



Submission by Friends of the Earth (Ireland) to the Department of the Environment regarding preparation of the European Union's Submission to the UNFCCC secretariat on new commitments under the Kyoto Protocol for the post 2012 period.

February 2006

Friends of the Earth appreciates this opportunity to submit our views on this important first stage to shaping the future commitments for the Annex 1 countries. We will be working to ensure that the positive momentum following Montreal continues and we look forward to submitting further views and information as required.

Recognising the issue of equity, and the principle of “differentiated but common responsibilities”, it is essential that Annex I countries act first in making the deepest cuts and demonstrate further leadership on the issue of climate change, by setting new binding targets that sharply reduce their emissions beyond 2012. We look forward to seeing progress and robust preparations for deepening industrialised country commitments in the post 2012 regime which will help to secure the protection of this planet against the dangers of climate change.

Our observations and recommendations are as follows:

1. Relationship to other negotiations and discussions

The negotiations on future emission cuts by Annex 1 countries following article 3.9 of the Kyoto Protocol must not be held back by until the review of, and amendments to, the Kyoto Protocol under Article 9 are completed. Similarly, agreeing future cuts in a subsequent commitment period must not wait for achievements made under the Convention ‘dialogue’. Reductions are needed in any case, regardless of the progress made in the various processes, and the sooner Europe sets out adequate targets, the more European citizens will be able to fully reap the societal, environmental and economic benefits of early and ambitious action.

2. Timeline

At the first meeting of the Ad-Hoc Working Group in May, government must explicitly agree that the second commitment period starts on 1 January 2013, putting a date to the ‘no gap’ language of the Montreal decision. The EU should ensure that a realistic time frame to complete negotiations so the next commitment phase can start in time, by working backwards from 2013 and assessing the length of the negotiation and the subsequent ratification processes. We believe negotiations on future cuts must be completed by 2008 latest. The work plan that will be agreed by the Ad Hoc Working Group needs to set sufficient subsequent meetings to make that happen.

3. Work plan

The programme of work for the Working Group is extensive and a high intensity of work is required. It is essential that the first meeting of the AHWG, in conjunction with

the 24th session of the subsidiary body in May 2006 agrees the work schedule and sets sufficient subsequent meetings to carry it out.

4. Targets

This issue is the heart of the 3.9 review and with sufficient commitments will help to build trust in the international regime and give a strong signal to developing countries that the industrialised world is serious about taking action on climate change. Friends of the Earth believes that to address climate justice and the threat that climate change represents, Annex I countries must commit to deeper, legally binding cuts in their carbon emissions beyond 2012.

5. Adequacy of targets

Commitments to further cut emissions must ensure that the ultimate objective of the UNFCCC can be achieved. The EU should seek to establish the 2°C temperature target within the UN climate regime as a base for overall emission cuts needed in subsequent commitment periods of the Kyoto Protocol. New emission cuts must be in line with this 2°C target, based on best available science. EU Environment Ministers concluded last year that this would require global emission cuts “in the order of at least 15% and perhaps by as much as 50% by 2050 compared to 1990 levels”. We note with concern that according to recent findings, the lower range will be absolutely inadequate to avoid catastrophic climate change. It is important that the AHWG take into account the findings of the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report, due for release in 2007. Also, as a consequence of its historical and present responsibility, the European Union and other Annex I countries must, during the negotiations, commit to cut its emissions by *at least* 30% by 2020 and 80% by 2050.

6. Time frame for second commitment period

Many Parties and observers are questioning the 5 year time period for future commitments beyond 2012, specifically that longer time frames may be required. This may be an issue that the wider review under Article 9.2 opens up, and something that the AHWG should be aware of. If longer commitment periods are agreed, it is important that specific measures and mechanisms are also put in place to regularly review the adequacy not only of commitments but also of implementation measures to achieve those commitments.

7. Wider participation of all industrialised countries

It is imperative that the Article 3.9 review process “shall begin without delay”. The US Administration, by refusing to sign Kyoto and attempting to scupper any progress in the international talks has shown its irresponsible position in the international fight against climate change. Friends of the Earth is encouraged that this working group is proceeding despite the lack of US participation and the best efforts of the US Administration to block it. We hope that the US will enter back into the regime after 2008. In the meantime, Parties must not wait for that to happen but move on swiftly in agreeing new and deeper cuts.