NDC Update From the EU? Go For at Least 65% as Fair Ambition

The European Union has made some progress in reducing harmful greenhouse gas emissions. While forever young in spirit, ECO is old enough to know the history of this. Since 1990, EU emissions have gone down in total by 23% to per capita levels which are now below Brazil and Indonesia, and the member countries achieved their Kyoto target. The EU's current NDC aims to drive this further to net emissions reductions of at least 55% by 2030 compared to 1990, and in 2022 the EU has been very busy with updating the group's climate and energy legislation, aka 'Fit for 55', negotiated between Member States, the European Commission and the European Parliament. Yes, ECO knows that this has been (and still is) complex, but two further milestones have been reached in this very first COP week. On Thursday, the negotiations on the regulation with the funniest acronym (LULUCF - Land Use, Land Use Change and Forestry) were finalised. While the outcome is an improvement to current rules, Member States insisted on bringing back many loopholes that will allow them to cheat with the atmosphere but look good on paper.

On Wednesday, negotiations also concluded on the Effort Sharing Regulation (ESR), which sets national 2030 emission reduction targets in the ESR sectors beyond the Emission Trading System: buildings, road transport, small industrial and power plants, agriculture and waste. The final regulation leaves big doors open for countries to use "flexibilities" – claiming emission reductions that happened in the past, in other countries, in other sectors – instead of real emission cuts. Still outstanding is the reform of the ETS (Emission Trading System) which covers emissions from large industrial and power plants.

ECO knows that estimating the impacts of the complex set of regulations on the EU's emission reductions is not straightforward at all, also because some have built-in loopholes for Member States which they may use to water down ambition. Some research estimates that the combined package may lead to 57% reductions by 2030, maybe a bit more. But that's not enough. The outcomes of all the negotiations have been disappointing. The European Parliament's proposals at least would have resulted in a higher emission reduction, but the fossil fuel industry, other lobbies and too many conservative Member State voices slowed that down.

ECO hears that the EU may announce at COP27 its plans for updating the NDC based on the 'Fit for 55' negotiations (listen carefully into today's pre-2030 mitigation ministerial roundtable). However, setting in stone a minimally higher 2030 target is not what the Glasgow Climate Pact intended when asking Parties to update NDCs in line with the 1.5°C. And here is the crux of the matter: the EU's ambition is far from being its fair share (which, unfortunately, is not a new finding), and this is underpinned by more than one analysis!

For example, dividing the remaining global CO2 budget on a per capita basis would provide the EU, with around 5% of the world's population, with a carbon budget of only around half of what the EU Climate Law foresees. The UN Environment Programme's 2019 Emissions Gap Report called upon G20 countries to reduce their annual emissions by 7.6% between 2020 and 2030, which, if applied in a linear manner, would lead to emission reductions in the EU of at least 65% in 2030. Another report found that the EU's NDC only roughly matches a third of the efforts required by 2030 to be in line with Fair Shares.

But there is good news: ECO has access to new science that shows us that it is possible for the EU to achieve at least 65% emission cuts by 2030 and climate neutrality by 2040, which is necessary to achieve the Paris Agreement goals. The higher ambition is technically and economically feasible if the EU rapidly upscales renewable energy and energy saving over the coming decades, with wind and solar as the cornerstone of the energy transition.

The EU cannot assume to get to 2030 with just a minimally increased target when climate impacts are unfolding more quickly and severely, when more and more reports show how much we are off track from 1.5°C, and when the Global Stocktake will result in calls for greater action. While the next EU NDC with a 2035 timeframe must be guided by a steeper emission reduction trajectory, 2030 is the critical decade: Don’t lock in a 55% + tiny % increase in an updated NDC here at COP27; go for at least 65% by 2030!

Let’s not forget that alongside emissions reductions, the EU is committed to contributing climate finance responsive to needs and priorities of developing countries. In scaling up its ambition, it should be looking for all opportunities to scale up its contributions: EU Member States should move towards the Parliament position on the ETS, and earmark a share of revenues from the sale of ETS allowances to go to climate finance for developing countries. It should also ensure revenues from the carbon border adjustment mechanism go to developing countries.
The [Implementation] of an [Ambitious][Equitable][Robust][MWP]: a Quick Guide for Ministers

ECO has always had a very good memory. We recall very clearly that at COP26 Parties agreed to establish, at COP27, a work programme to urgently scale up mitigation ambition and implementation in this critical decade.

So ECO was excited to come to Sharm El-Sheikh to see the ambition and implementation of Parties’ efforts for an equitable and just reduction of emissions in line with 1.5°C. But after the first week of [negotiations] ECO is [very] [quite] [super] anxious because we are not there yet. The text is 9 pages long, has only brackets, and contains enough options to take you from one end of the Nile to the Bermuda triangle.

Since you seem lost, and do not know which priorities to highlight at today’s ministerial roundtable, let us [guide you back] [refresh your memory:
- Technical and political deliverables such as dialogues on sectoral mitigation/implementation barriers and solutions as well as decisions to be taken at COP27 and beyond to ensure that Parties get on track to limiting global warming to 1.5°C. You need this handhold work package because clearly after 2015 the time has tik toked to climate disaster!
- Duration: until 2030 or until we close the emissions gap. You had 5-6 years to prepare enhanced NDCs and those amount to a 3.6% reduction of emissions in 2030 from 2019 levels. According to the IPCC, we need 43%. Then Glasgow called for you to enhance NDCs until now and only 24 did. If you want to be serious about enhancing ambition and implementation by 2030, let’s do it right and take the time to discuss and deliver every year until we get on a path for 1.5°C.
- A sectoral approach that addresses barriers and creates opportunities for enhancing ambition and engaging the private sector. Mitigation dynamics can transcend national borders, for example when innovative renewable energy technologies spread to other countries. This requires direct technical support for all relevant sectors as outlined in IPCC AR6 WG3 (including food systems, energy, transport, health care, urban areas, oceans and coastal areas) and taking full advantage of the opportunities to maintain and enhance carbon sinks by protecting and restoring natural ecosystems and engaging with Indigenous peoples and local communities whilst safeguarding and protecting their rights. This can produce leapfrog implementation.
- The MWP should incorporate not only the sectors reflected in the Glasgow Climate Pact; subsequent COPs must also be included to enhance delivery of pre-2030 ambition - just as your NDCs must! What is the point of suffering through this nightmare COP - unless you just want to continue fueling the fire that is currently burning us all.
- The measures and policies for sectors that we want to see discussed and facilitated under the MWP need to be met with a package of incentives in terms of Means of Implementation. More resources flowing will definitely mean more action, so you need to connect this discussion with the finance ones.

When the Mitigation and Finance HODs meeting happened [a long time ago] in October 2022, 200 civil society organizations demanded the delivery of urgent ambition mitigation and climate finance. Climate finance is a key enabler and incentive of mitigation. Yet, the financial requirements as assessed by the SCF report are significantly lower, in particular for clean energy than the IPCC analysis for the same timeframe to meet a 1.5°C trajectory by 2030.

This is the critical moment to show political leadership in this climate emergency. ECO will never get tired of repeating [once again] [and again] that mitigation is an opportunity, not a burden as financial, social, and environmental costs of inaction will be much higher. Remember that we all [want to] [must] keep 1.5°C alive.

Fossil Fuels Out Not Down

We’re not in Glasgow anymore. ECO remembers last year’s battles beneath stormy Scottish skies, as countries twisted words to justify phasing coal down but not out and contorted themselves to excuse gas and oil while cursing coal. That’s a start, but we can’t stop there.

Burning just the oil, gas and coals in existing fields and mines now would take us beyond 2°C, not just 1.5°C. It’s too late to phase out one fossil fuel at a time.

That’s why ECO was so excited to hear India stepping up and taking a leadership role in calling for wording about the phase out of all fossil fuels to be included in the COP27 cover decision. This is a strong move. Last year, many countries criticised India for opposing calls to phase out coal in the CO26 cover decision. But now, the country has fired the ball at searing speed into its critics’ court. Will other negotiators, particularly from the global north, play the ball and seize the chance to phase fossil fuels out?

ECO also welcomes the EU’s support for fossil fuel phase out. Even though record numbers of oil and gas lobbyists are in the room, the forces of fossil fuel phase out are not yet defeated. Instead, there has been big progress in the last week. ECO’s friends in Norway succeeded in slowing and probably stopping the huge Wisting field in the Arctic.

Several countries announced intentions to move to 100% renewable energy, including Tanzania, Kenya, Estonia, and Guinea-Bissau. Colombia announced plans to stop developing oil and gas. Tuvalu endorsed the Fossil Fuel Non-Proliferation Treaty.

The UN High-Level Export Group on Net Zero Emissions Commitments provided additional clarity that institutions committing to net zero must not support fossil fuel extraction – which has already been adopted by the Net Zero Asset Owners Alliance. The flows of finance are tilting against new fossil fuel expansion. In the Breakthrough Agenda, governments representing over half of global GDP set out 12-month action plan to help make clean technologies cheaper and more.

Finally, and importantly, several countries explicitly called out fossil fuels and demanded that polluters pay for the loss and damage they cause. Big oil and gas companies’ desperate spin on ‘Decarbonisation Day’ showed that the industry has no new ideas, as they desperately trotted out tired cliches.

ECO will be watching the coming days with interest. Will new countries commit to the Glasgow Declaration on public finance? Will new members join the Beyond Oil and Gas Alliance? Will India and others stand strong, championing the phase out of fossil fuels on the front page of the COP27 outcomes?
No Gender Justice on Gender Day

ECO is happy to share this part of our publication with the Women and Gender Constituency (WGC) to help amplify their voice. This article reflects the views of the WGC.

Today is Gender Day at COP27. A day filled with many high-level talk shops, especially at country Pavilions, about gender equality and climate action. But don’t be fooled. Last week, in negotiation rooms largely closed to Observers, Parties showed ECO their lack of priority for achieving gender-just climate action, the same lack of prioritization we saw in Bonn.

This year, Parties were meant to engage in and conclude a substantive midterm review of the Gender Action Plan. However, according to the Women & Gender Constituency and its allies, the review process has not prompted real reflection on the failures of this GAP. The proposals for revised language are weak, vague, and without any substance to change the course of its implementation.

There may be an outcome under this review here at COP, but it will not be one that reflects the inputs of women and gender advocates or communities. We have remained on the sidelines looking in - or sometimes fully on the outside - only to find text that doesn’t reflect the realities of people nor their needs and demands. So, we ask Parties: who does this agenda aim to serve at this point?

The negotiations are not serving Indigenous and rural women who fought hard to have their voices and leadership recognized under the GAP. They are facing ever-increasing rates of violence and discrimination in the face of environmental degradation, human rights violations, extraction, and land grabbing. The negotiations are not serving Parties who seek to have a better understanding of how to advance gender equality across all areas of climate change, nor grassroots practitioners waiting endlessly for more support, funding, and recognition for their work. They are not serving the women human rights defenders and Indigenous women whose lives remain in danger from threats and gender-based violence in spaces of increasing environmental degradation. They are not serving the communities that are denied sexual and reproductive health and rights, preventing them from adapting to a changing climate and extreme weather disasters. And this review is not serving everyone facing the impacts of an ongoing pandemic that exposed deep structural inequalities, especially around the role women play in underpinning an economy of care.

ECO wants to remind Parties that gender equality is not a sideshow, not a thematic day, not an opportunity to host an event at your Pavilion.

Parties need to prioritize a robust outcome, or a rethink of the entire approach. Parties need to prioritize gender and create a real, detailed vision of what a GAP could accomplish. Parties need to resource activities and ensure their implementation. We actually want Parties to show us every day, not just on Gender Day, what their commitment to gender equality in climate action really means.

As is, the current text contributes little to the work of gender equality. Regardless of what may be adopted, this is not a substantive outcome of this COP. We have learned from this review that we must look elsewhere, outside the UNFCCC, for real commitment to gender-just climate action. But we will still be watching you!

A 25 Year Long Wait - Global CAN Now Opposes Corporate and Governmental Offsets

For ECO, this is a continued dejavu - and a very welcome achievement finally. Better late than never. Governments and corporates, you must listen very carefully: The newly agreed CAN position paper on offsets draws the conclusion from witnessing 25 years of cheating with baselines, permanence issues, human rights abuses of Indigenous peoples, voodoo accounting and free rides for fossil fuel polluters driven by offsets.

Delving briefly into history and not outlining all the many details and reasons for opposing offsets, ECO remembers the many fights since 1997 when the Kyoto Protocol was agreed to and with it the so-called Clean Development Mechanism (CDM), the principal offset mechanism. Fights were within and among CSO as well as governments. ECO remembers the various disputes very well.

The veteran ECO recalls that within only a few years the UNFCCC parties agreed that CDM offset credits should exclude so-called ‘Avoided Deforestation’ credits, attempting to establish a scientifically flawed equivalence for the protection of forests through a perverse element of carbon crediting of natural carbon cycle dynamics in order to keep oil, coal & gas pollution in the North.

CDM offsets generally allowed carbon-capped polluters to buy carbon credits from an uncapped sector in the South in a fully unregulated way from often bogus projects like monocultural forest plantations, non-additional hydropower or F-gas destruction.

It took another few years until it became very clear that the CDM created more carbon emissions (due to lack of permanence & non-additionality) than would have happened without the mechanism while the carbon credits prices resulting from flooded bogus credits eroded into less than $1/ton of CO2. Not permitting any decent safeguards, monitoring, verification further damaged the schemes credibility. And the CDM was more or less removed from the European Emissions Trading System. The world’s largest cap and trade system now fully rejects any offsets for compliance towards the EU 2030 objectives.

However, ECO observes with disgust that fossil fuel companies increasingly embrace offset schemes under ‘Voluntary’ Standards to keep their products, resulting in pollution and profits, rolling. And all while claiming they are “carbon neutral” in their public propaganda. There is no carbon-neutral coal, oil or gas. Fossil fuels cannot be compensated by protection of forests. Such claims are scientifically flawed and dangerous having been debunked by many scientists and institutions like the IPCC, IEA & IRENA.

ECO is very clear - we love forests, wetlands, and other ecosystems and want to see them protected and restored. They are fundamentally important for storing and removing atmospheric CO2. They harbor high biodiversity, support the culture and livelihoods of many Indigenous peoples and have a plethora of other benefits for the health and stability of the biosphere. But they are not for sale to keep the deadly fossil fuel supply running. For a 1.5°C trajectory, we need both the radically enhanced protection of ecosystems and the phase out of fossil fuels. There must be no trade-offs between these imperatives.

ECO strongly sympathises instead with the novel idea of ‘contributions’, where Corporations (not fossil fuel companies) and governments are invited to pay the social cost of carbon for hard-to-abate emissions into something like a democratically organised climate fund run by a third party; an independent entity that distributes the money to projects in developing countries. But without any carbon offset credits for the donors.
CONFIDENTIAL - SECRET Article 6
(please don’t read)

Today’s Fossil of the Day Award goes to the USA for continuing to outrightly dismiss the demand from over 130+ developing countries, representing over 5 billion people, for a loss and damage finance facility.

Today hundreds of civil society delegates marched in sweltering heat in the COP27 venue demanding climate justice, reminding us all that real lives and livelihoods hang in the balance as rich nations continue to delay and distract from their climate obligations.

Meanwhile, US Special Envoy John Kerry was blunt and cold in his statements on the US position here at COP27 on loss and damage finance.

He said: “The US and many other countries will not establish some sort of a legal structure that is tied to, you know, compensation or liability. That is just not happening, but for a whole bunch of countries.”

Well into week one of COP27, vulnerable nations have stood united in their demand for funding for loss and damage - the unavoidable impacts of the climate crisis that threaten to destabilize entire communities, through floods, cyclones, super storms and rising seas.

The US claims it is working intensively with partners to find a good outcome on addressing loss and damage at COP27 but at the same time, it has not budged one bit on its public message which is: no new fund or facility for loss and damage.

As climate disasters escalate it should be clear that developing countries cannot wait any longer. Some rich nations have shown their openness to consider a loss and damage fund but the U.S. is continuing to be uniquely uncompromising.

We call out the US, the world’s biggest historical polluter, for this blatant refusal to deliver on their climate debt, leaving millions of people to suffer the consequences of climate impacts that they did little to cause.

ACTION HIGHLIGHT: #WeAreNotYetDefeated

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**Time for the Art. 6.4 Supervisory Body to Try Again**

ECO knows the Supervisory Body worked hard. And they were given a near impossible task to agree on recommendations on methodologies and on removals (as well as setting up their basic rules of procedure, budget…). They only really had four months to do a (at least) year’s worth of work.

Rejecting the recommendations on removals isn’t criticizing the Supervisory Body, but merely recognizing that they need more time and the CMA needs to give them more guidance.

And of course, ECO is here to help.

First, the CMA must reject the recommendations on removals! As ECO explained earlier, the recommendations on removals are unacceptable and put the integrity of the Paris Agreement at stake by including an overbroad definition of “removals” and undermining human rights.

The next step is to send the recommendations back to the Supervisory Body to try again. But don’t just tell them to try again, give them more guidance. Be clear and tell them to review what they’ve done so far in line with obligations to protect human rights including the rights of Indigenous peoples and ecosystem integrity in line with the Paris Agreement, science, and international law.

**Don’t Let NAPs Take a Nap at COP 27**

Dear Ministers, at the start of week 2, ECO would like to remind you of your commitment in developing and implementing the “National Adaptation Plan (NAP) process” which was established 12 years ago in COP 16 under the Cancun Adaptation Framework.

National Adaptation Plans (NAPs) are vehicles for delivering on adaptation, and so it is critical for the NAPs agenda item to be negotiated with the attention and urgency it deserves to support adaptation actions in vulnerable countries. We don’t have the luxury of talk-shop after talk-shop, a clear sign of delaying tactics to make progress on the adaptation agenda. Adequate finance is crucial in enabling NAPs to play its key role as adopted in an effective manner as stipulated in the Paris Agreement.

ECO is disappointed by the push and pull tactics in the negotiation rooms on the NAPs agenda item, especially blocking language that calls for the scaling up of financial provisions to support the formulation and effective implementation of NAPs by developing countries. By proposing a watered down language on finance, developed countries are signaling a lack of responsibility, especially to vulnerable communities from developing countries who are already bearing the brunt of climate change. ECO would like to remind ministers that COP27 is an implementation COP - the so called “togethertimplmentation”. It is therefore extremely important that this COP adopts a decision that calls for enhanced, flexible, easily accessible, new and additional adaptation finance to accelerate the formulation and full implementation of NAPs by developing countries.

**Do it Right(s) for a People-Centered Santiago Network**

When floods inundated one third of Pakistan - killing 1500 people, damaging and destroying 2 million homes, displacing 30 million people, and sweeping away food crops and livestock, schools and health facilities - millions of people’s rights to life, health, adequate housing, food, education, and a healthy environment were harmed, often irrevocably. What is called loss and damage in the climate negotiations, is what the human rights community sees as harms to human rights. How then, ECO wonders, are Parties proposing to support adaptation actions in vulnerable countries to deal with loss and damage, without talking about human rights?

As the technical arm of the WIM, the Santiago Network is a key piece of the puzzle to ensure the WIM delivers on its third function: enhancing action and support. Its effective operationalization must guarantee that, once the funds start flowing via the Loss and Damage Finance Facility to be established here in Sharm el-Sheikh, developing countries are equipped to provide remedy to those whose rights are affected, and deliver rights-based responses when communities are facing loss and damage. To enable it to do this, it needs to be guided by human rights principles:

- Transparency, accountability, and good governance;
- Demand- and needs-driven, and locally-led;
- Gender-responsive and non-discriminatory;
- Meaningful public participation, in particular of those most affected by loss and damage, and inclusivity, including with special attention to disability-inclusivity;
- Respect, promotion and protection of human rights including the rights of Indigenous Peoples, the needs of local communities and fulfillment of minimum social standards

An inclusive, diverse and participatory Advisory Board must provide oversight and ensure that the delivery of technical assistance is compliant with these principles. ECO kindly reminds Parties about their human rights obligations, and the confirmation they made in Paris to honor these in the context of climate action. This is more relevant than ever as we have entered the era of loss and damage. It’s time to do it right(s)!
The Moment Has Arrived for L&D Finance

As the second week of negotiations begin, ECO wants to warn developed nations: last week, ECO once again witnessed the disturbing pattern you have adopted in the talks surrounding funding arrangements for loss and damage.

With their words cloaked in a false sense of solidarity, rich countries appear to be united in delaying the decision to establish a loss and damage finance facility, with some suggesting an agreement would only be possible in 2024. Their blocking tactics are reminiscent of what we have seen in previous COPs.

This type of posturing does not reflect the realities frontline communities are facing. This year has been characterized by a series of climate disasters of biblical proportions around the world. Recent flooding in Pakistan has displaced 33 million people and killed over 1,500, and brutal heat waves, droughts, fires, and floods have plagued many parts of the world. With the climate crisis upending the lives of frontline communities, the need to address loss and damage in a substantive manner and create a financial mechanism for it becomes increasingly urgent.

With this apocalyptic backdrop, a proposed two-year plan consisting of a process with a collective buy-in at COP27, review of the discussion at COP28, and a decision at COP29 is unacceptable.

The emphasis on the Global Shield against Climate Risks proposed jointly by the V20 and the German G7 Presidency is not a substitute for a funding mechanism accountable to and receiving guidance from the UNFCCC with a comprehensive funding approach that delivers the money owed to frontline communities in the Global South to deal with losses and damages. Limited in scale, scope and reach, the buzz it creates runs the risk of delaying the establishment of a proper facility.

Developing nations have been waiting for action from the Global North on the issue of loss and damage for more than 30 years. Talks around a financial mechanism to deal with loss and damage date back to a 1991 submission by Vanuatu on behalf of the Alliance of Small Island States for an insurance pool funded by developed countries to help cover the financial burden and to compensate/rehabilitate the loss and damage suffered by the most vulnerable small island and low-lying developing countries.

Simply put, frontline communities cannot wait until 2024 for a decision on the establishment of a finance facility to deal with the catastrophic effects of climate change they are already facing. The moment has arrived, and rich nations must agree to #PayUp4LossAndDamage at #COP27.

Dos and Don’ts for Ministers in Long Term Ministerial

We know it is hard to keep Ministers on topic, and prevent them from rambling on about random issues or extolling (and distracting from) their often dubious achievements.

So straight to the point - here is what Ministers should and should not talk about in the LTF ministerial today.

DO DISCUSS

• When developed countries will deliver a roadmap for how to double adaptation finance and keep it growing from there to be at least 50% of all public climate finance.
• That the high share of loans, many of them not even concessional, is further indebtedness recipient countries and how to respond to the growing need for grant based finance and how to avoid low or non-concessional loans entirely.
• That the share of climate finance, especially grant-based public finance, reaching the most vulnerable countries in particular LDCs and SIDS must be increased rapidly.
• How to ensure that not only is the US$100 billion per year reached as soon as possible but also how to ensure that this level is provided on average over the 6-year period of 2020 to 2025 for a $600bn total, and scale up from there in line with the needs of developing and especially vulnerable country and community needs.
• How to increase the share of climate finance that is provided in a gender-responsive way through direct access, including through simplified and enhanced direct access procedures that devolve decision-making on climate actions to the lowest political level feasible and directly benefit local communities.
• That it is high time that substantial amounts of finance get dedicated to addressing loss and damage, additional to the more than $100bn for adaptation and mitigation.
• That generous reporting practices for developed countries mean that reported climate finance figures are quite different from the real value of provided support, as recently shown by an estimate by Oxfam.

DO NOT DISCUSS:

• “Expanding the contributor base”: Developed countries in Annex 1, and those countries alone, are responsible for delivering on the commitment of more than $600bn over 2020-2025, so any discussion of passing the burden to others is not only off topic here, but will be considered evasion and prevarication.
• Use Article 2.1(c) as a distraction from developed country responsibilities: this article is indeed very important, but is a separate issue from climate finance, and attempts to use 2.1c to switch the channel from the need to deliver on developed country climate finance obligations is out of bounds.
• That your developed country is already doing a lot and otherwise point your finger elsewhere.
• That the low performance on mobilising private finance is the reason developed countries broke their $100bn promise UNLESS you also accept that your country’s public finance commitments were inadequate.
• Otherwise distract from the developed countries’ lack of political will by pointing out, over and over again, that public finance cannot do the job alone and it’s the private sector that needs to be mobilised. We got it. The private sector needs to shift drastically. Yes. But that’s no reason to not provide what is needed in public finance.