

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

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

Vilnius, 12 September 2013

**Subject: Non- market based approaches (NMA)
Submission under FCCC/SBSTA/2013/L.7¹, June 2013**

The European Union and its Member States welcome the draft conclusions of SBSTA at its thirty-eighth session (FCCC/SBSTA/2013/L.7)¹ and the invitation to submit views on the elements of the work programme for Non-Market based Approaches (NMA).

The EU underlines the importance of existing non-market based approaches under the UNFCCC and the important role that they should continue to play in a future climate change regime.

We see merit in any approach that helps to combat climate change and delivers real, permanent, additional and verified mitigation outcomes, avoids double counting of effort, achieves a net decrease and/or avoidance of greenhouse gas emissions, contributes to safe and sustainable development and social well-being and preserves biodiversity.

As shown by the list below, NMA are prevailing and the default approach under the UNFCCC, since there are obviously already several fora and institutions where we are dealing with NMA, e.g.:

- Nationally Appropriate Mitigation Actions (NAMAs)
- National Adaptation Plans (NAPs)
- Nairobi Work Program on impacts, vulnerability and adaptation
- Development and transfer of Technology, implementation of the Technology Mechanisms, Climate Technology Center and Network (CTCN)
- Capacity Building initiatives (CB)
- Reducing emissions from deforestation and forest degradation and the role of conservation, sustainable management and enhancement of carbon stocks (REDD+)
- Cooperation with other international organizations
- Issues related to Agriculture
- Approaches to address loss and damage
- Projects supported through international climate finance. e.g.: Fast Start-Finance (FSF), the Global Environment Facility (GEF) or other (private) sources.

¹ Report for SBSTA 38 is not available yet.

- Green Climate Fund (GCF)

NMAs are also widely applied outside of the UNFCCC. They are not limited to but include approaches that are undertaken in collaboration with other Conventions (such as for HFC) or other approaches, such as the International Cooperation Initiatives (ICI) discussed under the ADP or energy efficiency standards.

Recalling the importance of NMA to tackle climate change and the importance of existing institutions and fora under the UNFCCC being based on NMA and recognizing that synergies between Conventions (in particular with the Convention on Biodiversity and the Montreal Protocol where such a cooperation to tackle synergies already exists) are needed, the EU is of the view that we need to avoid duplication of discussions taking place elsewhere or under other Conventions, and that instead we need to focus on the establishment and enhancement of such synergies.

Similarly, under the work programme to elaborate NMAs under the UNFCCC, we should refrain from discussing approaches that are already addressed under other agenda items (under SBI, SBSTA, CMP, COP or ADP), unless there is a clear added value for doing so.

Besides contributing to implement and finance many NMAs under the UNFCCC (as listed above), the EU also implements a large range of NMAs internally through its domestic legislations.

While recalling the importance of NMAs to tackle climate change, we note that market-based approaches are more cost-effective under certain circumstances and conditions. Both approaches complement each other. Accordingly, we should address the work programme to elaborate NMAs also in light of the work programme to elaborate a Framework for Various Approaches and the work programme to elaborate the Modalities and Procedures for the New Market Mechanism, those three issues being closely interlinked.