UN climate talks could undermine precaution on geoengineering called for by the biodiversity convention

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> *UNFCCC negotiations on Article 6 of the Paris Agreement risk legitimising dangerous Carbon Dioxide Removal (CDR) schemes and undermining precautionary work being undertaken in other UN fora.*

At the upcoming COP29 climate talks, which kick off in Azerbaijan next week, negotiators will once again meet to discuss the rules around the implementation of international carbon markets, which fall under Article 6 of the Paris Agreement. The concerns around these carbon markets and how they will be implemented are many, but one to focus on in particular is the inclusion of ”carbon removals“ in them alongside existing emissions reductions and offsetting schemes.

The inclusion of carbon removals – which encompasses a range of geoengineering schemes falling under the Carbon Dioxide Removal (CDR) banner – leaves the door wide open to dangerous and speculative large-scale technological approaches to pulling CO_2 out of the atmosphere. Such approaches could include Bioenergy with Carbon Capture and Storage (BECCS), Direct Air Capture with Carbon Capture and Storage (DACCS) and industrial-scale Enhanced Weathering. Also on the table are marine geoengineering approaches such as Ocean Fertilisation, Ocean Alkalinity Enhancement (OAE), Direct Ocean Capture and large scale seaweed farming and biomass sinking.

Negotiations over Article 6.4, the section of Article 6 which deals with international carbon markets, had reached a stalemate at previous COPs. However, in an effort to overcome this, the Article 6.4 Supervisory Body, which is tasked with developing the key rules and methodologies for Paris Agreement carbon markets, made a cunning move this year: After consensus was not reached on its recommendations at COP27 or COP28, at its last meeting in October 2024, the 6.4 Supervisory Body quietly decided to convert its recommendations into “internal standards” that came into in force immediately, and which supposedly do not require further discussion and approval at COP29.

Controversial documents turned into “internal standards”

Olga Gassan-Zade, a member of the 6.4 Supervisory Body, was the first to draw attention to this, and articulated her concerns in a LinkedIn post:

> *"The most fundamental change compared to a year ago is that the recommendations that were made to the CMA* [referring to the Meeting of the Parties to the Paris Agreement at the annual COP] *last year are not coming back to the CMA. Instead they were converted into internal SBM* [Article 6.4 Supervisory Body] *standards that procedurally do not require CMA approval. Future will tell if it was a good idea or not. Personally I have huge reservations against creating a UN mechanism that can effectively evade UN governance but it didn't feel like the SBM as a whole was willing to risk not adopting the CMA recommendations for a third year in a row."*

The Supervisory Body was not elected with a mandate to evade UN governance, and this unilateral action should not be allowed by the Parties to the Paris Agreement – precisely because the negotiations on the contents of these documents proved to be controversial at the last two COPs and Parties were unable to reach an agreement.

Furthermore, the standards that have now been adopted by the Supervisory Body establish a very broad definition of carbon removals: *"Removals are the outcomes of processes by which greenhouse gases are removed from the atmosphere as a result of deliberate human activities and are either destroyed or durably stored through anthropogenic activities."* (A6.4-SBM014-A06, at 9 (a), p. 4)

Article 6 would enable risky geoengineering technologies

Such a wide definition could open the floodgates to the commercialisation of several forms of dangerous and unproven land and marine geoengineering technologies. This would bring many risks to ecosystems and to communities, particularly those living around carbon capture facilities or whose livelihoods are based on artisanal fisheries and other marine activities.

There are also large scientific uncertainties around the claim that these technologies can reliably and permanently remove carbon from the atmosphere. In fact, in many cases these geoengineering schemes could even be a net source of CO2 emissions, once all lifecycle emissions are taken into account. This is especially true of numerous BECCS and industrial seaweed farming projects, as well as many Carbon Capture Use and Storage (CCUS) proposals which, rather than being proven to "durably" store carbon, in most cases simply postpone emissions for a brief period. At the same time, they create significant additional emissions from all of the processes involved.

Geoengineering is a threat to biodiversity

Many of the risks to biodiversity and communities posed by geoengineering were acknowledged years ago by the UNFCCC's sister convention, the UN Convention on Biological Diversity (UN CBD). Just last week at the CBD's COP16 in Cali, Colombia, in recognition of the fact that the risks and uncertainties around geoengineering proposals have only increased, Parties reaffirmed the CBD's *de facto* moratorium on climate-related geoengineering and urged Parties to ensure its implementation:

> 6. Reaffirms decision IX/16 C, on ocean fertilization, paragraph 8 (w) of decision X/33, and decisions XI/20 and XIII/14 of 9 December 2016 on climate-related geoengineering, and urges Parties, and encourages other Governments, to ensure their implementation; (Decision CBD/ COP/16/L.24, Cali, Colombia Nov 1, 2024)

Meanwhile, there is also work ongoing to regulate marine geoengineering through the London Convention/London Protocol, which is a UN mechanism for protecting the marine environment from pollution and waste dumping. Its governance framework already prohibits Ocean Fertilisation except for legitimate scientific research with no commercial purpose. There is now work underway to evaluate the impacts of and regulate several other geoengineering techniques that have impacts on marine ecosystems.

Against the backdrop of the recent CBD decision and the work being undertaken through the London Convention/London Protocol, there is a serious risk that the UNFCCC will directly undermine the important and precautionary work being carried out in these other UN fora. By legitimising large-scale Carbon Dioxide Removal

for offsetting purposes, the climate convention will be putting itself at odds with its biodiversity counterpart, thereby risking exacerbating both the climate and biodiversity crises.