies offering seaweed sinking

for carbon neutrality. Data for global seaweed production comes from FAO 2021

<https://www.fao.org/fishery/statistics-query/en/aquaculture/> and is presented in two ways: fresh biomass (yellow bars) and economic value (blue bars). Yellow bars represent average production per year in the last five years (2015-2019) in tonnes of fresh weight using a logarithmic transformation. Blue bars represent average value per year in the last five years (2014-2019) in USD x 1000 using a logarithmic transformation. The vertical dotted line represents the amount of annual seaweed production required for the removal of 0.1 Gt of carbon dioxide (CO₂), see details in main text. The subplot map highlights the number of countries (n=54) with seaweed production reported to FAO in the last five years (2015-2019) and the number of countries (n=6) with registered private companies or startups offering seaweed sinking for carbon benefits as of 21st of December 2021. For the latter, information comes from a search in CDR project databases (carbonplan.org, airminers.org, Stripe Negative Emissions Purchase, Microsoft

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3 Carbon Removal Request for Proposals) and Google (words: “seaweed sinking deep ocean carbon dioxide
4 removal”).
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8 **Potential risks and lack of scientific evidence** 9

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11 Currently, science cannot discern the impacts of large-scale seaweed sinking in the ocean for
12 marine life or the carbon cycle. The ecological carrying capacity of both large-scale offshore
13 farming and large-scale sinking is unresolved. The consequences for primary productivity in the
14 upper ocean and associated food webs (e.g., from diverting nutrients into large scale production of
15 seaweed), as well as the impacts of large seaweed biomass to deep-sea biological communities
16 (e.g., from oxygen depletion), are largely unknown (National Academies of Sciences Engineering
17 and Medicine 2021, Campbell *et al* 2019). Moreover, not all seaweed ecosystems, farmed or wild,
18 may sequester carbon (Gallagher *et al* 2022) and it is not known with confidence how much and
19 for how long sunk seaweed will store carbon in the deep ocean, and what will be the turnover rate,
20 which likely will depend on the location (Siegel *et al* 2021).
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25 The scientific community, in a clear example of producing demand-driven research, is in the
26 process of identifying the best approaches to test the reliability and impacts of sinking seaweed.
27 This is an essential step forward. Here, we alert that the race to sink seaweed in the ocean is
28 outpacing the rate of progress of the essential science to assess risks, surging past even perfunctory
29 evaluation of the environmental impacts and social benefits. This lack of scientific evidence and
30 of peer-reviewed procedures to verify success of the practice, however, has not prevented the
31 private sector from currently offering carbon removal from sinking seaweed as an attractive
32 marketable product where millions \$USD have already been invested.
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36 **Lack of governance regarding large-scale seaweed sinking** 37

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39 Seaweed farming is a multibillion-dollar industry (Fig. 2) and the fastest-growing aquaculture
40 sector worldwide. For the most part, seaweed cultivation activities in territorial waters are
41 regulated in the same way as shellfish farming (Billing *et al* 2021, Wood *et al* 2017), and there are
42 no explicit regulations regarding sinking seaweed in the deep ocean at any national or international
43 level, although there are international policy instruments that may apply: The United Nations
44 Convention on the Law of the Sea (UNCLOS), the Convention on Biological Diversity (CBD),
45 and the London Convention (1972) and its modernization under the London Protocol (1996).
46 Under the London Protocol, all dumping into the ocean is prohibited, except for acceptable wastes,
47 including organic material of natural origin. But, if the objective of farmed seaweed is to sink it
48 for financial gain through carbon credits, should the valued biomass be considered waste? Specific
49 regulations designating harvested biomass status are required, particularly if negative
50 environmental and social impacts are anticipated. Further, in-depth, third-party environmental
51 impact assessments will be crucial. Similarly, accreditors of carbon credits should enforce reliable
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3 verification processes and hold companies accountable for the accuracy and precision of
4 estimations of carbon removal.
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6 Commensurate with emergent scientific evidence, urgently needed is a plural oversight approach
7 that embraces and coordinates the diversity of actors: governments, managers, civil society (as
8 consumers and final beneficiaries) and the private sector. All of these play a vital role in climate
9 action governance.
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12 **Ethical considerations**

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15 The disposal of a valuable, nutritional and biomaterial resource in the deep ocean in a world
16 suffering from hunger and a sustainability crisis needs careful ethical consideration. The
17 agriculture capacity to meet demands from the growing human population for food and materials
18 is forecasted to become limited (Duarte *et al* 2009). Seaweed cultivation, for centuries a common
19 practice in East Asia, has recently gained increased attention globally for its great potential to meet
20 these challenges (Duarte *et al* 2021). Seaweed farming has the capacity to meet multiple goals
21 contributing to advance a number of the United Nations Sustainable Development Goals (UN
22 SDGs). These include zero hunger (SDG2), good health and well-being (SDG3), affordable and
23 clean energy (SDG7), climate action (SDG13) and life below water (SDG14); which provide
24 integrative benefits contributing to additional SDGs (Duarte *et al* 2021). Despite its sustainability
25 potential, social license for the seaweed aquaculture sector hinders its growth (Billing *et al* 2021).
26 Sinking seaweed for a poorly documented climate benefit will likely be met with increasing social
27 opposition.
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33 In recent human history, we have seen other examples of natural food resources being deviated to
34 climate-related actions with negative consequences for communities that depend on them. The
35 sudden interest in sinking seaweed, that otherwise is usable and has market value, mirrors the
36 biofuel race a few decades ago, where the price of flour increased due to competing demands of
37 crops for biofuel. Developing seaweed farming, both as a CDR strategy and an industry for
38 resource production and use in parallel, could have a positive social impact by enhancing both the
39 blue economy and the green shift, and possibly avoid negative social consequences. But the
40 framework should be to achieve UN SDGs goals as a whole, not solely climate action (Duarte *et*
41 *al* 2021).
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46 **A call to action**

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48 Managing the risks from the growing drive toward sinking seaweed as a CDR strategy requires a
49 number of urgent actions.
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52 -Advance the scientific understanding of sinking seaweed as a CDR strategy (scope and duration)
53 and the associated ecological impacts. The development of comprehensive estimates of regionally
54 specific carrying capacity for large-scale seaweed farming and informed assessments of where
55 seaweed sinking trials are best executed, are critical elements to inform regulations.
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3 -Generate robust estimates of the spatial area necessary to grow enough seaweed to sink in a way
4 that is climatically effective, as well as estimates of area availability. A recent exercise in this sense
5 (National Academies of Sciences Engineering and Medicine 2021) suggests a required farming
6 area of 7.3 million hectares for CDR-worthy gigaton levels (0.1 Gt carbon dioxide sequestered per
7 year = seaweed production of $0.033 \text{ PgC yr}^{-1}$), which would require the entire current global annual
8 aquaculture production (Fig. 2) to be sunk. Estimates for carbon neutrality suggest even larger
9 areas and seaweed production (Gao *et al* 2022a). However, the uncertainty around these estimates
10 is very large, and layered seaweed cultivation systems are in development that would modify these
11 estimates.
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15 -Craft sustainability and ethical standards for large-scale natural nuisance or farmed seaweed
16 sinking including socioeconomic and climate benefits that consider all applicable UN SDGs.
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19 -Develop and vet reproducible and species-specific methodologies to verify carbon credits from
20 seaweed sinking that considers various current farming practices. Aside from sinking the entire
21 crop, seaweed farming presents other opportunities for CDR through pathways not currently
22 accounted for (Fig. 1). For instance, consideration for carbon sequestration purposes should be
23 given to non-edible parts of the seaweed which are currently culled and dumped during harvest as
24 they are difficult to commercialize (e.g., holdfasts, biofouled fronds, excess product). Similarly,
25 sediments underneath farms could also be accumulating and storing carbon. Gaining carbon credits
26 from these pathways represents an unrealized, existing opportunity at no change in current
27 activities and their impacts that needs to be explored.
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32 -Synthesize life cycle assessments (LCAs) to account for total GHG emissions. These ‘sinking of
33 farmed seaweed’ LCAs need to be juxtaposed against the same assessments for sinking nuisance
34 seaweed and against farmed seaweed biomass utilization strategies that avoid or sequester GHGs
35 elsewhere in food, feed, plastic, or fuel supply chains to fully understand trade-offs and determine
36 the most cost-effective CDR strategies.
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39 -Consider all potential options that seaweeds offer as a natural-based solution to reduce CO₂
40 emissions. From integrating all seaweed uses (e.g., food, biofuel) and their specific temporal scale
41 of carbon sequestration in estimates of carbon neutrality, to considering the role of all carbon
42 pathways from seaweed cultivation, including lost particle organic carbon and excreted dissolved
43 organic carbon, which are usually overlooked (Gao *et al* 2022b, Duarte *et al* 2021).
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47 In conclusion, the urgency to find solutions that help stem climate change does not justify the
48 deliberate sinking of seaweed in the deep ocean without properly assessing the consequences.
49 Investment is best spent on advancing practical knowledge, not on unfounded promises of carbon
50 sequestration.
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37 **Data availability statement:** All data supporting this study is publicly available and data
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39

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41

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