



# Marrakech: Galvanizing Ambition

**CLIMATE ACTION NETWORK  
Annual Policy Document 2016**

## Executive Summary

With the Paris Agreement entering into force less than eleven months after COP 21 concluded, leaders have demonstrated their ambition and willingness for decisive action on climate change. The establishment of a Global Market Based Mechanism (GMBM) under the International Civil Aviation Organization (ICAO) and the amendment to the Montreal Protocol to phase-down climate damaging hydrofluorocarbons (HFCs) further demonstrates the commitment that governments undertook in Paris to pursue efforts to limit the temperature increase to 1.5°C above pre industrial levels.

While COP 21 in Paris delivered the architecture and the regime in the form of the Paris Agreement, COP 22 will need to galvanize ambition within this regime. This means to swiftly enable transformative action, shifting away from outdated forms of energy to transformational plans to a brighter, cleaner, fairer and safer future for all. Continuing the collaborative and balanced process that was initiated at COP 21, this transformation must not only be in the hands of a few, but should instead derive its power from a shared sense of leadership among all those that helped shape success in Paris, including through catalyzing and building on the ambition shown by non-state actors as well as governments.

We should celebrate the remarkably early entry into force of the Paris Agreement, but at the same time remember that we are now living in a 400ppm world, in which global temperature records are being shattered each month. People all over the globe are already suffering from the impacts of climate change. The need to act continues to be urgent, and in Marrakech we must shift attention towards rapidly scaling up ambition, which has lagged behind in the past few years.

COP 22 must create the right conditions for enabling both immediate and longer-term action. Concrete progress on capacity building, the \$100 billion roadmap and a successful conclusion of the facilitative dialogue would be essential for building trust and unlocking pre-2020 ambition. In laying the longer term foundations for the new Paris regime, agreeing on a time bound work plan for the rule book, to be finalized no later than 2018, rapid progress on loss and damage, and greater clarity over how 2018 facilitative dialogue is conducted would define success at COP 22.

Finally, the Paris Agreement reiterates the necessity for all governments to respect, promote and take into consideration their respective human rights obligations when taking climate actions. Beginning at COP 22, the new climate regime in the post-Paris era must build on this mandate and promote the integration of human rights into its various areas of work.

**Assessing, reviewing and scaling-up ambition:** To keep the global temperature in line with Article 2 of the Paris Agreement, Nationally Determined Contributions (NDCs) will require revision and strengthening over the course of the next few years. Revising them in five-year cycles and underpinning them with ambitious, national long-term strategies, presents opportunities for concentrated political attention that could result in greater collaboration and a rapid increase in ambition.

- **Assessments:** Through **the facilitative dialogues in 2016 and 2018, and the first global stocktake in 2023**, the Paris Agreement has in-built mechanisms, to assess progress and scale up ambition. COP 22 should get the ball rolling on these by successfully concluding the 2016 facilitative dialogue. The facilitative dialogue should take stock of progress and identify implementation gaps.

**CAN proposes that a comprehensive chair's summary is produced from the 2016 facilitative dialogue capturing the discussions as well as potential options to explore for bridging the implementation gaps.**

- The facilitative dialogue in 2018 should be conducted over the course of 2018, ensuring a process in which countries are prepared to ramp up their level of ambition in current NDCs and look at opportunities to further increase ambition in the next round. **COP 22 should adopt a decision to invite countries and other stakeholders to submit their views (particularly on format, scope, inputs and outcome) on the facilitative dialogue by 31st March 2017, with a synthesis report from the UNFCCC that should inform a workshop on the facilitative dialogue at SB 46.**
- **COP 22 should establish a Preparatory Process for the Global Stock take (PPGS), culminating at COP 25 in 2019:** This preparatory process would help in drawing lessons from the facilitative dialogues conducted over the next few years. It would also help in developing the modalities to assess over all progress towards achieving the long-term goals of the Paris Agreement.

**Enhancing action pre-2020:** Limiting global warming to 1.5°C will require urgent ramping up of pre-2020 action on mitigation, adaptation and means of implementation.

- Radical collaboration facilitated by the high-level champions and an **improved Technical Expert Meetings (TEMs) process** with a narrower focus would enable greater mitigation ambition. Along with this, strong guiding criteria for initiatives would allow UNFCCC to maintain high levels of integrity.
- Adaptation and loss and damage should be given greater priority and tangible steps to finance them should be taken urgently. COP 22 needs to set in motion concrete steps for additional adaptation action pre-2020. This includes the **identification of adaptation actions that need to be urgently financed at the high-level dialogue on finance.** The financial requirements for addressing loss and damage also need to be addressed at COP 22. **The COP should undertake to operationalize the need for L&D finance as acknowledged in Article 8 of the Paris Agreement.**
- **COP 22 should give greater clarity on the \$100 billion roadmap.** The roadmap should demonstrate how a 50:50 balance between adaptation and mitigation finance is achieved. The expected COP decision on long-term finance (LTF) should also include an aspirational target for the provision of annual financial assistance for adaptation to be reached by 2020.

**Transparency and Accounting of Action and Support:** A core set of robust and enforceable MRV rules will be critical to driving forward the ambition necessary to ensure the success of the Paris Agreement.

- **Transparency Framework:** the post-Paris transparency framework should be completed no later than 2018. The framework should be robust, ensuring the highest levels of environmental integrity, and avoid double counting as well as loopholes. **Monitoring, reporting and review should cover all Parties whilst still recognizing different national circumstances. The framework should provide flexibility and this should not be used as an excuse to keep the status quo, but rather as a means to enable participation, balanced by the overarching goal to enable progression and facilitate improvement over time.**

- Comparability of NDCs: **A minimum requirement should be that Parties indicate a direction of improvement for the information they provide in their NDCs.** This could range from information to specify emission pathways, intended use of international markets, renewable and energy efficiency targets, fossil fuel phase-out, participation of civil society, indigenous peoples, and affected local communities, respect for and promotion of human rights and gender equality, conditional aspects of the contribution, or “stretch goals”, and information on financial support needed by developing countries in order to achieve their pledges.
- **Accounting for finance:** In order to address existing insufficiencies in the reporting of climate finance and to avoid overestimation of climate-specific net assistance, **at COP 22, SBSTA should adopt a detailed work program and timeline to advance discussions on modalities of accounting for climate finance.** While discussions may need to continue at SB 46 and COP 23, the draft decision for modalities of accounting should be presented for consideration and adoption by CMA no later than 2018.
- **Accounting for adaptation:** Decisions on adaptation communications should identify the capacity needs of vulnerable countries, including approaches to plan and communicate adaptation requirements in light of different warming scenarios, and promote ways to communicate on adaptation progress (and limits) effectively and efficiently for different reporting purposes.
- **Accounting for agriculture forestry and other land use:** Countries must account for emissions and removals from AFOLU in a comparable and transparent way, especially those which intend to include emission reductions or increased removals from the sector as part of their NDCs. The Convention employs a land-based system of reporting and this should be used in the new agreement and should applied towards accounting for AFOLU sector.

**Finance:** Provision of finance is key towards galvanizing ambition and COP 22 needs to take several decisions on facilitating greater climate finance flows.

- **Adaptation: COP 22 should adopt a decision clarifying the role of the Adaptation Fund under the Paris Agreement.** COP 22 should also encourage countries to announce financial contributions to both the Adaptation Fund and Least Developed Countries (LDC) Fund.
- **Loss and Damage: COP 22 must review the WIM with a view to putting more emphasis on enhancing action and support to address loss and damage,** as well as the need to provide the WIM with more resources to deliver on its tasks. The five-year work plan should be guided by strategic objectives which can develop the WIM in the next phase into a tool that is ideally in position to respond to L&D that has already taken place and prevent further loss and damage.
- **Technology: COP 22 must mandate the SBI to develop and recommend an adequate, sustainable and predictable financing model for the CTCN for adoption at COP 23,** taking into account the CTCN host’s obligations to also provide and seek out funding.

## Table of Contents

Executive Summary.....	2
Glossary.....	6
Ambition Post Paris.....	7
Facilitative dialogue 2016.....	9
Facilitative dialogue 2018.....	9
Global stocktake in 2023 .....	10
Long-term Strategies .....	11
Enhance action prior to 2020 .....	12
Enhancing mitigation action pre-2020 .....	12
Enhanced adaptation action pre-2020 .....	13
Provision of promised climate finance pre-2020.....	13
Transparency of Action and Support .....	14
Features of the design of the Paris Agreement’s transparency framework .....	14
Transparency and comparability of NDCs .....	15
Features of NDCs .....	15
Information to facilitate clarity, transparency and understanding of NDCs .....	16
Accounting for finance .....	17
Accounting for adaptation .....	17
Accounting for agriculture, forestry and other land use.....	18
Finance .....	19
Adaptation .....	19
Loss and Damage .....	20
Technology.....	21
Paris Agreement Article 6. Mechanisms .....	21
Agriculture .....	22
International Shipping and Aviation .....	23
Contacts .....	25

## Glossary

AFOLU	–	Agriculture, Forestry and Other Land Use
Agenda 2030	–	The 2030 Agenda for Sustainable Development
CMA	–	Conference of the Parties serving as the Meeting of the Parties to the Paris Agreement
COP	–	Conference of the Parties to the UNFCCC
CTCN	–	Climate Technology Centre and Network
ExCom	–	Executive Committee of the Warsaw International Mechanism for Loss and Damage
FD2016	–	Facilitative Dialogue in 2016
FD2018	–	Facilitative Dialogue in 2018
GCF	–	Green Climate Fund
ICAO	–	International Civil Aviation Organization
IMO	–	International Maritime Organization
IPCC	–	Intergovernmental Panel on Climate Change
L&D	–	Loss and Damage
LDCs	–	Least Developed Countries
LTF	–	Long-term Finance
MRV	–	Measurement, Reporting and Verification
NAMA	–	Nationally Appropriate Mitigation Action
NAP	–	National Adaptation Plan
NDCs	–	Nationally Determined Contributions
ODA	–	Official Development Assistance
REDD+	–	Reducing Emissions from Deforestation and Forest Degradation
SCF	–	Standing Committee on Finance
SDGs	–	Sustainable Development Goals
SIDS	–	Small Island Developing States
TEC	–	Technology Executive Committee
TEM	–	Technical Expert Meeting
TM	–	Technology Mechanism
WIM	–	Warsaw International Mechanism for Loss and Damage

## Ambition Post Paris

**A key feature of the Paris Agreement is its likely ability to increase ambition over time.** Current Nationally Determined Contributions (NDCs) are not ambitious and do not reflect countries' existing mitigation capacity nor their capabilities. This is also true for finance, where climate finance flows are still far away from what is needed for transformational change as articulated in Article 2 of the Agreement.

The Paris Agreement has five key elements that provide the opportunity for countries to assess the current status of progress, take stock of the situation and act accordingly. These should enable overall ambition within the agreement to increase rapidly over a period of time, taking into account collective progress and implementation gaps towards the common objectives agreed within the Paris agreement.

- a. Facilitative Dialogue in 2016 - (paragraph 115, 1/CP.21)
- b. Facilitative Dialogue in 2018 - (paragraph 20, 1/CP.21)
- c. Global Stocktake in 2023 (Article 14, Paris Agreement)
- d. Long-term Strategies (Article 4.19, Paris Agreement; paragraph 35, 1/CP.21)
- e. Pre-2020 action

While the two facilitative dialogues provide an opportunity of learning by doing, as well as a dress rehearsal for the global stocktake, they should primarily be used to increase ambition as well as feeding into the discussions on modalities for the global stocktake.

### What should these instruments do?

- a) **Collective assessment:** Although individual country action is decided at the national level and presented in the form of an NDC every 5 years, it is important to have a collective assessment of progress towards the goals of the Paris Agreement. The current synthesis report from the UNFCCC secretariat gives us a clear picture of how far we are from being on track to achieve the 1.5°C temperature goal. **The collective assessment would help to better understand the collective gaps as well as provide opportunity to have honest discussions about difficulties countries are facing in their implementation.** However, globally aggregated assessments alone do not result in outputs that individual countries can meaningfully apply to their domestic circumstances. It is therefore instrumental that **collective assessments are transparently underpinned by Party-level information (e.g. a Party-level emissions data annexed to the UNFCCC secretariat's NDC synthesis report) and that globally-aggregated assessments are complemented by information with a lower level of aggregation.** For example, this could be aggregated by groups with similar levels of development, negotiating blocs, or with similar types of commitment (e.g. absolute economy-wide mitigation targets, or intensity targets). **The IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways (IPCC Special Report on 1.5°C) will be extremely helpful in this endeavor to understand what is required of the collective action that is being assessed. Another key input could be long-term strategies.** These strategies will not only align development priorities with climate ambition,

but will also reflect the long term development and emissions trajectory countries are embarking on.

- b) **Identify implementation gaps:** If we are to increase ambition over time, which is the key purpose of these instruments, we need to know where the implementation gaps are. Whether on finance, capacity building or access to technology, these gaps need to be identified and appropriately addressed.
- c) **Dialogue towards future collaboration and cooperative action:** These important components of the Paris Agreement should not end up becoming forums for finger pointing, but should be spaces where **future collaboration amongst countries is identified as well as where cooperative action should be developed**. The facilitative dialogue and global stocktake should not only be about countries individually increasing ambition, but how they can come together to address common barriers. They should also contribute to understanding on potential areas of cooperation in various sectors and areas, taking example from past collaboration between countries, such as addressing deforestation and building alliances for renewable energy and adaptation. In this context, the facilitative dialogues and global stocktake should also enable exchanges with other UN Bodies and Treaties (e.g. International Civil Aviation Organization (ICAO), International Maritime Organization (IMO) or the Montreal Protocol) on their progress in contributing towards an overall reduction of emissions.
- d) **Strong signal to governments to increase ambition:** It is important that the outcome from the facilitative dialogues, as well as from the global stocktake, are widely accepted and effective in triggering greater ambition. **The outcomes from these assessments should avoid being prescriptive and should not infringe on national sovereignty. At the same time, they should signal key steps that need be taken in order to increase ambition, articulating the discussions in a manner that will enable an effective follow through on their implementation.** Merely taking note of the outcomes would not suffice. The COP and CMA (wherever appropriate) should deliberate on the outcomes to decide on the way forward, based on the recommendations presented, and direct action accordingly, under their authority as the ultimate body responsible for furthering the objectives of the Convention and the Paris Agreement.
- e) **Ensure proper participation of civil society:** Civil society participation takes different forms at different stages of the exercises. For example, allowing UNFCCC observer organizations to submit questions to parties if any of the exercises includes a Q&A segment, such as currently used in the International Consultation and Analysis (ICA) process; encouraging Parties to enable broad stakeholder participation in domestic processes, such as determination of contributions or development of long-term strategies; including civil society inputs as direct inputs in the multilateral assessment and review exercises themselves; or ensuring full transparency with regards to data, methodologies, and other inputs used for carrying out such assessments.

## Facilitative dialogue 2016

As per paragraph 116, 1/CP.21, Parties agreed to conduct a facilitative dialogue to assess progress in implementing decisions 1/CP.19, paragraph 3 and 4, as well as identify opportunities towards greater access and availability of means of implementation.

In order to effectively carry out the facilitative dialogue and achieve a successful conclusion, CAN believes the facilitative dialogue should follow a two-track approach. A technical track should take stock of progress and identify implementation gaps. Alongside this, there should be a high-level track that would receive inputs and recommendations from the technical track in order to inform appropriate decisions to be taken.

**The technical process would primarily focus on assessing pre-2020 ambition, particularly means of implementation, as well as take stock of the pledges made by countries within the 2<sup>nd</sup> commitment period of the Kyoto Protocol and in their Cancun pledges.** It should take the form of roundtable discussions amongst experts, facilitated by the high-level champions, and include technical experts from UNFCCC institutions. The discussions from the technical track should be reflected in the form of a summary for policymakers, making recommendations to address the various issues under discussion.

On receiving these inputs, **the high-level track, overseen by the COP Presidency, should then provide the opportunity for discussions on how these recommendations should be taken forward. It should also provide a platform for ministers to make announcements and pledges towards greater action and strengthening of their own commitments.**

The discussions from the high level track should then be reflected in a chair's summary to be forwarded to the COP for its consideration. **COP 22 should take note of this chair's summary from the high level track along with taking other appropriate decisions based on the discussions in the facilitative dialogue.**

## Facilitative dialogue 2018

In 2018, Parties will reconvene to take stock of their collective efforts towards the long-term Paris Agreement goal referred to in Article 4.1 and to inform the preparation of NDCs, pursuant to Article 4.8 of the Agreement (paragraph 20, 1/CP.21).

**The facilitative dialogue in 2018 (FD2018) should ensure a process in which countries come prepared to ramp up their level of ambition in current NDCs and start looking at opportunities to further increase ambition in the next round.** It should inform the process of putting forward new NDCs with a five-year time frame (2025-2030) as well as updating and strengthening NDCs that contain a 10-year time frame (2020-2030).

**The FD2018 should not just be a stock-taking exercise, but should also be forward-looking with respect to helping countries identify future opportunities for action.** It should consist of a robust technical and political process that enables this. The FD2018 should also draw on the lessons learnt from FD2016, in order to ensure deeper engagement with various stakeholders and enable continuity.

**The IPCC Special Report on 1.5°C will almost certainly be a driving force of the FD2018 and should be considered as a key input towards the discussions. Along with this, CAN believes that the interim mid-century strategies from various countries should play a crucial role as a key input to the dialogue.**

When assessing collective progress towards the goal enshrined in Article 4.1 of the Paris Agreement, it is instrumental that cooperative approaches as well as the provision of means of implementation, including finance, are fully considered during the FD2018. The dialogue should also focus on any additional barriers to implementing or strengthening NDCs, including the processes by which conditional components of NDCs are developed, and should ensure that initiatives that could help to increase ambition, such as the NDC Partnership, are also addressed.

**CAN proposes that rather than one meeting during COP 24, the facilitative dialogue should be conducted over the course of the year with various regional meetings culminating in a high-level event complimented by technical discussions at COP 24.**

The COP 23 and 24 Presidencies should conduct informal discussions with governments to design the FD2018 and appropriate guidance should be given in time for countries to prepare accordingly. **CAN recommends that COP 22 should adopt a decision to invite countries and other stakeholders to submit their views (particularly on format, scope, inputs and outcome) on the facilitative dialogue by 31st March 2017. The UNFCCC secretariat should synthesize the submissions with a view to holding a workshop on the facilitative dialogue during SB 46 in 2017.**

### **Global stocktake in 2023**

After the FD2018, the next major moment of formal self-reflection will be in 2023 at the first global stocktake, in which the Parties will assess not only implementation and collective progress, but also the overall fairness and functioning of the Paris system. The global stocktake, to occur every five years, will serve as the primary collective moment to assess mitigation action as well as adaptation, means of implementation (including finance, technology transfer and development, and capacity building), and other support. **The global stocktake should be based on broad terms of reference and must be conducted in the light of equity and the best available science, including the latest IPCC reports.**

Based on the outcomes of the global stocktake, Parties will be required to prepare and communicate new NDCs for both domestic mitigation and cooperative international action across all the pillars of the agreement, including (but not limited to) mitigation, adaptation, finance, and loss and damage. Parties will also be asked to explain exactly why they see their overall effort as constituting their fair share of the overall global effort. New contributions should represent a progression, and reflect each Party's highest possible ambition.

Further clarity needs to be provided on the inputs for the stocktake, including inputs that can serve as benchmarks, and the modalities for the actual conduct of the stocktake. For example, the modalities need to clarify: what it means to conduct the stocktake in the light of equity and how these modalities need to differ across the pillars of the Agreement; how methodological considerations can be undertaken and resolved; what role civil society can play at the stocktake; and what kind of outputs can assist Parties in unilaterally increasing their ambition in the future, to name but a few.

Since a full elaboration of these items is premature at this point, **CAN recommends the establishment of a Preparatory Process for the Global Stocktake (PPGS) at COP 22, culminating at COP 25 in 2019, in order to include lessons learned and best practice from the FDs, and to develop modalities that can be used in the global stocktake to analyze overall progress towards achieving the long-term goals of the Paris Agreement and to identify where opportunities lie to pursue increased climate action.**

In order for the PPGS to be successful, towards the end of its sixth assessment cycle the IPCC should make a call to the scientific community to develop scenarios and benchmarks for the PPGS and the global stocktake based on the newest IPCC scenarios. The purpose would be to show how to reach the long-term temperature goal of the Paris Agreement (Article 2.1.a) and include 2030, 2040, 2050 and 2070 emissions data. Further, the scientific community should be called upon to develop similar benchmarks for the other long-term goals, for example by establishing risk-reduction and resilience benchmarks for the long-term goal on adaptation (Article 2.1.c), or by identifying the financial needs consistent with low greenhouse gas emissions and climate-resilient development (Article 2.1.c). Furthermore, for some areas falling within the scope of the global stocktake, scientific knowledge is currently under-developed. A clear and early signal by the IPCC could help remedy this situation. To provide just one example, the “in light of equity” provision could make Parties want to consider distributional justice implications of rapid low- or zero-carbon transformations between or within countries, which is currently an under-researched area.

The Structured Expert Dialogue (SED) should ask the secretariat of UNFCCC to develop an FAQ in regards to the new scientific findings of the IPCC’s Sixth Assessment Report (AR6) and its implications for the global stocktake.

Finally, the process should also facilitate the sharing of expertise and knowledge, essential for the effective integration of human rights in the operationalization of the Paris Agreement. In this context, CAN welcomes the Geneva Pledge for Human Rights in Climate Action committing its signatories to integrate human rights and climate change expertise and calls on additional parties to sign the pledge. The organization of an in-session Expert Workshop in 2017 would enable relevant experts and intergovernmental organizations to share expertise, good practices and lessons learnt in relation to the promotion of human rights in climate action.

## Long-term Strategies

As mentioned previously, developing *Long-term Strategies for Sustainable Development and Decarbonization* is essential to ensure compatibility of countries’ emissions and development trajectories with limiting the global average temperature to 1.5°C above pre-industrial levels. It is urgent to begin developing the plans as soon as possible to ensure that there is enough time to revise them where necessary. The Paris Agreement calls for global peaking as soon as possible, and to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century. Further, the agreed limit of 1.5°C constrains the amount of emissions allowed, such that this balancing must occur not long after 2050. In order for this to be achieved equitably, each party should consider its fair share of mitigation actions. **The development of long-term strategies presents countries with an opportunity to develop a framework for short-term policymaking and ensure compatibility of the country’s long-term development goals with the Paris Agreement.**

As such, the development of long-term strategies also provides the opportunity to mainstream climate considerations into a country's national planning, and to develop synergies between climate change policies and national development planning. Developing long-term strategies gives countries a framework within which to place both of these considerations, in order to mutually reinforce the achievement of climate and development goals. Based on the best available science, long-term strategies set the national benchmarks for safe emissions curbs to ascertain *how* development should take place, while implementation of the 2030 Agenda and national development goals enables countries to know *what* their development should look like, within these safe climate limits. Synergistic planning procedures will enable the most successful combined outcomes for both processes.

**In light of the above, to begin with CAN calls on all G20 countries to come forward with *interim* long-term strategies by mid-2018, with G7 countries taking the lead in light of their greater capacity, historical responsibilities, and levels of emissions and economic development. Such a timeframe will enable the UNFCCC Secretariat to complete an assessment of the collective impact of the strategies and the implications for the long-term temperature goals, in preparation for the 2018 facilitative dialogue.**

### Enhance action prior to 2020

Without urgently ramping up pre-2020 action, countries' actions under the Paris Agreement will be "too little, too late" to keep global warming to 1.5°C. According to the IPCC AR5, at current emissions levels the carbon budget for a strong likelihood (66%) of keeping warming to 1.5°C could be exhausted by 2020. Aside from enhanced mitigation and adaptation action, the provision of promised climate finance and support for the means of implementation will also be crucial for enhancing action prior to 2020.

### Enhancing mitigation action pre-2020

**The technical examination of areas with high mitigation potential can accelerate and lend legitimacy to climate action on the ground, by serving as an incubator for international cooperative initiatives to advance new ideas, and expanding existing initiatives to accelerate impact.** Results-focused technical expert meetings (TEMs) that identify concrete steps to overcoming barriers to implementation and opportunities to scale up specific, credible, and impactful actions have the potential to drive further action and raise ambition.

To achieve this, several steps can be taken:

- Narrow the focus of the TEMs, and have them follow and track a small number of concrete, highly promising initiatives from idea to implementation and replication, while continuing to showcase best practices more broadly. This way, the technical examination process can be the basis for more innovative initiatives similar to the Africa Renewable Energy Initiative, either happening independently or as part of the Global Climate Action pillars and events.
- The High-level Champions for pre-2020 action should facilitate this transformation from ideas to actions and engage Parties and non-state actors to match ideas to support. The summary for policymakers, one of the outcomes of the facilitative dialogue in 2016, can serve as key input to the Champions' work in this regard.

- Lastly, all mitigation initiatives associated with the UNFCCC should adhere to a set of strong guiding criteria to ensure positive impact and avoid greenwashing. Giving the UN stamp of approval to greenwashers will undermine the UNFCCC's credibility and make the goal of limiting global warming to 1.5°C more difficult to achieve. The criteria development process should be announced at COP 22, and be facilitated by the Champions.

### Enhanced adaptation action pre-2020

- COP 22 needs to set in motion concrete steps for additional adaptation action pre-2020. This includes the identification of adaptation actions that need to be urgently financed at the high-level dialogue on finance. While the Green Climate Fund (GCF) could support some of the adaptation actions, the adaptation-relevant Initiatives launched at COP 21 could also help. There should also be a report back at COP 22 from these initiatives on the actions undertaken, lessons learnt as well as showcasing successful projects.

### Provision of promised climate finance pre-2020

While previous COPs have urged developed countries to increase public finance, only a few have paid heed to these demands. Therefore, the roadmap prepared by developed countries needs to demonstrate how the \$100 billion target is going to be met in order to improve this situation. **At COP 22, donor countries that have not yet clarified the aspirational level to which they intend to increase their annual public finance goal should do so.**

Greater attention should be paid to adaptation finance and promoting concrete adaptation projects on the ground. **CAN believes that the imbalance between adaptation and mitigation in climate finance should be addressed before 2020.** The expected COP decision on long-term finance (LTF) should also include **an aspirational target for the provision of annual financial assistance for adaptation to be reached by 2020**, as well as a balance between mitigation and adaptation in the allocation of climate finance within the framework of the \$100 billion roadmap. COP 22 should take a decision on urging **developed countries to present individual countries' plans to significantly increase adaptation finance**, as part of developed countries' next round of submissions of their strategies and approaches.

The \$100 billion roadmap is unlikely to provide sufficient confidence to increase ambition from now to 2020. **A decision at COP 22 for the roadmap to be mutually discussed and agreed upon by COP 23 with consultation between both developed and developing Parties will go a long way in increasing confidence. The decisions should also** reflect the modalities of accounting for climate finance.

The financial requirements for addressing loss and damage also need to be addressed at COP 22. The COP should undertake to operationalize the need for L&D finance as acknowledged in Article 8 of the Paris Agreement. Specifically, the SCF and the WIM ExCom should work together to:

- Generate a plan to **scale up loss and damage finance to \$50bn by 2020, in addition to the \$100bn by 2020**, recognizing that existing studies, such as the UNEP Adaptation Gap, show there are already significant unmet needs. This should include a plan to establish innovative sources of finance to provide significant, predictable, polluter pays sources of finance.

- Develop a definition of loss and damage climate finance (to complement the existing SCF definition of mitigation and adaptation finance) that avoids double counting and ensures that loss and damage finance does not undermine adaptation finance.
- Invite other bodies such as the IPCC and UNEP, to **undertake work to identify the scale of finance for loss and damage required** at various levels of mitigation and adaptation effort.

## Transparency of Action and Support

Because of their key role in assessing and improving the efficacy of climate action, a core set of robust and enforceable Measurement, Reporting and Verification (MRV) rules will be critical for driving further ambition necessary to ensure the success of the Paris Agreement. In recognition of this fact, in Article 13 Parties established an Enhanced Transparency Framework for Action and Support as a key feature of the Paris Agreement.

Effective rules benefit national governments by helping them to:

- 1) Understand the scope of the climate challenge;
- 2) Empower domestic constituencies that can develop strategies to address this challenge;
- 3) Assess the extent to which policy interventions are succeeding.

Transparency rules also give public and private actors confidence in calculating the costs and benefits of addressing rising emissions, and in turn help mobilize investment in low-carbon development – particularly when supported with a long-term policy signal. In the process, transparency systems improve governments’ capacities to address climate change.

Transparency builds mutual trust and confidence among Parties, and is essential to track progress towards individual and collective targets. **An enhanced transparency framework will also be critical to ensuring:**

- The environmental integrity and credibility of NDCs;
- **Effective global stocktakes** that promote further ambition;
- A well-functioning implementation and Compliance Committee.

## Features of the design of the Paris Agreement’s transparency framework

In order to enhance mutual trust and accountability and promote implementation, the **post-Paris transparency framework should be completed no later than 2018. The framework should be robust, ensuring the highest levels of environmental integrity and avoid double counting as well as loopholes.** In particular, the enhanced transparency framework must ensure adequate information is available to fully assess the integrity of a “mitigation outcome” used toward a Party’s nationally determined contribution, including how integrity and the avoidance of domestic double counting is verified based on up-to-date national emissions inventories and/or other MRV systems.

**Monitoring, reporting and review should cover all Parties whilst still recognizing different national circumstances. The framework should provide flexibility for developing country Parties that need it, while allowing improvement over time. Flexibility should not be used as an excuse to keep the status**

**quo, but rather as a means to enable participation, balanced by the overarching goal to enable progression and facilitate improvement over time.** This could be enabled by acknowledging and adapting the reporting requirements to reflect the diversity of types of commitments or the use of tiers in a way that stimulates a race to the best possible data. The review process could be made flexible to cope with the intensity (in terms of time, human and financial resources) of such a universal exercise and consider what type of review (in-country, desk, centralized) would be more adequate in view of countries' needs.

Furthermore, in order **for countries to fulfil their transparency obligations and to enable progress over time, finance, capacity building and technology transfer will be needed in several countries.** The Paris Committee on Capacity Building provides an opportunity in 2017 to consider how to support national efforts to ensure that their respective human rights obligations are effectively enshrined into all climate action. **The new framework should also allow countries to report on how the principles and obligations mentioned in the Paris Agreement have been integrated into their climate actions, such as human rights, public participation in climate policy, gender equality, a just transition, indigenous peoples' rights and intergenerational equity.** Countries should also be encouraged to report how their climate actions support their sustainable development goals and vice-versa.

**Civil society needs to play a far greater role in the new transparency framework.** To promote implementation and contribute to effectiveness, reliability and legitimacy, **civil society should be involved in the tracking of implementation of the agreement.** The modalities should promote this role both at the national level when monitoring implementation as well as during the international review and verification of this information. **The framework should refer to respective obligations of parties under international legal or policy frameworks such as the regional instruments related to public participation, access to information and the Open Government Partnership.**

More efforts will need to be made on monitoring, reporting and evaluation of mitigation and adaptation efforts (through more transparency and comparability of countries' NDCs), tracking of financial flows (see details on finance accounting below) and accounting for emissions from the land sector. The framework should also consider what may contribute to an effective input for the 2018 facilitative dialogue and global stocktake in 2023, and provide confidence to Parties in tabling ambitious future NDCs well before 2020.

Eventually, CAN foresees a transition towards a common and robust transparency framework. 2016-2020 is likely to be a transition period, during which countries strengthen their capacity for measurement and reporting of action, put in place a strengthened system to track MOI support provided, and improve transparency and comparability of their individual mitigation and adaptation efforts.

## Transparency and comparability of NDCs

### Features of NDCs

**In order for NDCs to be comparable they should have a common five-year time frame.** Article 4.10 of the Paris Agreement states that CMA1 "shall consider common time frames" for NDCs. **CAN believes the common time frames need to be set at five year periods** for the following two reasons:

- The common timeframe needs to make it possible for countries to adjust their level of ambition in light of the latest science and progress they have made individually. Ten years is too long for the purpose of timely adjustment and poses a real risk of locking in an insufficient level of ambition, while five years can give sufficient flexibility to parties.
- The common time frame needs to function in tandem with the five-year cycle of communication of NDCs and the global stocktake. One note of caution is that this should not prevent Parties from having consecutive five-year-term targets, e.g. having targets for 2030-2035 and 2035-2040, where the latter would be more indicative in nature.

**CAN also believes that parties should be strongly encouraged to not only offer strong unconditional contributions, but also to share in their NDCs the specific barriers that prevent them from achieving even more. The conditions for finance and technology would signal areas and levels of further support.**

Many Parties inscribed conditions for the full implementation of their NDCs. Some relate to land-use and forestry rules, but many refer to financial and/or technological needs. While “conditions” can function as barriers to implementation, **conditional components can also be the basis for deepened collaboration between Parties, leveraging greater ambition. If “conditions” expressed in NDCs can become a communication tool, thereby providing the basis for further collaboration, they will strengthen the Paris Agreement.**

Specifically, developing countries’ conditional components should indicate countries’ needs for finance, technology and capacity building support and possible emission reductions that can be achieved through such support. Developed countries’ conditional components could instead be referred to as “stretch goals” to indicate their nature as a further step. “Stretch goals” can include possible further emission reductions through the provision of international support, which could take the form of finance, technology transfer and capacity building. This part of the conditional component could also be expressed as a separate mitigation target for emission reductions abroad. It should be noted that the distinction between “developing” countries and “developed” countries will change over time.

In order for “conditionality” to function as an effective ambition mechanism, CAN believes it is vital to have a “matchmaking” process between conditions and support.

### **Information to facilitate clarity, transparency and understanding of NDCs**

Both the content and quality of information are key to facilitating understanding of NDCs among Parties and observers and are essential for building trust and confidence in the Paris Agreement. In light of this, while it would be difficult and undesirable to set mandatory, universal information requirements for NDCs at this point, a **direction of improvement should be indicated for the information provided by Parties in their NDCs.**

While acknowledging the list of upfront information requested in paragraph 14, 1/CP.20, CAN believes there should be greater improvement by countries to provide information on the following areas within their NDCs:

- Information to specify emission pathways and clear metrics indicating the baseline assumptions used in fairness and ambition indicators;
- Intended use of international markets, and basis for determining avoidance of double counting;
- Renewable and energy efficiency targets and fossil fuel phase-out;
- Participation of civil society, indigenous peoples, and affected local communities;
- Respect for and promotion of human rights and gender equality;
- Conditional aspect of the contribution, or “stretch goals”;
- Information on financial support needed by developing countries in order to achieve their pledges. Information should reflect a country’s circumstances and shouldn’t create a burden to developing countries

## Accounting for finance

When it comes to the modalities for accounting and reporting, CAN suggests:

- In order to address existing insufficiencies in the reporting of climate finance and to avoid overestimation of climate-specific net assistance, **at COP 22, SBSTA should adopt a detailed work program and timeline to advance discussions on modalities of accounting for climate finance.** While discussions may need to continue at SB 46 and COP 23, the draft decision for modalities of accounting should be presented for consideration and adoption by CMA no later than 2018.
- Accounting should also include information on the net assistance provided to developing countries contained in reported figures. This means for instance that reporting on non-grant instruments should include information on the underlying grant equivalent of reported amounts for non-grant instruments. CAN believes this would be a better proxy for assessing progress towards meeting UNFCCC Article 4.3 and 4.4 obligations (which were confirmed by the Paris Agreement). Complete accounting requires that reporting should be based on project-level data that allows identification of individual measures for which funding is considered as climate finance - a requirement without which the “V” in MRV would not be possible.
- **A more consistent approach to assess the climate-relevance of reported figures should be developed**, especially for assessing climate-relevance of funds where climate is only one of several objectives, to avoid overestimation and to assure a more detailed account of the climate-relevance of financed projects. This should start with reporting projects that have climate as their main issue separately from those that pursue climate as one of several objectives. For the latter, a more detailed approach should be developed to report only those portions of funds that are directly addressing or attributed to climate action.

## Accounting for adaptation

The Paris Agreement places more emphasis on national adaptation action than previously was the case. Marrakesh will discuss communication needs and requirements including on adaptation. The local and context-specific dimension of adaptation requires a different accounting approach than that which applies

to mitigation transparency. **Further decisions on adaptation communications should identify capacity needs of vulnerable countries, including approaches to plan and communicate adaptation needs depending on different warming scenarios, and promote ways to communicate on adaptation progress (and limits) effectively and efficiently for different purposes, incl. NDCs, NAPs etc.**

## Accounting for agriculture, forestry and other land use

About one quarter of all human induced emissions come from agriculture, forestry and other land use (AFOLU), mainly from land use change, fertilizer use, livestock and peatland degradation. Reducing emissions (for example, by reducing deforestation) and enhancing removals (for example, by reforestation) are important components of many countries' NDCs and will continue to be so in future NDCs. Land use is mentioned in 77% of all countries' mitigation contributions in their NDCs, second only to the energy sector. The potential for both reducing emissions and increasing removals in the AFOLU sector is thus large, although it must be ensured that AFOLU mitigation does not compromise adaptation, food security or other social and environmental safeguards. Several key points are crucial to the discussions on accounting rules:

- **It is vital that all countries account for emissions and removals from AFOLU in a comparable and transparent way**, certainly those countries which intend to include emission reductions or increased removals from the sector as part of their NDCs. However, special allowance should be made for countries with the least capacity, notably, Least Developed Countries (LDCs) and Small Island Developing States (SIDS).
- **The Paris Agreement is under the Convention and so the general rules laid down by the Convention should apply. The Convention employs a land-based system of reporting and this should be used in the new agreement and should also be applied to accounting. Parties should use the methodologies provided in the 2006 IPCC Guidelines, which employ a land-based approach, or methodologies consistent with them.**
- Parties with economy-wide NDCs including absolute emission reduction targets should comprehensively report on and account for their emissions and removals from all sectors, including land use. All human-induced emissions contribute to climate change and removals help to mitigate it. Countries should account for "what the atmosphere sees" in terms of emissions and removals, when they occur.
- Parties with NDCs that do not contain economy-wide absolute targets should account comprehensively and completely for those elements which are included in their NDCs, and should explain why other emissions and removals are excluded, in line with paragraph 31 (d), 1/CP.21, and commit to overcome the deficit through capacity building on comprehensive AFOLU accounting.
- **The base year or period used for reporting and accounting for AFOLU should be consistent with a Party's overall NDC** to facilitate comparability, i.e., baseline periods should be the same for the AFOLU sector as for other sectors and be historical rather than projected. Furthermore, the AFOLU base year or period should be measured using agreed methodologies to estimate the

emissions, removals, and stocks of the sector. It may be advisable to use a base period rather than a base year, as studies conducted by some CAN members indicate that this would be more reliable for forestry and other land types.

## Finance

In the post-COP 21 era, finance commitments from providing countries must reflect ambition, equality, equity, long term vision and transparency. Also, developed countries should continue to provide public financial assistance to developing countries. Private flows are key though cannot be considered as substitute for public finance. Instead, they should be seen as a way to make all financial flows consistent with low-emission, climate-resilient development.

In order to respect and promote human rights, all implementation and financial mechanisms should integrate adequate criteria, safeguards and remedy mechanisms.

**Donor countries should continue to provide climate finance in the context of their UNFCCC obligations on top of resources they provide to meet their Official Development Assistance (ODA) promises (0.7% of Gross National Income).** Climate finance needs to be new and additional as well as transformational. At a minimum, **an increase in climate finance needs to happen within overall aid budget increases to avoid cannibalization of scarce ODA budgets.** Ideally, to make all financial flows consistent with low-emission, climate-resilient development, developed countries need to evaluate their levels of public finance.

**The Green Climate Fund (GCF) should aim to achieve its funding goal as soon as possible, and pursue a sound accreditation policy.** It needs to make sure that it supports transformational projects, as well as enabling country readiness to develop adequate project pipelines.

**COP 22 should adopt a decision clarifying the role of the Adaptation Fund under the Paris Agreement. While the adaptation fund might have been an instrument for Kyoto protocol, now the Adaptation Fund should serve the Paris Agreement as well. COP 22 should also encourage countries to announce financial contributions to both the Adaptation Fund and Least Developed Countries (LDC) Fund.** Developed countries should put further resources on the table so that the Adaptation Fund can meet its fundraising target of \$80 million. Both are in need of urgent replenishment for developing countries to continue building on experience gained thus far and best practices.

## Adaptation

Article 7 of the Paris Agreement represents a major step in the global response to better adapt to the consequences of climate change. **A global goal on adaptation will guide the future work on adaptation.** Paris puts individual countries in the spotlight to plan for, implement and communicate adaptation strategies. Adaptation should follow principles of conduct, and be people-centered. Paris enshrines a simple relationship between mitigation and adaptation efforts: the level of mitigation reached establishes the level of adaptation needs and the required support that developed countries are obliged to provide to assist vulnerable countries.

Several detailed discussions need to take place in the coming years to elaborate the provision on adaptation within the Paris Agreement, that should begin at COP 22:

- **Develop a compass for operationalizing adaptation decision in the next years: COP 22 needs to lay out plans for the adaptation goal**, the adaptation input into the global stocktake and guidance on adaptation communication and finance, including when and where these will happen.
- **Rebalance and scale-up adaptation finance**: Adaptation finance is currently minuscule in comparison to overall climate finance flows. **The high-level finance dialogue at COP 22 needs to provide tangible steps to identify an upward trajectory for adaptation finance until 2020.**

## Loss and Damage

The issue of loss and damage (L&D), i.e. those climate impacts which for physical, social or economic damages occur beyond measures to avoid or rectify them, has been rising steadily on the international policy agenda. The establishment of the WIM in 2013 marked a first key milestone. The inclusion of L&D in the Paris Agreement in Article 8, separate from adaptation, reinforced the call by vulnerable developing countries that the international community can no longer stand silently watching the harm occur.

**COP 22 must now deepen the international engagement in confronting loss and damage for the benefit of the poorest and most vulnerable, in particular through the envisaged WIM review and progress on the next five-year work plan.**

The ExCom made important progress this year in following up on the Paris outcome and in preparing the COP 22 outcome. Through decisions at its September meeting, it initiated the Paris-mandate task force on climate change displacement as well as agreed the TOR for the clearinghouse on insurance and risk transfer. The expert group on non-economic losses already held its first meeting and will present this at a side event at COP 22. The loss and damage finance forum organized by the Standing Committee on Finance also highlighting the increasing and urgent needs to address the costs of loss and damage.

However, given its delayed start and limited resources available, the ExCom's two-year work plan could not be entirely implemented and major work on drawing up recommendations and pushing for next steps remains to be done. There are 2 key aspects for consideration at COP 22:

- **Review of the WIM**: COP 21 failed to clearly outline a process towards the envisaged review of the WIM. Given the on-going work of the ExCom, the time for a fully-fledged review does not seem appropriate. However, governments should highlight in the review **the need to put more emphasis on enhancing action and support to address loss and damage and the need to provide the WIM with more resources to deliver on its tasks. Parties should envisage to have a more in-depth review of the WIM towards the middle of the next work plan, e.g. by COP 25.**
- **Five-year work plan**: The ExCom concluded its last pre-COP meeting with in-depth consideration of the future areas of work, but has not yet been able to elaborate a more detailed five-year work plan. It plans to do so in 2017 based on the further implementation of the current work plan. **The five-year work plan should be guided by strategic objectives which can develop the WIM in the next phase into a tool that really responds to the needs of vulnerable developing countries in**

**addressing L&D.** Ideally the WIM should be in a position to respond to L&D that has already taken place and prevent further loss and damage occurring.

## Technology

Work is ongoing in the Technology Executive Committee (TEC) on the linkages between technology transfer support and the NDC process. COP 22 should also use the opportunity to further discuss and deliberate on the issue of technology assessment as well as elaboration of the technology framework in order to take decisions on these issues in the near future.

- **Cooperative Technology Assessment: Developing clear rules for selection, support and evaluation of technology projects and programs** for use by the financial mechanisms of the Convention and bilateral support that takes place outside the Convention. Meeting the Paris Agreement's 1.5°C goal requires urgent emission reductions on a massive scale. While there may be quickly deployed technologies, there are concerns that many may pose "high", "unknown", or "unknowable" negative social and environmental risks when assessment is not undertaken or can only be undertaken in the open atmosphere or ocean. **The COP (drawing from paragraph 67 (c), 1/CP.21) should mandate a multi-stakeholder forum commissioned by the TEC to develop criteria and standards for technology assessment, to be reported to the SBI, which will recommend them for approval by COP 23 and subsequent adoption by the CTCN and the financial mechanisms of the Convention.**
- **Elaboration of the Technology Framework:** Work on the technology framework has not been sufficiently developed to be adopted at COP 22. However, the SBSTA has received sufficient inputs from parties and civil society organizations to underpin a solid first draft as a product of SBSTA at COP 22. The COP needs to mandate SBSTA to adopt and recommend the framework that will be adopted at COP 23 for immediate implementation. Finally, **COP 22 must mandate the SBI to develop and recommend an adequate, sustainable and predictable financing model for the CTCN for adoption at COP 23, taking into account the CTCN host's obligations to also provide and seek out funding.**

## Paris Agreement Article 6. Mechanisms

Flexible mitigation mechanisms such as markets should enhance ambition, and not delay the action needed to decarbonize economies to protect the climate. Any transfer of international units should help meet ambitious nationally determined contributions (NDCs), ensure environmental integrity, and be in line with parties' fair shares and in line with what is needed to avoid a 1.5°C increase in global temperatures.

We call for Parties to:

- **Define prerequisites** allowing only countries that have economy-wide targets with NDCs preferably expressed as multi-year carbon budgets, **to use transfers for compliance.**

- **Ensure a common accounting system** for measuring, reporting, and avoiding double counting of all mitigation outcomes and transfers used to meet an international commitment including commitments outside the scope of NDCs or the UNFCCC.
- **Cancel, or not recognize units from the Kyoto Protocol's pre-2020 mechanisms for compliance with its post-2020 mitigation commitments.**
- Consider the important role that the enhanced transparency framework under Article 13 and compliance under Article 15 can play in ensuring environmental integrity.
- **Ensure respect for human rights when developing and implementing actions under the flexible mitigation mechanisms.**
- Develop guidance under Article 6.2 that ensures the environmental integrity of mitigation outcomes used toward a Party's NDC, based on a reference level of recent national emissions inventories and other emissions reporting systems, in line with credible science to avoid a 1.5°C increase in global temperatures.

Regarding Article 6.4, we call on parties to:

- **Establish rules to ensure environmental integrity** by requiring that emission reductions are real, additional, verifiable, and permanent; avoid double counting of effort; are supplemental to ambitious national mitigation, and ensure net atmospheric benefits.
- **Establish credible baselines** for units, clearly referencing absolute or business-as usual levels, to be recognized as meeting the additionality principle.
- **Provide a negative list of activities ineligible for compliance** in order to ensure environmental integrity and that the mechanisms contribute to sustainable development. The negative list should include but not be limited to any large power production, including fossil fuel power, large hydro, nuclear, as well as N<sub>2</sub>O from adipic acid production and HFC-23 destruction.
- **Establish clearly defined international sustainable development criteria** that are applied throughout the activity, consistent with international obligations, including the human rights and sustainable development frameworks.
- **Establish clear guidance for local and global stakeholder consultation** processes to ensure meaningful and effective participation (including free, prior and informed consent when appropriate).
- **Create a grievance process** to provide a means of recourse for people and communities adversely affected by activities under Article 6.4.
- **Improve governance** by excluding negotiating delegates from, and inviting civil society nominations for membership in the body designated to oversee the Mechanism.

## Agriculture

As a source of livelihood and income for over three billion people, agriculture is a contributor to nutrition and health, and the foundation of identity and food security, requires special consideration, and Parties should approach actions holistically in line with the principles of the Paris Agreement. **COP 22 should**

**establish a new joint SBSTA/SBI Work Program on Climate and Food Security to further the subsidiary body work on agriculture in the previous years.** This program should inform the priorities of and provide guidance to related Convention bodies, including the APA and financial mechanism, to enhance implementation of the Paris Agreement, identify and catalyze action to address gaps in knowledge, research, action, and support.

Through these efforts, the work program can encourage and enhance adaptation and mitigation actions toward improving and ensuring food security and other sustainable development goals based on the principles given for INDCs as outlined above.

**The Work Program on Climate and Food Security might initially focus on examining and enhancing understanding of how climate change will impact other aspects of food security (beyond production), different food producer/provider groups, and different populations and genders, as well as the meaning of sustainable consumption in the context of climate change and food security.** The Work Program agenda might also include concrete deliverables that inform the work of other Convention Bodies and negotiations, such as identifying:

- Necessary characteristics for agriculture to deliver on all three aspects of “sustainability” – environmental, economic, and social;
- Criteria, principles, or guidelines to ensure environmental and social integrity of action or finance related to climate and agriculture based on the principles given for INDCs as outlined above.

## International Shipping and Aviation

The International Civil Aviation Organization (ICAO), adopted a Global Market Based Mechanism (GMBM) this year to offset emissions growth from 2020 levels. However, because of its voluntary nature until 2027, exemptions, and expected continued non-participation of major emitters, the ICAO GMBM will only cover an estimated 75% of emissions growth from 2020 levels.

**The objectives of the Paris Agreement cannot be achieved without emission reductions from these sectors.** Recognizing the role and expertise of the ICAO and the International Maritime Organization (IMO) in regulating these sectors, states must work to ensure:

- The establishment of emissions targets for the aviation and shipping sectors in line with the 1.5°C goal and the rapid implementation of policy instruments to achieve those targets;
- Sectors are subject to the polluter pays principle, preferably through measures adopted at a global level and that their targets are supplementary to national emissions pledges;
- The need for appropriate differentiation in the context of the non-discrimination principles that govern these sectors;
- The use of any offsetting units guarantees environmental integrity, are not double-counted towards other climate commitments, and a rapid move beyond offsetting to reduce in-sector emissions;

- That ICAO and the IMO work on a levy scheme to provide financing for adaptation in developing countries;
- Increased ambition for the new ICAO CO2 standard adopted earlier this year, which in its current form won't reduce emissions beyond business-as-usual, and market-based measure;
- The establishment of rigorous environmental certification criteria for alternative fuels.

Effective carbon pricing mechanisms play a central role in all of the above, by providing new incentives and resources for further emissions reductions in line with agreed targets, as well as ensuring that these sectors, which currently enjoy tax-free fuels, contribute their fair share to global mitigation and adaptation measures. Emission reductions could also be advanced through more stringent energy efficiency standards for both sectors.

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