

WWF Climate & Energy

MITIGATION EXPECTATIONS FOR COP 19, WARSAW

The latest edition of UNEP's "Emission Gap Report" showed the "gigatonne gap" between climate mitigation action and the emission reductions required to limit warming to below 2 °C continues to exist¹. It reports "[e]ven if pledges are fully implemented, the emissions gap in 2020 will be 8–12 GtCO2e per year". The report further states that "Limited available information indicates that the emissions gap in 2020 to meet a 1.5° C target in 2020 is a further 2–5 GtCO2e per year wider." WWF urges parties to come to Warsaw with fresh ideas and the political will to ensure that the gap starts closing rather than continuing to expand.

COP19 is critical for the development of a solid workplan for the next two years. This workplan must include concrete milestones and timelines under the ADP that would ensure an ambitious outcome in 2015 and lay out specific steps to close the gigaton gap before 2020. Post-2020 commitments cannot become the sole focus until 2015 - If urgent action is not taken to ensure that global emissions peak within the next few years, the economic costs of future action will escalate as early retirement of carbon intensive infrastructure will be required and further climate change is locked into the system.

Pre-2020 ambition in ADP Workstream 2: Closing the Ambition Gap

The Pre-2020 workstream under the ADP provides parties with two unique opportunities.

- Parties have given themselves a chance to align emission reduction commitments with the latest climate science on trajectories to keep global warming below 2 °C and even the safer threshold of 1.5 °C.
- This workstream provides Parties with an opportunity to find innovative new ways to hasten climate action. Since the workstream is not an intensive negotiation about

long-term commitments parties have an opportunity to test new approaches and to take action in innovative ways. These new approaches cannot be at the expense of developed countries taking faster, more ambitious action but they can add much needed momentum to multilateral efforts.

Each of these opportunities is discussed further in the following paragraphs.

Increase current pre-2020 pledges

Developed countries

With leading emitters such as the USA, Japan, Canada, New Zealand and the Russian Federation not having any emission reduction obligations under the Kyoto Protocol's second commitment (KP CP2) period the Protocol covers only 13% of global greenhouse gas (GHG) emissions². The IPCC suggests that Annex I countries need to reduce their emissions by at least 25-40% below 1990 levels by 2020 to stabilize GHG concentration levels at 450 ppm. Current commitments for countries that have targets under the KP CP2 at best add up to 18% emission reductions³. This already low figure does not account for the many loopholes that have been created and most of the commitments are little better than business as usual projections.

In Doha, parties agreed to consider strengthening their commitments in 2014. WWF urges all Annex I Parties –Kyoto or non-Kyoto – to recognize the complete inadequacy of their current efforts and to increase their 2020 targets before the end of 2014. The Climate Action Tracker suggests that the emission gap could be narrowed by 5.6 GtCO2eq if

² IEA (2013) Redrawing the Energy-Climate Map: World Energy Outlook Special Report. OECD/IEA.

³ UNFCCC (2012) Quantified economy-wide emission reduction targets by developed country Parties to the Convention: assumptions, conditions, commonalities and differences in approaches and comparison of the level of emission reduction efforts. (FCCC/ TP/2012/05).

¹ UNEP (2013) The Emission Gap Report 2013. UNEP. http://www.unep. org/publications/ebooks/emissionsgapreport2013/

Annex I countries delivered the most ambitious end of the 25-40% reduction range⁴. To ensure comparability, developed countries that have not signed up to a second commitment period should agree to a set of accounting rules that are directly comparable to those of targets under the Kyoto Protocol.

Developing Countries

Closing the emissions gap does not only require additional efforts from developed countries, but also from many developing countries. In this regard, WWF is encouraged by the efforts of countries or country groups like the newly-formed AILAC (Association of Independent Latin American and Caribbean states) that have emphasized that "countries need to act according to their capabilities and stop looking to others to act first." WWF would like to see that those countries that have not pledged or announced Nationally Appropriate Mitigation Actions (NAMAs) yet make pledges/ announcements. These pledges should include information on what support they need to implement such pledges/NAMAs and to further enhance these actions. Developing countries with high capabilities and/ or high responsibilities that have made pledges or NAMA announcements should consider whether they have additional potential to reduce emissions and point out where and how financial and technological support could leverage this potential.

Those countries that are not ready to announce pledges or NAMAs, due to their low capabilities, should decide to establish at COP19 a NAMA readiness process.

By putting NAMAs on the table developing countries not only contribute to maintaining a climate in which sustainable development is possible, they also make the case for support for climate actions much stronger. Crystalizing the specific needs for climate finance would prevent any excuses on the part of developed countries to not fulfill their commitments.

Complementary measures

While the most important part of ramping up action to combat climate change lies in increasing country targets, there are many additional measures that could be taken to close the gigatonne gap. There exists untapped potential in complementary initiatives such as reducing emissions from international aviation and shipping, phasing out fossil fuel subsidies, cooperative actions on

Climate Action Tracker (2013) Climate shuffle (Climate Action Tracker Update, 12 June 2013) http://climateactiontracker.org/publications/pressreleases/132/Two-degrees-possible-but-time-is-not-on-our-side-Climate-Action-Tracker.html

REDD, scaling up renewable energies, harnessing energy efficiency potentials and reducing the emission of short-lived climate forcers.

To generate momentum for these initiatives the UNFCCC could play an invaluable role in providing guidance to other existing multilateral bodies and agreements to enhance coordination, measure success and to streamline the climate change agenda in their work. Other international bodies with high potential to contribute to the UNFCCC efforts are the Montreal Protocol, the Climate and Clean Air Coalition (CCAC), ICAO, IMO, G2O, etc.

All complementary measures need to be clearly analyzed in terms of how much they are truly additional to current (and new or enhanced) pledges by countries. Implementing such complementary measures will not excuse parties from enhancing their 2020 pledges or commitments.

WWF has identified the following measures that parties should urgently implement:

Addressing emissions from international aviation and shipping

International aviation and maritime transport account for 5% of global CO2 emissions. This increases to around 8% of the human-caused global warming effect, if we take into account indirect radiative forcing effects. Progress to date under the International Maritime Organization (IMO) and the International Civil Aviation Organization (ICAO) to control these emissions has been extremely disappointing, and neither of these bodies is planning to implement adequate measures by 2015 to control these emissions. The ADP must begin a process to agree on emissions reduction targets that would ensure that these sectors do their fair share towards global efforts to keep warming below 2°C, and to keep 1.5°C within reach, and ensure measures are implemented to meet these targets.

Phase out HFCs

HFCs are thousands of times more powerful than carbon dioxide (CO₂) in terms of their global warming potential. With current growth rates for HFC emissions, annual emissions of HFCs are projected to rise to about 3.5 to 8.8 Gt CO₂eq by 2050⁵. The good news is that there already exist climate-friendly alternatives to the use of HFCs. COP19 should urge the Montreal Protocol to phase

⁵ UNEP (2011) HFCs: A Critical Link in Protecting Climate and the Ozone Layer. UNEP.

out production and consumption of these gases as a matter of urgency at MOP26.

Address short-lived climate forcers

Short lived-climate forcers, in the form of soot/Black Carbon (BC), methane and tropospheric ozone, have recently emerged as major contributors to global climate change. BC is produced both naturally and by human activities as a result of the incomplete combustion of fossil fuels, biofuels, and biomass. Furthermore BC and ozone pollution has strong detrimental impacts on health and food security. This means that the elimination of BC and ozone has strong developmental benefits in addition to the climate positives. Considering these co-benefits it should be easy for Parties to agree on a text that requests an appropriate forum to address the issue by COP19.

Remove fossil fuel subsidies

Fossil fuel subsidies delay investment in clean renewable energy and promote unnecessary climate change emissions. Conservative estimates show that in 2012 world governments spent 775 billion US\$ on such subsidies, more than twelve times the amount provided to renewable energy⁶. The phase out of fossil fuel subsidies could reduce global carbon dioxide emissions by nearly 6% by 2020. The ADP could facilitate such a phase out by developing pathways for reducing fossil fuel subsidies, first in Developed countries and in Developing countries over time. Furthermore, Parties should identify options to shift the subsidies towards climate finance for additional mitigation activities in developing countries.

A global shift to renewable energy and energy efficiency

Any newcomer to the UNFCCC process would be astonished to learn that concrete emission reducing measures such as renewable energy (RE) and energy efficiency (EE) are not explicitly part of the negotiations. This must change in 2013. WWF urges parties to consider the suggestions made in the non-paper and submission by AOSIS⁷, which focuses on how the UNFCCC can achieve greater and quicker mitigation before 2020 by scaling

6 Natural Resources Defense Council (NRDC). (2012) Governments Should Phase Out Fossil Fuel Subsidies or Risk Lower Economic Growth, Delayed Investment in Clean Energy and Unnecessary Climate Change Pollution (Fact Sheet). http://www.nrdc.org/energy/ fossilfuelsubsidies.asp up RE and improving EE globally. The paper makes innovative suggestions about technical and interactive process for dissemination of policies and best practices, cooperation with experts such as IEA and IRENA, ministerial meetings, and public-private partnerships. Energy and technology represent a unique way to make industry part of the solution, not just the problem. In addition, such efforts may be more appealing to those parties favoring concrete actions that are grounded in progress already taking place at a national level.

In all countries, political will and popular support can be raised by highlighting the many co-benefits of RE on poverty reduction, human development, health, biodiversity, green jobs, energy access, and more. WWF believes that the best way to move the RE & EE initiative forward would be to agree on the following set of decisions at COP 19 in Warsaw⁸:

- Formally establish an initiative to scale up RE & EE under the ADP and mandating an appropriate existing body (possibly the Technology Executive Committee or Climate Technology Network Centre) to coordinate activities and report back to the ADP.
- Mandate the relevant mechanisms dealing with means of implementation under the UNFCCC (e.g. Green Climate Fund, TEC) to prioritise the rapid and scaled up rollout of RE & EE. Finance and technology support will be critical in ramping up RE & EE action. Technology support should be done in a way that avoids entrenching new technology and market dependencies in developing countries.
- The mandated body, tasked with dealing with this could take the following actions amongst others:
 - Invite parties and other stakeholders to identify concrete financing and technology needs and potential sources to scale up RE & EE;
 - Improved bilateral, multilateral and regional cooperation and exchange of experience and best practices;
 - Convene expert practitioners to provide inputs on what they perceive to be the barriers to further rollout of RE & EE.
- Agreement that during 2014 developed countries that are willing to lead will pledge targets for renewable energy scale-up to 2020 in line with an aggregate global objective of 25% renewable energy by 2020 (excluding traditional biomass). Countries must indicate how these targets are clearly additional to already existing targets.

⁷ AOSIS (2013) AOSIS Non-paper for ADP workstream 2, May 2013. http://unfccc.int/files/documentation/submissions_from_parties/adp/ application/pdf/adp_workstream2_aosis_02052013_.pdf and AOSIS (2013) Submission by the Republic of Nauru on behalf of AOSIS. http://unfccc.int/files/documentation/submissions_from_parties/adp/ application/pdf/adp_aosis_workstream_2_20130911.pdf

⁸ For a more comprehensive discussion please refer to WWF's submission which is available at: http://unfccc.int/resource/docs/2013/ smsn/ngo/369.pdf

- Agreement that developing countries, that are willing to do so, will submit additional NAMAs on RE & EE initiatives to the Registry. These countries should clearly indicate what support would be necessary for them to achieve their targets.
- Agreement that in 2014 countries will present energy efficiency objectives for their economies per unit of GDP and indications from developing countries on what support will be necessary for them to achieve these objectives. Developing countries that are not ready to submit economy-wide energy efficiency objectives, could submit additional energy efficiency NAMAs to the registry.

Towards an equitable and sciencebased 2015 Agreement /ADP Workstream 1

CBDRRC and Equity

A comprehensive, ambitious climate agreement will only be possible if it is built on an enhanced understanding and application of the Convention's fundamental principle of common but differentiated responsibilities and respective capabilities (CBDRRC). The last ADP session was a first step in the right direction to open up the discussion on CBDRRC and on how these principles can be applied as the climate regime evolves. WWF encourages the establishment of a workprogram to ensure a common understanding on what a fair and equitable share of efforts can look like. We suggest establishing a process to discuss the equity principles in workshops and special roundtables throughout 2014 to develop a robust and dynamic Equity Reference Framework against which various proposals for components of the 2015 climate deal can be assessed9.

Long term global goal, review and peak year

Related to the discussion on CBDRRC and equity is the discussion on a long term global goal, peak year and science review. The long term goal should be informed by the 2013-2015 science review and the result of the process should be available by no later than 2014 to define the scale of individual party commitments. In order to keep warming below 2°C, and to keep 1.5°C within reach,

parties must agree that emissions need to peak as early as possible within this decade.

Zero Carbon Action Plans and Low Carbon Action Plans as low emission development strategies

A visionary and pragmatic strategy is essential to achieve the goal of keeping global warming well below 2°C, and 1.5°C within reach. Developed countries should develop and implement national *Zero Carbon Action Plans* (*ZCAPs*) to ensure that they are moving towards carbon neutral economies. To avoid political fluctuations, these Plans should be formally submitted to the UNFCCC as low-emission development strategies as stipulated in Decision 1/CP.16 and 2/CP.17 and could come as a part of national climate legislation with detailed carbon budgets. Developing countries should also be encouraged to develop their *Low Carbon Action Plans* (*LCAPs*) as soon as possible.

International aviation and shipping: Emissions from international aviation and maritime transport must be explicitly included in the global climate regime in the post 2020 period. A global climate regime that does not have clear targets for these fast-growing sectors and means to assess their contribution to global efforts will not be effective. The ADP Workstream 1 must start immediately to address the role of these sectors in the emerging global regime, and develop concrete options for establishing emissions targets and regulating emissions from ships and aircraft in the very near term. If current initiatives under the IMO and ICAO fail to produce robust regulatory regimes and targets for emissions from the respective sectors, this must be done under the UNFCCC.

New Market Mechanism and Framework for Various Approaches

WWF strongly believes that any discussion on future mechanisms (approaches) must take into account the experiences and lessons from the existing mechanisms, especially those ones related to the Clean Development Mechanism (CDM), especially considering the strong criticism that the CDM has received. In addition, expected demand for carbon credits in the future is quite low and oversupply is already anticipated due to the low ambition by developed country parties¹o. Given the criticism on the existing mechanism and the widening

⁹ For the idea of Equity Reference Framework, see CAN (2013) CAN's Equity Reference Framework Discussion Paper. http://www.climatenetwork.org/publication/cans-equity-reference-framework-discussion-paper

¹⁰ See further details for WWF's submission on these issues: http://unfccc.int/resource/docs/2013/smsn/ngo/331.pdf; http://unfccc.int/resource/docs/2013/smsn/ngo/342.pdf

emission gap, both concepts of New Market Measures (NMM) and Framework for Various Approaches (FVA) need to be approached with great caution.

There are five principles that WWF believes Parties must consider when discussing NMMs and FVAs:

- **Net atmospheric benefits.** Any mechanisms/ approaches must go beyond offsetting and must be generating net additional emissions reductions that would not occur in the absence of them.
- **Avoid double counting.** Neither emission reduction nor financial flows should be counted twice.
- Ensure sustainable development benefits. Any mechanism has to contribute to sustainable development of the concerned countries. Accordingly, finance through these mechanisms/approaches should be directed mostly

towards renewable energy-related actions, rather than fossil-fuel technologies.

- Ensure supplementarity. Use of these mechanisms must not discourage parties to implement domestic climate actions.
- Avoid monopolizing low-hanging fruit. These mechanisms should not prevent developing countries from accessing their own low-cost abatement opportunities in order to provide cheap offsets to developed countries.

These principles are essential to secure the environmental integrity of the whole climate regime. In addition, on FVA, WWF believes that the UN must play a central role when an "approach" engages more than one country and involves transfer of mitigation efforts from one country to another in the form of either tradable units or others.

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