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**Hon Reece Whitby MLA**  
**Minister for Environment; Climate Action;**  
**Racing & Gaming**

Our Reference: 79-07883

Mr Tony Zappia MP  
Chair  
House Standing Committee on Climate Change, Energy, Environment and Water  
House of Representatives  
Parliament House  
[cceew@aph.gov.au](mailto:cceew@aph.gov.au)

Dear Mr Zappia

I refer to your letter of 30 January 2023 to the Premier of Western Australia, Hon Mark McGowan MLA, inviting a submission on the Terms of Reference (ToR) for the inquiry into the 2009 and 2013 amendments to the 1996 Protocol to the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972 (London Protocol). As the matter raised falls under the Environment portfolio, your letter has been referred to me for a response.

I note the ToR for the inquiry and can provide the following comments in relation to the first two points regarding environmental benefits and impacts of activities associated with sub-seabed sequestration and marine geoengineering.

The capture and sequestering of carbon in the ocean represent a potentially important mechanism for offsetting greenhouse gas emissions. The 2009 and 2013 amendments to the London Protocol could support the application of projects on sub-seabed sequestration, with the potential for flow on benefits to the carbon economy. Full appreciation of the long-term ecological risks and benefits associated with such projects requires further research.

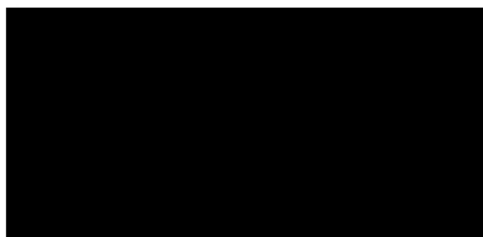
Within the State waters of Western Australia, marine plants that capture carbon from the atmosphere (e.g. seagrass, mangroves and macroalgae) are the subject of ecological research and monitoring. Understanding of carbon transport among these communities and their contribution to marine carbon fixation at a broader scale is limited, particularly for transport of carbon from State waters to deeper waters, which are likely to be the most stable and secure carbon sinks. Therefore, the potential benefits of marine geoengineering activity cannot be predicted with any degree of confidence. The 'farming' or fertilisation of sea plants for fixation of carbon may alter natural cycles

of productivity, with unknown consequences for the environment and the services it provides to the people of Western Australia.

Although amendments to the London Protocol may pave the way for projects that produce, export and sequester marine carbon, these projects must be underpinned by robust scientific understanding of carbon flow across the entire seascape. Further, it is critical that assessments of any such projects consider the long-term implications for natural levels of productivity and carbon transport.

Thank you for the opportunity to submit these points for your consideration.

Yours sincerely



Reece Whitby MLA  
**MINISTER FOR ENVIRONMENT**

28 February 2023