



SUBMISSION BY IRELAND AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

This submission is supported by Albania, Croatia, the Former Yugoslav Republic of Macedonia, Montenegro and Serbia.

Dublin, 1 March 2013

Subject: Implementation of all the elements of decision 1/CP. 17, ((b) Matters related to paragraphs 7 and 8. (ADP)

PRE-2020 MITIGATION AMBITION

A. Introduction

1. We face potentially devastating impacts if we fail in our collective goal of limiting global temperature increases to below 2°C relative to pre-industrial levels (*below 2°C objective*). According to the IPCC 4th Assessment Report 2007 (*AR4*) these include: increased storms and floods; inundation of coastal zones; increasing risks for food production; increased disease; increased morbidity and mortality due to heatwaves; increasing drought - with hundreds of millions of people exposed to increased water stress; and loss of biodiversity, including widespread loss of coral reef systems. Recent events have also demonstrated the impacts on, and vulnerability of, developed and developing countries to weather and climate extremes. Yet the transition to a low greenhouse gas emitting and resilient future offers major opportunities for all parties to achieve their development goals in a sustainable manner.
2. Parties are collectively not yet on an emissions pathway to achieve our shared goal to stay below 2°C. Between 2000 and 2010 emissions of carbon dioxide are estimated to have increased by 3% each year. This is **3 times the annual rate for the previous decade** (SBSTA Research Dialogue, 2012). Current annual emissions stand at approximately 50 GtCO₂e. This is already 14% higher than the median estimate (44 GtCO₂e) of the emission levels in 2020 consistent with a likely chance of meeting the below 2°C target. The effects of implementing current pledges would increase 2020 emission levels to 52 to 57 GtCO₂e (UNEP Bridging the gap report 2012). This leaves us with **a mitigation gap of 8- 13 Gt**. It is therefore imperative to understand and to encourage action – domestic or international - that has the potential to put us on track for our below 2°C objective.
3. In Durban we all acknowledged the urgent need to act to keep our below 2°C objective within reach, and that we cannot wait for the 2015 Agreement to do so. We have since had some good initial exchanges, but in terms of concrete action to move a step closer to closing the ambition gap Doha was disappointing. We agreed in Doha that the ADP must move to a more focussed mode of work and, in 2013, identify and explore a range of actions that can close the pre-2020



ambition gap. In line with the Doha conclusions we need to have substantial discussions, including on: mitigation and adaptation; the benefits of increasing ambition; barriers and ways to overcome them; and incentives for action; as well as finance, technology, and capacity building to support implementation. The co-Chairs' summary of the Doha roundtables captures common proposals on how we can take this work forward. The ADP should build on that in order to catalyse action. In 2013 focused workshops on specific topics will be of vital importance to get into the necessary detail to make progress.

4. **The below 2°C objective is still achievable.** Many countries have embarked on decoupling growth from emissions, but, as the science shows, doing so will require a fundamental shift in, and acceleration of, how we collectively approach emissions reductions and low carbon development. Early action to mitigate emissions will reduce overall costs, prevent lock in of carbon intensive investments, and present opportunities to design investment in a way that will promote sustainable development and growth. For example, additional investment of **\$11.8 trillion in more energy-efficient technologies now would boost cumulative economic output to 2035 by an estimated \$18 trillion** (IEA, WEO 2012).
5. We need to enhance ambition and explore collectively how we can make this shift happen. This submission identifies some options with the greatest potential that we should explore in 2013. We also draw attention to the previous EU submissions on pre 2020 mitigation ambition¹.

B. Enhancing Mitigation Ambition through Pledges

6. Increasing the collective ambition of pledges through the UNFCCC will ultimately have the most impact on closing the pre 2020 mitigation gap. **Unless action is fully implemented** and reflected internationally we will not be able to track our collective progress or generate the **mutual trust** and confidence necessary to enhance ambition to the levels required to achieve below 2°C objective. As such the ADP must retain a focus on pledges.

Increasing existing pledges

7. We need to explore how we can raise the level of ambition of existing pledges. That includes the EU. We have made **a conditional offer** to move to a 30% reduction by 2020 compared to 1990, as part of a global and comprehensive agreement for the period beyond 2012 and **provided that other** developed countries **commit themselves to comparable emission reductions** and that more advanced developing countries contribute adequately according to their responsibilities and respective capabilities. **Many of the conditions on the table from other Parties are similarly dependent on the actions of others.** We therefore see benefit in a collective discussion on how we might move forward.

The need for pledges from countries that have not yet come forward

8. Many countries have put forward pledges. We were pleased to see the Dominican Republic come forward with a pledge at Doha, and note that other developing countries are putting forward new nationally appropriate mitigation actions through the registry. In addition, many countries are acting domestically to limit their emissions. We welcome this.

¹ FCCC/ADP/2012/MISC.3, pg 19; Submissions of 18 July 2012; 17 October 2012.



9. However, there are still over one hundred countries that have not pledged, representing some 17% of global emissions and rising. This is a greater coverage than the second commitment period of the Kyoto Protocol, and includes some G20 countries, some countries with per capita income levels above the OECD average, and some countries with per capita income levels above income levels of several EU Member States.
10. Many countries that have not yet pledged are putting in place domestic policies to reduce their emission levels. We call on countries that have not yet pledged to share information on what they are doing domestically, so that their contribution to the global effort can be recognised and act as inspiration to other countries, and to look at how we can overcome barriers to pledging. Moreover, we encourage these countries to come forward with a formal pledge no later than 2014.

We would like to see in the April session a **focused roundtable/panel, guided by specific questions, to understand the barriers for countries to put forward new or enhanced pledges, and the role of the UNFCCC institutions and processes to lift these barriers.**

We need to have a discussion about how we create the broader conditions to enable countries to come forward with new pledges and increase existing pledges – particularly those countries that do not reflect their national pledges internationally.

Questions that could guide our discussions include;

1. What is preventing Parties coming forward with (more ambitious) pledges to the table?
2. What lessons can be learned from experiences of countries that have already made pledges and how did they deal with national constraints and specific circumstances?
3. How can the UNFCCC and other international collaboration facilitate parties in further mitigation action and making (more ambitious) pledges?

11. Clearly means of implementation is an issue for some developing country Parties. The European Commission and a number of EU Member States² announced on a voluntary basis in Doha their objective to contribute more than EUR 5.5bn of climate finance from their respective financial provisions for the coming years. At Doha Parties decided to continue the work programme on long term finance with the aim of informing developed country Parties in their efforts to identify pathways for mobilising the scaling up of climate finance to USD100bn per year by 2020 from public, private and alternative sources in the context of meaningful mitigation actions and transparency on implementation. The EU is ready to engage fully in this.

Clarification of existing pledges

12. We decided in Doha that the clarification of pledges process will continue over the next two years through work programmes in the permanent Subsidiary Bodies of the UNFCCC. This process will be important to further clarify the assumptions and methodologies behind the 2020 pledges. In our view this technical exercise to determine what the existing pledges mean in relation to the 2°C goal will be a vital complement to the work of the ADP, which should be the forum through which we address the collective ambition of pledges, and identify the challenges to enhancing ambition.

² France, Germany, United Kingdom, Sweden, Netherlands, Ireland, Denmark, and Finland.



C. Exploring options for increasing mitigation ambition beyond pledges

13. Raising ambition through existing and new pledges is essential to put us on track towards meeting our below 2°C objective. However, we recognise that it may take time for some countries to do this. Even as we work to implement and enhance pledges, there are additional actions we can and must urgently take, through domestic policies and international cooperation, to contribute to closing the mitigation gap and facilitate greater ambition of pledges.
14. The IPCC AR4 estimated reduction potentials by 2030, across all GHGs, of 9-18GtCO₂e at costs below \$20/tCO₂e. Moreover, the UNEP Bridging the Gap report 2012 estimated that policies in the power, industrial, transport, building, waste, forestry and agricultural sectors have a potential to realise around 17GtCO₂e emission reductions by 2020 at low to medium costs and with significant co-benefits. The co-benefits of GHG mitigation policies are well documented and include: improved local air quality; better targeting policy responses to the needs of the poor; improved energy security; and unlocking low carbon development. We must explore how we can harness this mitigation potential and reap these co-benefits. Engaging the private sector will be crucial in achieving the transformation needed.
15. The EU would welcome and encourage the exploration of policy options with a potential to realise cost-efficient emissions reductions at a globally significant scale. This will allow countries to assess policy options for additional mitigation action and could catalyse action between groups of countries and/or other stakeholders in specific policy areas, with the aim of building capacity and scaling up best practice. This is the concept of ‘International Cooperative Initiatives’ (ICIs) which the EU introduced in Bangkok. Options include:
 - Energy efficiency: Fostering additional energy efficiency improvements could deliver at least 2.2 GtCO₂e of new emission reductions by 2020 and rapid deployment of energy-efficient technologies could postpone lock-in to a world beyond two degrees to 2022 (WEO2012). Energy policy decisions taken today will affect the emissions for years to come. Recent analyses conclude that there is significant potential in this sector^{3 4}.
 - Renewables: Current policies for renewable energy can be enhanced to deliver at least another 0.7 GtCO₂e emission reductions by 2020, and 3 GtCO₂ by 2030 (WEO2012). More generally, doubling the share of renewables in total primary energy sources, compared to business as usual trends, could secure our chances of staying below 2°C (IPCC SRES), and indications are that the total global technical potential for renewable energy is substantially higher than global energy demand (the 2011 IPCC Special Report on Renewable Energies (SRREN)).
 - F-gases: F-gas emissions are increasing sharply to the extent that a global phase-down of HFCs could avoid emissions of up to 100Gt CO₂e. It would not appear possible to get on track for 2 degrees without dealing with these gases. In the shorter term, UNEP indicates a clear potential to reduce global emissions by 0.5 GtCO₂e by 2020 through new actions on F-gases e.g. the additional costs of using climate-friendly alternatives when implementing the phase out of ozone depleting substances under the Montreal Protocol would be less than 1 euro/tCO₂e, and could deliver additional energy savings.

³ Bridging the Gap report, UNEP 2012

⁴ Lessons Learned from Success Stories, World Bank 2013



- Reforms of Fossil fuel subsidies: It is feasible to realise an additional 1.5 GtCO₂e global emission reductions by 2020 from enabling such reforms in context of alleviating poverty and enhancing growth (WEO2012).
- Reducing Short-Lived Climate Pollutants (SLCPs): the ADP should take into account the experiences from initiatives such as the Climate and Clean Air Coalition (CCAC) - gathering a group of countries with the shared interest to reduce short lived climate pollutants, representing a significant share of these emissions.
- REDD+: Reducing emissions from deforestation and forest degradation has the potential to reduce net global emissions by up to 3 GtCO₂e annually by 2030⁵. Further work to identify cost effective REDD+ mitigation potential is essential.
- International aviation and maritime transport have a combined potential to reduce emissions by 0.3-0.5 GtCO₂e by 2020 (UNEP, 2011).

Emissions from aviation currently account for 2% of global CO₂ emissions, and are expected to quadruple by 2050. While the International Civil Aviation Organization has made modest progress in developing global goals, standards and implementations mechanisms, these are **largely aspirational**. The ICAO 2013 Assembly must deliver a package of measures, including a framework for national and regional Market Based Measures and a clear roadmap to a global measure, that demonstrate ICAO's capacity and commitment to bring aviation emissions under control in an environmentally effective, cost efficient and non-discriminatory manner.

Continued and intensified work by all Parties through the IMO to **develop without delay global market based mechanisms** to address global emissions from international shipping, could significantly contribute to raising pre-2020 mitigation ambition.

Information on progress should be brought to the attention of the ADP.

In April the ADP should have focused roundtables/panels that aim to share best practice and experiences in specific policy areas. The purpose of the workshops would be to:

- reflect on the latest information and investigate the mitigation potential of various options
- identify ways to lift barriers to realising the remaining mitigation potential
- explore policy experiences and opportunities for collaboration between countries and other actors to reduce emissions, including opportunities for new partnerships
- consider how the UNFCCC can most effectively catalyse, make transparent and recognise additional mitigation actions
- provide input into the Secretariat Technical paper

We suggest a focus on the **energy sector and on F-gases**. Others sectors, gases and pollutants should be examined in subsequent sessions. There should be technical input and participation from different stakeholders (including international organisations, NGOs and the private sector).

⁵ Initial analysis on the mitigation potential in the Forestry sector, prepared for the UNFCCC Secretariat by Jürgen Blaser and Carmenza Robledo, 2007



16. The following questions could facilitate the ADP discussions in April and subsequent sessions:
- What mitigation initiatives are currently being undertaken by countries or groups of countries (or other actors e.g. subnational, private sector), and what is their mitigation potential?
 - What are the potential opportunities for and benefits of countries working together through Cooperative Initiatives to scale up efforts? What are the barriers?
 - What is the potential role for the UNFCCC to facilitate and encourage additional mitigation action (e.g. by helping to lift barriers, creating improved conditions for further mitigation action and providing transparency and recognition of efforts)?
17. The EU is keen to contribute relevant information about the benefits of climate action. For instance in relation to the adoption of the revised Energy Efficiency Directive in October 2012; the preparation of EU legislative proposals for improving the efficiency of new cars (95 g/km, -40% compared to 2007) and vans (147 g/km which is -28% compared to 2007); and the EU proposal to reduce F-gas emissions in the EU by two-thirds of today's levels by 2030.
18. We are also particularly interested in exploring ideas raised by other Parties in previous sessions about the role of NGOs and the private sector to realise further the cost-effective mitigation potential and the associated co-benefits for sustainable development (Ecofys, 2012⁶).

D. Ministerial Input

19. Doha noted the need for continuous political commitment and the need for Ministerial input. High-level dialogue is required on an ongoing basis to build the global political conditions necessary to facilitate the kind of transformation needed to keep us on track for the below 2°C objective.
20. 2014 in particular will be a key year for mitigation ambition. Clear milestones will be necessary to guide our work to ensure that the necessary technical and political conditions are in place to enable an appropriate and effective consideration by leaders at the meeting being organised by the UN Secretary General.
21. In order to maximise the effectiveness of high level political input we need a clear understanding at the technical level regarding the options and potential for enhanced mitigation action, as well as the barriers to achieving that and options to overcome them. We would therefore suggest that the April and June sessions focus on workshops at the technical level, culminating in a Ministerial event in Warsaw to discuss political conditions for ambition and prepare for leadership level involvement in 2014.

⁶ Kornelis Blok, Niklas Höhne, Kees van der Leun and Nicholas Harrison (2012): Bridging the greenhouse-gas emissions gap - Twenty-one coherent major initiatives could together stimulate sufficient reductions by 2020 to bridge the global greenhouse-gas emissions gap, NATURE CLIMATE CHANGE | VOL 2 | JULY 2012 | www.nature.com/natureclimatechange.