Pledges v Loopholes

As we look closely at the current state of the negotiations, the LCA text released over the weekend falls short of the advantages we need on both clarification and accounting. Without more progress this week the environmental integrity of the regime will die if not disappear altogether.

Amongst all the talk of lack of ambition, one would think that the far from sufficient pledges in hand today would at least be solid. But we don’t clearly know what is in the pledges and the foundation on which they supposedly stand – a solid accounting framework – is also at risk.

Here’s why we care about clarification of pledges. Recent workshops showed that countries have not been very forthcoming about their pledges, including underlying methodologies and assumptions. This is a serious problem for tracking progress towards both domestic goals and global temperature targets – and that’s at the heart of the matters before us, right?

We are looking at real challenges to understanding aggregate reductions, a key input into the 2015-2017 review.

And that’s not all. Without more transparency, it will also be difficult to avoid double counting of emissions reductions. So let’s review one piece by piece where the text falls short.

Regarding Annex I targets, the text calls for workshops, a technical paper, and a template to be filled out by Parties (Chapter IIIA, Para 9).

This is a good start, but the template should also request Parties to come to the table about market-based mechanisms accounting methodologies, procedures to avoid double counting, the use of uncovered sectors or gases acting as domestic offsets (if applicable) and related methodologies. And the template should be included in the Durban decision.

On non-Annex I actions, the text invites Parties to submit information on their actions (Chapter IIIB, Para 23).

However, an invitation alone will not necessarily result in the information necessary for tracking performance. The COP should also create a mandate for non-Annex I Parties to provide information through the completion of templates or questionnaires, with capacity support as needed. These should be specific to various pledge types, given the diversity of actions.

Lastly, SBSTA should establish a process on how these details should be reported in biennial reports, and define adjustment procedures so Parties don’t just change assumptions and methodologies willy-nilly with no real justification.

Now here’s why we care about accounting. Accounting for emission reductions is at the heart of international environmental integrity of the regime. If done in a transparent, consistent, comparable, complete, and accurate manner, accounting ensures comparability, the ability to add up and assess global emissions reductions, and quality in the carbon market.

And here’s where the text falls short. On Annex I, the text acknowledges the need for a common system for measuring progress (Chapter II, Para 14), the text does not refer to the word “accounting”, leaving the text fuzzy and vulnerable to co-opting.

The text further calls for a work programme to establish such a system but fails to mention “common” and “accounting”.

And a work programme is not necessary for Annex I targets. Considering the experience we have gained through the Kyoto Protocol, there is no date by which the work programme is completed, so clearly these elements are just tactics for delay.

So to recap, if we are to preserve any environmental integrity of this regime, provisions for clarification of pledges and proper accounting needs to be strengthened this week.

MRV and the Virtues of Clarity

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LULUCF for Ministers

Ministers, your attention is about to be rewarded. This article aims to preserve your sanity.

In the past, ministers have run out of closed rooms when asked to make decisions on LULUCF. When a minister was once asked how the LULUCF rules were progressing in Marrakesh he replied, “I have no idea. It is like fighting in a fog and the civil servants have all the weapons.”

The basics of LULUCF are not hard, just weird, and they work in opposition to the rest of the UNFCCC process. For example, it is generally assumed that developed countries should be cutting their emissions, or at least trying to. This is not the case in the Alice in Wonderland world of LULUCF, quite the opposite in fact.

To begin with, the ‘rules’ are currently optional, so if a country thinks that a LULUCF activity such as forest management will result in an emission, then it can choose not to account for it. If it thinks that the activity will result in a reduction, then it will account for it and take the credit.

Are you with us so far? Can you imagine the fuss if developed countries arbitrarily decided not to account for industrial emissions? This is what is commonly known as legalizing cheating.

So we offer a remedy. Ministers should ensure that developed countries have to account for all LULUCF emissions and removals, not just the ones that suit them. This is called mandatory accounting and it really should be a core principle, or at the very least applicable to forest management and wetlands.

It gets worse. The new rules on forest management are likely to allow countries to account for emissions however they choose, giving a whole new meaning to the word ‘rule’.

The most popular option (Option 1) is for the reference level (baseline) to be a projection, which assumes that emissions will increase, thereby ensuring that no emissions have been cut.

Imagine this ‘rule’ being applied to electricity generation. A country could build as many new coal-fired power stations as it liked, and as long as the country first announced that it would do so, they would not have to account for any of the emissions. Bearing this in mind, ministers should reject Option 1 and go for either Option 2 (proposed by the Africa Group) or Option 3 (by Tuvalu) instead. These are not ideal but they are a lot better than Option 1; almost anything would be.

Now for another mind-bender. To fully understand Harvested Wood Products (HWP) requires a twist in logic that we hope that ministers will not countenance, here’s very simple advice. Just go for Option 3.

Last but not least, there is a proposal called FFLU, which is as nasty as it sounds. This is an attempt to rewrite the Kyoto Protocol’s article 3.3. Reject “flexible land use” out of hand.