

4 April 2011

English only

UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

**Ad Hoc Working Group on Long-term Cooperative Action
under the Convention**

Fourteenth session

Bangkok, 5–8 April 2011, and Bonn, 6–17 June 2011*

Item 5 of the provisional agenda

**Work programme on enhanced measurement, reporting and verification for
Parties included in Annex I to the Convention**

**Views on the items relating to a work programme for the
development of modalities and guidelines listed in
decision 1/CP.16, paragraph 46**

Submissions from Parties

Corrigendum

Page 9

The whole text of paper no. 2 *should be replaced* by the text below:

* The second part of the fourteenth session of the Ad Hoc Working Group on Long-term Cooperative Action under the Convention will be held in conjunction with the second part of the sixteenth session of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol and the thirty-fourth sessions of the Subsidiary Body for Implementation and the Subsidiary Body for Scientific and Technological Advice. The exact dates of the resumed sessions of the ad hoc working groups will be announced in due course.

**Submission by the Plurinational State of Bolivia
on mitigation by developed country parties,
including the issues referred to in paragraph 46 of 1/CP.16**

The Plurinational State of Bolivia presents its views on the establishment of one or more market-based mechanisms to enhance the cost-effectiveness of, and to promote, mitigation actions, as referred to in document FCCC/AWGLCA/2010/L.7, paragraph 81. The views expressed in this and other written and verbal communications by Bolivia shall not be regarded as implying acceptance of certain outcomes of the UN Climate Change Convention in Cancun, which were declared as adopted over the formal, explicit and express objection by Bolivia on the basis, among other things, that they pave the way to: end the Kyoto Protocol; replace it with a more lax voluntary pledge and review approach without specifying the pledges of developed countries; anchor inadequate emission reductions by developed countries under the convention, which if based on the Copenhagen Accord are estimated to result in emission reductions of between 13-17% from 1990 levels; realize levels of global warming of up to 4 degrees Celsius, which is unacceptable to humanity and nature; and prefigure new market mechanisms which enable developed countries to further transfer their responsibilities to developing countries, allowing developed countries to continue utilising and creating market mechanisms outside of the Kyoto Protocol. Bolivia views this violation of consensus as a dangerous precedent for the multilateral system and the rule of law and will seek to defend the rights of Bolivia and ensure that rules and procedures apply equally and fairly to all States, large and small.

The key issues for mitigation by Annex I Parties towards Durban

1. The key issue to be resolved for the whole UNFCCC process by Durban is mitigation by developed country Parties, for them being the principle historical responsible of the climate change crisis, and still the actual highest per capita emitters in the world, while possessing the necessary know how to attend the problem.
2. Being this the central issue not only of the mitigation chapter, but indeed of the whole UNFCCC process per se, it is very worrying that apart from “urging to increase the level of ambition”, and no concrete action is being taken to assure the necessary level of ambition is reached.
3. Bolivia expresses its profound preoccupation that the whole workprogramme for 2011 related to mitigation for developed country parties seems to be reduced on the revision of guidelines, and the clarification of assumptions to the actual emission reduction pledges. These may be relevant issues, but only to the extent to which they respond to the first objective of the 1b(i) of the BAP: to assure that the aggregate number of mitigation commitments is sufficient to the levels required by science.

4. In this regard Bolivia proposes a work program that concentrates on the definition of the aggregate level of ambition, and posterior definition of the individual mitigation targets of Annex I Parties. A workshop with scientific inputs for this issue should be organized during the session of the AWG-LCA in June.
5. Once the issue of levels of mitigation commitments is settled at a satisfactory level, the AWG-LCA can concentrate on the revision of the existing guidelines to report on the achievement of those levels.
6. The issue of mitigation by Annex I Parties must be resolved with full respect of the Bali Roadmap, which mandate was prolonged by Cancún, so assuring the amendment of Annex B of the Kyoto protocol, and the complementary inscription of the commitment for the Party that is not a Party to the Kyoto Protocol in the chapter corresponding to 1b(i).
7. The chapter IIIA of 1/CP16 has the intrinsic danger of trying to replace the second commitment period of the Kyoto Protocol. It must be made very clear that all Annex I Kyoto Parties must inscribe their commitments in the amended Annex B of this protocol. For the Party that is not a Party to the Kyoto Protocol, its commitments, with comparable level of ambition and comparable compliance mechanisms must be inscribed in 1b1.
8. The document referred to in paragraph 36, which was issued under another number namely FCCC/SB/2011/INF.1 seems to respond both to 1/CP16 and to 1/CP6. This is a clear violation of the separation of the mandates of the AWG-KP and the AWG-LCA.
9. The aggregate number of emission reduction must be defined in KP, and together with the number of the Party that is not a Party to the KP, the overall aggregate number of Annex I Parties can be placed the outcome of 1b(i) of the Bali Action Plan.
10. Chapter III.A. lacks any reference to a compliance regime. This is problematic as experience tells us that without strict compliance mechanisms, no commitment, even less a pledge is translated into real action. In this regard, Bolivia reiterates its proposal to launch discussions to install an international court of climate justice.

Agregate number to assure sufficient level of ambition

11. This aggregate number must be assured to respond to the levels required by science and the level of ambition of the stabilization of the temperature and the concentration of greenhouse gases in the atmosphere, to be defined under shared vision item.
12. Bolivia reiterates its position that we must maintain the global increase in temperature below 1° and 300ppm. The number and intensity of disasters provoked by climate change even with the actual 0,8° of increase warn us that more will be unbearable for large part of the world's population and ecosystems.

13. In order to assure that the world keeps within 1 degree and 300ppm Annex I countries need to reduce at least 50% at a domestic level by 2017, and over 100% by 2040.
14. The study of the carbon budget indicates us that even for the alleged 2° increase, the world can only emit 750Gt of CO₂ from now up till 2020, with an equitable per capita division, this implies that Annex I Parties can emit 120GT by 2020. This contrasts with the 130GT of CO₂ emissions that will result if the actual high-end pledges are implemented.
15. If Annex I countries wouldn't have emitted since 1850 a total of 932GT CO₂ (72% of historical emissions, counting with 25% of the world population), the world wouldn't actually be fighting the climate crisis.
16. It is therefor imperative that those countries responsible for the climate crisis take there responsibility and commit demselves to deep emission reduction that ensure the world will get on track to reach climate stabilization at 300ppm.
17. Therefore the share of the burden in the distribution between developed and developing countries of the carbon budget of remaining atmospheric space must be defined in accordance to the principles of equity and science, taking into account population and historical emissions (climate mitigation debt), among others.
18. Unfortunately it has been calculated that the actual levels of ambition (13-17% of emission reductions) would lead us to a global increase of than 4°C.
19. Even a comparison with the levels demanded by IPCC Box 13.7 of the 4AR (a reduction of 25-40% of emissions of Annex I Parties AND a reduction of 15-30% of Business as Usual in developing countries) show that actual reduction levels are totally insuficient. Furthermore these IPCC proposed numbers are very low because of the following concerns:
 - (a) The devision of burden of the emission reductions is a political issue, which must be defined based on equity principles, and which cannot be defined on cientific criteria
 - (b) Most efforts to deviate from BAU lines in developing countries are translated into offset credits, which in practice means they are not accountable to reduction in the non Annex I country, but are going to be accounted for as a part of the pledged 13-17% by Annex I countries.
 - (c) The actual reduction numbers proposed are clearly a low estimate, taking into account the following issues:
 - i. Box 13.7 excludes various of the conclusions which demand higher reduction commitments
 - ii. IPCC mitigation requierments count on the basis of total emissions, while the emission pledges of Annex I countries only take into account reported emissions, whereby the following emissions are omitted at world level:
 - methane emissions due to the loss of permafrost areas
 - Loopholes in the mitigation chapters of both the Kyoto Protocol and 1b(i)
 - Legislated and voluntary exclusions (e.g. some LULUCF categories)

- Lowest-end estimations for GHG Inventories
 - War emissions
 - Bunker fuels (¿?)
- iii. The data on which these numbers are based are outdated by now
 - iv. Climate change is occurring at rates much faster than was predicted in the 4AR
- (d) The actual pledges in doc FCCC/SB/2011/INF.1 reflect a reduction of 13-17% under 1990 levels, which is about half of the lowest estimates of the IPCC
 - (e) As a conclusion, actual pledges are far below the IPCC required mitigation levels, and even those levels are clearly insufficient to Mother Earth's needs and latest science which warns about the need to avoid serious irreversible damages.

General remarks on chapter III.A. of 1/CP.16

20. The preambular language, first paragraph, refers to "all Parties" in the chapter which is specific to Annex I Parties, this is violating the clear distinction between Annex I and Non-Annex I Parties, and their common but differentiated responsibilities, as defined in the convention.
21. Paragraph 36, takes note of quantified economy-wide emission reduction targets to be implemented by Parties included in Annex I to the Convention as communicated by them and contained in document FCCC/SB/2010/INF.X4 (to be issued); This document was issued by now, under another number, namely FCCC/SB/2011/INF.1. This means that the document referred to will never be issued as such.
22. Low-carbon development strategies or plans are not a goal, the goal is to reduce the emissions, which should be translated in the compliance of ambitious mitigation commitments.

On guidelines:

23. Bolivia considers that a revision of guidelines on reporting of national communications is included in the SBI agenda, and that the inclusion of this issue distracts from the core issue of this mitigation chapter, furthermore those guidelines refer to many elements that, even when they are important, are not relevant to 1b(i). In this understanding, Bolivia will submit its views on guidelines to 1b(i).
24. In order for Parties to have easy access to this submission, we will reproduce the above mentioned submission here:

Submission by the Plurinational State of Bolivia to the SBI, on reporting of national communications, including the biennial report:

1. *The revision of guidelines, as necessary, on the reporting of national communications, including the biennial report:*

(i) *The provision of financing, through enhanced common reporting formats, methodologies for finance and tracking of climate-related support;*

=> This issue is not related to 1b(i), nevertheless Bolivia considers:

- Financing for developing countries, be it for mitigation or for adaptation must be reported through National Communications, but must be clearly differentiated from mitigation commitments for Annex I countries itself. Financing through carbon markets cannot be double counted as a contribution to finance commitments and a contribution to mitigation commitments.
- Financial means employed to achieve mitigation commitments of Annex I Parties, as well as investment in R&D for climate friendly technologies, or investment in scientific research on climate change is important additional information, that can show the means employed to assure the mitigation commitment is reached.

(ii) *Supplementary information on achievement of quantified economy-wide emission reductions targets;*

- Any supplementary information on achievement of mitigation commitments is welcome. Especially lessons learned and information that can serve to other Parties is most needed.

2. *The revision of guidelines for the review of national communications, including the biennial report, annual greenhouse gas inventories and national inventory systems;*

⇒ Those guidelines have to make sure that no sector or source of emission is left without reporting. Therefore, all sectors and subsectors must be made obligatory and robust in their reporting. Among others, the sectors to be included are:

- LULUCF: considering as mandatory all activities of LULUCF, comparing in all cases the level of emission vs. the level defined in 1990 in order to make this information comparable among developed country Parties within LULUCF sector and among all other sectors. It is not acceptable that Parties could decide to report or not some activities under LULUCF when those results reflect this sector as a source but only when they obtain credits from it.
- Warfare emissions
- Bunker fuel emissions
- Emissions caused by extreme events
- Emissions which are caused by global warming (e.g. permafrost release of methane)

3. *The establishment of guidelines for national inventory arrangements;*

=>The arrangements for national inventories must make sure that all emissions are reported, and that all assumptions made in reporting reflect the highest degree of fidelity towards the atmosphere.