

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

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

Dublin, 27 May 2013

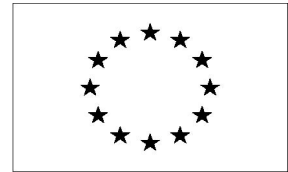
Subject: Process for Ensuring Ambitious Mitigation Commitments in the 2015 Agreement

Introduction

1. The Roundtables in Bonn in April/May saw the emergence of some themes relating to mitigation commitments in the 2015 Agreement, namely:

- (i) all Parties need to take ambitious action if we are to achieve our common below 2°C objective
- (ii) commitments should be fair and reflect the principles of the Convention - in particular equity and CDBRRC - as well as be consistent with the achievement of sustainable development
- (iii) there will need to be adequate means of implementation for Parties that need support to make ambitious mitigation commitments
- (iv) the proposed mitigation commitments of a Party must be transparent, quantifiable and comparable - that is proposed commitments will need ex ante clarity on the assumptions, baselines and methodologies underpinning them, what they mean in terms of quantity of greenhouse gas emissions that will be reduced and how they compare to the commitments of other Parties
- (v) there needs to be a way to reconcile nationally proposed mitigation commitments with the required level of ambition as indicated by science, in particular:
 - a process, before adoption of the 2015 Agreement, to review the mitigation commitments proposed by Parties and to scale up the level of ambition of the commitments if necessary to stay on track to achieve the below 2°C objective; and
 - a mechanism within the 2015 Agreement to review periodically, and if necessary scale up, the level of ambition of mitigation commitments to stay on track to achieve the below 2°C objective
- (vi) indicators could be useful for Parties to consider in the development of proposed mitigation commitments, as well as in setting the context for a discussion on the relative contribution to the global effort of different Parties

2. The conversation in Bonn indicated interest in a step wise approach to formulating and inscribing mitigation commitments in the 2015 Agreement as a way to: (i) have a wider conversation about the comparability of proposed efforts, such that individual commitments are fair and consistent with the principles of the Convention; and (ii) address the challenge of reconciling purely nationally proposed mitigation commitments with the need to ensure that the global level of ambition is sufficient to achieve the common below 2°C objective. The EU would like to explore this further during the June session.



3. In that context we observe that in their reflections note on the first part of the second session of the ADP the co-Chairs pick up on these emerging themes and suggest focusing our work on topics where differences can be bridged and where common ground can be enlarged. Furthermore their information note of 24 May proposes, in paragraph 11, specific roundtable discussions which relate to ensuring ambitious mitigation commitments in the 2015 Agreement.
4. While this submission should be considered in the light of previous EU submissions¹, its purpose is to begin exploring in more detail what a step wise approach might mean in practical terms. We need to get from where we are now to a point where we are ready to adopt a legally binding agreement in 2015 which contains mitigation commitments from all Parties that are, collectively, ambitious enough to keep us on track for below 2°C in a way that is fair, efficient and transparent. The EU is aiming for an Agreement that will encourage and ensure the highest possible mitigation efforts by all Parties, and where those with the greatest responsibilities and capabilities take the lead. A mechanism should also be included in the 2015 Agreement itself to ensure that it is sufficiently flexible and dynamic to respond to the requirements of science and ensure that collective ambition is sufficient to stay on track for below 2°C.

Possible step wise approach to formulating mitigation commitments

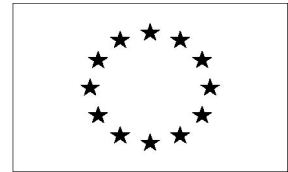
Exploring options and ex ante clarity for post 2020 commitments	Parties to formulate and propose commitments	'Review' of proposed commitments	Inscription of initial commitments in the 2015 Agreement
2013	2014	2014/2015	End 2015

Step 1: Exploring options for post 2020 commitments

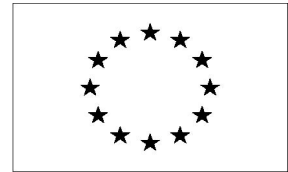
5. If we are to achieve the below 2°C objective, proposed mitigation commitments need to be ambitious, quantifiable, transparent and robust and allow comparison of Parties' efforts including in terms of impacts on greenhouse gas emission reductions before they are inscribed in the 2015 Agreement. The commitments should also be equitable, and fit with the low emissions development strategies of each Party. Step one must be about considering the options for achieving this. The key challenge will be how, in practical terms, this can be done in relation to mitigation commitments for all Parties in time for the 2015 Agreement. The key questions to consider:

- What types of commitments could be considered? Which criteria should be considered?
- What do the ex ante clarity elements look like that will ensure transparency, quantification and comparability?

¹ FCCC/ADP/2012/MISC.3, pg 19; Submissions of 18 July 2012; 17 October 2012; 1 March 2013



6. Many Parties, including the EU, have called for opportunities in the June ADP session for Parties to come forward and explain the kind of pre 2020 mitigation commitments they have made and to elaborate on whether they have thought about what kind of mitigation commitment they might make in the 2015 Agreement. A discussion of what types of commitments might be appropriate in a post 2020 context would be helpful. In discussing different types of commitments, it would also be valuable to consider possible criteria that might be used by Parties in the development of commitments and to help inform any review process. For example, it would be beneficial to discuss the elements that would be needed for different types of commitments to deliver the required ex ante clarity in terms of quantification and comparability. June would be a good time to start this conversation.
7. Parties providing clarity on their proposed commitments is key to allow ex ante transparency, quantification and comparability. For this purpose, it would seem that as a minimum, mitigation commitments that Parties propose will need to be accompanied with information, including on:
- The type of commitment
 - The scope of the commitment (economy wide, sectors, gases covered)
 - Proposed timescale of the commitment
 - The anticipated quantitative impact of the commitment (at minimum in terms of tonnes of CO₂ equivalent)
 - Any assumptions used in formulating the commitment including methodological issues (e.g. baselines, methodologies etc.) and also in relation to indicators used in determining the fairness of the commitment and how it represents that Party's responsibilities and capabilities.
- Is this the right information needed? Are there other elements that should be included?
 - How can this information be provided by all Parties in a way that allows proposed commitments to be quickly and easily understood and compared?
8. The type of commitment will determine the kind of information that is required in order to allow ex ante clarity (transparency, quantification and comparability) – this will also be needed for subsequent MRV and accounting.
9. Further discussion of what types of commitments Parties might propose would be valuable. An analysis of pre 2020 mitigation pledges reveals the following possibilities for commitment types:
- Absolute emission targets (economy wide, sectoral) limiting or reducing emissions or achieving carbon neutrality
 - Relative emission targets related to economic activity (emissions intensity targets) or population levels (reductions in per capita emissions)
 - Policies and Measures with quantified emissions reductions
 - Targets for reaching levels/changes in other parameters of sustainable development, like energy mix, land use areas or activities, with quantifiable emissions reductions



➤ Is this a comprehensive list? Are there any options missing?

10. Each of these possible types of commitments has a specific set of defining parameters (timeline, baseline etc.). These will need to be clearly set out by Parties as part of the ex ante clarity that will be needed for all commitments. Therefore, in discussing the options for commitment types we also need to start thinking about the MRV and accounting rules that will be needed so that progress to achieving the below 2°C objective can be tracked.

Step 2 – Parties to indicate what mitigation commitment they propose to take in the 2015 Agreement

11. In step 2 Parties will need to formulate and come forward with robust and ambitious mitigation commitments sufficiently in advance of 2015 in order to allow time for: (i) others to understand what they mean in terms of contribution towards the below 2°C objective; (ii) comparison of proposed commitments with others; and (iii) a collective consideration of the overall adequacy of proposed commitments and the increase of ambition if needed to stay on track for below 2°C.

12. All this suggests that Parties should aim to come forward in 2014 with an indication of the commitment they propose to make in the 2015 Agreement. The proposed commitments should be accompanied with sufficient information, perhaps along the lines set out in paragraph 7 above, to allow other Parties to quickly understand and compare each other's proposed commitments.

13. As such COP 19 in Warsaw will need to set the path for active preparation for and communication of indicative commitments. In the EU we recognise the significant challenges associated with being ready to propose a commitment sufficiently in advance of 2015 and we have already launched an internal process to look at this². The Secretary General's summit of World leaders may provide a good forum to discuss proposals for mitigation commitments by Parties.

Step 3 – review of proposed mitigation commitments (reconciling proposed commitments with the need to stay on track for below 2°C)

14. In Bonn there seemed to be wide acknowledgment that there would need to be a step where there is a collective conversation about the commitments offered by Parties and the global level of ambition represented by them. The purpose and outcome of such a 'review' step needs to be discussed further. It would seem reasonable that any review should aim to assess whether commitments are: (i) sufficiently transparent, quantifiable and comparable; (ii) ambitious enough

² "A 2030 framework for climate and energy policies" [COM(2013) 169] http://ec.europa.eu/energy/green_paper_2030_en.htm



to stay on track for below 2°C; and (iii) fair and in accordance with the principles of the Convention.

15. In relation to reviewing the fairness and adequacy of individual commitments and allowing for comparability of efforts, it seems that many Parties are of the view that objective indicators could play a role in providing a context for such a conversation if used in a non-prescriptive way. Such indicators might also be useful to Parties in developing their proposed commitments.

16. There are many questions that need to be addressed as to how conduct a review step, including:

- What form would the review step take? Who would conduct it? What would be its outcome?
- What role could objective indicators play in assessing individual and overall levels of ambition?
- What would be the time period for the review step?

Step 4 – Inscribe mitigation commitments consistent with the below 2°C goal in the 2015 Agreement at COP 21

Final thoughts

17. The upcoming session in June should focus mainly on Parties' general views as to the acceptability and constituent elements of a step wise approach. Progress should also be made towards deepening our understanding around the elements of the first step, notably possible types of commitments and the ex ante clarity needed for different types of commitment.