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SCIENTIFIC GROUP OF THE LONDON  
CONVENTION – 30<sup>th</sup> Meeting; and

LC/SG 30/INF.28

1 June 2007

ENGLISH ONLY

SCIENTIFIC GROUP OF THE LONDON  
PROTOCOL – 1<sup>st</sup> Meeting  
18 – 22 June 2007  
Agenda item 12

### ANY OTHER BUSINESS

#### Planktos, Inc., Large-scale Ocean Iron Addition Projects

#### Submitted by the United States

##### SUMMARY

**Executive summary:** It is the understanding of the United States Government that the United States-based for-profit company Planktos, Inc., plans to dissolve up to 100 tons of iron dust in a 100 km by 100 km area approximately 350 miles west of the Galapagos Islands in June 2007 in order to stimulate phytoplankton blooms. Because this iron release project will not be done by vessels flagged in the United States or by vessels leaving from the United States, the United States Government does not have jurisdiction to regulate this project under its law implementing the London Convention. The United States believes that the iron addition projects proposed by Planktos, Inc. should be evaluated carefully by any State that has appropriate jurisdiction over this activity.

**Action to be taken:** Paragraph 9

**Related documents:** LC/SG 30/12 and LC/SG 30/12/1

### Introduction

1 It is the understanding of the United States Government that the United States-based for-profit company Planktos, Inc. plans to dissolve up to 100 tons of iron dust in a 100 km by 100 km area in the Pacific Ocean, approximately 350 miles west of the Galapagos Islands, in June 2007 in order to stimulate phytoplankton blooms. We also understand that subsequent, similar large-scale iron additions may be carried out by Planktos, Inc. in other locations in the Pacific and Atlantic Oceans.

2 According to press reports and discussions with Planktos, Inc., a primary goal of these projects is to assess whether large-scale iron additions result in carbon sequestration that can be quantified, verified, and sold in the global carbon credit market, particularly in the European Union.

3 Initial press reports indicated that the planned iron addition by Planktos, Inc. off the Galapagos Islands would be done using a vessel flagged in the United States, the *Weatherbird II*. Such a project potentially would be subject to permitting requirements under the United States' Ocean Dumping Act, which implements the London Convention on ocean dumping.

4 The United States Environmental Protection Agency (EPA) contacted Planktos, Inc. on 21 May 2007, to get additional information about the iron addition projects.

5 Planktos, Inc. contacted the EPA on Wednesday, 23 May 2007, to state that the company will not use the *Weatherbird II*, a United States' flagged vessel, for releasing the iron. Instead, the EPA understood the representative of Planktos, Inc., to say that the company will use a non-United States flagged vessel for releasing the iron so as not to be subject to regulation under the United States' Ocean Dumping Act. Planktos, Inc. was not able to say at the time under which country the vessel(s) used for the iron additions would be flagged. Planktos, Inc. also was unable to identify from which country the vessel(s) used in the iron releases would be leaving, although the EPA understands that the vessel(s) would not leave from the United States.

6 Planktos, Inc. was not able to provide the EPA with any information relating to an evaluation by the company or by any regulatory body of the potential environmental impacts of their planned iron addition projects, such as:

- .1 the estimated amount and potential impacts of iron that is not taken up by phytoplankton;
- .2 the amounts and potential impacts of other materials that may be released with the iron;
- .3 the estimated amounts and potential impacts of other gases that may be produced by the expected phytoplankton blooms or by bacteria decomposing the dead phytoplankton;
- .4 the estimated extent and potential impacts of deep ocean hypoxia (low oxygen) or anoxia (no oxygen) caused by the bacterial decay of the expected phytoplankton blooms; or
- .5 the types of phytoplankton that are expected to bloom and the potential impacts of any harmful algal blooms that may develop.

7 According to the Planktos, Inc. website, the company is based in San Francisco, California (United States), with offices in the European Union and British Columbia (Canada).

8 The United States believes that the iron addition projects proposed by Planktos, Inc. should be evaluated carefully, including for potential environmental impacts, by any State that has appropriate jurisdiction. For example, under the London Convention, dumping does not include placement of matter for a purpose other than the mere disposal thereof, provided however that such placement is not contrary to the aims of the Convention. Other international regimes (e.g., regional seas agreements) and domestic regimes also may apply to this activity.

### **Action requested of the Scientific Groups**

9 The Scientific Groups are invited to take note of the information provided and to comment, as they deem appropriate.