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# WWF Mitigation Expectations for COP18

**In Doha Parties need to agree that global emissions need to peak as early as possible within this decade, ideally by 2015, and rapidly decline thereafter.** By 2050 emissions need to be 80% below 1990 levels. The global carbon budget defined by this trajectory is non-negotiable if Parties are to honour their existing commitment to limit global warming to less than 2°C above pre-industrial levels. It is even more immutable for the goal that the majority of countries have of staying below 1.5°C.

## AWG-LCA: developed countries

Parties are reminded of the Durban decision to “*extend the Ad Hoc Working Group on Long-term Cooperative Action under the Convention for one year in order for it to continue its work and reach the agreed outcome pursuant to decision 1/CP.13 (Bali Action Plan)...at which time the Ad Hoc Working Group on Long-term Cooperative Action under the Convention shall be terminated.*” In Doha Developed countries need to show their commitment to the UNFCCC process by negotiating in good faith under the LCA to achieve concrete outcomes in line with the Bali Action Plan.

This means that; **developed countries who have not agreed to take a target in a second commitment period of the Kyoto protocol should translate their existing pledges into comparable targets under 1bi (mitigation by Annex I countries) of the Bali Action Plan.** The existing pledges only represent emissions at a given point in time, and these need to be translated into carbon budgets, Quantified Emission Limitation or Reduction Commitments (QELROs), for the period to 2020 for all developed countries. Parties who have not joined the KP should inscribe comparable QELROs in the LCA decisions. Related issues will also need to be resolved, including agreement of a base year and common accounting and reporting methods and standards based on those of the Kyoto Protocol. These accounting rules should also seek to improve the existing

KP framework in areas where it has been unsuccessful, particularly in land use and land use change and forestry (LULUCF).

In Doha, developed countries should also provide analytical information that forms the basis of their Zero Carbon Development Strategies, which will lay out realistic pathways to their near-complete decarbonization by 2050.

An ambitious outcome under the LCA will be a prerequisite for the success of both the pre-2020 ambition track and the post-2020 deal track of the ADP.

## AWG-LCA: developing countries

**Keeping within the global carbon budget is impossible if all countries do not take appropriate action based on the principles of CBDR-RC.** For developing countries this means that those that have not yet made nationally-appropriate pledges for mitigation action should do so by COP18 in Doha. Developed countries should take the lead in mitigation action, but developing countries can also use the opportunity to ensure that they do not fall behind in the race to become the leading economies of a decarbonised future. Indeed, many developing countries are already taking many positive steps to develop clean energy and submitting these in the form of pledges would be a natural progression of already stated ambition levels.

Developing countries that have already made pledges should provide further clarifications of the assumptions underlying their business as usual curves and the expected emissions limitations or reductions. WWF believes that these pledges can assist developing countries in achieving sustainable development and economic competitiveness in a climate resilient low carbon future. Financing and other support could also be more effectively leveraged from developed countries if developing countries provided information on how their actions can be enhanced with additional support.

Furthermore, all **developing countries should also begin to build up their long-term low-carbon climate-resilient development strategies**, building up a suite of NAMAs as wedges towards achieving long-term sustainable development. Putting these strategies in place will also make it easier to identify the support required to achieve low carbon development in these countries.

In line with this long-term process reporting frameworks will need to be developed that allow a reasonably smooth transition in methodologies, requirements and capabilities, over nationally-appropriate time periods, to allow countries to move from accounting and reporting for project-level NAMAs ultimately through to economy-wide plans and actions. These frameworks could potentially continue to be addressed through a tiering of reporting methodologies, which, if appropriately developed, would respect CBDR-RC.

Developing countries need to have confidence that financing and other support will be scaled up as they develop and implement NAMA's and Low Carbon Development Plans.

## AWG-LCA: Sectoral Approaches

**At COP18 the UNFCCC should send an appropriate signal to ICAO and IMO that supports their respective efforts to agree global mechanisms to address emissions from international aviation and shipping.** The draft texts submitted by parties in Bangkok could, if combined properly, be used for this purpose. In accordance with the principal of common but differentiated responsibilities and respective capabilities, revenues from these mechanisms can be used for three purposes,:

1. To address impacts on developing countries,
2. To support emission reduction actions in the shipping and aviation sectors sector as well as technology cooperation and transfer, and
3. To generate climate finance, to be channelled through the Green Climate Fund to developing countries.

## AWG-LCA: Various approaches

**It is important to have common core standards set for various mechanisms (approaches) including both market-based ones and non-market-based ones.** In Doha Parties must agree on work programmes for two priority issues: “A new market-based mechanism” and “a framework for various approaches.” While these mechanisms should take into account regional and national circumstances, governance should be centralized to guarantee consistency and environmental integrity. This means that these systems should be established with centralized governance and decentralized operational systems.

The Durban decisions have provided a good starting point by setting out important principles such as securing “net” mitigation and avoiding double counting. Doha needs to integrate these principles into robust standards that would ensure net emission reductions globally, contribute to sustainable development, and ensure complementarity, while preventing that the low hanging fruits of low carbon development are taken from the developing countries.

If the Doha decisions successfully set up and clarify such common and core standards, further operational rules can be negotiated under the Subsidiary Bodies (SBs). However, Parties are reminded that even the most perfectly designed mechanisms would remain inadequate if they are not underpinned by emission reduction commitments that are in line with the requirements of the science to stay well below 2°C of warming.

## AWG-KP

In order to ensure an outcome in Doha that is in line with the requirements of the science, **developed countries that are signatories to the Kyoto Protocol must increase their pledges, so that they are at least at the top of the 25-40% reduction range (from 1990 levels) by 2020.** At present pledges only amount to a 12-18% reduction. Any further needed clarity on the assumptions behind pledges should also be presented by Doha.

The AWG KP needs to complete its mandate with decisions that maximize environmental integrity and that create good precedents for the developing UNFCCC regime. Key deliverables include:

- Enhancing the current pledges and transforming them into QELROs.
- Avoiding a legal gap in commitment periods,
- Resolving the length of commitment period, in a manner that does not lock in low mitigation ambition. WWF supports a commitment period of 5 years. If Parties do not reach agreement on a 5 year Commitment Period they at least need to put in place a legally-mandated mid-term review of ambition that will require an increase of the QELROs.
- This review process should ensure that collective commitments and pledges meet global mitigation objectives, ensure comparable levels of ambition and effort and take into account the outcomes of the 2013-15 science review.
- Agreeing expedited procedures for the adoption of new QELROs during a commitment period, as long as these would result in a real reduction in tons of emissions.

To secure a strong foundation for a 2015 deal and to ensure sufficient emission reductions in the pre-2020 period, Developed countries are expected to honour their international commitments under the Convention and the Kyoto Protocol and their historical responsibilities. In particular;

- The commitment of the EU, Switzerland, Norway, Australia and others to participate in the second commitment period of the Kyoto Protocol is welcomed. However, Switzerland and the EU need to move to a target of at least 30% emission domestic emission reductions. This commitment should be inscribed as a QELRO into Annex B in Doha. Australia is called upon to take on increased, binding QELROs under the second commitment period, at least consistent with the upper end of their current pledges and communicate their proposed QELRO and assumptions behind it before Doha.. These targets must reflect real emission reductions

that the atmosphere actually sees and put their economies on a low carbon development path.

- By all measures, those countries who have decided not to join the 2nd Commitment period of the KP, Japan, Canada, Russia and now New Zealand, are urged to reconsider their positions, but at the very least their commitments and obligations under 1bi of the Bali Action Plan, should not be less than those that other Parties accept under the Kyoto Protocol. The USA should make a similar commitment. In particular these countries should submit QELROs that are comparable in ambition to those inscribed in the Protocol and regulated by a set of common accounting rules that are based on those of the Protocol.

## AWG-KP: Surplus AAUs and CDM in AWGKP

To date flexible mechanisms, in particular those under Article 17 (Trading between Annex I countries) and Article 12 {Clean Development Mechanism (CDM)} of the KP, have had largely negative impacts on the atmosphere due to design flaws. Flawed targets for some Developed countries in the first commitment period of the KP have led to the creation of “Hot Air” in the form of tradable surplus Assigned Amount Units (AAUs) of up to 13 Gt CO<sub>2</sub>e. These are emission reductions that never occurred and that exist only on paper. Similarly, there is evidence that the CDM allowed for several million tons of CO<sub>2</sub> emissions which would have been avoided in the absence of CDM.

To rectify the mistakes of the past parties must agree on the following in Doha:

1. **There can be no AAU surplus carry-over from the first commitment period by any country.** The current AAU surplus was built into the KP targets that allowed very unrealistic AAU allowances for certain countries. These allowances were substantially higher than even the business as usual projections for the period 2008 – 2012 for these countries. In order to ensure the environmental integrity of the UNFCCC agreements,

to prevent 2 degrees of warming, to bolster the integrity of carbon markets and Art.17 of the KP, these surplus AAU cannot be carried over into the next commitment period. Such a decision need not prevent AAU surplus trading or banking in a futher climate agreement as countries that overachieve their targets should be allowed to sell or bank their surplus emissions reductions.

- 2. The CDM and any related future mechanisms dealing with carbon trade between developed and developing countries needs to address the need for net mitigation efforts.** For example, mechanisms could implement a discount factor of 1:3 (as an indicative figure). This would mean that an investor from a developed country would need to finance three tons CO<sub>2</sub>e emission reductions in return for one CER (certified emission reduction). This would mean that the offsets generated by CDM projects would become true global emission reductions and that the prevailing uncertainties of additionality, permanence and leakage are sufficiently dealt with.

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