Like-Minded Developing Countries’ preparations and views for the 2015 Paris climate agreement

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# Content

1. **Introduction: A New 2015 Climate Agreement in Paris** ........................................ 4  
   1.1 The 2015 Paris Agreement: Background and Negotiating Mandate ................ 4  
   1.2 Preparations for Paris by the Group of Like-Minded Developing Countries .......... 5  
      1.2.1 Comparison of greenhouse gas emissions and energy sources of the selected countries ................................................................. 8  
2. **Introduction to the LMDCs in the UNFCCC** ...................................................... 11  
   2.1 Brief history of the LMDCs in the UNFCCC negotiations .......................... 11  
   2.2 Operation of the LMDC Coalition ....................................................... 12  
   2.3 Internal and External Dynamics of the LMDCs ...................................... 12  
3. **Intended Nationally Determined Contributions of Selected Countries in the LMDC Coalition** ........................................................................ 14  
   3.1 Algeria ........................................................................................................ 14  
   3.2 Argentina .................................................................................................... 15  
   3.3 Bolivia ........................................................................................................ 17  
   3.4 Dominica ..................................................................................................... 18  
   3.5 Ecuador ....................................................................................................... 19  
   3.6 Iran .............................................................................................................. 21  
   3.7 Malaysia ..................................................................................................... 22  
   3.8 Mali .............................................................................................................. 22  
   3.9 The Philippines .......................................................................................... 23  
   3.10 Saudi Arabia .............................................................................................. 24  
   3.11 Sudan ......................................................................................................... 27  
   3.12 Venezuela .................................................................................................. 28  
   3.13 Comparison of INDCs and country data ............................................... 30  
4. **Positions of the LMDC Coalition and Selected Countries of the Coalition on Some Key Issues** ................................................................. 35  
   4.1 General Views on the Paris Outcome and its Legal Form ......................... 35  
      4.1.1 Introducing the Issue ........................................................................... 35  
      4.1.2 Position of the LMDCs ...................................................................... 36  
      4.1.3 Positions of Selected Countries in the LMDC Coalition .................... 37
4.1.4 Analysis of Group and Country Positions

4.2 Elements Agreed in the Negotiating Mandate

4.2.1 Mitigation

4.2.2 Adaptation

4.2.3 Finance

4.2.4 Technology

4.2.5 Capacity building

4.2.6 Transparency

4.3 Some Specific Issues in the Negotiations

4.3.1 Interpretation of Equity and Responsibility in the Post-2020 Period

4.3.2 Land use and forests

4.3.3 Time frames and process related to commitments/contributions

4.3.4 Adaptation - Loss and Damage

4.3.5 Carbon pricing and carbon markets

5. Conclusions

5.1 INDCs

5.2 LMDC coalition dynamics and positions for the Paris Agreement

Annex 1. Country positions on some key issues

Legal form and general views of the Paris Agreement

Mitigation

Adaptation

Finance

Technology

Capacity building

Transparency

Equity and responsibility post-2020

Time frames and process for assessment of contributions

Land use and forests

Adaptation – Loss & Damage

Carbon pricing and carbon markets
1. Introduction: A New 2015 Climate Agreement in Paris

The 196 Parties to the United Nations Framework Convention on Climate Change (UNFCCC) are currently engaged in negotiations for a new climate change agreement applicable to all Parties from 2020. The deadline for concluding the agreement is at the 21st session of the Conference of the Parties (COP 21), which will be held in Paris, France, in December 2015.

This report, commissioned by the Finnish Ministry of the Environment, describes and analyzes negotiating positions by countries in the coalition of Like-Minded Developing Countries (LMDCs) at the Paris negotiations. The report has been structured as follows: Chapter 1 gives an introduction to the Paris negotiations and negotiating mandate. It also briefly describes the countries analyzed in this report. Chapter 2 gives a brief introduction to the LMDCs. Chapter 3 introduces and examines some key issues in the Paris negotiations, and the position in relation to such issues taken by the LMDCs as a coalition, as well as by the coalition’s individual members. Chapter 4 includes brief conclusions.

1.1 The 2015 Paris Agreement: Background and Negotiating Mandate

The UNFCCC was adopted in 1992. It provides the main international legal framework for addressing climate change. According to Article 2, the ultimate objective of the UNFCCC is to prevent dangerous anthropogenic interference with the climate system. Parties have subsequently agreed on a goal to limit the global average temperature increase to below 2°C from pre-industrial times. This target is currently under review that will take place in 2013-15.

The current international legal framework for mitigating climate change is based on binding emission targets for developed countries under the 1997 Kyoto Protocol. The first commitment period for Annex I countries under the Kyoto Protocol took place in 2008-12. Based on the Doha Amendment to the Kyoto Protocol, adopted in 2012, the second commitment period runs from 2013 until 2020.¹ In addition to the Kyoto Protocol’s legal framework, a number of developed and developing countries have submitted unilateral mitigation pledges to the UNFCCC Secretariat. These submissions were mostly made in context of the 2009 UN Climate Change Conference in Copenhagen and cover the pre-2020 period. In light of climate science it is clear, however, that the combined effect of the existing binding and non-binding mitigation measures is inadequate to achieve the two-degree target. A new negotiating round was therefore launched at COP 17 in Durban with two workstreams. Workstream 1 focuses on enhancing pre-2020 ambition and the Workstream 2 on negotiating a new climate treaty that would apply from 2020 onwards.

¹ Note, however, that the Doha Amendment to the Kyoto Protocol containing, inter alia, emission targets for 2013-2020 has not entered into force.
A new subsidiary body entitled the Ad Hoc Working Group on the Durban Platform for Enhanced Action (ADP) oversees the negotiations. Concerning Workstream 1, its mandate is to negotiate a new agreement, applicable to all Parties. The agreement should be adopted in 2015 and become effective and be implemented from 2020 onwards. Issues addressed by the ADP include mitigation, adaptation, finance, technology development and transfer, transparency of action and support, and capacity building. These are also the main issues analyzed in this report, along with countries’ views on the overall Paris outcome and its legal form.

Intended Nationally Determined Contributions (INDCs) are an important aspect of preparations for the 2015 Paris agreement. In their INDCs, countries outline what climate actions they intend to take in the post-2020 period. According to guidance from COP 20 in Lima last year, INDCs should facilitate the clarity, transparency and understanding of a country’s contribution. The UNFCCC Secretariat publishes INDCs on its website and will prepare a synthesis report on their aggregate effect by 1 November 2015.

1.2 Preparations for Paris by the Group of Like-Minded Developing Countries

This report focuses on the negotiating coalition known as Like-minded Developing Countries on Climate Change (LMDC), analysing the coalition’s negotiating positions and preparations for the 2015 UN Climate Change Conference in Paris. While its membership is not always consistent, the LMDC coalition in the UNFCCC negotiations normally includes the following countries: Algeria, Argentina, Bolivia, Cuba, China, Democratic Republic of the Congo, Dominica, Ecuador, Egypt, El Salvador, India, Iran, Iraq, Kuwait, Libya, Malaysia, Mali, Nicaragua, Pakistan, Philippines, Qatar, Saudi Arabia, Sri Lanka, Sudan, Syria and Venezuela. The LMDC group covers nearly 50% of the world’s population, so it has significant negotiating power. All of the countries in the LMDC group also belong to the Group of 77 and China (G-77/China).

Figure 1. LMDCs share of global population and GHG emissions (Source: WRI CAIT)
In this report the positions and preparations regarding the 2015 Paris Agreement are assessed both on the level of the whole group and on the level of selected specific countries.\(^7\)

Specific countries from the LMDC group considered in this report include (in alphabetical order):

1. **Argentina**: Argentina is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. Argentina has not formally accepted the second commitment period of the Kyoto Protocol, the so-called Doha Amendment, yet (as of October 2015). The total greenhouse gas (GHG) emissions\(^8\) of Argentina are the 21\(^{\text{st}}\) highest in the world, if emissions from land use, land-use change and forestry (LULUCF) are taken into account. Without LULUCF emissions Argentina ranks as the 24\(^{\text{th}}\) largest emitter of GHGs. Argentina belongs to the G-77/China and the LMDC coalition in the climate negotiations. Argentina has submitted its Intended Nationally Determined Contribution (INDC) to the UNFCCC Secretariat on 1 October 2015.

2. **Bolivia**: Bolivia is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. It has not formally accepted the Doha Amendment yet (as of October 2015). The total greenhouse gas emissions of Bolivia are the 50\(^{\text{th}}\) highest in the world, if LULUCF emissions are taken into account. Without LULUCF emissions it ranks as the 80\(^{\text{th}}\) largest emitter of GHGs. Bolivia also belongs to the Bolivarian Alliance for the Peoples of Our America\(^9\) (ALBA) group, in addition to the LMDC and G77 and China groups. Bolivia has submitted its INDC to the UNFCCC Secretariat on 12 October 2015.

3. **Ecuador**: Ecuador is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. It has submitted its instrument of acceptance of the Doha Amendment in April 2015. The total greenhouse gas emissions of Ecuador are the 49\(^{\text{th}}\) highest in the world, if LULUCF emissions are taken into account. Without LULUCF emissions it ranks as the 73\(^{\text{rd}}\) largest emitter of GHGs. Ecuador belongs to the ALBA group. Ecuador has submitted its INDC to the UNFCCC Secretariat on 1 October 2015.

4. **Iran**: Iran is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. It has not formally accepted the Doha Amendment yet (as of October 2015). The total greenhouse gas emissions of Iran are the 10\(^{\text{th}}\) highest in the world, if LULUCF emissions are excluded and 11\(^{\text{th}}\) highest if LULUCF emissions are taken into account.\(^{10}\) Iran is the

\(7\) Of the group’s countries, the specific positions of China, Democratic Republic of the Congo and India have been analysed in more detail in a separate report, “Large countries’ preparations and views for the 2015 Paris climate agreement”.

\(8\) World Resources Institute CAIT Climate Data Explorer

\(9\) http://albainfo.org/what-is-the-alba/

\(10\) World Resources Institute CAIT Climate Data Explorer
world’s 18th most populous country. Iran belongs to the Organization of Petroleum Exporting Countries (OPEC). Iran has not submitted its INDC to the UNFCCC Secretariat (as of 16.10.2015)

5. **Malaysia**: Malaysia is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. It has not formally accepted the Doha Amendment yet (as of October 2015). The total greenhouse gas emissions of Malaysia are the 18th highest in the world, if LULUCF emissions are taken into account. Without LULUCF emissions it ranks as the 29th largest emitter of GHGs. Malaysia has not submitted its INDC to the UNFCCC Secretariat (as of 16.10.2015)

6. **Saudi Arabia**: Saudi Arabia is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. It has not formally accepted the Doha Amendment yet (as of October 2015). The total greenhouse gas emissions of Saudi Arabia are the 15th highest in the world (including and excluding LULUCF emissions). Saudi Arabia belongs to the League of Arab States (Arab Group), and also the OPEC. Saudi Arabia has submitted its INDC to the UNFCCC Secretariat on 10 November 2015.

7. **Sudan**: Sudan is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. Furthermore it has accepted the Doha Amendment in February 2014. Sudan is part of the Least Developed Countries (LDC) group. The total greenhouse gas emissions of Malaysia are the 42nd highest in the world, if LULUCF emissions are not taken into account. With LULUCF emissions it ranks as the 44th largest emitter of GHGs. Sudan has not submitted its INDC to the UNFCCC Secretariat (as of 16.10.2015)

8. **Venezuela**: Venezuela is a non-Annex I Party to the UNFCCC and has ratified the Kyoto Protocol. It has not formally accepted the Doha Amendment yet (as of October 2015). The total greenhouse gas emissions of Venezuela are the 22nd highest in the world, if LULUCF emissions are taken into account. Without LULUCF emissions it ranks as the 30th largest emitter of GHGs. Venezuela is part of the ALBA Group in the climate negotiations. Venezuela has not submitted its INDC to the UNFCCC Secretariat (as of 16.10.2015).

**Table 1: Basic information of the selected LMDCs compared to Finland, EU and the US**

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<td></td>
<td>in millions</td>
<td>in 10^9 US dollars (2005 value terms)</td>
<td>in US dollars (2005 value terms)</td>
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<tr>
<td>Argentina</td>
<td>41.1</td>
<td>322</td>
<td>7 833</td>
</tr>
<tr>
<td>Bolivia</td>
<td>10.5</td>
<td>13</td>
<td>1 260</td>
</tr>
<tr>
<td>Ecuador</td>
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<td>56</td>
<td>3 592</td>
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<tr>
<td>Iran</td>
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<td>257</td>
<td>3 369</td>
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<tr>
<td>Malaysia</td>
<td>29.2</td>
<td>199</td>
<td>6 790</td>
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In Table 1 above the basic information (population, GDP and GDP per capita) of the selected 8 LMDCs is compared with those of Finland, the whole European Union and the United States. The 8 selected countries have a total population of 268.2 million, which is 85% of the US population. The total GDP of the 8 countries is 1571 million USD, which is approximately 11% of GDP of the US and 10% of EU’s total GDP.

From the basic information it is evident that Saudi Arabia is the wealthiest of the LMDCs considered, and its GDP per capita is approximately 60% of the level of the whole EU. Compared to the United States, it is approximately 40%. The second wealthiest selected LMDC country is Argentina, but its GDP per capita is less than half of Saudi Arabia’s. Sudan is by far the least financial resources, as its GDP per capita is 837 USD, which is only approximately 2% of Finland’s level. Bolivia has the second lowest financial resources per capita, and the lowest total GDP, of the selected countries.

1.2.1 Comparison of greenhouse gas emissions and energy sources of the selected countries

In Figure 2 below, the total greenhouse gas emissions of the selected countries is pictured both including and excluding emissions from Land Use, Land-Use Change and Forestry (LULUCF). When comparing the eight selected countries, Iran has the highest greenhouse gas emissions, followed by Saudi Arabia. However, as Figure 3 below shows, the per capita emissions are on a remarkably higher level in Saudi Arabia than Iran. Iran, on the other hand has the highest emissions intensity of its Gross Domestic Product (GDP). Sudan has the lowest GHG emissions per capita of the selected countries, but Bolivia and Ecuador have lower overall emissions, as they have smaller populations.

Figure 3 below compares GHG emissions\(^{12}\) per unit of Gross Domestic Product (GDP) and GHG emissions per capita in the select large countries. It shows that there are several differences in the countries’ ranking regarding these two characteristics.

\(^{12}\) Including all greenhouse gases
The current energy mix in electricity generation in the selected countries also gives indication of the countries’ mitigation potential and gives an interesting insight when comparing the INDCs of the countries. In figure 4 below the electricity generation in the selected countries is illustrated by energy source, in percentages from total net electricity generation. From this figure it can be seen that Sudan, Venezuela and Ecuador have the highest share of renewable sources in electricity generation (mostly hydropower), and that there is very little nuclear power in any of the selected countries. Other renewables
than hydropower are almost non-existent in electricity production in the selected countries. Saudi Arabia produced its electricity in 2012 only by fossil fuels. Malaysia and Iran also both have more than 90% fossil sources in power production.

**Figure 4: Electricity generation by energy source in the selected countries in 2012.**

Source: US Energy Information Administration

2. Introduction to the LMDCs in the UNFCCC

2.1 Brief history of the LMDCs in the UNFCCC negotiations

The coalition of Like-minded Developing Countries (LMDCs) first appeared in the UNFCCC negotiations in May 2012. Its emergence coincided with the beginning of negotiations under the ADP and the Durban Platform for Enhanced Action (Decision 1/CP.17).

After some preparatory work among core countries earlier in the spring of 2012, some joint statements were made at the first ADP meeting by Argentina, Algeria, Bahrain, Bolivia, China, Comoros, Cuba, Democratic Republic of Congo, Djibouti, Ecuador, El Salvador, Egypt, India, Iran, Iraq, Jordan, Kuwait, Libya, Malaysia, Mali, Mauritania, Morocco, Nicaragua, Oman, Paraguay, Palestine, the Philippines, Qatar, Saudi Arabia, Somalia, Syria, Sudan, Thailand, Tunisia, United Arab Emirates, Venezuela and Yemen without using the name LMDCs (38 countries). Such cooperation continued at the second ADP meeting in Bangkok in August/September 2012. In October 2012, the LMDCs held their first external meeting in Beijing, China with participation of 12 countries. They agreed to continue working together in the UNFCCC negotiations with the aim of strengthening the unity of the G-77/China Group and to play a constructive role in the UNFCCC negotiations.

Based on LMDC statements and submissions in 2012-2015, it would appear that there is some fluctuation in the coalition’s membership. At COP 18/CMP 8 in Doha, Qatar, in December 2012, the LMDC closing statement was made on behalf of 23 countries. The LMDC submission to the ADP in March 2013 included 18 countries, namely Bolivia, China, Cuba, Dominica, Ecuador, Egypt, El Salvador, India, Iran, Iraq, Malaysia, Mali, Nicaragua, Philippines, Saudi Arabia, Sri Lanka, Sudan and Venezuela. A year later, 24 countries associated themselves with the LMDC submission to the ADP. The six

16 Ibid.
17 The statement was made by the Philippines, speaking on behalf of Algeria, Argentina, Bolivia, China, Cuba, Democratic Republic of the Congo, Dominica, Ecuador, Egypt, El Salvador, India, Iran, Iraq, Kuwait, Malaysia, Mali, Nicaragua, Pakistan, Saudi Arabia, Sri Lanka, Thailand and Venezuela. Available at: <http://www.alainet.org/en/active/60229>.
additional countries were the Democratic Republic of the Congo (DRC), Kuwait, Libya, Pakistan, Qatar and Syria. In 2015, LMDC submissions and statements have not singled out countries associating themselves with the coalition. The most recent LMDC meeting in India in September 2015 was attended by 13 countries, namely Argentina, Bolivia, China, Cuba, El Salvador, Ecuador, Iran, Nicaragua, Venezuela, Malaysia, Vietnam, Saudi Arabia and India.

2.2 Operation of the LMDC Coalition

In the past three years, the LMDC coalition has become a regular feature in the UNFCCC negotiations. It remains particularly active in negotiations under the ADP. The coalition habitually makes opening and closing statements at ADP sessions, as well as joint submissions and other interventions. It also holds coordination meetings at the UNFCCC negotiating sessions.

Since October 2012, the coalition has also organized meetings at least once year outside UNFCCC negotiations, with the most recent meeting taking place in India in September 2015.

2.3 Internal and External Dynamics of the LMDCs

While “strengthening unity of the Group of 77 and China” was one of the objectives identified at the first LMDC external meeting in October 2012, it could be argued that the coalition’s emergence reflects growing fractions within the G-77 and China negotiating group. These concern, in particular, the role of the principle of common but differentiated responsibilities and respective capabilities (CBDRRC) in shaping the post-2020 climate regime. While certain developing countries, especially those associating themselves with the Alliance of Independent Latin American Countries (AILAC), have accepted the need to re-interpret the CBDRRC principle, the LMDC Group advocates for a traditional interpretation of the CBDRRC principle and for maintaining the distinction between Annex I and non-Annex I countries in the post-2020 agreement. Indeed, it would seem that the G-77/China has only few common positions under the ADP.

Concerning the internal dynamics of the LMDCs, as explained above, there has been some fluctuation in the coalition’s membership. Some of the core consistent members would seem to include at least Bolivia, China, Cuba, Ecuador, Egypt, El Salvador, India, Malaysia, Nicaragua, the Philippines, Saudi Arabia and Venezuela. Those whose association with LMDC submissions and statements seems to fluctuate somewhat include Argentina, Democratic Republic of the Congo, Dominica, Iran, Iraq, Kuwait, Libya, Mali, Thailand, Pakistan, Sri Lanka, Sudan, Syria, Vietnam and Yemen. Some countries, such as Bahrain, Comoros, Ghana, Djibouti, Jordan, Lebanon, Mauritania, Morocco,

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19 Ibid.
21 Ibid.
Oman, Paraguay, Qatar, Somalia and Tunisia, appear only in one or two LMDC statements and submissions. In addition, the LMDCs apparently receive some support from the South Centre, an international organization that seeks to help developing countries to promote their interests in the international agenda.

Arguably, the core of the LMDC position in the ADP negotiations is the idea that instead of the contents of the Convention's provisions, the problems of the current UNFCCC regime derive from the lack of implementation of the Convention by developed countries. The solution is that developed countries increase their ambition to reduce emissions and to facilitate technology, capacity building and financial support to developing countries.

Differences in detailed positions of the core members the LMDC group are often not apparent in the UNFCCC negotiations. However, it can be presumed that some differences exist. For example, ALBA countries, such as Bolivia, have been advocating for very ambitious climate targets and the concept of 'Mother Earth'. Hard-line oil-producing countries like Saudi Arabia are unlikely to share these views. Countries like China and India have benefitted from the Kyoto Protocol's Clean Development Mechanism and China is also experimenting with emissions trading. In contrast, Bolivia and Venezuela have traditionally strongly opposed market mechanisms for ideological reasons. The DRC is a member of the Coalition for Rainforest Nations (which advocates for REDD+ as a market mechanism, a position opposed by Bolivia).

Looking at the LMDCs from a broader perspective, it is useful to note that a developing country negotiating group with partly overlapping membership, known as Like-minded (Developing) Countries, has existed in negotiations under the World Trade Organization (WTO) since the 1996. Its original eight members included Cuba, Egypt, India, Indonesia, Malaysia, Pakistan, Tanzania and Uganda. In 2005, the group consisted of Algeria, Bangladesh, Belarus, Bhutan, China, Cuba, Egypt, India, Indonesia, Iran, Malaysia, Myanmar, Nepal, Pakistan, the Philippines, Sri Lanka, Sudan, Syria, Vietnam and Zimbabwe. This negotiating group has been advocating a "strict distributive strategy" at the WTO from shifting value from the North to the South. This goes to show that some links and solidarities between members of the LMDC coalition that has emerged in the UNFCCC negotiations partly extend to the international agenda more broadly.

22 <http://www.southcentre.int/about-the-south-centre/>


24 Ibid.


In this Chapter four additional LMDC coalition member countries (Algeria, the Philippines, Mali and Dominica) in addition to the selected eight countries assessed in this report, are considered regarding their Intended Nationally Determined Contributions (INDCs). This is because only three of the originally selected LMDC member countries have submitted their INDCs to the UNFCCC Secretariat by October 2015. The countries are assessed here in alphabetical order.

3.1 Algeria

Contents

In its INDC Algeria presents the following mitigation target:

- Unconditional target of reducing greenhouse gas emissions by 7 % below Business-As-Usual (BAU) levels by 2030;
- The target can be increased up to -22 %, conditional to international finance, technology and capacity building;
- Conditional to international support, Algeria is planning to increase the share of renewable sources in electricity generation to 27 % by 2030.

- Adaptation:
  o Developing a National Adaptation Plan
  o Reinforcing ecosystems resilience, fighting against erosion, etc.

The mitigation target is based on the following greenhouse gases: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). It covers the following sectors: energy, forests, housing, transport, industry and waste. BAU emissions in 2030 are not defined in the INDC. Also the role of carbon markets is not specified.

Equity aspects

Algeria states in its INDC that it is a low GHG emitting country, with significant development and adaptation needs, given its high population growth. Algeria states that it is vulnerable to the adverse effects of climate change, and has already invested heavily in adaptation actions. The country states that it is highly dependent on petroleum export revenues, and thus it would be vulnerable to negative impacts of response measures²⁷.

²⁷ “The impact of the implementation of response measures” refers to negative side effects resulting from the implementation of climate change mitigation activities. <http://unfccc.int/cooperation_support/response_measures/items/4294.php>
Algeria adds that through its mitigation actions it will contribute, on an equitable basis, to the achievement of the global 2°C target.

**Links to finance**

The higher end of Algeria’s mitigation target (up to -22% below BAU) is conditional to international finance, technology and capacity building.

**Level of ambition**

As the country does not include the information of estimated BAU emissions in 2030, the ambition level of the target is difficult to assess. Generally, if the country does not give the level of estimated BAU emissions in its INDC, it can be considered that the country could substantially increase its emissions from current levels by 2030. According to Grantham Institute, Algeria’s electricity demand is expected to more than double by 2030, therefore the BAU emissions could be relatively high.  

Algeria is a very dry country, severely affected by desertification. Nearly 87% of the land area of Algeria is in the Sahara Desert region and only just over 3% of land is considered arable. Therefore some concrete quantifiable targets in the LULUCF sector would have been welcome in the INDC, which currently vaguely says that the country will carry out afforestation, reforestation and prevention of forest fires.

More than 99% of Algeria’s electricity generation is based on fossil fuels, and energy use is the primary source of GHG emissions in the country, accounting for more than 69% of total net emissions. Therefore there are substantial mitigation possibilities in the energy sector, especially in deploying more renewable energy sources. In 2011, with the adoption of a Renewable Energy and Energy Efficiency Development Plan, Algeria set an ambitious goal of achieving 40% of national electricity generation via renewable sources by 2030. The INDC target of 27% by 2030, conditional to international support, seems somewhat unambitious compared to the nationally adopted renewables target.

### 3.2 Argentina

**Contents**

Argentina submitted its INDC on 1 October 2015. In the INDC the country sets the following targets:

- Unconditional reduction of greenhouse gas emissions by 15% below Business As Usual (BAU) level by 2030. The BAU level in 2030 is calculated at 670 Mt CO₂e.

- Conditional to international financing, technology transfer and capacity building, the country could increase its emissions reductions to 30% below BAU levels by 2030.

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29 Ibid.
The mitigation target covers the whole country and the following sectors: energy, agriculture, waste, industrial processes and LULUCF. The 6 greenhouse gases covered by the target are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulphur hexafluoride (SF₆), perfluorocarbons (PFCs) and hydrofluorocarbons (HFCs). The fullfill the unconditional target, Argentina plans to undertake actions in several sectors, such as sustainable forest management, energy efficiency, biofuels, nuclear power and renewable energy, as well as transport. The role for carbon markets is not specified in the INDC.

The INDC also considers adaptation to climate change to be a principal priority to Argentina, and the country states that it could extend deepen its actions in this area, conditional to international finance, technology and capacity building. Such conditional actions would include e.g. increasing early warning systems, increasing irrigated crop area, and conservation and restoration of forests.

Argentina reserves the right to make revisions to its INDC, depending on the outcome of the Paris negotiations.

Equity aspects

Argentina states in its INDC that its contribution is fair and ambitious, as the priority of the country is to continue the development path and achieve improved well-being for the whole population, particularly the most vulnerable. The determined contribution is linked to this objective, but Argentina has made efforts to identify mitigation potential allowing it to contribute to combating global climate change. Argentina also mentions in its INDC that “countries that have not yet reached full development are those that suffer most from this phenomenon [of climate change], despite not being principally responsible”. The country also emphasises its role in guaranteeing global food security.

Links to finance

The higher mitigation target of -30 % below BAU in 2030 is conditional to international provision of Means of Implementation (MoI), including finance, technology and capacity building. Also increasing the adaptation efforts is conditional to provision of international MoI.

Level of Ambition

Argentina is one of the largest greenhouse gas polluters in the region, and its GHG emissions have doubled in the last 20 years. According to several Non-Governmental Organisations (NGOs), Argentina’s mitigation effort relies on long-proposed hydroelectric dams, including one named after late president Nestor Kirchner, which has limited potential to cut emissions and could release methane. "The proposals seem weak. We are committing little," said Pablo Boniscontro, of youth campaign group Aclimatando. "Many of the projects accounted for purposes of mitigation are already underway," said Juan Carlos Villalonga, president of the Environmental Protection Agency in capital Buenos Aires. According to Villalonga, In Argentina 50% of emissions are from agriculture, and Argentina could have offered ending deforestation in its INDC, as it alone
amounts to 22 % of the country's emissions. However, there were no such pledges in the INDC, or any separate targets for the LULUCF sector.

"In Argentina there are laws linked to climate change, such as the laws on native forests, glaciers and renewable energy, but they are poorly enforced and the budgets for the different programmes are declining," said María Marta di Paola, a researcher with the Fundación Ambiente y Recursos Naturales (FARN), an Argentine NGO.

For the Copenhagen conference in 2009 Argentina did not submit an emission reduction pledge, but a list of Nationally Appropriate Mitigation Actions (NAMAs). However, the implementation of NAMAs in Argentina has not happened so far. There are 2 renewable energy related NAMAs in the development phase, however none are so far listed in the official UNFCCC NAMA Registry. Thus it can be said that the country has not been very active so far in the field of internationally recognised mitigation actions. In this light it is promising, that the country is at least taking a relative to BAU emission reduction target.

### 3.3 Bolivia

**Contents**

The Plurinational State of Bolivia submitted its INDC to the UNFCC Secretariat on 11 October. The INDC consists of a list of dozens of actions in the energy, LULUCF and water sectors.

The unconditional contributions include e.g.:

- **mitigation:**
  - increasing the share of renewable energy to 79 % by 2030 from 39 % in 2010;
  - reaching zero illegal deforestation by 2030 and increasing forest area by 4.5 million hectares by 2030
- **adaptation:**
  - tripling the water storage capacity to 3779 million m$^3$ by 2030;
  - tripling irrigated area as well as production of food by 2030.

Conditional to international finance, Bolivia commits to e.g. the following actions:

- **mitigation:**
  - increasing the share of renewable energy to 81 % by 2030
  - increasing the area of community management forests sevenfold by 2030, and increasing reforestation to 6 million ha by 2030.
- **adaptation:**
  - quadrupling the water storage capacity by 2030

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33 [http://www4.unfccc.int/sites/nama/SitePages/Home.aspx](http://www4.unfccc.int/sites/nama/SitePages/Home.aspx)


- quadrupling the agricultural production under irrigation by 2030.

In addition to the targets, Bolivia sets in its INDC 10 “structural solutions to the climate crisis”, including ending capitalism and diverting military spending to climate finance.

**Equity aspects**

Bolivia considers in its INDC that it must carry out fair and ambitious efforts to tackle the impacts of climate change, despite the fact it hasn’t caused the phenomenon of global warming. Bolivia bases the equity considerations on the idea of a “global emissions budget”. This means that countries with high historical responsibility, large ecological footprint and technological capacity should have a smaller share of the remaining right to emit greenhouse gases in order to reach the global 2°C goal. Bolivia has calculated that 89% of the remaining emissions budget should go to non-Annex I countries.

**Links to finance**

In the past Bolivia has been of the view that climate finance should be seen as payment of a long-standing ‘climate debt’ owed by developed countries to developing countries for their unjust and inequitable accumulative use of the “atmospheric space”. In its INDC Bolivia has set both conditional and unconditional targets. The higher targets are conditional to international finance, technology and capacity building.

**Level of ambition**

Bolivia has not set an economy-wide target for GHG emission reduction. Also, the country does not give any indication on its estimated level of total future emissions. However, doubling the share of renewable energy by 2030 (from 39% in 2010 to 79% in 2030), regardless of international climate finance, can be considered an ambitious target for Bolivia. On the other hand, the deforestation target of only addressing illegal deforestation might not be ambitious enough. Nearly 60% of Bolivia’s emissions come from land use, as private companies legally clear rainforest for soy plantations or oil exploration. This has not been addressed in the INDC, otherwise than proposing to increase the forest area of the country.

### 3.4 Dominica

**Contents**

In its INDC the Commonwealth of Dominica sets a conditional target of absolute reduction of greenhouse gas emissions by 44.7% below 2014 levels. Achieving the target is conditional upon receiving international Means of Implementation.

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The sectors covered are energy, transport, manufacturing and construction, commercial, residential, LULUCF and solid waste sectors. The greenhouse gases covered are carbon dioxide, methane, nitrous oxide and HFCs. Energy sector mitigation actions will comprise especially of harnessing geothermal energy and other renewable energy sources.

Dominica intends to introduce market-based mechanisms to promote energy efficiency and to reduce GHGs from the transport sector.

Regarding adaptation, Dominica lists several actions in its INDC, including e.g. establishing early warning systems, and establishing off-grid renewable energy electrical systems to areas vulnerable to natural disasters.

**Equity aspects**

Dominica states in its INDC that it is in a vulnerable position economically, socially, culturally and environmentally, as it is susceptible to natural disasters and its ecologically and economically fragile. The country highlights e.g. the tropical storm Erica hitting Dominica in August 2015, which resulted in deaths and 392.3 million USD in damages (76 % of the country’s GDP). Dominica also states that as its forests act as a major carbon sink, the country is making no net contribution to global GHG emission levels.

**Links to finance**

The targets stated in the INDC are all conditional to international finance, technology and capacity building.

**Level of ambition**

It is relatively rare for a Small Island Developing State (SIDS) such as Dominica to commit to an absolute emission reduction target, even conditional to international finance. In this sense the mitigation target can be seen as ambitious. The country’s GHG emissions are very small, especially when taking the LULUCF sector into account. According to the World Resource Institute data, its net emissions in 2012 were only 0.24 Mt CO₂e. However, Dominica’s population is also very small, as there are only 73,607 inhabitants in the entire country.

### 3.5 Ecuador

**Contents**

The Republic of Ecuador has submitted its INDC in Spanish on 1 October 2015, just hours before the official Secretariat deadline. On 13 October the country published an unofficial English translation of the INDC.

The INDC contains the following mitigation targets:

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36 World Resources Institute CAIT Climate Data Explorer

• Reducing emissions unconditionally from the country’s energy sector by 20.4 – 25% below Business As Usual (BAU) levels by 2025. The target corresponds to a 40% reduction in the level of emissions per capita compared to BAU.
• Conditional to receiving international finance, Ecuador could increase the target to -40% below BAU levels by 2025.

The abovementioned targets cover the energy sector only. Estimated BAU emissions in 2025 are not given in the INDC. The emissions covered by the target are carbon dioxide, methane, nitrous oxide, carbon monoxide, particulate matter, nitrogen oxides and sulphur dioxide. This means that the gas coverage differs from other INDCs, and thus makes it somewhat more difficult to assess.

Regarding adaptation, Ecuador is aiming to strengthen the adaptive capacity of the most vulnerable areas of the country by at least 50%, establish early warning systems and risk management systems in all levels of government. For the land use sector Ecuador does not set quantified contributions by 2025, but mentions aiming for zero deforestation as one possible means to achieve the adaptation objectives.38

**Equity aspects**

In its INDC Ecuador states that it, despite being a developing country and having relatively low global emissions, recognizes the importance of implementing mitigation and adaptation actions. Ecuador thinks that involving all countries in these actions, in line with their capabilities and responsibilities, is crucial. Ecuador also states that its GHG emissions account for only 0.15% of global emissions, and are therefore relatively low. Even though Ecuador is a member of the ALBA group, its views on the equity and responsibility issues seem somewhat softer than e.g. of Bolivia, at least based on its INDC.

**Links to finance**

The higher target of to 37.5 - 45.8% reduction from BAU level by 2025 is conditional to international finance.

**Level of Ambition**

The smallest member of OPEC, a club of oil-producing countries, Ecuador is calling for a global levy to raise funds for climate projects in the developing world. A 3-5% tax on every barrel of oil exported to the developed world could raise US$30 billion a year for the Green Climate Fund.39

It is somewhat surprising that Ecuador even submitted an INDC before the October deadline. Daniel Ortega Pacheco (a member of the CDM Executive Board and a negotiator for Ecuador) had told RTCC news that “Ecuador wouldn’t bow to pressure to deliver the INDC” and criticised the “simple promises” of the likes of Morocco, Macedonia

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38 Ecuador’s Intended Nationally Determined Contribution (INDC)
and Kenya that have only made conditional mitigation targets. “They have to mean something. That’s why we continue to promote the tax.”

The ambition level of Ecuador’s own contribution seems relatively low, because the energy sector amounts to only 50 % of the country’s emissions, and there are no quantifiable targets for the LULUCF sector, which is an important emissions source in the country (43 %). Therefore half of the country’s emissions are not bound by the INDC targets, and thus the country could increase its emissions from other sectors than energy.

3.6 Iran

Contents

The Islamic Republic of Iran has not submitted its INDC (by September), and has not indicated a submission date.

However, in its 2nd National Communication to the UNFCCC (2010) the country mentions that its National Mitigation Plan has a target or 30% GHG emission reduction by 2025 in comparison with BAU in the energy sector, as well as a 34% reduction target conditional to international technical and financial assistance. In the National Communication it lists also targets for energy efficiency and LULUCF. The former consist of increasing the demand-side energy efficiency of end-use sectors by 2% per year until 2025. The latter consist of reducing illegal forest harvesting and land use change by 20% per year, decreasing wood harvesting by 10% per year and reducing GHG emissions by 20% through reforestation and forest rehabilitation.41 42

Equity aspects

As Iran has not submitted its INDC, its equity aspects cannot be considered.

Links to finance

As Iran has not submitted its INDC, its links to finance cannot be considered.

Level of Ambition

The target set in Iran’s National Communication (NC) is not very ambitious, as according to the BAU calculations the country’s emissions would almost quadruple between 2007-2025 in the BAU scenario. Even if the country would reduce emissions by 30 % below BAU, it could still nearly triple its energy sector emissions.

40 Ibid.
41 http://www.lse.ac.uk/GranthamInstitute/legislation/countries/iran/
3.7 Malaysia

Contents

Malaysia has not submitted its INDC to the UNFCCC Secretariat (situation 12.10.2015).

As a background, the Malaysian Prime Minister has announced a Copenhagen pledge of voluntary reduction of up to 40% in terms of carbon emission intensity of GDP by the year 2020 compared to 2005 levels, conditional to receiving the transfer of technology and finance of adequate and effective levels from Annex 1 countries.43

Equity aspects

As Malaysia has not submitted its INDC, its equity aspects cannot be considered.

The Malaysian government developed its “climate resilient policy strategy” while keeping in mind the need to balance such measures with Malaysia's others needs — eradicating poverty and pollution, raising living standards, income and productivity.44

Links to finance

As Malaysia has not submitted its INDC, its links to finance cannot be considered.

Ambition level

Despite the lack of an INDC so far, Malaysia has already implemented climate policies efficiently: its GHG emission intensity of GDP has reduced by 33% from 2005 to 2013, so it probably will fulfil its Copenhagen pledge. Malaysia sees itself as a developing low-carbon society. By 2020, it aims to transform into a fully developed nation. The government also implemented a Renewable Energy Act in 2011, developed flood hazard maps, and increased Malaysia's forest cover by around 5% in 4 years.45

In the light of the country wishing to be a fully developed country by 2020, it should have submitted its INDC to the Secretariat by the 1 October deadline, and preferably given an absolute emission reduction target.

3.8 Mali

Contents

The Republic of Mali submitted its INDC46 to the UNFCCC Secretariat on 29 October 2015. The INDC is only in French language. It contains the following mitigation targets:

43 http://www.lse.ac.uk/GranthamInstitute/legislation/countries/malaysia/
44 Ibid.
46 Republique du Mali: Contribution Prevue Determinee au Niveau National (INDC in French), September 2015
- Conditional GHG reduction targets compared to the baseline scenario:
  o - 31% for energy sector
  o - 29% for agriculture sector
  o - 21% for forestry and land use sector by 2030.

- Mali has also indicated in a table an unconditional reduction target, which amounts to an approximate reduction of 3.5% below BAU emissions of the selected three sectors combined.

The GHGs covered by the targets are carbon dioxide, methane and nitrous oxide. The BAU emissions in 2030, and the costs associated with the mitigation actions, are given for each of the listed sectors (energy, agriculture as well as forestry and land use).

In addition, Mali’s INDC contains adaptation actions, such as development of intelligent and resilient agriculture, providing irrigation for 92,000 hectares of agricultural land, and increasing the capture and storage of rainwater.

**Equity aspects**

According to the INDC, the Government of Mali is determined to assume its responsibilities to address climate change, under the principle of common but differentiated responsibilities. In this context Mali has begun a sober low-carbon economic development trajectory resilient to climate change, contributing more to global efforts stabilization of greenhouse gases than before.

**Links to finance**

Mali’s INDC targets are mostly conditional to international finance, technology and capacity building. The country would commit to only a small reduction compared to BAU (approximately 3.5%) unconditionally.

**Level of ambition**

Mali is classified as a Least Developed Country according to the UN. Therefore it is among the countries with least economic capacity and most development needs in the world, and thus committing to any mitigation action can be considered relatively ambitious.

### 3.9 The Philippines

**Contents**

The Republic of the Philippines has submitted its INDC on 1 October 2015. The country sets a conditional target for greenhouse gases of -70% below BAU emissions by 2030.

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47 Page 18 of Mali’s Intended Nationally Determined Contribution
However, the estimation of BAU emissions in 2030 is not given. The covered sectors include energy, transport, waste, forestry and industry. Information on the gases covered by the targets is not provided in the INDC.

Regarding adaptation, the Philippines states that it prioritizes adaptation (over mitigation), and sets conditional adaptation targets of e.g. rolling out climate risk and vulnerability assessments and development of climate and disaster-resilient ecosystems.

**Equity aspects**

According to its INDC, the Philippines recognizes its responsibility to contribute its fair share in global climate action. Based on this fair share, the country will commence a broad consultative process to determine also the need to peak its emissions, taking into account the country’s economic growth and state of development. However, the country thinks the developed countries should have a leadership role in climate change action.

**Links to finance**

The Philippines has only put forward a conditional mitigation target, and thus without international finance it is not committing to any mitigation actions. Regarding national financing towards climate change, the country has developed a system for tagging its expenditure for adaptation and mitigation, and starts to use it in annual budgeting from this year onwards.

**Level of ambition**

As the Philippines is a large country with over 100 million inhabitants, its actions to mitigate climate change are of an important scale. The fact that the country is not committing to any unconditional mitigation actions in its INDC can be seen as worrying and unambitious. Because the Philippines has not given an estimate of its BAU emissions in 2030, it is difficult to assess the actual ambition level of its conditional efforts.

According to media, 52 new coal power plants are in the process of being constructed across the country, each with an estimated lifetime of 35 years.\(^{49}\) Also, the country’s Department of Energy (DOE) projects a rise of over 31% of carbon emissions *per capita* by 2030.\(^{50}\) In this light the Philippines is not expected to move into a low-carbon path, especially without substantial international climate finance.

### 3.10 Saudi Arabia

**Contents**

The Kingdom of Saudi Arabia has submitted its INDC on 10 November 2015. In its INDC\(^{51}\) Saudi Arabia sets a conditional target of achieving mitigation co-benefits of

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\(^{51}\) [http://www4.unfccc.int/submissions/INDC/Published%20Documents/Saudi%20Arabia/1/KSA-INDCs%20English.pdf](http://www4.unfccc.int/submissions/INDC/Published%20Documents/Saudi%20Arabia/1/KSA-INDCs%20English.pdf)
economic diversification actions of up to 130 million tons of CO$_2$e annually by 2030. Saudi Arabia has not yet done BAU emission projections for the year 2030, but is working on developing a baseline on the basis of a combination of two scenarios.

The mitigation target is conditional on “the country’s economy continuing to grow with an increasingly diversified economy and a robust contribution from oil export revenues”. It is also premised on the assumption that the consequences of international climate policies do not pose a disproportionate or abnormal burden on the country’s economy.

The plans for economic diversification, which are expected to generate GHG mitigation, include (non-quantified) actions in the following fields:

- energy efficiency (mainly industry, transport and buildings)
- renewable energy (solar, wind, geothermal and waste to energy)
- Carbon Capture and Utilization/Storage
- utilization of natural gas
- methane recovery and flare minimization.

The INDC also includes adaptation actions, such as water and waste water management, reduced desertification and marine protection, which are also expected to generate mitigation co-benefits.

The INDC does not set any quantified targets for renewable energy. However, in 2013 the King Abdullah City for Atomic and Renewable Energy (K.A CARE) released a white paper to install 54 gigawatts (GW) of renewable (of which 40 GW solar) and 17 GW of nuclear power by 2032.\textsuperscript{52} The plan has the potential to curb emissions in 2030 by around 200 MtCO$_2$e, a reduction of 25% compared to a current policy projection. However fulfilment of the plan within the timeline is non-binding.\textsuperscript{53}

\section*{Equity aspects}

Regarding equity, Saudi Arabia refers in its INDC to the UNFCCC text, e.g. on the specific needs and special circumstances of developing countries. Saudi Arabia states that it is in the process of diversifying its economy, and the structural changes require high financial investments. According to Saudi Arabia, the targeted mitigation contribution leads to a significant deviation from BAU emissions for an economy highly dependent on fossil fuels.

However, it can be contested if Saudi Arabia should still be classified as a non-Annex I country in the UN climate talks, as its GDP per capita is among the highest in the world, above several Annex I countries, such as Spain, Italy or Russia. Saudi Arabia is still not a member of the OECD, membership of which was the method of selecting the Annex I countries in the UNFCCC in 1992. Still, the economic situation of the country would allow it to take on unconditional mitigation targets.

\section*{Links to finance}

\textsuperscript{52} https://www.irena.org/DocumentDownloads/masdar/Abdulrahman\%20A\%20Ghabban\%20Presentation.pdf

\textsuperscript{53} Climate Action Tracker, Saudi Arabia (updated in March 2015)
The Saudi Arabian INDC is not contingent on international finance, except for the continuance of oil export revenues. Still, Saudi Arabia sees an important role for international technology cooperation and transfer as well as capacity building for the implementation of its INDC.

**Level of Ambition**

Saudi Arabia possesses 18% of the world’s proven petroleum reserves and ranks as the largest exporter of petroleum. The oil and gas sector accounts for about 50% of its GDP.\(^{54}\) Electricity generation, the solid waste management, and the agricultural sectors are responsible for the highest share of emissions of CO\(_2\), CH\(_4\), and N\(_2\)O in the country, respectively.\(^{55}\) Saudi Arabia has submitted its second National Communication to the UNFCCC in 2011, but its last emissions inventory was done in 2000. Therefore there is no recent official GHG data available for the country, even though it is a significant emitter as it has the 15\(^{th}\) highest emissions in the world according to the World Resources Institute\(^{56}\).

The INDC of Saudi Arabia is relatively vague and does not give an estimation of the BAU emissions in 2030, thus the country’s emissions could rise considerably from the current level even if the mitigation target would be reached. According to Climate Action Tracker\(^{57}\), greenhouse gas emissions in Saudi Arabia are expected to increase by 60% in 2030 compared to 2010 levels with current policies. According to WRI, Saudi Arabia’s emissions were approximately 527 Mt CO\(_2e\) in 2012. If emissions would increase by 60% from this level, the BAU scenario would be approximately 843 Mt in 2030. A reduction of up to 130 Mt annually by 2030 would thus be in the range of -15% below BAU. Even in the case the mitigation target would be reached, the country could increase its emissions by approximately 35% from current levels, if Climate Action Tracker’s BAU estimates are correct.

The INDC does not quantify renewable energy targets or other mitigation actions, even though the country has in 2013 set plans to install 54 gigawatts of renewables by 2032. This previously released non-binding renewable energy plan has considerably more potential to curb emissions (around 200 Mt CO\(_2e\) annually) than the INDC target of reducing up to 130 Mt CO\(_2e\), which covers several mitigation and adaptation actions. This indicates that the INDC target is not very ambitious, even compared to the country’s own recent plans. However, the renewable energy target Saudi Arabia set 3 years ago is going to be challenging to achieve\(^{58}\), as so far the country only has 25 MW of solar power, compared to the target of 40 GW.

Nevertheless, the Saudi Arabian INDC can be seen as an important turning point in the country’s view of the global climate negotiations, as it is the first time the country commits

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56 [WRI CAIT Climate Data Explorer](http://www.wri.org/)

57 [Ibid.](http://www.wri.org/)

to any mitigation target. Saudi Arabia has so far been reluctant to agree on a global climate agreement, because the country's main source of revenue comes from fossil fuels. However, potentially due to the plummeting oil price this year, the country may have seen that the threat to its economy is already here, despite of a climate agreement. Some of the shift may be a result of the US engaging with the country. A joint statement from a summit in September 2015 between President Obama and Saudi King Salman noted that the two leaders "discussed the challenge of global climate change and agreed to work together to achieve a successful outcome at the Paris negotiations in December."59

3.11 Sudan

Contents

Republic of the Sudan has submitted its INDC on 10 November 2015. The INDC contains several sectoral measures, but no economy-wide targets. Sudan's targets are conditional to developed countries fully implementing their climate finance commitments, reaching the global 2°C temperature goal, and Sudan's access to international finance, technology and capacity building. Sudan does not exclude using market-based mechanisms in implementing its INDC.

The conditional mitigation commitments in the INDC include actions in three sectors: energy, forestry and waste. The quantified targets include e.g.:

- 20% renewable energy in the power system by 2030
- energy efficiency measures with total savings of 6500 GWh
- production of 2300 MW using natural gas
- 25% forest coverage of total land area by 2030.

Sudan does not yet have a baseline emission scenario for 2030 either for the whole economy or the selected three sectors. However, baseline development is in progress.

As a country severely affected by the adverse effects of climate change with low emissions per capita, Sudan's contribution is focused more on adaptation than mitigation. Sudan's adaptation contribution covers water, agricultural, coastal zone and human health issues.

Equity aspects

Sudan states in its INDC that as a Least Developed Country, it is not obliged to pursue a GHG reduction target. Still the country is planning to pursue a low-carbon development path. According to the INDC, Sudan is highly vulnerable to climate change and variability, and in addition limited access to capital, markets, infrastructure and technology has weakened the country's ability to adapt to climate change.

Links to finance

59 http://mashable.com/2015/11/10/saudi-arabia-oil-gas/#QUEAzurP8ZqT
Sudan's INDC is conditional to international finance, technology and capacity building.

**Level of Ambition**

The country's priority is adaptation, and it is currently finalizing its updated National Adaptation Programme of Action (NAPA)\(^6\). Regarding mitigation the INDC states that the country does not yet have a baseline calculated, but according to the second National Communication by Sudan (2013), its energy use and also sector GHG emissions are expected to double by 2030 from 2015 levels in the BAU scenario. In its National Communication Sudan has identified 5 priority mitigation actions in the energy sector (e.g. fluorescent lighting and increasing public transport), with a total potential to decrease the BAU emissions by 28.3%\(^6\). As Sudan has low financial resources to implement these actions, reaching its mitigation targets under the Paris agreement would be conditional to finance.

Sudan is, however, also an oil exporting country. Oil production in Sudan has grown rapidly from about 24.6 million barrels in 1999 to about 183.5 million barrels in 2010, a growth rate of roughly 20% per year. Despite the recent increase in the production of refined oil products, biomass remains the dominant energy resource (78% of total energy use). The country's electric supply differs from the other assessed countries, as it is a mix of hydro and refined oil products; no natural gas or coal is used.\(^6\)

The country has very low carbon dioxide emissions per capita (only 0.35 t CO\(_2\)e, excluding LULUCF emissions, 1.03 t including LULUCF emissions\(^6\)). Methane and N\(_2\)O emissions of Sudan are substantially larger than CO\(_2\) emissions, if looking at their CO\(_2\)e level. The country's methane emissions are 2.27 tCO\(_2\)e per capita and its N\(_2\)O emissions are 1.32 tCO\(_2\)e per capita\(^6\). Therefore it can be estimated that there would be larger emission reduction potential in sectors such as waste, agriculture and LULUCF, than e.g. the energy sector. Therefore it is positive, that the mitigation actions in the INDC cover also the forestry and waste sectors, and not only the energy sector.

### 3.12 Venezuela

**Contents**

Venezuela has not submitted its INDC (situation 12 October 2015). There is no information on the possible contents or date of the contribution.

Venezuela’s chief negotiator Claudia Salerno has indicated in an interview with RTCC that the country will not send its INDC by the October deadline, as it wants to assess all countries’ climate plans ahead of the Paris summit, to see how close they get to holding

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\(^6\) http://www.undp-alm.org/sites/default/files/sudan_nap.pdf

\(^6\) Sudan’s Second National Communication to the UNFCC, available at <http://unfccc.int/resource/docs/natc/sudnc2.pdf>

\(^6\) http://unfccc.int/resource/docs/natc/sudnc2.pdf

\(^\) http://cait.wri.org/profile/Sudan

\(^\) Ibid.
temperature rise to 2°C. According to Salerno, “there is no deadline for Venezuela. If it happens in December, great, but we welcome January also for all countries. You can’t remove anybody *ex ante* because the Secretariat wants a webpage complete.”\(^65\)

**Equity aspects**

As Venezuela has not submitted its INDC, its equity aspects cannot be assessed.

Chief negotiator Salerno has said that the country won’t back a Paris deal that “bullies poorer countries for not cutting enough”. Market mechanisms are another red line for the socialist country.\(^66\)

**Links to finance**

As Venezuela has not submitted its INDC, its links to finance cannot be assessed.

**Level of Ambition**

Oil production dominates the Venezuelan economy, provides 95% of export earnings and a quarter of national income. The country consumes 800,000 barrels a day of petrol and diesel and provides fossil fuel subsidies total US$12 billion a year. “Venezuela sees the global climate regime as a threat to its national interests,” says Guy Edwards at Brown University’s Climate and Development Lab. Almost three-quarters of the country’s electricity generation comes from hydropower. Beyond big hydropower the country has little intention to shift to cleaner forms of energy or reduce oil exports.\(^67\)

The national policy framework of Venezuela regarding climate change is not strong, as the country has no legislation in place that singularly or comprehensively affects climate change either from the perspective of mitigation or adaptation. Beyond the ratification of the Kyoto Protocol and additional international treaties, it does not have any climate legislation in place.\(^68\)

\(^{65}\) http://www.climatechangenews.com/2015/06/16/venezuela-the-climate-paradox-of-the-petro-state/

\(^{66}\) Ibid.

\(^{67}\) Ibid.

\(^{68}\) http://www.lse.ac.uk/GranthamInstitute/legislation/countries/venezuela/
3.13 Comparison of INDCs and country data

In Table 2 below INDCs targets are compared, and for targets that are either absolute or contain estimates of the future BAU emissions, and an annual reduction rate is calculated from current (year 2012) emissions to the target year. The annual reduction rate is calculated in percentage points (abbreviated pp), i.e. the percentage reduction between 2012 and the target year is divided with the length of the period in years. This approach gives insight into the ambition level of the proposed commitments, and makes them easier to compare with each other. Many of the selected countries did not provide any information on the level of BAU emissions in their INDC, thus in those cases an annual reduction could not be calculated.

Table 2: Annual reductions of countries with reduction targets expressed relative to BAU. Sources: INDCs, World Resources Institute CAIT

<table>
<thead>
<tr>
<th>Country</th>
<th>Type of target</th>
<th>Target period</th>
<th>Stated BAU in 2030</th>
<th>GHG reduction target</th>
<th>Annual reduction incl LULUCF</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit</td>
<td>-</td>
<td>-</td>
<td>in Mt CO2 eq.</td>
<td>-</td>
<td>in percentage points per year starting from 2012 until the end of the reduction period with BAU in INDC</td>
</tr>
<tr>
<td>Algeria</td>
<td>-7% below BAU (unconditional)</td>
<td>2012..2030</td>
<td>BAU not available</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td></td>
<td>-22% below BAU (conditional)</td>
<td>2012..2030</td>
<td>BAU not available</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Argentina</td>
<td>-15% below BAU (unconditional)</td>
<td>2012..2030</td>
<td>670</td>
<td>570</td>
<td>2.26</td>
</tr>
<tr>
<td></td>
<td>-30% below BAU (conditional)</td>
<td>2012..2030</td>
<td>670</td>
<td>469</td>
<td>0.88</td>
</tr>
<tr>
<td>Bolivia</td>
<td>E.g. 79% renewable energy</td>
<td>2010..2030</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Dominica</td>
<td>Absolute reduction target of -44.7%</td>
<td>2014..2030</td>
<td>n/a</td>
<td>0.165</td>
<td>-2.48</td>
</tr>
<tr>
<td>Ecuador</td>
<td>-20.4..25.0% below BAU (unconditional)</td>
<td>2012..2025</td>
<td>BAU not available</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td></td>
<td>-45.8% below BAU (conditional)</td>
<td>2012..2025</td>
<td>BAU not available</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Iran (energy sector)</td>
<td>-30% below BAU for the energy sector only (not INDC)</td>
<td>2007..2025</td>
<td>1967</td>
<td>-84.94</td>
<td>3.03</td>
</tr>
<tr>
<td>Mali</td>
<td>Indicative unconditional target relative to BAU</td>
<td>2015..2030</td>
<td>-29</td>
<td>-33.63</td>
<td>5.23</td>
</tr>
</tbody>
</table>


As the BAU emission level information was missing from many INDCs, the annual rate of emissions reductions could not be calculated for all of the countries. However, it can be said that Dominica’s absolute reduction target corresponds to a -2.48 percentage point reduction per year, which is ambitious. However, as the target is fully conditional to international support, it is probably not going to materialize in full. Argentina has the most ambitious of the unconditional targets (of countries that have provided BAU information), when looking at the annual rate. Argentina could increase its emissions by 2.26 pp annually from the current levels. Mali’s conditional reduction target and Iran’s non-INDC target amount to a similar annual increase level (3.03 pp), but in Iran’s case only the energy sector is taken into account, and in Mali’s case the target is a combination of energy, agriculture and forestry sectors.

Analysis of country characteristics and gaps in INDCs

In Table 3 below the relevant country characteristics are gathered from statistics about GDP per capita, CO₂ emissions per capita, methane (CH₄) emissions per capita, greenhouse gas emissions per unit of GDP and share of fossil fuels (excluding nuclear power) in the electricity production. Methane emissions are taken into account in this report, because in countries such as Sudan and Mali the methane emissions are substantially higher than CO₂, when comparing emissions per capita in CO₂-equivalent terms. This information is used to compare, which countries would have the greatest mitigation potential in terms of financial capacity and emission reduction potential, such as the current emission intensity and the share of GHG emitting electricity.

Table 3: Relevant country characteristics. Sources: World Bank, U.S. Energy Information Administration, World Resources Institute CAIT

<table>
<thead>
<tr>
<th>Country</th>
<th>GDP per capita in 2011</th>
<th>CO₂ emissions per capita incl. LULUCF in 2011 (WRI CAIT)</th>
<th>CH₄ emissions per capita incl. LULUCF in 2012 (WRI CAIT)</th>
<th>GHG emissions per GDP incl. LULUCF</th>
<th>Share of GHG emitting sources in electricity generation in 2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit</td>
<td>Current 1000 USD</td>
<td>in tCO₂</td>
<td>in tCO₂e</td>
<td>in USD per kgCO₂e</td>
<td>%</td>
</tr>
<tr>
<td>Algeria</td>
<td>5.27</td>
<td>3.46</td>
<td>1.18</td>
<td>0.38</td>
<td>99 %</td>
</tr>
<tr>
<td>Argentina</td>
<td>13.75</td>
<td>6.32</td>
<td>2.36</td>
<td>n/a</td>
<td>71 %</td>
</tr>
<tr>
<td>Bolivia</td>
<td>2.32</td>
<td>9.91</td>
<td>2.14</td>
<td>2.30</td>
<td>65 %</td>
</tr>
</tbody>
</table>
Dominica    7.12  1.75  1.26  0.44  73 %  
Ecuador      5.20  2.34  0.79  0.87  44 %  
Iran          7.64  7.78  1.21  0.57  94 %  
Malaysia     10.06  7.85  2.19  0.68  92 %  
Mali          0.74  0.09  1.04  1.48  24 %  
Philippines   2.36  0.86  0.57  0.27  70 %  
Saudi Arabia 24.12 18.74  1.22  0.36 100 %  
Sudan         1.62  0.35  2.41  1.34  25 %  
Venezuela    10.73  6.40  1.95  0.75  34 %  

Algeria is a relatively low-income country with a GDP per capita in the same range as Ecuador, but half of the level of Malaysia or Venezuela. The country’s electricity is almost fully produced by GHG emitting sources, so there would be potential to reduce emissions from this sector e.g. by increasing renewable energy production. Algeria’s CO₂ emissions per capita (including LULUCF) are in the lower end of the countries assessed in this report, but ten times the level of Sudan. Algeria’s INDC is lacking some key data, such as the BAU emissions projections for 2030 and the accounting assumptions for the LULUCF sector. This makes assessing the actual level of emission reductions related to the INDC target difficult.

Argentina is the second wealthiest nation of the assessed LMDC countries in terms of GDP per capita. Its emissions have been increasing rapidly during 20 years. Its per capita CO₂ emissions are approximately in the same magnitude with China (which has 6.71 t CO₂ per capita), and in addition it has notable methane emissions per capita (2.36 t CO₂e). Argentina would have potential to reduce emission by increasing the utilization of renewable energy sources, especially hydro, in its electricity production. Argentina’s INDC is quite clear in terms of BAU emissions, and the scope and coverage of the targets. However, as half of the country’s GHG emissions come from the LULUCF sector, it would have been informative to include a quantifiable target for land use and forestry in the country’s INDC.

Bolivia views mitigation targets as the responsibility of more developed countries. Its national wealth level is rather low as it has third lowest GDP per capita of the LMDCs compared here. Its CO₂ emissions per capita are however the second largest of the assessed countries, as it has relatively high emissions from the LULUCF sector. It also has notable methane emissions per capita. Its GHG emissions per unit of GDP are the highest of all countries considered, when LULUCF emissions are taken into account. As a key member of the ALBA group, Bolivia is in a more radical view of the Paris Agreement than many of the other LMDC group members. From this perspective it is commendable that Bolivian has submitted an INDC, even though late from the 1 October deadline. Bolivia’s contribution does not have any economy-wide GHG reduction target or information about its projected emission levels in 2030. Still, its renewable energy target is ambitious for such a low-income country. However, as its LULUCF sector emissions are so notable, it should take more efforts to decrease them.
Ecuador has one of the lower CO$_2$ emissions *per capita* of the assessed countries, about a third of the level of e.g. Malaysia or Iran. Ecuador has relatively low share of GHG emitting sources in electricity production, 44 %. In its INDC Ecuador has set an unconditional target for energy sector to reduce emissions by 20.4 - 25% below BAU level by 2025. This is rather aggressive as it translates to 40 % reduction *per capita* emissions, which are already quite low. Ecuador’s INDC however lacks some key information, such as estimated BAU emissions in 2025.

Iran's has not yet submitted its INDC, but its National Mitigation Plan has an energy sector emission reduction target of 30% by 2025 below BAU. Its 94 % share of fossil fuels in electricity generation is among the highest of the assessed countries, and its CO$_2$ emissions *per capita* are relatively high. Its financial capacity is in the middle range of the selected countries, however only a third of the wealthiest country, Saudi Arabia. Mitigation potential and financial capacity both exist in the country, so it should participate in the Paris agreement by submitting a national contribution.

Malaysia’s share of fossil fuels in electricity generation is one of the highest, and its emissions intensity of GDP, when taking LULUCF emissions into account, is nearly double the level of e.g. Saudi Arabia’s. Thus there is significant mitigation potential in the country. However, Malaysia already has made efforts in this field, as its emission intensity has reduced by 33% from 2005 to 2013. Its financial capacity is on the same level as Venezuela’s, and double the level of Ecuador. As there is mitigation potential in the country, and it is not one of the lowest-income countries, Malaysia should submit a contribution to the Paris agreement.

Mali has the lowest values in almost all assessed characteristics of all selected countries: it has the lowest financial capacity, lowest CO$_2$ emissions *per capita*, and also lowest share of fossil fuels in electricity generation. However it does have higher than average GHG emission intensity of its GDP, when taking LULUCF sector into account. As a Least Developed Country, Mali does not have significant own capacity for emission reductions or adaptation measures, thus it has provided conditional targets in its INDC. The data level of the INDC is on quite a good level for an LDC, as there is data for energy, agriculture and forestry emissions, even though emissions of the whole economy are not given.

The Philippines has low GDP *per capita*, on the same level as Bolivia, and only one tenth of the level of Saudi Arabia. It also has very small CO$_2$ and CH$_4$ emissions *per capita* and lowest emissions intensity of the GDP. This implies that the country does not have significant mitigation potential or financial resources for the implementation of mitigation actions. In this light its conditional reduction target against BAU emissions is understandable. Still, the Philippines is a relatively large country with approximately 100 million people, thus its future emissions development is not negligible in the view of global emissions.

Saudi-Arabia has not defined its baseline emissions in its INDC, but has set a goal reducing emissions up to 130 Mt annually. Its GHG emissions are expected to increase by 60% in 2030 with current policies. Due to its role as the biggest oil exporter in the world, it has by far the highest *per capita* GDP and highest CO$_2$ emissions *per capita* of the assessed countries. The country produces all of its electricity with fossil fuels. Saudi Arabia definitely has high mitigation potential with financial ability to implement mitigation
actions. From this perspective it should take on an absolute reduction target, because its financial capacity is on the same level as Annex I countries.

**Sudan**, the largest country in Africa in land area, is a Least Developed Country with low emissions *per capita* and low financial resources to combat climate change. Sudan is the second poorest country of the LMDC countries compared after Mali, and it also has the second lowest *per capita* CO₂ emissions. However, it has the highest methane emissions *per capita* of the assessed countries, mainly coming from the agriculture sector. Sudan has very low mitigation potential, except in agriculture, and low financial capacity. It can be expected that Sudan’s possible upcoming INDC could be focused more on adaptation.

Due to its oil production revenues **Venezuela** is relatively rich when comparing with other LMDC countries. Its own electricity production is however not dependent on oil because of high utilization rate of hydropower. Venezuela has not submitted its INDC, and seems hesitant to do so before Paris. As a country with relatively high GDP *per capita* (double the level of e.g. China, which has a GDP *per capita* of 5570 USD) it would be fair for Venezuela to take on an unconditional mitigation target in the Paris agreement.
4. Positions of the LMDC Coalition and Selected Countries of the Coalition on Some Key Issues

This chapter identifies key issues in the negotiations of the Paris agreement. It then describes and analyses select countries' positions on these issues, which include the Paris outcome and its legal form: mitigation; adaptation; finance; technology; LULUCF; and transparency.

4.1 General Views on the Paris Outcome and its Legal Form

4.1.1 Introducing the Issue

The ADP’s negotiating mandate, agreed at COP 17 in Durban, defines the outcome of the negotiations under the Durban Platform as “a protocol, another legal instrument or an agreed outcome with legal force under the Convention applicable to all Parties...” 69

There have been different interpretations of what this mandate means with respect to the legal form of the Paris outcome. While the protocol option seems clear, the expressions “another legal instrument” and “agreed outcome with legal force” leave more scope for interpretation.

Some legal scholars support a broad interpretation, arguing that the Paris outcome could take the form of an amendment to the Convention and/or its annexes, as well as a COP decision or a set of COP decisions. 70 Other legal scholars feel, however, that the Durban mandate can only be fulfilled through an instrument that has a stronger international legal status than that of a COP decision. According to their view, the reference to “legal force” implies that the Paris outcome “must take the form of a treaty within the meaning of the Vienna Convention on the Law of Treaties.” 71 Considerations to support this interpretation including the negotiating history of the ADP’s mandate suggesting that the reference to “legal force” was included in the ADP’s mandate with the intention of

69 Decision 1/CP.17
achieving something more than a COP decision\textsuperscript{72} and that the five-year gap between the deadline for adopting the ADP’s outcome in 2015 and its effectiveness in 2020 could be seen as a time period reserved for countries to ratify the Paris outcome and for the legal instrument to enter into force.\textsuperscript{73}

Regardless of the legal form of the Paris ‘core’ agreement, it is generally agreed that some issues relating to the Paris outcome should be included in COP decisions. The ADP Co-Chairs’ scenario note issued in July 2015 (ADP.2015.4.InformalNote) made an attempt to identify those issues in the ADP negotiating text that should go to the draft agreement and those that should be in a COP decision. Accordingly, provisions that should go the draft agreement include overarching commitments, durable provisions and standard provisions for an agreement. Provisions appropriate for inclusion in COP decisions include details of implementation, provisions likely to change over time, provisions related to pre-2020 action and interim arrangements pending the entry into force of the agreement. The Co-Chairs non-paper from October 2015 (ADP.2015.8.Informal Note) includes a proposal for a draft agreement and accompanying COP decisions to give effect to the agreement.

4.1.2 Position of the LMDCs

According to the LMDCs, the 2015 outcome must cover all the elements in the ADP negotiation mandate, namely mitigation, adaptation, finance, technology development and transfer, transparency of action and support as well as capacity-building. The 2015 agreed outcome must have substantive provisions that reflect and operationalize all these elements.\textsuperscript{74} All elements of the 2015 agreement should also have the same legal nature.\textsuperscript{75}

The LMDCs are also of the view that the 2015 outcome should be built on the principles, provisions and structure of the Convention, especially the principles of equity and CBDRRC. The group insists on retaining the Annexes as in the Convention, including the distinction between Annex I and non-Annex I countries.\textsuperscript{76} At ADP-10, Malaysia, for the LMDCs, specified that the mandate is not to renegotiate, rewrite, restructure or replace the Convention or reinterpret its principles and provisions. Concepts, such as “evolving CBDRRC; “parties in a position to do so” and “single transparency system” are not consistent with the principles of the Convention and are not acceptable.\textsuperscript{77} Each element of the agreed outcome must be based on, and specifically linked to, a specific provision of the Convention, or with previous COP decisions that relate to the implementation of a specific provision of the Convention.\textsuperscript{78}

\textsuperscript{72} Ibid.
\textsuperscript{73} Ibid.
\textsuperscript{74} LMDC group submission on Elements of the 2015 ADP Agreed Outcome, June 2014
\textsuperscript{75} LMDC group submission on Elements of the 2015 ADP Agreed Outcome, June 2014
\textsuperscript{76} LMDC submission to ADP workstream 1, November 2013
\textsuperscript{77} Malaysia on behalf of LMDC opening statement in Bonn 31.8.2015
\textsuperscript{78} LMDC submission to ADP Workstream 1 and 2, September 2013
According to the LMDCs, the Paris outcome must reinforce a fair, multilateral and rules-based regime under the Convention that brings into effect the right to equitable access to sustainable development, sharing of atmospheric space and resources, taking into account cumulative historical responsibility. The legal form of the agreed outcome will follow the substance and content of the structure and scope of the agreed outcome. In any event, the form of agreed outcome must fully reflect and be consistent with the principles and provisions of the Convention.79

### 4.1.3 Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDC coalition and the selected LMDC member countries on legal form and general views on the Paris outcome, especially on the differentiation of Parties, are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Country</th>
<th>Legal form and general views of the Paris Outcome</th>
</tr>
</thead>
</table>
| LMDC group    | • Shall cover all elements: mitigation, adaptation, finance, technology development and transfer, transparency of action and support as well as capacity-building  
• All elements of the 2015 Agreement should have the same legal nature, consistent with other related legal instruments that the COP has adopted  
• Legal form will follow substance and scope  
• The 2015 outcome should be built on the principles, provisions and structure of the Convention, especially the principles of equity and CBDR  
• The group insists on retaining the current Annexes of the UNFCCC  
• Concepts such as “evolving CBDRRC”, “Parties in a position to do so” and “single transparency system” are not consistent with the principles of the Convention and are not acceptable  |
| Argentina     | • Argentina supports legally binding commitments for Annex I Parties, but does not specify what the legal form of the whole 2015 outcome should be  
• 2015 outcome should take fully into account the specific needs and special circumstances of developing countries  
• Developing country actions are subject to receiving proper support from the developed countries in terms of financial resources, technology transfer and capacity building  
• Land-use sector should be excluded  |
| Bolivia       | • 2015 agreement must be fully consistent with the principles and provisions of the UNFCCC, including differentiation between developed and developing countries  
• 2015 agreement needs to take the top-down approach of the Kyoto Protocol, which implies the distribution of a “global emission budget”  |
| China         | • Outcome with core agreement and COP decisions  
• Legally-binding agreement implementing the Convention and covering mitigation, adaptation, finance, technology, capacity building and transparency of action and support in a balanced manner |

79 LMDC submission to ADP workstream 1, March 2013
<table>
<thead>
<tr>
<th>Country</th>
<th>LMDCs' Preparations and Views</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ecuador</td>
<td>Developed countries need to take legally binding commitments through a top-down approach. “Under the Convention” means that all its principles and provisions shall apply in the 2015 outcome. There cannot be the same mandatory nature of obligations for both developing and developed countries, since this is clear in the Convention.</td>
</tr>
<tr>
<td>India</td>
<td>The expression “outcome with legal force” in the ADP’s mandate can be interpreted meaning that the outcome could derive its legal force from domestic instead of international law. All options on legal form can be considered when substantive contents have been agreed.</td>
</tr>
<tr>
<td>Iran</td>
<td>Agreed outcome in Paris that addresses all the six core elements from the Durban mandate in a balanced manner. The outcome should reflect the equitable principles of the Convention, particularly the principle of CBDR.</td>
</tr>
<tr>
<td>Malaysia</td>
<td>Paris outcome must enhance the implementation of “the already long-lasting and durable” Convention, and not replace it. Balanced and holistic treatment of all elements of the Agreement. Keep principles of the Convention.</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>2015 outcome should provide expressly that the INDCs themselves are not legally binding. The legal nature of the agreement should not be discussed ahead of agreement on the substance. Continuing relevance and applicability of the Convention. The Kyoto Protocol preamble can serve as a model for the 2015 outcome preamble, and that the outcome does not need a “General/Objective” section.</td>
</tr>
<tr>
<td>Sudan</td>
<td>African Group: 2015 agreement should reflect a balance between all elements (mitigation, adaptation and loss &amp; damage, finance, technology development and transfer) in terms of the legal nature of obligations. Agreement should be under the Convention and thus its principles and provisions (including its annexes) shall apply. 2015 agreement should integrate mechanisms and institutions built under the Bali Roadmap.</td>
</tr>
<tr>
<td>Venezuela</td>
<td>Venezuela suggests addressing “the elephant in the room,” namely that one set of parties seeks a mitigation-based outcome and another feels it should be based on all the elements of the Bali Action Plan. Provisions of the Convention should be taken into account in the Agreement, and differentiation should be based on the principle of CBDRRC.</td>
</tr>
</tbody>
</table>
4.1.4 Analysis of Group and Country Positions

For the LMDCs, the 2015 agreement should be under the UNFCCC, building on the Convention’s provisions and principles. Principles of a particular importance for the LMDCs include equity and the CBDRRC. The coalition is unwilling to accept the concepts proposed by developed countries, such as “evolving CBDRRC” and their emphasis is on retaining the current distinction between Annex I and non-Annex I countries. This is different from the position of developed countries who tend to see the legal structure of the UNFCCC regime as the main challenge of the current regime that should be addressed through the Paris agreement, taking into consideration changes in countries’ capabilities since the early 1990s. In comparison with other non-Annex I countries, LMDCs tend to be more conservative in their interpretation of equity and CBDRRC, especially when compared to those in the Alliance of Independent Latin American Countries (AILAC). From a broader perspective, it is useful to note that international law in general provides support for evolutionary interpretation of international treaties. Ultimately, however, UNFCCC Parties are free to agree on any interpretation – be it evolutionary or conservative – of the CBDRRC for the purposes of the post-2020 climate regime.

The LMDCs as a coalition do not seem to have a firm common position on what the legal form of the Paris agreements should be. For India and Saudi Arabia, the legal form should be discussed only once substance has been agreed. However, most LMDCs have, in their individual submissions, explicitly supported legally-binding, top-down commitments for Annex I countries in terms of mitigation and means of implementation. The coalition also agrees that all elements included in the ADP’s negotiating mandate (mitigation, adaptation, finance, technology development and transfer, transparency and capacity building) should be treated in a balanced manner and have the same legal nature in the final outcome. This differs from the views of most developed countries, which focus more on mitigation with less importance attached to issues such as technology and capacity building.

All in all, there seem to be important differences between views of the LMDCs and developed countries concerning issues, such as differentiation and the role of the CBDRRC and Annex I / non-Annex I distinction in the Paris agreement.

4.2 Elements Agreed in the Negotiating Mandate

As explained above, the negotiation mandate for the Paris Agreement covers the following topics: mitigation, adaptation, finance, technology development and transfer, transparency of action and support, and capacity building. Country positions on these topics are assessed in this section.

4.2.1 Mitigation

4.2.1.1 Introducing the Issue

Given the gap between current climate policies and those needed to achieve the two-degree target agreed in Copenhagen (2009) and Cancun (2010), mitigation is one of the crucial issues in the negotiations for the Paris agreement. The current mitigation regime
under the UNFCCC and its Kyoto Protocol illustrates that the issue has been difficult in the history of the UNFCCC regime. In the 2013-2020 period, only a small proportion of global GHG emissions fall under the legally-binding framework of the Kyoto Protocol as only European countries and Australia have expressed willingness to join the second commitment period. Annex I countries like Russia and Japan have not done so, Canada withdrew from the Kyoto Protocol entirely and the US never ratified the instrument. As a result, global GHG emissions mostly fall under a ‘bottom-up’ mitigation regime consisting of unilateral mitigation pledges made by UNFCCC Parties, mostly in connection of the 2009 UN Climate Change Conference in Copenhagen. The positive aspect of the ‘bottom-up’ approach is that it has encouraged more than half of UNFCCC Parties to pledge mitigation actions. Challenges with the ‘bottom-up’ approach include vastly inadequate level of collective mitigation ambition as well as the difficulty of comparing countries’ highly divergent pledges and the fact that there is no mechanism to effectively monitor their implementation.

The need to address the ‘emissions gap’ between the existing and necessary climate policies was one of the motivations for launching the ADP process. A number of proposals are on the table in the Paris negotiations on how to strengthen action on mitigation, including in the post-2020 period. The proposals included in the ADP negotiating text from February 2015 cover long-term and global aspects of mitigation, such as proposals endorsing the 2°C/1.5°C targets, peaking of global emissions, long-term zero emissions, net zero emissions, full decarbonisation and/or carbon neutrality. They also cover proposals for individual mitigation commitments, contributions or actions by Parties. Some proposals apply equally to all Parties, some distinguish between developed and developing counties, and yet others envisage new country categories, such as annex x and y countries.

Issues under discussion also include whether a country’s mitigation contribution, commitment or action must be unconditional or whether aspects of it can be conditional, such as dependent on support received. There are also various proposals concerning the form that mitigation commitments or contributions should take, including inscribing mitigation them in a legally binding annex of the Paris agreement, national schedule or an attachment, or in an information document or online registry maintained by the Secretariat. Several Parties have proposed a cyclical approach, whereby mitigation contributions are periodically updated. There are also proposals on the table for a review the adequacy of the collective level of mitigation ambition. The mitigation section also addresses issues, such as market mechanisms, land sector principles and response measures.

4.2.1.2 Position of the LMDCs

As seen above, continued differentiation between Annex I and non-Annex I countries is a key element of the LMDC position. According to them, Annex I Parties must take on comparable top-down, legally-binding, economy-wide and quantified emission reduction targets. These should use comparable criteria in terms of timeframes, greenhouse gases and base year. In contrast, non-Annex I Parties will implement Nationally

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80 These are compiled in the ADP negotiating text
Appropriate Mitigation Actions (NAMAs) subject to financial, technological as well as capacity-building support from Annex II Parties.\textsuperscript{81}

According to the coalition, mitigation actions should achieve a net decrease in overall emission levels in the context of the UNFCCC.\textsuperscript{82} Annex I Parties should take the lead through emission reductions undertaken domestically, so that it would not result in developing countries doing mitigation on behalf of developed countries.\textsuperscript{83}

4.2.1.3 Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDCs and the selected LMDC group member countries on mitigation in the Paris outcome are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Country</th>
<th>Positions on mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Annex I Parties to take on comparable top-down economy-wide quantified emission reduction targets that go beyond their targets under the Kyoto Protocol’s second commitment period or their Cancun pledges &lt;br&gt; • Annex I Parties’ mitigation commitments should use common timeframe, greenhouse gases, base year, etc. enabling comparability &lt;br&gt; • Non-Annex I Parties should implement NAMAs subject to and supported by finance, technology development and transfer as well and capacity building &lt;br&gt; • Evolutionary approach to the CBDRRC, updating the Convention’s annexes or elimination of differentiation seen as “illegal” &lt;br&gt; • Developing country action may include REDD+ and joint adaptation and mitigation approaches</td>
</tr>
<tr>
<td>Argentina</td>
<td>• Legally binding commitments for Annex I Parties and voluntary actions for non-Annex I Parties</td>
</tr>
<tr>
<td>Bolivia</td>
<td>• Mitigation commitments should be based on a “global emissions budget” &lt;br&gt; • Sharing of the global emissions to be based on “Compound Index” consisting of indexes on Historical Responsibility, Ecological Footprint, Capabilities and Development and Human Development &lt;br&gt; • Calls for inclusion of alternative, non-market, and joint mitigation and adaptation approaches &lt;br&gt; • Outcome should be establishment of a new “Mechanism for Climate Resilience and Sustainable Development” &lt;br&gt; • Mitigation and adaptation outcomes could be monitored through proxies, indicators and standards</td>
</tr>
<tr>
<td>China</td>
<td>• Annex I and non-Annex I differentiation continues in the post-2020 period &lt;br&gt; • Ambitious, economy-wide and absolute quantified emission reduction targets for developed countries up to 2030 in light of historical responsibilities &lt;br&gt; • Diversified enhanced mitigation actions for developing countries, such as emission intensity targets, deviation from BAU targets or low-carbon</td>
</tr>
</tbody>
</table>

\textsuperscript{81} LMDC submission on Elements of the 2015 agreed outcome, June 2014

\textsuperscript{82} Ibid.

\textsuperscript{83} LMDC submission to the ADP on elements of 2015 agreement, March 2015
strategies in context of sustainable development and in accordance with specific needs and special circumstances; dependent on adequate finance and technology support from developed countries

- Developed country emission targets are internationally legally-binding and included in an attachment of the agreement
- Developing countries’ enhanced mitigation actions are compiled in an attachment to the agreement with relevant information communicated through national communications and BURs

<table>
<thead>
<tr>
<th>Country</th>
<th>Position</th>
</tr>
</thead>
</table>
| Ecuador | • Need to achieve a net balance reduction and avoidance of GHG emissions at the national and global levels  
• Policies and measures should take into account different socio-economic contexts, be comprehensive, and cover all relevant sources and sectors, sinks and reservoirs |
| India   | • Annex I and non-Annex I differentiation continues in the post-2020 period  
• Quantified emission limitation and reduction objectives for Annex I Parties  
• NAMAs enabled by finance and technology transfer for non-Annex I Parties  
• Need to address response measures and discourage the use of unilateral trade measures |
| Iran    | • No individual submissions |
| Malaysia| • No individual submissions |
| Saudi Arabia | • Will not support the new agreement if it does not adequately address the issue of response measures |
| Sudan   | • Supports a differentiated approach across all mitigation elements  
• Developed countries should commit to absolute and economy-wide emission reduction commitments, and to zero-carbon emission pathways  
• For Annex I parties there should be a quantification of their global carbon budget at the start of any commitment period  
• Developing countries should commit to relative emission reductions  
• Aggregate consideration for non-Annex I Parties contributions and available support |
| Venezuela| • No individual submissions |

4.2.1.4 Analysis of Group and Country Positions

On mitigation, a key common element in the LMDC position is continued differentiation between Annex I and non-Annex I countries in the Paris outcome. Accordingly, Annex I countries should take comparable and legally-binding, economy-wide emission reduction targets. Mitigation actions by non-Annex I countries depend on support provided by Annex II countries; for LMDCs, insufficient support from developed countries is a fundamental problem in the current UNFCCC regime that should be addressed through the Paris agreement.
These views are markedly different when compared to developed country positions on issues, such as differentiation. Also the ADP Co-Chairs draft text (ADP.2015.8.InformalNote) seems to contrast the LMDC position concerning the need to retain the Convention’s structures in that the proposed articles on mitigation and reporting would apply to “each Party.”

For some LMDC countries, addressing response measures is an important aspect of mitigation. Especially Saudi Arabia and India have emphasized this, with India mentioning unilateral trade measures in particular. Both are topics that Annex I countries have been traditionally reluctant to address. In the past, there has also been some tension among non-Annex I countries on whether to link response measures and adaptation.

While countries participating in the LMDCs coalition seem to have attempted to formulate their positions in similar terms, some differences within the coalition can be detected. Bolivia has made a proposal to link mitigation commitments with a global emissions budget, highlighting that even the target of limiting global average temperature increase to below 1.5 degrees Celsius poses important risks to Mother Earth. Bolivia is proposing a compound index of countries’ participation in the global emissions budget. Other members of the LMDC coalition have not joined the proposal, and it is conceivable that not all of them support it. For example, Saudi Arabia and other oil-producing countries from the region have traditionally opposed the 1.5°C target. It is also not known whether all LMDC members support the formula proposed by Bolivia for calculating each country’s mitigation contribution. In other words, there are important common elements in LMDC coalition members’ position regarding mitigation. At the same time, the importance various countries attach to aspects of mitigation is not the same. For Bolivia, the idea of Mother Earth and the concept of a global emissions budget rank high on the agenda, while Saudi Arabia gives more emphasis on response measures.

4.2.2 Adaptation

4.2.2.1 Introducing the Issue

Adaptation refers to adjustments in ecological, social, or economic systems in response to actual or expected climatic stimuli and their effects or impacts. It refers to changes in processes, practices, and structures to moderate potential damages or to benefit from opportunities associated with climate change”. (IPCC 2001, Third Assessment Report). Although the UNFCCC historically has placed greater emphasis on climate mitigation than on adaptation, a number of the Convention’s provisions relate directly or indirectly to climate adaptation.

Article 4.1(b) of the UNFCCC includes the key commitment on adaptation. It requires parties to publish national information on mitigation and adaptation, including measures to facilitate adequate adaptation to climate change. A similar provision is found in Article 10(b) of the Kyoto Protocol.

Article 4.1(e) requires cooperation for the preparation of adaptation of the impacts of climate change, particularly in Africa. Articles 4.3 and Article 4.4 of the UNFCCC mandates all Annex II countries to assist developing countries to cope with climate impacts. Article 4.4 requires them to assist developing countries that are particular
vulnerable to the adverse effects of climate change in meeting the costs of adaptation of those adverse effects. In addition, Article 4.9 states that “Parties shall take full account of the specific needs and special situations of the least developed countries in their actions with regard to funding and transfer of technology”.

Implementation of these provisions has evolved along many pathways under the UNFCCC. Three important milestones that provide the foundations of an international regime for adaptation under the UNFCCC include the LDC Work Programme, the Nairobi Work Programme and the Cancun Adaptation Framework.

Least Developed Country Work Program (LDCWP):

- **Least Developed Countries Work Program 5/CP.7**: Under the LDCWP, Least Developed Countries (LDCs) identify and report their adaptation needs and report through their National Adaptation Programmes of Action (NAPAs).
- **Least Developed Countries Fund: 7/CP.7**: The Least Developed Countries Fund (LDCF) was established to meet the adaptation needs of least developed countries (LDCs). Specifically the LDCF has financed the preparation and implementation of National Adaptation Programs of Action (NAPAs) to identify priority adaptation actions for a country based on existing information.
- **Guidelines for the preparation of National Adaptation Programs of Action (NAPAs) decision 28/CP.7**: NAPAs provide a process for the LDCs to identify priority activities that respond to their urgent and immediate needs with regard to adaptation to climate change - those needs for which further delay could increase vulnerability or lead to increased costs at a later stage.
- **Least Developed Countries Expert Group (LEG) 29/CP.7**: provide technical support and advice to the LDCs on the National Adaptation Programmes of Action (NAPAs) and the LDC work programme, and to provide technical guidance and support to the national adaptation plan (NAP) process.

The Nairobi Work Programme was established by COP11 through Decision 2/CP.11, as a mechanism under the Convention to facilitate and catalyze the development and dissemination of information and knowledge that would inform and support adaptation policies and practices.

The Cancun Adaptation Framework was established at COP16 in 2010 relates to:

1. Implementation, including a process to enable LDC Parties to formulate and implement national adaptation plans (NAPs), and a work programme to consider approaches to address loss and damage;
2. Support;
3. Institutions, including the establishment of an Adaptation Committee at a global level, as well as regional and national level arrangements;
4. Principles;
5. Stakeholder engagement.

The Lima Call for Climate Action adopted at COP 20 affirmed that adaptation is among the issues to be addressed in the Paris agreement. Beyond the question of how to ensure adequate financial resources to assist particularly vulnerable developing countries in strengthening their adaptation efforts, broad issues for consideration on adaptation in the Paris agreement include, firstly, how the new agreement can establish greater parity between mitigation and adaptation. Should the agreement set some form of adaptation
goal or establishes new adaptation commitments? Other issues related to adaptation in the ADP’s official negotiating text (FCCC/ADP/2015/1) include proposals for obligations to match the level of support with adaptation needs and enhancing support for developing countries; establishment of a platform for Parties to communicate their adaptation efforts towards achieving the proposed adaptation goal.

4.2.2.2 Position of the LMDCs

The LMDC coalition advocates that existing adaptation-related institutions should be strengthened and fully financed, such as the Adaptation Fund, and the Adaptation Committee. In addition, national and regional institutional arrangements need to be strengthened to address the specific context and needs of developing countries.

With respect to the financing for adaptation, the LMDCs have a very clear position which includes provisions that specifically commit Annex II Parties, through the Green Climate Fund, to deliver adequate and predictable funding for adaptation in developing countries, in particular for the implementation of the Cancun Adaptation Framework. There is a mounting expectation within the LMDC coalition that future financing should address the historical imbalance in the provision of financing between mitigation and adaptation by having a significant share of multilateral funding for adaptation flow through the Green Climate Fund. Financing adaptation needs to be linked with the need to monitor, report and verify support, which should be in the agreement.

The LMDCs feel that increasing ambition means that mitigation and adaptation (as well as capacity building, technology transfer and provision of financial support) should be holistically reflected in the Paris outcome. The LMDC coalition pointed out that post-2020 enhanced action should include adaptation and should specifically address loss and damage.

The LMDC coalition called for INDCs by developing country Parties to include adaptation and loss and damage to be communicated and implemented in the context of sustainable development. The LMDC group view National Adaptation Strategies as Nationally Determined Contributions (NDCs) for adaptation.

The LMDC coalition noted that there was a lot of language which spoke of human rights in the context of adaptation, however the LMDC’s noted that these important issues are not specific to adaptation, and would rather see that type of language in the general objective (chapeau) rather than linked specifically to adaptation.

4.2.2.3 Positions of Selected Countries in the LMDC Coalition

<table>
<thead>
<tr>
<th>Country</th>
<th>Positions on adaptation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Adaptation financing should be linked with the MRV of support</td>
</tr>
<tr>
<td></td>
<td>• Nation Adaptation Strategies are Nationally Determined Contributions for adaptation</td>
</tr>
<tr>
<td></td>
<td>• Build and strengthen existing adaptation institutions, such as the Adaptation Committee and the Adaptation Fund</td>
</tr>
<tr>
<td></td>
<td>• Commit Annex II countries to deliver financing for adaptation through the GCF</td>
</tr>
<tr>
<td></td>
<td>• Expect the historical imbalance between mitigation and adaptation to be</td>
</tr>
<tr>
<td>Country</td>
<td>Views and Recommendations</td>
</tr>
<tr>
<td>--------------</td>
<td>---------------------------</td>
</tr>
</tbody>
</table>
| Argentina    | • No new reporting burdens for adaptation. Current reporting is already cumbersome  
               • Is in favour of using language that connects long term vision with the principles of the convention and should be science based.  
               • Supports including and strengthening existing institutions such as the Adaptation Committee and Adaptation Fund |
| Bolivia      | • Traditional indigenous knowledge should be integrated into adaptation  
               • Integrating best available science requires capacity, and is not simple  
               • Supports ALBA position |
| China        | • Adaptation should be on equal footing with mitigation  
               • All Parties are to take enhanced actions on adaptation  
               • Developed countries shall continue to support developing countries to formulate and implement national adaptation strategies and plans so as to effectively adapt to the impacts of climate change; adaptation funding to the GCF should be increased  
               • Further elaboration of institutional arrangements resulting from the negotiations under the Bali Action Plan |
| Ecuador      | • Supports ALBA position, supports G77+China, supports LMDC |
| India        | • There must be predictable and adequate Annex II funding for adaptation  
               • The Cancun Adaptation Framework and the Doha decision for setting up an institutional mechanism for ‘loss and damage’ must be carried forward and implemented. Without provision of finance it will be extremely difficult to undertake adaptation. Adaptation and MoI need to be at the core part of the agreement. |
| Iran         | • Notes LMDC group have taken ambitious actions on adaptation (and mitigation)  
               • Call for enhanced finance for enhanced ambition on adaptation actions |
| Malaysia     | • No individual position submitted |
| Saudi Arabia | • Build on existing institutions for adaptation.  
               • Recommends against reporting obligations in the text.  
               • Are not in support of placing human rights language within the context of adaptation and would prefer such language in the context with the general objective in the Agreement |
| Sudan        | • What countries do for adaptation should be consistent with the Convention.  
               • Raise the profile of adaptation in the Paris Agreement, and that the key word of "planning", should be in the long term vision for adaptation. |
| Venezuela    | • Support ALBA position, support G77+China, support LMDC |

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84 Malaysia on behalf of the LMDC Group, Opening Statement, Bonn 31st August 2015
4.2.2.4 Analysis of Group and Country Positions

The LMDC coalition links adaptation within the context of sustainable development, and all of the LMDC countries are also part of the G-77/China, for which they consistently give stated support. All ALBA countries are also LMDC countries, so those positions are quite consistent in the context of adaptation.

At the moment, the LMDC coalition does not want to commit to any agreement on wording for adaptation in the Paris agreement, like Global Adaptation Goal, or long-term vision for adaptation. This is visible in the G-77/China position, which indicates that the large group is yet to find a common agreement on wording for adaptation.

The LMDCs do however, continuously bring up the issue of adequate finance for adaptation, and in their submission they give a clear presentation of their expectations on how to achieve financing for adaptation.

There are some minor points of potential divergence/non-convergence, which became apparent between LMDC countries at the latest intercessional. For example, Bolivia emphasised several times that traditional indigenous knowledge should be integrated into adaptation. Ghana, for the African group (which represents Sudan) felt that adaptation should be science based and would like to see that specifically stated in the text, this view was also backed up by Argentina. Not a lot of research to date, has investigated the role traditional knowledge can play in autonomous or planned adaptation, and therefore a number of Parties, emphasise the need for science based approaches to adaptation. This somewhat downplays the role of indigenous knowledge. There is scientific opinion that indigenous knowledge can enhance the effectiveness of adaptation, (IPCC AR5) but how and to what extent, is less certain.

Human rights have also popped up in the adaptation talks, and provide divergence of opinion on how it should be presented in the context of adaptation, particularly between the developing countries. In general, most Parties, specifically Saudi Arabia in this case, are not opposed to mentioning human rights at a general level in the agreement.

One of the unique features of the LMDC position is that unlike the position of the G-77/China, it presents a way forward for directing finance for adaptation, and refers to institutions set up to do so, such as the GCF. Many developing country submissions note that recent financing for adaptation has not been adequate, predictable or sustainable, and that finance has been predominantly skewed in favor of mitigation to this point in time.

Upon further investigation of the overall Multilateral Funding Focus, we find that this is quite consistent. According to Climate Funds Update, Multilateral focus has been, so far, focused on mitigation, as outlined in the table below.

Table 4: Multilateral Funding by Focus (Source: climatefundsupdate.org)

<table>
<thead>
<tr>
<th>Multilateral Focus</th>
<th>Amount (USD)</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitigation</td>
<td>7.052 Billion</td>
<td>53%</td>
</tr>
<tr>
<td>REDD+</td>
<td>2.086 Billion</td>
<td>16%</td>
</tr>
<tr>
<td>Adaptation</td>
<td>3.109 Billion</td>
<td>23%</td>
</tr>
<tr>
<td>Multiple foci</td>
<td>1.061 Billion</td>
<td>8%</td>
</tr>
</tbody>
</table>

47 (102)
Adaptation attracts only half of what mitigation has attracted through multilateral finance, to date. While this is a well known feature, going into COP21, there are growing concerns from Parties, in the lead up, that the 2 degree pathway will not be achieved, based on current INDC submissions so far. If the 2 degree pathway is overshot in Paris, adaptation will need to become a financing priority in the decades to come, and LMDCs are clearly positioning themselves for such a scenario.

To conclude, the LMDC position and the Parties that it represents is an interesting concoction for an international agreement on adaptation, and because of this, it may become the deal maker for adaptation. The LMDC group, so far, however has refrained from committing to language and terminologies for adaptation, suggesting that there is no convergence on the issue yet within the group that consists of extremely broad and diverse interests.

The LMDC group is the only negotiating coalition to outline and propose a method that would provide (and commit) Annex II Parties to financial commitments to the GCF for adaptation. This position will not be easy to pass, though.

If there is convergence on terminologies within the LMDC and G77 group, one will find that a global agreement is more likely. The issue to overcome though, is that South Africa (not analysed in this report), which is part of G77, has a very strong position on adaptation and this has given it some influence within the G77.

### 4.2.3 Finance

#### 4.2.3.1 Introducing the Issue

According to Article 4.3 of the Convention, Annex II Parties are to provide financial resources to developing country Parties. The current institutional framework for climate finance under the UNFCCC consists of the Convention’s Financial Mechanism with the Green Climate Fund (GCF) and the Global Environment Facility (GEF) as its operating entities. The Standing Committee on Finance assists the COP in its functions related to the Financial Mechanism. Concerning the scale of funding, developed countries promised in the 2009 Copenhagen Accord and 2010 Cancun Agreements to mobilize US$100 billion of annual climate finance by 2020.

Key issues in the negotiations for the Paris agreement include the provision and mobilization of financial resources, including which countries are responsible for providing them. In the ADP official negotiating text (FCCC/ADP/2015/1), there are proposals that financial resources should be provided by: all developed countries; countries included in the Convention’s Annex II; countries included in a new annex; or all countries in the position to do so. Some proposals address the scale of funding, including by suggesting periodic needs’ assessments. Concerning sources, some proposals highlight the mobilization of diverse sources while others place the emphasis on public finance, for example, through quantified individual commitments, such as a proportion of the Gross Domestic Product (GDP).

There are several proposals concerning the allocation of resources between adaptation and mitigation, and for new funding windows for example, for REDD+ and loss and damage. Several proposals have been made for the Convention’s Financial Mechanism
to serve under the new agreement and concerning the respective roles of the GCF, SCCF and AF under the new agreement. Proposals have also been made with respect to enhancing enabling environments.

4.2.3.2 Position of the LMDCs

According to the LMDCs, enhanced action by developing countries under the 2015 agreement must be accompanied by a corresponding increase in the provision of new additional, adequate and predictable financial resources by developed countries. In other words, levels of financing to be provided by developed countries should be commensurate to the climate financing needs of developing countries as identified by them, and should have an increasing trend over time.\(^{85}\)

For the LMDC coalition, public finance from Annex II countries must be the primary source of financing to non-Annex I countries under the Convention. Public financing could leverage private finance and other sources, but should remain the primary vehicle. Annex II parties must provide a clear roadmap for public climate financing from developed countries with specific targets, timelines and sources.\(^{86}\)

The coalition does not agree with developed country proposals on the importance of creating enabling environments in developing countries to facilitate private sector investments, if this means developing countries need to provide greater market access to their economies. The LMDCs have also stated that the $100 billion annual financing commitment by developed countries should only be a starting point for the post-2020 period, and financial support to developing countries should be scaled up from there. Financial resources, including for the transfer of technology, must be channeled through the Convention’s financial mechanism, and in particular through the GCF.

In the view of the LMDC coalition, Annex II countries should continue to have commitments to provide finance and technology support to developing countries in the 2015 outcome. Any burden-sharing for the provision of climate finance must be done among developed country Parties only. In Lima COP-20 the LMDC group opposed text suggesting “all” parties mobilize climate finance through a diversity of actions, and called for deleting references to provision of finance by “parties in a position to do so.” Thus Annex II Parties should take domestic preparations on their commitments on finance and technology support in addition to their commitments on emission reductions.\(^{87}\) The LMDCs opposed also references to results-based adaptation finance.\(^{88}\) In the February 2015 Geneva session Ecuador, for the LMDCs, said developed countries should submit information on their financial contributions and developing countries on their financial needs.\(^{89}\) For LMDCs, it is also important to develop a mechanism for the MRV of support provided.

\(^{85}\) LMDC submission on Elements of the 2015 agreed outcome, June 2014
\(^{86}\) LMDC submission to ADP Workstream 1, November 2013
\(^{87}\) LMDC submission to ADP on Elements of the 2015 outcome, March 2014.
\(^{88}\) IISD Earth Negotiation Bulletin, COP20 Summary
\(^{89}\) IISD Earth Negotiation Bulletin, Geneva ADP 2.8 Summary
4.2.3.3 **Positions of Selected Countries in the LMDC Coalition**

In the below table the main positions of the LMDC coalition and the selected LMDC group member countries on finance in the Paris outcome, especially on sources of finance, finance flows and related institutions, are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Country</th>
<th>Sources of finance, finance flows</th>
<th>Institutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Any enhanced action of developing must be accompanied by a additional financial resources</td>
<td>• Financial resources, including for the transfer of technology, shall be</td>
</tr>
<tr>
<td></td>
<td>• Burden sharing for the provision of climate finance must be done among developed country Parties</td>
<td>channelled through the financial mechanism of the Convention and GCF</td>
</tr>
<tr>
<td></td>
<td>• Public finance must be the primary source of financing. Annex II Parties to provide a clear</td>
<td></td>
</tr>
<tr>
<td></td>
<td>roadmap for public climate financing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Is against creating enabling environments to facilitate private sector investments</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Increasing levels of financing should correspond needs of developing country Parties as</td>
<td></td>
</tr>
<tr>
<td></td>
<td>identified by them</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Mechanism for the MRV of support</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Regarding formulations on mobilizing finance opposes texts suggesting “all” and “parties in</td>
<td></td>
</tr>
<tr>
<td></td>
<td>a position to do so</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Opposes also references to results-based adaptation finance</td>
<td></td>
</tr>
<tr>
<td>Argentina</td>
<td>• Annex I and II Parties have caused historical environmental debt towards developing countries</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Developed countries should redouble their efforts</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Commitments announced so far are insufficient and imprecise</td>
<td></td>
</tr>
<tr>
<td>Bolivia</td>
<td>• Finance is among the overarching goals of the 2015 Agreement and should be reflected in all</td>
<td>• Institutional arrangements, especially the GCF, should be</td>
</tr>
<tr>
<td></td>
<td>relevant sections of the text</td>
<td>further elaborated</td>
</tr>
<tr>
<td></td>
<td>• Finance section of the 2015 Agreement should be arranged in clusters on, e.g. scale of</td>
<td>• The GCF shall be under authority of, guided by, and accountable to the</td>
</tr>
<tr>
<td></td>
<td>resources, assessment and review, and sources of finance</td>
<td>COP</td>
</tr>
<tr>
<td>China</td>
<td>• Clear roadmap to scale up developed countries’ financial commitments in the post-2020 period</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Funding primarily from public sources, additional to Official Development Assistance with</td>
<td></td>
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<tr>
<td></td>
<td>developed countries contributing at least 1% of GDP to the GCF from 2020 onwards</td>
<td></td>
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<tr>
<td></td>
<td>• Financial flows to increase annually from</td>
<td></td>
</tr>
<tr>
<td>Country</td>
<td>Position</td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Ecuador</td>
<td>No individual submissions</td>
<td></td>
</tr>
<tr>
<td>India</td>
<td>• Amount of financing provided by Annex II Parties should be increased.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Finance should come mainly from public sources.</td>
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<tr>
<td></td>
<td>• Full incremental costs of meeting enhanced non-Annex I reporting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>obligations should be met through additional funding</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Work under the finance pillar must build on existing promises and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>institutions.</td>
<td></td>
</tr>
<tr>
<td>Iran</td>
<td>No individual submissions</td>
<td></td>
</tr>
<tr>
<td>Malaysia</td>
<td>No individual submissions</td>
<td></td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>• Financing should be primarily public including grant-based finance</td>
<td></td>
</tr>
<tr>
<td>Sudan</td>
<td>• Financial resources should be based on a quantified target in line with</td>
<td></td>
</tr>
<tr>
<td></td>
<td>the 2 degrees goal</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Finance should be transparent.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Lack of a clear collective pathway to reach the $100 billion goal by</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2020 is a major concern for developing countries</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Any commitment in mitigation by developing countries should be</td>
<td></td>
</tr>
<tr>
<td></td>
<td>balanced by a commitment on finance and technology transfer</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Public sources are the main source of finance, but necessary to work</td>
<td></td>
</tr>
<tr>
<td></td>
<td>more closely with the private sector</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Adaptation finance should be given a priority</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Each continent to get its share in line with the challenges it is</td>
<td></td>
</tr>
<tr>
<td></td>
<td>facing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Country ownership through enhancing direct and facilitated access to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>resources</td>
<td></td>
</tr>
<tr>
<td>Venezuela</td>
<td>No individual submissions</td>
<td></td>
</tr>
</tbody>
</table>

4.2.3.4 **Analysis of Group and Country Positions**

The need for enhanced climate finance is a key element in the LMDC position in the negotiations for the Paris agreement. For them, many of the shortcomings in the current UNFCCC regime have been caused by inadequate support from developed to developing countries. Such shortcomings must be addressed in the Paris agreement both in terms of the scale of support provided and its predictability. Finance is a central,
overarching theme in the Paris outcome with clear links to issues, such as mitigation by non-Annex I countries.

Compared to developed countries, there are clear differences with the LMDCs on climate finance. For LMDCs, the scale of climate finance must be reconsidered as the US$100 billion commitment is only the starting point. At the same time, the coalition stresses that the group of countries responsible for providing climate finance must remain limited to Annex II Parties. This stands in contrast to developed country proposals to expand the group of countries providing climate finance. While developed countries tend to emphasize the importance of mobilizing private sector and creating enabling environment, for LMDC members, the stress is on public finance from developed countries. They stress the need for predictable public sector financial commitments, given the same priority and legal form as mitigation in the Paris agreement. For developed countries, in contrast, the idea of binding and quantified financing commitments is unacceptable. According to LMDCs, climate finance must be channelled primarily through the Convention's financial mechanism, in particular the GCF.  

Overall, climate finance is an area where LMDCs views tend to come close to those of other non-Annex I countries even if some differences between more conservative and progressive developing countries are visible. The contrast between LMDC views and developed country views is, however, particularly manifest.

4.2.4 Technology

4.2.4.1 Introducing the Issue

Article 4.1.c of the UNFCCC includes a general obligation for all Parties to cooperate “in developing, applying and diffusing, including transferring technology.” Under Article 4.3, Annex II Parties must provide financial resources for technology transfer and under Article 4.5, they are to take all practicable steps to finance and facilitate technology transfer. Article 4.7 provides that the extent to which developing country Parties will effectively implement their commitments under the Convention will depend on the effective implementation by developed country Parties of their commitments related to financial resources and technology transfer. In 2010, Parties agreed to establish a Technology Mechanism as part of the Cancun Agreements. It consists of the Technology Executive Committee (TEC), as well as the Climate Technology Centre and Network (CTCN).

In the ADP official negotiating text (FCCC/ADP/2015/1), there is a proposal for a global goal of technology transfer and development, as well as various proposals on strengthening action on technology. Many of these involve the existing Technology Mechanism and some would also address the issue of intellectual property rights (IPR). However, the text also includes proposals that the Paris agreement should contain no provisions technology and IPRs. There are also different views on which Parties, if any, the obligation to promote technology transfer should cover: all countries; countries in a position to do so; or only developed countries. On institutional arrangements, several proposals have been put forward for the Convention’s Technology Mechanism to serve the new agreement and for it to be strengthened. Some Parties have proposed, however, that the Paris agreement should not contain any provisions on institutional arrangements for technology.
4.2.4.2 Position of the LMDCs

According to the LMDCs, a provision should be incorporated to the 2015 outcome to enhance action on the development and transfer of technologies and know-how, including financing of transfer and access, including by the removal of barriers, including those potentially arising from intellectual property rights (IPRs). This should be done through the establishment of an international mechanism on IPRs by developed country Parties and the provision of financial resources for technology development and transfer to developing countries through a specific window under the GCF. The enhanced action should apply to both mitigation and adaptation-related technologies.  

According to the LMDC coalition, the 2015 Agreement should contain a provision establishing operational modalities under the Convention through which developed country Parties could commit financing and capacity building resources to support endogenous capacities and technologies for mitigation and adaptation in developing countries. These modalities should incorporate financing to facilitate access to and finance the transfer of environmentally-sound technologies from developed to developing countries, and to promote endogenous technology engineering, development, application and diffusion in developing country Parties. There should also be a provision in the Agreement on research and development of technology, including financing of climate technology development. In addition the LMDC group thinks that there should be a provision in the Agreement that strengthens the Article 3.5 of the Convention against the use of unilateral climate change-related trade measures that constitute arbitrary, unjustified, or disguised trade restrictions.

4.2.4.3 Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDC group and the selected LMDC group member countries on technology development and transfer in the Paris outcome, including relevant institutions and mechanisms, are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Country</th>
<th>Technology development and transfer</th>
<th>Institutions and mechanisms</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Calls for enhanced action&lt;br&gt;• Focus both mitigation and adaptation&lt;br&gt;• Financing required for transfer, access and R&amp;D&lt;br&gt;• Removal of barriers - establishment of an international mechanism on IPRs&lt;br&gt;• Suggests provisions against arbitrary, unjustified, or disguised trade restrictions.</td>
<td>• Financial resources through a specific window under the GCF.</td>
</tr>
<tr>
<td>Argentina</td>
<td>• Should proceed under the principles and provisions of the Convention&lt;br&gt;• Differentiated obligations for developed and</td>
<td>• Arrangements via TEC and CTCN</td>
</tr>
</tbody>
</table>

90 LMDC submission on Elements of the 2015 agreed outcome, June 2014
91 Ibid.
92 LMDC submission on Elements of the 2015 agreed outcome, March 2014
<table>
<thead>
<tr>
<th>Country</th>
<th>Proposals and views</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolivia</td>
<td>• Emphasizes technology originating from indigenous peoples and local communities</td>
</tr>
<tr>
<td>China</td>
<td>• Long-term technology goal&lt;br&gt;• Developed countries must promote and finance technology transfer to developing countries, as well as regularly assess prepare a list of “ready to transfer” technologies&lt;br&gt;• Developed countries must remove obstacles, such as IPRs, and support strengthening of endogenous capacities in developing countries&lt;br&gt;• Further development of institutional arrangements&lt;br&gt;• Establishing an international mechanism on IPR&lt;br&gt;• A window for technology development and transfer in the GCF</td>
</tr>
<tr>
<td>Ecuador</td>
<td>• No individual submissions</td>
</tr>
<tr>
<td>India</td>
<td>• Agreement must operationalize technology transfer to developing countries; ensure Annex II financing for technology development; remove obstacles; provide financing and incentives for transfer of technology, and facilitate R&amp;D cooperation in climate technology&lt;br&gt;• Barriers created by IPRs must be addressed&lt;br&gt;• The GCF should allocate funds to meet the full costs of developing country access to environmentally sound technologies</td>
</tr>
<tr>
<td>Iran</td>
<td>• No individual submissions</td>
</tr>
<tr>
<td>Malaysia</td>
<td>• No individual submissions</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>• Links the issue with effective implementation of developing country INDCs (position of the Arab Group)</td>
</tr>
<tr>
<td>Sudan</td>
<td>• Developing and developed countries to cooperate&lt;br&gt;• Developing country actions should build on Technology Needs Assessments and Technology Action Plans&lt;br&gt;• Developed countries should have obligations in promoting, facilitating and financing&lt;br&gt;• Has proposed text on a strategy to guide the Technology Mechanism&lt;br&gt;• The Agreement should define and provide further guidance to the TEC and CTCN</td>
</tr>
</tbody>
</table>

4.2.4.4 Analysis of Group and Country Positions

Technology development and transfer is one of the topics the LMDC coalition has a strong opinion about, and several proposals to the 2015 Agreement. The group considers
technology to be one of the key issues enabling the implementation of climate change actions in developing countries, and that developed countries should provide support in this field, including through a specific window for technology under the Green Climate Fund.

The LMDC coalition suggests developing an international mechanism on intellectual property rights, an idea not receiving much support from Annex I countries. The group also suggests provisions in the Agreement against arbitrary, unjustified, or disguised trade restrictions. Especially the two biggest countries in the LMDC group, China and India, are advocating addressing the issue of IPRs; the other countries assessed in this report do not mention this issue in their submissions. Also the idea of creating a separate window for technology under the GCF seems to come from these two largest countries. The other assessed members of the group stress more the role of the existing Technology Mechanism, consisting of the Technology Executive Committee and the CTCN. This reflects also the differences and dynamics inside the group – the countries have different priorities depending on their size and their level of development.

When looking at the Article 7 (Technology development and transfer) of the first draft agreement text provided by the Co-Chairs on 5 October 2015\(^{93}\), it seems that most of the LMDC group proposals are not included, and thus the group could be unhappy with the Co-Chairs approach. The draft text does not include wording on IPRs or trade restrictions, but does include that developing countries would be eligible for support in the field of technology and that the Technology Mechanism will serve the 2015 agreement. The draft agreement text also states that the first Conference of Parties of the new agreement (the “CMA”) shall consider and adopt a technology framework, which could (depending on further negotiations on the issue) also include some of the issues proposed by the LMDC group.

### 4.2.5 Capacity building

#### 4.2.5.1 Introducing the Issue

Capacity building has been part of the UNFCCC negotiating process since its inception in early 1990s. Capacity building has long been recognized in the Convention’s work on such issues as national communications, greenhouse gas inventories, technology transfer and adaptation. In 2001, the COP adopted two frameworks that address the needs, conditions and priorities of developing countries and countries with economies in transition in decisions 2/CP.7 (Marrakesh Accords, includes framework on developing country capacity building) and 3/CP.7 (capacity building in countries in transition). Since the adoption of the frameworks in 2001, countries continued to implement or enhance capacity building activities at the individual, institutional and systemic levels. In 2009 capacity building was introduced in the ADP negotiating process, and the Durban Forum on Capacity-building was established in 2011.\(^{94}\)

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\(^{93}\) http://unfccc.int/resource/docs/2015/adp2/eng/8infnot.pdf

\(^{94}\) http://unfccc.int/cooperation_and_support/capacity_building/items/1033.php
In the negotiations for the 2015 Agreement many developing country parties have underscored that their enhanced climate change actions will depend on Means of Implementation (MOI) provided by developed countries, which includes capacity building. The Co-Chair’s Tool from July 2015 reaffirms that capacity-building shall be guided by the framework for capacity-building in developing countries established by the Marrakech Accords.

4.2.5.2 Position of the LMDCs

According to the LMDC coalition, capacity building should be delivered upon the request of the developing country Parties and as identified by them as necessary, and with respect to all actions that may be undertaken by developing country Parties under the Convention. In the group’s view capacity building to strengthen capacities and enable development of technologies must be enhanced; it must be effective and sustained over the long term until developing country Parties have acquired the capacity to fully implement climate change actions under the Convention. Capacity building should be demand-driven and be financed and supported by developed country Parties. The LMDC group has also stated in its submissions that capacity building should not be focused only on mitigation or enhancing MRV of mitigation. Capacity-building to enable absorption and development of technologies must be enhanced. Special focus for these kinds of capacity building activities should be provided to LDCs and African countries.

The LMDC group thinks that provisions to enhance action on capacity building in developing countries should include:

a) Specific and quantified commitments from developed country Parties to provide adequate and predictable financing and technology for capacity building for developing countries that require it, with the financing to be channelled through the GCF.

b) Establishing an international capacity building mechanism that would be funded by the GCF, and whose operations are linked to the work of the TEC and the adaptation institutions. Capacity building could include human skills training for planning, implementation, and domestic institution building, as well as technology innovation and development of endogenous technology. There could also be an evaluation mechanism to assess the effectiveness of the delivery of capacity building to developing countries.

In the February 2015 Geneva session the LMDC group emphasized that a capacity-building mechanism should be based on sharing experiences, lessons learned and best practices on capacity building.

95 LMDC submission on Elements of the 2015 agreed outcome, June 2014
96 LMDC submission to ADP Workstream 1, November 2013
97 LMDC submission on Elements of the 2015 agreed outcome, June 2014
98 IISD Earth Negotiation Bulletin, Geneva ADP2.8 Summary
Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDC coalition and the selected LMDC member countries on capacity building in the Paris outcome, including relevant institutions and mechanisms, are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Countries</th>
<th>Capacity building actions</th>
<th>Institutions and mechanisms</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Demand-driven: to be delivered upon the request</td>
<td>• Financing to be channelled through the GCF</td>
</tr>
<tr>
<td></td>
<td>• Long term and to deal with all actions under the Convention</td>
<td>• Establishing of an international capacity building mechanism. Its operations are linked to the work of the TEC and the adaptation institutions.</td>
</tr>
<tr>
<td></td>
<td>• Quantified commitments with evaluation mechanism from developed countries</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Should not focus solely on mitigation and MRV of mitigation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Underlines the needs of LDCs and African countries regarding capacity building on technology absorption</td>
<td></td>
</tr>
<tr>
<td>Argentina</td>
<td>• Private funding for capacity building should be complementary to public funding (statements in Lima COP-20)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Demand-driven: parties to identify their own capacity caps</td>
<td></td>
</tr>
<tr>
<td>China</td>
<td>• All Parties need to enhance their action on capacity building to address climate change</td>
<td>• Establishing an international capacity-building mechanism</td>
</tr>
<tr>
<td></td>
<td>• Developed countries should provide support in all areas of capacity building to developing countries</td>
<td>• A separate window for capacity building under the GCF</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Creation of a capacity-building body or center to e.g. provide a more structured and holistic approach to capacity building</td>
</tr>
<tr>
<td>Ecuador</td>
<td>• No individual submissions</td>
<td></td>
</tr>
<tr>
<td>India</td>
<td>• No individual submissions</td>
<td></td>
</tr>
<tr>
<td>Iran</td>
<td>• No individual submissions</td>
<td></td>
</tr>
<tr>
<td>Malaysia</td>
<td>• No individual submissions</td>
<td></td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>• Calls for a governing body to coordinate capacity-building efforts (Bonn, June 2015)</td>
<td></td>
</tr>
<tr>
<td>Sudan</td>
<td>• Calls for a coordinated approach on adaptation and mitigation actions, finance and technology</td>
<td>• Proposes a permanent Capacity Building Committee to review and assess delivery of capacity</td>
</tr>
</tbody>
</table>
4.2.5.4 Analysis of Group and Country Positions

Capacity building is among the important issues for the LMDC coalition, as it is seen by most developing countries as a central means to implement their mitigation and adaptation actions. Capacity building is one of the issues in the Paris negotiations that clearly enjoys a much higher priority among non-Annex I countries than Annex I countries.

The LMDC coalition seems to coordinate the positions on capacity building among the group and chooses to speak more with “one voice” about this issue than in individual country submissions, as most of the assessed countries have not addressed the issue in their own submissions, but the LMDC submissions are lengthy on this issue. The only LMDC country that has touched this issue in its own submissions is China, who is an advocate of the new Capacity Building Mechanism proposed by the LMDCs. It can be estimated from this perspective, that China had been one of the driving forces behind much of the LMDC position on the issue of capacity building, in addition to Sudan, which has a leading role also in the African Group.

The proposal of the LMDC coalition about setting up a Capacity Building Mechanism has made its way as an option (Option 2) in Article 8 on capacity building of the Co-Chairs draft agreement text from 5 October. Also otherwise the LMDC positions are quite well taken into account in the draft text, compared to e.g. their positions on technology development and transfer.

4.2.6 Transparency

4.2.6.1 Introducing the Issue

Transparency refers to Parties’ obligations to report and communicate their efforts to implement the UNFCCC and possible new agreement. In the Paris negotiations, proposals have been made to improve transparency both regarding mitigation as well as with respect to support provided to developing countries. A closely related concept is monitoring, reporting and verification (MRV), which can relate to mitigation, adaptation as well as means of implementation. Under the current UNFCCC system, MRV is differentiated between Annex I and non-Annex I countries. Transparency is a key element in all reporting under the UNFCCC and in the forthcoming 2015 Agreement.

Reporting requirements for Annex I Parties under the Convention include greenhouse gas inventories annually and national communications every four to five years, as well as biennial reports on the progress of achieving emission reductions and providing support to non-Annex I Parties. There is also an International Assessment and Review process for developed countries under the Subsidiary Body for Implementation, which started in
2014. The process consists of two steps: technical review of national reports by each developed country, followed by Multilateral Assessment (MA) of progress toward achieving the country's economy-wide mitigation target.

Reporting for developing countries is implemented through national communications and biennial update reports (BURs). Developing country Parties are required to submit their national communications every four years (conditional on provision of resources). The first BUR should be, consistent with the Party's capabilities or level of support provided, submitted by December 2014, and every two years thereafter. LDCs and SIDS may submit BURs at their own discretion. The reports are considered at the international level through a process known International Consultation and Analysis (ICA). The process includes two steps, starting with a technical analysis of the BUR conducted by a team of technical experts and ending with a facilitative sharing of views among Parties.

In the ADP negotiating text (FCCC/ADP/2015/1), issues related to transparency are addressed under the title 'transparency of action and support.' This highlights the fact that especially for non-Annex I countries, negotiations on transparency are not confined to reporting on mitigation, but they also include financial, technological and capacity-building support provided by developed countries as an essential component.

With respect to detailed proposals in the ADP negotiating text, the relevant section is lengthy. It includes a range of proposals on whether the transparency framework for action and support should be common to all Parties or differentiated, for example, between developed and developing countries, or between countries in new or existing annexes. There are numerous proposals concerning the role of expert review and existing arrangements as well as applicable methodologies and metrics. Proposals are also included on developed country reporting and review on the provision of support to developing countries.

4.2.6.2 Position of the LMDCs

According to the LMDCs, transparency of action and support will be a key element of the Paris outcome. Under the Convention, Articles 10.2(a), 10.2(b), 12.1, 12.2 and 12.3 provide the basis for transparency in a manner that is differentiated between developed and developing country Parties. Enhancing transparency of the implementation of Annex I Parties' mitigation commitments should be on the basis of enhanced procedures for comparability (e.g. more frequent reporting, standardized format, common accounting framework with common base year and expressed in tons of CO$_2$e, projections of emission trajectories/pathways). Transparency of non-Annex I Parties' mitigation actions can be done in accordance with current procedures set up under in the Cancun Agreements (1/CP.16) and Durban decisions (2/CP.17), as these involve new procedures and mechanisms that should be given the opportunity to be fully implemented.99

The LMDC coalition states also that provisions on the MRV of support provided by developed country Parties to developing countries should be an integral part of the 2015 agreed outcome. Such an MRV mechanism for the provision of support is a key element

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99 LMDC submission on Elements of the 2015 agreed outcome, June 2014
in ensuring that finance and technology commitments are being fulfilled by Annex II Parties and that there is a comparability of such efforts.\(^{100}\)

The LMDC coalition wishes a differentiated MRV system, with different rules for developed and developing countries. In Lima COP20 the LMDCs called for text in the 2015 Agreement on a common methodology for MRV of support by developed countries; a strengthened review of MOI support; and a financial channel under the GCF for MRV-related capacity building in developing countries.\(^{101}\) In the February 2015 Geneva session the LMDC group called for a finance registry and using a common format for reporting on finance.\(^{102}\) In the Bonn ADP 2.10 session the LMDC group presented a proposal reflecting that the extent to which developing countries can implement MRV arrangements will depend on financial support from developed countries.\(^{103}\)

### 4.2.6.3 Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDC coalition and the selected LMDC member countries on transparency in the Paris outcome are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Country</th>
<th>Inventories, mitigation &amp; adaptation</th>
<th>Support to developing countries</th>
</tr>
</thead>
</table>
| **LMDC group**| • Transparency is a key element of the Paris outcome  
• Transparency needs to be differentiated between developed and developing country Parties  
• Annex I Parties’ mitigation commitments: enhanced procedures for comparability  
• Non-Annex I Parties’ mitigation actions: to be done in accordance with current procedures | • MRV of support is an integral part of the 2015 agreed outcome  
• Common methodology for MRV of support by developed countries  
• Strengthened review of MOI support  
• Financial channel under the GCF for MRV-related capacity building in developing countries  
• Calls for a finance registry and using a common format for reporting on finance  
• Extent to which developing countries can implement MRV arrangements will depend on financial support |
| **Argentina** | • Cautions against a bias towards mitigation  
• Is in favor of for maintaining the differentiation and the existing “two- | |

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100\textit{Ibid.}
101\textit{IISD Earth Negotiations Bulletin, COP20 Summary}
102\textit{IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary}
103\textit{IISD Earth Negotiations Bulletin, Bonn ADP 2.10 Summary}
<table>
<thead>
<tr>
<th>Country</th>
<th>Preparations and Views</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolivia</td>
<td>• No individual submissions</td>
</tr>
<tr>
<td>China</td>
<td>• Different rules for developed and developing country Parties&lt;br&gt;• Enhanced reporting by developed countries on mitigation and support through national communications, BRs and ICA, as well as Kyoto Protocol rules; common templates and rules applicable to all developed countries&lt;br&gt;• With support from developed countries, developing countries enhance transparency of their reporting through national communications, BURs, registry and ICA in a manner that is non-intrusive, non-punitive and respects national sovereignty&lt;br&gt;• Multilateral assessment of support with compliance consequences</td>
</tr>
<tr>
<td>Ecuador</td>
<td>• Robust mechanisms for compliance, accountability and transparency</td>
</tr>
<tr>
<td>India</td>
<td>• MRV requirements in relation to Annex I mitigation&lt;br&gt;• MRV requirements in relation Annex II provision of finance and technology</td>
</tr>
<tr>
<td>Iran</td>
<td>• No individual submissions</td>
</tr>
<tr>
<td>Malaysia</td>
<td>• No individual submissions</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>• Supports including MRV provisions in the 2015 Outcome&lt;br&gt;• MRV to be built on current practices and methodologies&lt;br&gt;• Enhancing the level of reporting and review should be self-determined&lt;br&gt;• Adaptation measures should be reportable under both the National Communications and the BURs&lt;br&gt;• To enhance MRV for mitigation, Parties need to consider reporting with accountability pursuant to the ICA and the International Assessment and Review (IAR)</td>
</tr>
<tr>
<td>Sudan</td>
<td>• Supports integration of already agreed reporting systems into the 2015 Agreement&lt;br&gt;• For Non-Annex I Parties they form sound platform for transparency</td>
</tr>
</tbody>
</table>
4.2.6.4 Analysis of Group and Country Positions

Compared with Annex I submissions, the LMDC coalition and other non-Annex I submissions place more emphasis on MRV of means of implementation than on MRV of mitigation. The LMDC group and its members assessed in this report are of the view that transparency needs to be differentiated between developed and developing country Parties, contrary to most Annex I country positions that call for a common reporting and review framework for all Parties in the Paris agreement.

The question concerning differentiation and the emphasis to be given MRV of action and MRV of support can be expected to be difficult in context of the transparency framework in the Paris negotiations. The draft agreement in Co-Chairs’ non-paper from October 2015 envisages a transparency system applicable to all Parties “in a flexible manner and taking into account their differing capacities.” Each party would provide regular information on through a national GHG inventory, implementation of the nationally-determined mitigation commitment/contribution, information on climate change vulnerability and actions taken to address this, as well as support provided, domestic enabling environments and support received. The paper will be considered by the Parties for the first time later in October. The Co-Chair’s “flexibility” view of transparency is not fully in line with the position of the LMDC coalition, which demands differentiated MRV processes for the Annex I and non-Annex I Parties, maintaining the division of the Convention and the already agreed reporting systems. However, the Co-Chairs also mention that the support provided to developing countries should be transparent, which is along the lines of the LMDC position.

4.3 Some Specific Issues in the Negotiations

There are also other important issues in the negotiations, than those agreed in the negotiating mandate. Many of these issues can be crucial to achieving an Agreement in Paris, such as the equity and responsibility issues.

4.3.1 Interpretation of Equity and Responsibility in the Post-2020 Period

4.3.1.1 Introducing the Issue

The principle of common but differentiated responsibilities and respective capabilities (CBDRRC) is included in Convention Article 3.1 and has played an important role in the UNFCCC regime. It is reflected in the differentiation between Annex I (developed) and non-Annex I (developing) countries. Reflecting the CBDRRC, the 1997 Kyoto Protocol imposed legally-binding emission reduction targets only on Annex I countries.
There is broad agreement among Parties that the CBDRRC along with other principles of the Convention remains relevant in the post-2020 period. There are, however, several proposals to adopt an evolutionary or dynamic interpretation of the CBDRRC and reconsider differentiation among countries taking into account economic and other developments since the early 1990s. In contrast, some Parties emphasize the need to retain the Convention’s current structure and annexes.

4.3.1.2 Position of the LMDCs

According to the LMDC coalition, equity is a cornerstone of the Convention, and all provisions of any agreement that will be adopted in 2015 shall have to ensure equity. The group has stated in 2014 that developed country Parties shall commit in the 2015 agreed outcome to take the lead in fully implementing the Convention in the pre- and post-2020 periods, and that “applicability to all” does not mean uniformity, but differentiation in application according to the provisions and principles of the Convention. According to the group’s statement, the current Annexes to the Convention should remain valid, as they are a reflection of responsibilities for historical emissions. The group thinks that these historical responsibility considerations continue to be as valid today as they were in 1992 when the Convention was adopted, because the underlying economic and emissions conditions among Parties have not substantially changed; developed countries still continue to have the highest emissions per capita and largest share of global income. The LMDC group thinks that the concepts or approaches such as “evolving CBDR” or “Parties in a position to do so” are not consistent with the principles of the Convention and are not acceptable.

For non-Annex I Parties, “national determination” of their contributions with respect to adaptation, mitigation, capacity building, and sustainable development should reflect the diversity of their respective national development conditions and circumstances. It should also take into account that as developing countries continue to pursue their overriding priority of socio-economic development and poverty eradication, their emissions will most likely grow.

4.3.1.3 Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDC group and the selected LMDC group member countries on equity and responsibility in Paris outcome are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>Country</th>
<th>Interpretation of Equity and Responsibility</th>
</tr>
</thead>
</table>
| LMDC group | • Equity is a cornerstone of the Convention. All provisions of any agreement shall have to ensure equity  
| | • Developed country Parties shall commit to take the lead in fully |

104 LMDC submission on Elements of the 2015 ADP Agreed Outcome, June 2014
105 LMDC submission to ADP Workstream 1, March 2013
106 Iran on behalf of LMDC opening words in ADP Bonn June 2015
107 LMDC submission to the ADP on elements of 2015 agreement, March 2014
implementing the Convention in the pre-and post-2020 periods

- “Applicability to all” does not mean uniformity, but differentiation in application according to the provisions and principles of the Convention
- Current Annexes should remain valid, as they are a reflection of responsibilities for historical emissions. Underlying economic and emissions conditions have not substantially changed
- “Evolving CBDR” or “Parties in a position to do so” are not acceptable
- For non-Annex I Parties, “national determination” of their contributions reflecting respective national development conditions and circumstances
- As developing countries continue to pursue their priority of socio-economic development, their emissions will grow

<table>
<thead>
<tr>
<th>Country</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Argentina</strong></td>
<td>Historical responsibility shall be firmly sustained in the 2015 Agreement. Full application of CBDRRC is fundamental</td>
</tr>
<tr>
<td>Bolivia</td>
<td>Defends the integrity of Mother Earth and the right of developing countries to development</td>
</tr>
</tbody>
</table>
| China | Paris outcome must be in line with Convention’s principles, and the current annexes continue to apply  
- In its Joint Presidential Statement with the US, China affirms its commitment to reach an ambitious agreement in 2015 that reflects the “principle of CBDRRC, in light of different national circumstances.”[108] |
| Ecuador | Collective action based on equity in the use of the global atmospheric space  
- Recognition of the historical responsibility and the right of developing countries to achieve their economic development in a sustainable manner  
- Recognition that the eradication of poverty, and a development based on equity and solidarity, are the legitimate priorities |
| India | Outcome must be built on equity and CBDRRC  
- Actions and commitments must be differentiated on the basis of equity in terms of historical responsibilities and the needs for social and economic development and poverty eradication |
| Iran | Need to reflect equitable principles of the Convention, particularly CBDRRC.  
- Calls for Enhanced action in the context of sustainable development  
- Reminds that developing countries have already undertaken ambitious domestic actions including on mitigation and adaptation |
| Malaysia | Need to reflect the principles and provisions of the Convention, particularly the principle of CBDR  
- Phrases “evolving CBDR”, “Parties in a position to do so”, “single transparency system” or “mitigation-centric cycle” are not consistent with the principles of the Convention and are not acceptable |

### 4.3.1.4 Analysis of the Group and Country Positions

Equity issues and responsibility of causing climate change are among the issues the LMDC group is most passionate about, and there their views most differ from those of the large Annex I Parties. This is also seen from the fact that all assessed LMDC countries have made submissions or statements about this issue, which is not the case of most topics discussed in this report.

Most Annex I Parties wish to move forward from the early 1990s differentiation of countries to Annex I and non-Annex I, and are wishing to remove or move those boundaries. However, the LMDC coalition is of the opposite view, and thinks that the concepts or approaches such as “evolving CBDR” or “Parties in a position to do so” are not consistent with the principles of the Convention and are not acceptable. This could become a major area of disagreement in the Paris negotiations. One major country in the LMDC group, China, has however in its other statements, such as the Joint Presidential Statement with the US, indicated its willingness to move to a concept of CBDRRC “in light of different national circumstances”. This could mean that the more wealthy developing countries could take on different commitments than the lower-income countries. This seems to be an issue where there is some emerging divergence of views inside the LMDC coalition.

The LMDC group members generally share the view that the developed (Annex I) countries have caused the phenomenon of climate change, and thus should be responsible for fixing the problem. Especially Bolivia is vocal about this topic. The LMDCs in general are looking more at historical emissions than future emissions, which are increasing rapidly in the developing world, and will cause an increasing share of global warming in the coming decades. A comprehensive climate agreement in Paris should take into account this development in order for the world to have possibilities to reach the 2°C target, and thus this polarized issue is one of the key areas a common understanding between the Annex I countries and the LMDCs is needed.

<table>
<thead>
<tr>
<th>Country</th>
<th>Calls for reflecting CBDRRC and equity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Saudi Arabia</td>
<td>• Sees that the 2015 Agreement should be under the Convention and in accordance with its principles, especially CBDRRC and equity.</td>
</tr>
<tr>
<td></td>
<td>• Recognition of sustainable development, gender issues, and poverty eradication</td>
</tr>
<tr>
<td></td>
<td>• Agreement should reinforce a fair, multilateral rule-based regime that brings to effect the right to equitable access to sustainable development</td>
</tr>
<tr>
<td>Sudan</td>
<td>• Atmospheric space has not being used in an equitable manner</td>
</tr>
<tr>
<td>Venezuela</td>
<td>• 2015 Agreement should enhance transformation towards an equitable, just and sustainable society</td>
</tr>
</tbody>
</table>

4.3.1.4 Analysis of the Group and Country Positions

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4.3.2 Land use and forests

4.3.2.1 Introducing the Issue

Article 4.1(a) of the UNFCCC identifies further commitment to develop, periodically update, publish and make available to the Conference of the Parties, in accordance with Article 12, national inventories of anthropogenic emissions, including land use and forestry, not controlled by the Montreal Protocol, using methodologies agreed upon by the Conference of the Parties. Over the past ten years, the methodologies have been implemented using guidance originating from SBSTA sessions, and have evolved, along with guidance coming from the IPCC.

Decision 18/CP.8 stipulates that Annex I Parties shall apply the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories for preparing annual inventories under the Convention, due since the year 2004. In the following year Decision 13/CP.9 requested Annex I Parties to the Convention to apply the Good Practice Guidance for LULUCF for preparing annual inventories. Following further guidance developed under the IPCC, most recent guidance Decision 24/CP.19 stipulates that Parties included in Annex I should apply the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The same decision encourages Annex I Parties to use the “2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands” in preparing their annual inventories under the Convention due in the year 2015 and beyond.

In addition to proving and agreeing on guidance for measuring emissions from land under the Convention, Parties who have signed onto the Kyoto Protocol are also required to report information under the Kyoto Protocol (Articles 3.3 and 3.4) during a commitment period, supplementary to the information reported under the Convention (Article 4.1(a)).

Under the Kyoto Protocol, Parties annually report emissions resulting from:

- LULUCF activities under Article 3.3, namely afforestation, reforestation and deforestation that occurred since 1990.
- Any elected human-induced activities under Article 3.4, which can be: forest management (mandatory in the second commitment period), revegetation, cropland management and grazing land management.

Unlike the Convention, which includes all emissions and removals from LULUCF in a Party’s total emissions (Land based accounting), the Kyoto Protocol restricts the accounting of the LULUCF sector to emissions and removals from specific activities (Activity based accounting) that are defined under Article 3, paragraphs 3 and 4, of the Protocol.

The IPCC recently confirmed in the Fifth Assessment Report\textsuperscript{109} (AR5) that tropical deforestation and forest degradation represent ‘the largest and most variable single contributor’ to emissions from land use change and that the ‘AFOLU (Agriculture, Forestry

and Other Land Use) sector accounts for about a quarter (~10-2GtCO2eq/yr) of net anthropogenic GHG emissions mainly from deforestation, agricultural emissions from soil and nutrient management and livestock’.

As reported in both the Technical Paper on ‘Investment and financial flows to address climate change: an update’ FCCC/TP/2008/7 and the UNEP ‘Emissions Gap 2012’ report, the mitigation potential in the forestry sector by 2020 in developing countries is equivalent to approximately 4.2 Gt CO2 annually. In addition, as highlighted by Houghton110 “no other processes or procedures alone have the potential for stopping and reversing the accumulation of CO2 in the atmosphere at the speed necessary to stabilize concentrations at 450 ppm or less.

REDD+ is one of the more advanced negotiation processes under the UNFCCC, mainly because there has been a good amount of progress in SBSTA on guidance and modalities for reporting, linked to the IPCC. This has placed REDD+ in a unique position, because it has an internationally acceptable framework, which sets it up to achieve results based payments. Without these guidance and modalities agreed already, the future role of REDD+ would be in question.

There are proposals, for example, by the Coalition of Rainforest Countries, which represents the position of DRC, to specifically integrate REDD+ into the Paris agreement under the ADP. Over the year, it has been taken in and out of the agreement text. It is expected generally by REDD+ countries that Part I of the Paris Agreement needs to be strengthened on REDD+ - reinserting necessary provisions and references to REDD+, as part of the core agreement. The importance of ensuring REDD+ within the core Paris Agreement is that without the specific recognition and high priority on REDD+, the 2 degree pathway will not be able to be met.

For example, DRC would like the following to be reflected in the Preamble: “Reaffirming the critical role played by sinks and reservoirs of greenhouse gases through mitigation actions, including REDD+, to achieve the stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system”

This preamble proposal puts REDD+ very much at the core of the Paris Agreement – without it, the 2 degree pathway cannot be achieved.

Negotiations on REDD originate from COP 11 in 2005. Since then, the COP has adopted a number of decisions on REDD+, including the Warsaw Framework on REDD+ adopted by COP 19 in 2013. Work on REDD+ continues under the Subsidiary Bodies. At the UNFCCC’s most recent intercessional meeting in June 2015, significant progress was made on REDD+ that could potentially become part of a global deal in Paris later this year. In what will become a COP decision, there were three issues that were agreed to:

1. Further guidance on safeguards, that will also see higher levels of financing committed to higher levels of protection;
2. Methodological issues and guidance related to non-carbon benefits (NCBs).
3. Non-market-based approaches, originally introduced by Bolivia. Bolivia’s Joint Mitigation and Adaptation proposal (JMA), would not allow the use of carbon markets. But the decision in Bonn allows all sources of funding, including carbon markets, to be available, and countries are free to choose the source of finance that they want.

Before Paris REDD+ negotiators will be focusing on what elements of REDD+ should constitute the basis of the Paris Agreement, and to a large extent this will rely on the submissions on INDCs.

In addition, there have been some recent submissions through ADP on REDD+ by DRC through the Coalition of Rainforest Nations (CfRN). These positions are very important because they are supported by a number of other REDD+ countries some that are part of G77, LDCs and African Group. These groups (G77, LDCs and African group) do not have a common position on REDD+, or might, support the CfRN position at the last moment. The CfRN submissions are the most influential submissions on REDD+ to the UNFCCC. The following are the most recent proposals under the ADP.

On Mitigation:

**REDD+ and other land use activities and categories** - In meeting their mitigation commitments, Parties may undertake REDD+ and other actions in the land sector in accordance with relevant decisions of the Conference of the Parties and with the provisions on transparency of action and support as contained in section I

On Markets:

Mitigation outcomes that are transferred between Parties to this agreement can be counted towards meeting the commitments contained in NDCs submitted by those participating Parties, in accordance with accounting rules to be developed by the Governing Body. Accounting rules shall ensure environmental integrity, including avoidance of double counting.

The Governing Body of this agreement may define mechanisms applying a baseline/reference level to produce mitigation outcomes that are real, additional, verifiable, and permanent, that can be used to meet NDCs commitments. These mechanisms shall be under the authority of the Governing Body.

On Finance - Anchoring agreed mechanisms and frameworks:

- The specific reference to the Warsaw REDD+ Framework from Part One has been replaced by ‘relevant decisions of the COP’ (para 12 and footnote 22)
- Replacement of the reference to the Warsaw Framework for REDD+ with reference to relevant decisions of the COP proposed by the co-chairs is too vague
- The text on financing for forestry in accordance with prior COP decisions should have a specific reference to REDD+.
4.3.2.2 Position of the LMDCs

The LMDC position makes light reference to forests, however they do see a clear work plan for ADP on the elements of “adaptation, mitigation, forest activities”.

In addition, the role of non-market mechanisms and approaches, including in relation to forests management takes on additional significance and need to be considered and advanced to enhance global mitigation action.

Financial resources shall be channelled also to approaches enhancing international cooperation such as joint mitigation and adaptation approaches on forests through the financial mechanism of the Convention and in particular through the Green Climate Fund.

4.3.2.3 Positions of Selected Countries in the LMDC Coalition

In the below table the main positions of the LMDC coalition and the selected LMDC member countries on land use and forests are summarized. The more detailed positions, including the sources of information, are listed in Annex 1.

<table>
<thead>
<tr>
<th>LMDC group</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>• Support forestry under NAMAs framework</td>
</tr>
<tr>
<td>Bolivia</td>
<td>• Joint Mitigation and Adaptation Mechanism is needed in order to promote the establishment of non-market based approaches for sustainable management of forests.</td>
</tr>
<tr>
<td></td>
<td>• Agreement must give full acknowledgement to non-carbon benefits from forests</td>
</tr>
<tr>
<td></td>
<td>• Recognises and supports the efforts of indigenous peoples and local populations collective action to strengthen local institutions regarding integral and sustainable management of forests and forest landscapes</td>
</tr>
<tr>
<td></td>
<td>• Convert REDD+ market based approach into non-market based approach</td>
</tr>
<tr>
<td></td>
<td>• Establish a forest mitigation and adaptation window under the GCF</td>
</tr>
<tr>
<td></td>
<td>• External public funds transfer through GCF</td>
</tr>
<tr>
<td>China</td>
<td>• No submissions</td>
</tr>
<tr>
<td>Democratic Republic of</td>
<td>• The Warsaw REDD+ Framework should be at the foundation of a REDD+ mechanism in the 2015 agreement, including both the methodological, financial and institutional elements.</td>
</tr>
<tr>
<td>Country</td>
<td>Notes and Recommendations</td>
</tr>
<tr>
<td>-----------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Congo           | • Wetlands are, together with forests, the most important Carbon sink and reservoirs that can be managed, in the short-term, for mitigating and adapting to climate change.  
• In order to achieve coherence, the REDD+ mechanism in the 2015 agreement should guide and eventually absorb and replace some existing multilateral initiatives on REDD+ outside the UNFCCC such as UN-REDD, FCPF, FIP, Interim REDD+ Partnership.  
• The role of wetlands  
• Paris Agreement should guide, absorb and replace multilateral initiatives. |
| Ecuador         | • No individual submission                                                                                                                                                                                                    |
| India           | • No submissions                                                                                                                                                                                                                |
| Iran            | • No individual submission                                                                                                                                                                                                       |
| Malaysia        | • Financial resources shall be channelled also to approaches enhancing international cooperation such as joint mitigation and adaptation approaches on forests through the financial mechanism of the Convention and in particular through the Green Climate Fund |
| Saudi Arabia    | • No individual submission                                                                                                                                                                                                       |
| Sudan           | • Support African group – apply LULUCF rules drawing on REDD+  
• Building on the agreed outcome, and existing mechanisms under the Convention, agreement on:  
• Market and non-market mechanisms,  
• LULUCF rules, based on implementation of REDD+  
• Further guidance to the NAMA Registry,  
• A mechanism for Response Measures in order to enhance environmental integrity and understanding of effort under the agreement |
| Venezuela       | • No individual submission                                                                                                                                                                                                       |

**4.3.2.4 Analysis of Group and Country Positions**

The submissions from the LMDC coalition point to the general role of forests in mitigation, noting that they are not using the language of REDD+ in their joint submission. There are calls for a financial mechanism under the GCF, but unlike a number of other developing countries, the LMDC coalition does not call for a REDD+ window under the GCF.

In 2012, Bolivia made a submission to the UNFCCC on the joint mitigation and adaptation role of forests, and this has gained interest across a number of countries. We see this position is slowly being integrated into the LMDC position, which makes reference to financial resources channelled to joint mitigation and adaptation.

There is dichotomy within the LMDC group, for example, Sudan, which also supports the African Group’s position, support market and non-market approaches for mitigation and...
REDD+. Bolivia has consistently and very famously advocated for the rights of the Mother Earth, and views market based approaches for rewarding carbon sequestration activities from land, as the commoditization of ecosystem services, which to this day, they cannot accept. It should be pointed out that the Cancun Agreements (1/CP.16) came into effect without consensus with Bolivia, a decision at the time, made by the Mexican president, to simply move ahead with agreements on REDD+ without the consensus. Consequently, Bolivia has been advocating joint mitigation and adaptation for forests, under a separate non-REDD+ framework. This has included some good points regarding non-carbon benefits, and the joint mitigation and adaptation role of forests, and these are being reflected in decisions expected to be reached in Paris under the COP.

In contrast to other countries that accept market based mechanisms for forests and REDD+, such as Sudan, Bolivia’s position is that finance should be channelled under non-market based approaches, and Bolivia feels that grants in the form of public finance should come from the GCF for results based payments from forests.

One of the consequences from the Bolivian position is that it has started to create a stronger dichotomy on forests and REDD+ within the negotiations. We see the language of REDD+ toned down and referred to under mitigation, and references to REDD+ under the core agreement moved in and out. The coalition for rainforest nations, the negotiating group representing the interests of REDD+ developing countries will insist a separate reference for REDD+ under the Paris Agreement, but Bolivia (and Saudi Arabia) have a history of attempting to block COP decisions on REDD+. It is possible that Bolivia could make an issue of this in Paris, as their position on joint mitigation and adaptation has been gaining ground, and their position is to transfer the market based approaches for REDD+ into non-market based approaches for joint mitigation and adaptation for the integral and sustainable management of forests.

To conclude, the LMDC position is reshaping the terminologies used within the UNFCCC on forests, and there is specifically no reference to REDD+. There are, of course, LMDC countries that have no objection to REDD+ as a term or concept, and there are no robust objections from the LMDC group, as of yet for including references to REDD+ within an international agreement in Paris. It is important to make this distinction because there are LMDC countries that are also in favor of using REDD+ terminology in the Paris Agreement, but it is not a common LMDC position.

4.3.3 Time frames and process related to commitments/contributions

4.3.3.1 Introducing the Issue

The ADP negotiating text (FCCC/ADP/2015/1) includes a section on time frames and process related to commitments/contributions in the context of the 2015 Agreement. It brings together Parties’ proposals on an assessment and review process for contributions. It also contains various proposals on how contributions will be put forward and renewed over time. In some proposals, contributions are seen as limited in time, e.g.
to 2030, while in others, a very long-term cycle is assumed, review and renewal of contributions e.g. every five years without any specified end date.\(^{111}\)

In the Co-Chair’s Tool from July 2015 there are proposals e.g. that Parties periodically communicate or update their proposed commitments/contributions. Such periodic communications shall take into account national circumstances and factors that affect the national determination of climate actions, such as public policy planning and execution cycles and domestic legislative requirements.\(^{112}\)

### 4.3.3.2 Position of the LMDCs

The LMDC coalition has not done submissions about the issue of time frames, or touched the issue in other submissions to the ADP. In the August-September 2015 Bonn session the LMDC group called for a comprehensive aggregate review, and emphasized that a review of support is key to increasing ambition. The LMDC group also suggested that Parties could decide for themselves on either five- or ten-year timeframes of individual contributions.\(^{113}\)

### 4.3.3.3 Positions of Selected Countries in the LMDC Coalition

<table>
<thead>
<tr>
<th>Country</th>
<th>Time frames for commitments/contributions</th>
<th>Assessment and process</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Parties to decide for themselves on either five- or ten-year timeframes of individual contributions</td>
<td>• Calls for a comprehensive aggregate review&lt;br&gt; • Review of support is key to increasing ambition</td>
</tr>
<tr>
<td>Argentina</td>
<td>• No individual submissions</td>
<td></td>
</tr>
<tr>
<td>China</td>
<td>• 10-year cycle for commitments focusing on enhanced ambition in 2020-2030</td>
<td></td>
</tr>
<tr>
<td>Ecuador</td>
<td>• No individual submissions</td>
<td></td>
</tr>
<tr>
<td>India</td>
<td></td>
<td>• Parties should consider adjustments to their mitigation commitments based on, e.g. historical responsibilities and equitable sharing</td>
</tr>
<tr>
<td>Iran</td>
<td></td>
<td>• Integrated treatment of mitigation, adaptation and the provision of finance, technology development and transfer and capacity building&lt;br&gt; • Process to be conditional on</td>
</tr>
</tbody>
</table>

\(^{111}\) OECD (May 2015): Strategic Review: Implications of Proposals to Date for Mitigation Contributions  
\(^{112}\) Co-Chairs’ Tool: A Non-Paper Illustrating Possible Elements of the Paris Package (July 2015)  
\(^{113}\) IISD Earth Negotiation Bulletin, Bonn ADP 2.10 Summary
4.3.3.4 Analysis of Group and Country Positions

The LMDC group has not been very active around the topic of time frames or the process related to the assessment of the contributions. Most of the individual countries assessed here have not touched the subject in their own submissions. According to the LMDC group, Parties could decide on their own, if they would wish to use 5 or 10 year timeframes for contributions. The group however supports comprehensive aggregate reviews of the contributions, and sees them as key in increasing ambition.

Annex I countries have been much more vocal about the issue of time frames and the review process, and wish to see increasingly ambitious contributions from all Parties at either 5 or 10 year timeframes. The LMDC coalition on the other hand is relatively silent about this topic, seemingly because they do not wish for such demands to apply for them.

The draft agreement in Co-Chairs’ non-paper from October 2015 proposes that successive nationally-determined mitigation contributions/commitments be communicated every five years and that governing body of the new agreement take stock of implementation at regular intervals.

4.3.4 Adaptation - Loss and Damage

4.3.4.1 Introducing the Issue

The COP initiated work on loss and damage as part of the Cancun Adaptation Framework to consider approaches to address loss and damage associated with the impacts of climate change in developing countries. This effort resulted in the Warsaw International Mechanism for Loss and Damage (Decisions 2/CP.19, and 2/CP.20).

The Loss and Damage Mechanism undertakes the following functions:
1. Enhancing knowledge and understanding of comprehensive risk management approaches to address loss and damage associated with the adverse effects of climate change, including slow onset impacts, by facilitating and promoting:
2. Strengthening dialogue, coordination, coherence and synergies among relevant stakeholders by:
3. Enhancing action and support, including finance, technology and capacity-building, to address loss and damage associated with the adverse effects of climate change, so as to enable countries to undertake actions pursuant to decision 3/CP.18, paragraph 6, including by:

In exercising the above functions, the Loss and Damage Mechanism will, \textit{inter alia}:

- Facilitate support of actions to address loss and damage;
- Improve coordination of the relevant work of existing bodies under the Convention;
- Convene meetings of relevant experts and stakeholders;
- Promote the development of, and compile, analyse, synthesize and review information;
- Provide technical guidance and support;
- Make recommendations, as appropriate, on how to enhance engagement, actions and coherence under and outside the Convention, including on how to mobilize resources and expertise at different levels.

The COP also established an Executive Committee to guide the implementation of functions of the Warsaw International Mechanism (WIM). The Executive Committee will report annually to the COP, and the COP will review the Warsaw International Mechanism at its 22nd session (2016). This has some countries quite nervous pre-empting the sunset of the WIM because of the scheduled evaluation in 2016, with so far limited results. Some considerable negotiation time has been taken addressing this concern, and it is driving a number of submissions to the ADP for new institutions.

4.3.4.2 Position of the LMDCs

The LMDC position on loss and damage is based on the LMDC submission 2014 to the ADP. The LMDC submission called for enhanced action to address loss and damage. According to the LMDC group, \textit{Additional to, but separate from, adaptation-related provisions}, there should be a provision that incorporates the Loss and Damage mechanism established at COP19 into the 2015 agreed outcome, and which provides for specific commitments from Annex II Parties to provide support for the financing and operationalization of this mechanism. Operational modalities and institutional arrangements for this mechanism should be made part of the 2015 agreed outcome, recognizing that addressing loss and damage is a challenge that is additional to adaptation.

Enhanced action to address loss and damage requires support for the efficient development and operationalization of approaches to address loss and damage from extreme weather events and slow onset events, including for the establishment of social safety nets and social protection programmes to address damage to or loss of livelihoods associated with the adverse effects of climate change.

At the recent June 2015 UNFCCC negotiations in Bonn, the LMDC position on loss and damage was presented in the Plenary, and notes the multiple challenges in terms of
social and economic development and poverty eradication for developing countries in the face of climate change. The position points out that the countries of the LMDC have undertaken ambitious domestic actions on climate change including on mitigation and adaptation, and in surmounting the losses and damages arising from climate change-related natural disasters, while pursuing various sustainable development pathways and eradicating poverty.

The LMDCs stress that the INDCs by developing country Parties on post-2020 enhanced action, including as appropriate, mitigation, adaptation and addressing loss and damage should be prepared, communicated and implemented in the context of achieving sustainable development and the implementation of Article 4.7 of the Convention.

4.3.4.3 Positions of Selected Countries in the LMDC Group

<table>
<thead>
<tr>
<th>Country</th>
<th>Summary of Loss and Damage Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Calls for enhanced action to address loss and damage, additional to, but separate from adaptation</td>
</tr>
<tr>
<td></td>
<td>• Would like to see specific commitments from Annex II Parties to provide support for the financing and operationalization of the loss and damage mechanism</td>
</tr>
<tr>
<td></td>
<td>• INDCs should address loss and damage</td>
</tr>
<tr>
<td>Argentina</td>
<td>• Loss and Damage should be included in agreement and separated from adaptation.</td>
</tr>
<tr>
<td></td>
<td>• WIM needs to be reinforced in the agreement.</td>
</tr>
<tr>
<td>Bolivia</td>
<td>• Presented position of G77+China on loss and damage</td>
</tr>
<tr>
<td></td>
<td>• Recognition of Loss and Damage can be done in preamble, but recognition would not suffice.</td>
</tr>
<tr>
<td></td>
<td>• Would like to see Loss and Damage in a post 2020 agreement.</td>
</tr>
<tr>
<td></td>
<td>• Would like justification of not including Loss and Damage in the agreement as in their opinion there is scientific data for why this issue should be considered in a durable agreement (post 2020).</td>
</tr>
<tr>
<td>China</td>
<td>• Science is clear why Loss and Damage should be presented as part of the Paris Agreement post 2020.</td>
</tr>
<tr>
<td>Ecuador</td>
<td>• No individual submission, also aligned with G77+China</td>
</tr>
<tr>
<td>India</td>
<td>• No submissions</td>
</tr>
<tr>
<td>Iran</td>
<td>• No individual position</td>
</tr>
<tr>
<td>Malaysia</td>
<td>• No individual position</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>• Support G77+China</td>
</tr>
<tr>
<td></td>
<td>• Loss and damage should be included in the agreement, and in addition, anchor the Warsaw International Mechanism in the agreement.</td>
</tr>
<tr>
<td></td>
<td>• Loss and damage need more deliberation and consideration</td>
</tr>
</tbody>
</table>
### Sudan
- Supports African group, and G77+China positions
- Reaffirms that loss and damage is very critical to the core agreement, so as to specify a linkage between inadequate mitigation ambition with adaptation and loss and damage;
- The agreement is expected to be durable with respect to loss and damage i.e. post 2020.
- The 2015 Agreement should provide for corresponding costs, including investment needs for risk assessment, risk management, insurance and compensation, including the associated overall costs and impacts of the residual damages (occurring in the form of loss and damage)
- An international climate change displacement coordination support mechanism is established.
- A clearinghouse for insurance and risk transfer systems should be established coordinated by the Executive Committee of the Warsaw International Mechanism for Loss and Damage Board

### Venezuela
- No individual submission

### Analysis of Group and Country Positions

The LMDC coalition’s positions have increased their focus on loss and damage over the past year, and the group has to some extent aligned their position with that of the G77+China. In this respect the G77+China position states that loss and damage should be specifically stated and part of the Paris Agreement. The LMDCs support this position such that loss and damage should be specified in the agreement anchored in Warsaw International Mechanism.

The LMDCs, so far, have put emphasis on addressing loss and damage in INDCs. This goes somewhat further, in terms of reporting expectations currently presented under the G77+China position and the African group position.

Sudan, represented by the African Group see a higher profile for loss and damage in the Paris agreement, and there is concern for the durability of loss and damage currently under the WIM. Despite the WIM, there are Parties that share concerns on the role of loss and damage in a post 2020 framework and feel that a separate section for loss and damage beyond adaptation within the Paris Agreement will secure its future. Saudi Arabia specifically noted, as part of a negotiation intervention, that loss and damage still needed more deliberation and consideration, because it lacked definition and clarity.

While there are no strong positions against placing loss and damage in the Paris Agreement, there are a lot of divergences on how, where, and to what extent it should be placed, in light of the existing arrangements under the WIM. This is to a great part, attributed to the fact that there is no common definition of loss and damage; in addition, there is no mention of loss and damage in the Kyoto Protocol or under the Convention. However there are a growing number of positions that are recognizing loss and damage on par with adaptation and mitigation. What started off as a movement by Tuvalu to have loss and damage in the Paris agreement separate and in addition to adaptation, has gained ground with AOSIS, now LDCs, the African Group and even LMDCs.
4.3.5 Carbon pricing and carbon markets

4.3.5.1 Introducing the Issue

The development of market-based mechanisms to enhance the flexibility of meeting emission reduction targets (and, in theory, ambition levels) was a key part of the Kyoto Protocol, which produced three international carbon market mechanisms: the Clean Development Mechanism (CDM), Joint Implementation (JI) and International Emissions Trading (IET). The utility of these mechanisms has fallen significantly in recent years because of both an oversupply from the CDM & JI mechanisms and a sharp in key sources of demand, primarily the EU ETS. With limited participation from developed countries in the 2nd commitment period of the Kyoto Protocol the structure of the flexibility mechanisms is unlikely to be transferred to the Paris Agreement as such.

The most recent “non-paper” released by the co-Chairs of the ADP on 5 October does not provide clarity on the role of carbon markets within the Paris Agreement or supplemental COP decision. Although the use of “internationally transferred mitigation outcomes” are clearly envisaged within the mitigation framework of Article 3, the proposed text provides little detail on the core issues of avoiding double counting, the institutional structure for transfers, the environmental integrity of units and consistent MRV standards. The proposed text does not establish an International Compliance Unit which could build upon the infrastructure developed under the Kyoto Protocol. On the other hand, issues related to the future role of carbon markets are also being negotiated outside the ADP, within the SBSTA under an agenda item related to a Framework for Various Approaches (FVA), including a possible New Market Mechanism (NMM). It is possible that the NMM could facilitate the transfer of units between different countries in the case of the Paris Agreement, after agreement on the details is reached.

4.3.5.2 Position of the LMDCs

The position of the LMDC coalition is that developed countries have a responsibility to undertake mitigation actions and that those actions should be primarily domestic. The corollary of this is that developing countries do not have a mitigation obligation. The LMDC group is also quick to highlight the perceived failures of carbon markets (although arguably this is the market operating efficiently by reflecting the imbalance between supply and demand) and use current price levels to argue that the effectiveness, viability and environmental integrity of market mechanisms for mitigation need to be reviewed and considered with caution. Reflecting the specific national circumstances of certain LMDC members, the role of non-market mechanisms and approaches, including those related to forest management, are advanced as solutions to enhance global mitigation action.  

4.3.5.3 Positions of Selected Countries in the LMDC Coalition

<table>
<thead>
<tr>
<th>Country</th>
<th>Views on carbon markets and carbon pricing</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMDC group</td>
<td>• Developed countries to fulfil their mitigation actions by mostly domestic efforts</td>
</tr>
</tbody>
</table>

114 LMDC submission to ADP Workstream 1, March 2013.
Learn from collapse of the carbon markets: effectiveness, viability and environmental integrity of market mechanisms need to be reviewed
The role of non-market mechanisms and approaches, including those related to forest management, need to be considered and advanced

### Argentina
- Opposes the inclusion of markets in the 2015 Agreement
- Does not accept proposals on market mechanisms in relation to the land-use, maritime transport and aviation sectors

### Bolivia
- Calls for an alternative approach supported by public climate finance
- Market mechanisms would transfer responsibilities to developing countries and the private sector. They would also promote inefficient technologies and increase inequalities. Thus opposes market mechanisms.

### China
- No reason for including a market mechanism in the 2015 Agreement
- If a market mechanism is included, it should be voluntary for developing countries
- Need for eligibility requirements for participating in such mechanism
- Sees carbon markets as a measure to reach its mitigation targets on the national level

### Ecuador
- No individual submission

### India
- Has not submitted its views on carbon markets or carbon pricing
- However, one of the major host countries of CDM projects under the Kyoto Protocol
- Has in place a nationwide carbon tax on coal for 50 rupees/ton of coal produced in and imported to India
- Domestic systems resembling ETS: ‘Perform Achieve and Trade’ (PAT) initiative for energy efficiency; and a Renewable Energy Credit (REC) trading system

### Iran
- No individual submission

### Malaysia
- No individual submission

### Saudi Arabia
- Encourages waiting until the commitments of developed countries are understood and agreed

### Sudan
- Paris negotiations should agree on market and non-market mechanisms

### Venezuela
- No reason for including a market mechanism in the 2015 Agreement
- Trading an “artificially created commodity” can cause the market to collapse, leading to the collapse of the climate system
- Opposes also voluntary cancellation of credits counting as climate finance as it would allow governments to avoid their financial commitments
- If there would be a market mechanism, it would need to be voluntary to use for developing countries, and that there should be eligibility requirements for its use
4.3.5.4 Analysis of Group and Country Positions

The rejection of the “commodification” of carbon is the primary negotiating position of a certain group of LMDCs. As noted by Bolivia in its submission on the NMM in September 2014, this position is based on the following arguments:

a. The establishment of markets in climate change implies the commodification of the environmental functions of Mother Earth;

b. Markets transfer responsibilities of domestic national emission reduction from developed countries to developing countries;

c. Market mechanisms enable double counting of emissions;

d. Market mechanisms replace the obligations of developed countries of providing financing; and

e. Developing countries are co-opted into volatile market that makes uncertain, unpredictable and unsustainable the access to financial resources given the carbon price shocks in those markets.

Although not persuasive to many Parties, the negotiating position of Bolivia (and to a lesser extent Venezuela) has been reflected in the “Non-Paper” by the ADP co-Chairs with option 2 for paragraph 34 of the CMA decision reading “[No text on this mechanism]”. It should also be noted that LMDCs as a wider group are divergently split on this issue and accordingly do not usually express an “LMDC position” on market-related issues.

The selected LMDCs that are the subject of this report are not utilising carbon pricing as a tool to mitigate climate change. This may in part be explained by the limited role they have played in the CDM (with the exception of Malaysia). In total the 8 selected countries have hosted only 266 CDM projects, being 3.3% of the total number of registered projects (8016 at the time of writing) despite collectively representing approximately 2.4 GtCO$_2$e of global emissions.

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116 Argentina (46), Bolivia (6), Ecuador (35), Iran (15), Malaysia (157), Saudi Arabia (5), Sudan (2) and Venezuela (0).

117 CAIT version 2.0, WRI available at http://cait.wri.org/
5. Conclusions

5.1 INDCs

The LMDC coalition has not been very active in submitting Intended Nationally Determined Contributions (INDCs). As of 13 November 2015, only 16 of 26 LMDC members have submitted their INDCs. Of these countries, 7 submitted their intended contribution only after the official Secretariat deadline of 1 October 2015, and thus they were not included in the synthesis report prepared by the Secretariat. The highest emitting country that has not yet submitted its contribution is Iran, also a member of the LMDC coalition.

Also, the INDCs that have been submitted by the LMDC coalition members generally suffer from a lack of data. For example, there is a lack of information on expected business-as-usual emission levels in the INDCs submitted by the Philippines, Ecuador and Algeria, which make it impossible to determine the actual emission development of these countries under the targets expressed in the INDCs. In many cases, including for Bolivia and Mali, the mitigation targets are for one sector or some sectors only, and do not give an overall picture of the emissions of the whole economy.

However, there are also positive surprises, such as Dominica’s absolute reduction target against the 2014 base year, although conditional to international finance. It is also rather surprising that countries such as Ecuador and Bolivia have even submitted INDCs, both with unconditional emission reduction targets, as especially Bolivia has been vocal about the responsibility of the developed countries in mitigating climate change, and Ecuador is promoting an alternative oil tax approach to financing mitigation actions in developing countries. Also Saudi Arabia’s contribution can be seen as a turning point in the country’s relations to the UNFCCC negotiations, even though the INDC is conditional and somewhat vaguer than would be expected from a country with such high financial resources.

5.2 LMDC coalition dynamics and positions for the Paris Agreement

Concerning the Paris agreement, all LMDCs agree and have repeatedly emphasized that the 2015 agreement should be under the UNFCCC, building on its provisions and principles. The CBDRRC and equity are particularly important in this respect. The coalition is also uniform in its emphasis on the need to retain the traditional interpretation of the CBDRRC, including the distinction between Annex I and non-Annex I countries. At the same time, the bilateral US-China joint announcement on climate change from November 2014 contained new language combining the CBDRRC with language on

118 The 26 LMDC members include: Algeria, Argentina, Bolivia, Cuba, China, Democratic Republic of the Congo, Dominica, Ecuador, Egypt, El Salvador, India, Iran, Iraq, Kuwait, Libya, Malaysia, Mali, Nicaragua, Pakistan, Philippines, Qatar, Saudi Arabia, Sri Lanka, Sudan, Syria and Venezuela.

119 http://unfccc.int/focus/indc_portal/items/9240.php
“different national circumstances.” This language was subsequently included in the Lima Call for Climate Action (Decision 1/CP.20). Thus, despite the fact that the LMDCs have repeatedly voiced very strong positions on the CBDRRC and equity in the formal UNFCCC negotiations, there may be scope for some compromises.

Concerning the form of the Paris outcome, LMDCs as a coalition have not put forward a clear position on what type of instrument(s) they would like to see. Some coalition members, India and Saudi Arabia in particular, have been reserved on the issue, arguing that the legal form should be discussed only once substance has been agreed. China has been more open, supporting a binding agreement as part of the outcome. Most LMDCs have, in their individual submissions, supported legally-binding, top-down commitments for Annex I countries in terms of mitigation and means of implementation. The coalition also agrees that all elements included in the ADP’s negotiating mandate (mitigation, adaptation, finance, technology development and transfer, transparency and capacity building) should be treated in a balanced manner and have the same legal nature in the final outcome.

On mitigation, a key common element in the LMDC position is continued differentiation between Annex I and non-Annex I countries in the Paris outcome. Accordingly, Annex I countries should take comparable and legally-binding, economy-wide emission reduction targets. Mitigation actions by non-Annex I countries depend on support provided by Annex II countries; for LMDCs, insufficient support from developed countries is a fundamental problem in the current UNFCCC regime that should be addressed through the Paris agreement. At the same time, the importance various LMDC members attach to detailed aspects of mitigation in the post-2020 regime is not the same. For Bolivia, the idea of Mother Earth and the concept of a global emissions budget rank high on the agenda, while Saudi Arabia gives more emphasis on response measures.

The LMDC coalition, so far, however has refrained from putting forward common language and terminologies on adaptation, suggesting that there is no convergence on the issue yet within the coalition that consists of extremely broad and diverse interests on the subject. However, the LMDCs are the only coalition to outline and propose a method that would provide (and commit) Annex II Parties to financial commitments to the GCF for adaptation. Whether or not this position will be acceptable to Annex II Parties is another issue; however the message from the LMDC group is clear - the LMDC group would like to raise the ambition and priority of adaptation to equal that of mitigation, and see it reflected in the Paris Agreement.

The need for enhanced climate finance is a key element in the LMDC position in the negotiations for the Paris agreement; it is central, overarching theme in the Paris outcome with clear links to mitigation by non-Annex I countries. For the LMDCs, the Paris agreement must address what the coalition sees as fundamental shortages in the current regime both in terms of the scale of support provided and its predictability. Overall, climate finance is an area where LMDCs views seem fairly uniform within the coalition and also tend to come very close to those of other non-Annex I countries even if some differences between more conservative and progressive developing countries are visible. The contrast between LMDC views and developed country views is, however, particularly manifest.

In addition to finance, the LMDCs consider the other means of implementation for their mitigation and adaptation actions, namely technology development and transfer and
capacity building, among most important issues in the Paris agreement. Regarding the issue of technology, the LMDC coalition suggests e.g. developing an international mechanism on intellectual property rights (IPRs) and creating a separate window for technology under the GCF, ideas not receiving much support from Annex I countries. Especially China and India are advocating these proposals. Overall, divides between Annex I and LMDC countries over technology seem fairly large. Linking the Technology Mechanism to the Paris agreement and continuing cooperation through the existing institutions possibly holds some potential for finding a compromise solution, and this has also been reflected in the Co-Chairs draft agreement text from 5 October. Regarding capacity building, the LMDC proposal about setting up a Capacity Building Mechanism has made its way as an option in the draft agreement text.

Regarding land use and forests, the LMDC position is reshaping the terminologies used within the UNFCCC on forests, and there is specifically no reference to REDD+. There are, of course, LMDC countries that have no objection to REDD+ as a term or concept, and there are no robust objections from the LMDC group, as of yet for including references to REDD+ within an international agreement in Paris. It is important to make this distinction because there are LMDC countries that are also in favor of using REDD+ terminology in the Paris Agreement, but it is not a common LMDC position. Bolivia has made its own submission on forests for joint mitigation and adaptation, and one of the consequences from the Bolivian position is that it has started to create a stronger dichotomy on forests and REDD+ within the negotiations. We see the language of, and references to, REDD+ somewhat diminished in prominence and referred to under mitigation, and references to REDD+ under the core agreement moved in and out throughout this long negotiation process.

Time frames and the process related to contributions are not high on the LMDC agenda, as the coalition has not done any submissions about the issue, and has only lightly touched it in recent negotiations. According to the coalition, Parties could decide for themselves on either five- or ten-year timeframes of individual contributions. However, the Co-Chairs draft agreement text from October proposes a fixed five year time frame for contributions.

The LMDC positions have increased their focus on loss and damage over the past year, and have to some extent aligned their position with that of the G77+China. While there are no strong positions against placing loss and damage in the Paris Agreement, there are a lot of divergences on how, where, and to what extent it should be placed, in light of the existing arrangements under the WIM.

Regarding carbon markets, the rejection of the "commodification" of carbon is the primary negotiating position of a certain group of LMDCs, especially Bolivia and Venezuela. These countries also think that market mechanisms would transfer mitigation responsibilities from developed to developing countries, and from the public to the private sector, which they do not accept. On the other hand, African countries such as Sudan would wish to see a carbon market mechanism in the Paris agreement. It should also be noted that LMDCs as a wider group are divergently split on this issue and accordingly do not usually express an “LMDC position” on market-related issues.
Annex 1. Country positions on some key issues

Legal form and general views of the Paris Agreement

Argentina: Argentina has not lately made own submissions about the 2015 Agreement, but has participated in the submissions of the LMDC group and the Group of G77 and China. In its last individual submission, on views of the ADP workplan in 2012, Argentina states that the 2015 outcome should follow the objective, principles and provisions established by the UNFCCC, and take fully into account the specific needs and special circumstances of developing countries. In Argentina's view developing country actions are subject to receiving proper support from the developed countries in terms of financial resources, technology transfer and capacity building. Argentina supports legally binding commitments for Annex I Parties, but does not specify what the legal form of the whole 2015 outcome should be. In the February 2015 Geneva session Argentina stressed that the ADP’s work must be in line with the Convention and its principles, reflecting CBDRRC and, in a balanced manner, all elements agreed in the negotiation mandate. Argentina also indicated that the land-use sector should be excluded from the Agreement.

Bolivia: In Bolivia’s view the 2015 Agreement must be fully consistent with the principles and provisions of the UNFCCC, including differentiation between developed and developing countries. Bolivia states that in order for developed countries to take the lead in combating climate change, the 2015 Agreement needs to take the top-down approach of the Kyoto Protocol, which implies the distribution of a “global emission budget” between developed and developing country parties based on the operationalization of the principles of equity and CBDR. Bolivia is also part of the ALBA group, whose views are stated below in the section for Venezuela.

Ecuador: Ecuador is on the view that “under the Convention” means that all its principles and provisions shall apply in the work of the ADP for the 2015 outcome. In Ecuador’s view there cannot be the same mandatory nature of obligations for both developing and developed countries, since this is clear in the Convention. The 2015 outcome should

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120 Argentina’s submission about Views on ADP workplan, April 2012
121 IISD Earth Negotiation Bulletin, Geneva ADP 2.8 Summary
122 Bolivia’s submission to the ADP on Global Emissions Budget, November 2014
contribute to strengthening the multilateral regime under the Convention, and cover all interrelated issues: adaptation, mitigation, finance, technology transfer and capacity building, under a shared vision that recognizes the needs of present and future generations, and the rights of nature. Ecuador states that developed countries need to take legally binding commitments through a top-down approach. Ecuador also states that the work of the ADP must only advance once there are assurances and legal proof that the second commitment period has been fully realized and ratified by all Parties as soon as possible.

**Iran:** Iran gave the opening speech in Bonn June 2015 session on behalf of the LMDC group. In its speech Iran stated that it looks forward to an agreed outcome in Paris that addresses all the six core elements from the Durban mandate in a balanced manner, reflects the equitable principles of the Convention, particularly the principle of CBDR, and will result in enhanced action in the context of sustainable development in implementing the UNFCCC both before and after 2020.

**Malaysia:** In the Geneva session Malaysia, for the LMDC group, underscored that the Paris outcome must enhance the implementation of “the already long-lasting and durable” Convention, and not replace it. Malaysia also called for shifting focus from the different nature of adaptation and mitigation to a balanced and holistic treatment of all elements of the Agreement.

**Saudi Arabia:** According to Saudi Arabia, the 2015 Outcome should include an enabling provision that would require all Parties to submit INDCs. However, the 2015 Outcome would provide expressly that the INDCs themselves are not legally binding. Therefore, a Party’s INDCs would not be “anchored” in, nor would they be considered as an “integral part” of, the 2015 Outcome. The country states that the preamble to the 2015 Outcome should be short and focused on the objective of the Convention and its principles, including the continuing relevance and applicability of the Convention. Saudi Arabia believes that the Kyoto Protocol preamble can serve as a model for the 2015 Outcome preamble, and that the Outcome does not need a “General/Objective” section. In Lima COP20 Saudi Arabia stressed the equal importance of adaptation and mitigation in the 2015 Outcome. In the February 2015 Geneva session Saudi Arabia, for the Arab Group, emphasized that the Agreement’s legal nature should not be discussed ahead of agreement on the substance.

When commenting the Co-Chair’s Tool from July 2015 Saudi Arabia (on behalf of the Arab Group) stated that the following paragraphs are more appropriately placed in the Agreement, and thus should be moved to Section A of Part One:

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123 Ecuador’s submission to ADP workstream 1, March 2013
124 Ibid.
125 Ibid.
126 IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary
127 Submission by the Kingdom of Saudi Arabia on the Way Forward for ADP 2.10, July 2015
128 IISD Earth Negotiations Bulletin, Summary of COP20
129 IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary
Sudan: Sudan, on behalf of the African Group, wants the 2015 Agreement to be under the Convention and in accordance with its principles and provisions, most importantly the CBDRRC and equity. The Agreement should provide parity between adaptation and mitigation, noting the increased burden for adaptation from inadequate mitigation efforts. The Agreement should have a global goal for adaptation, and an international obligation for Annex II Parties to provide scaled-up climate finance to developing countries.\textsuperscript{131}

Sudan states that from the African Group’s perspective, the 2015 Agreement should reflect the following elements:

- Definitions to minimise ambiguity on terms reflected in the agreement
- Preamble, covering the context and legal basis of the agreement, with affirmation of the agreement being under the Convention and thus its principles and provisions (including its annexes) shall apply;
- General aggregate commitments (aggregate emission reduction goal; a goal for adaptation; and quantified goals for the associated finance and technology), reflecting global objectives as agreed/to be agreed, including mechanisms for ensuring fair and adequate contributions to the global effort;
- Record of specific commitments by Parties in line with their Convention obligations, including mitigation, adaptation, finance, technology development and transfer, capacity-building and transparency of action and support;
- Elaboration of how operational mechanisms for finance, adaptation, and mitigation, technology development and transfer, transparency of action and support, and capacity-building, including those under the Convention, will support the delivery on the agreed general and specific commitments;
- Definition of accountability, compliance provisions as well as review process for the implementation of general and specific commitments, including adequacy of the operational mechanisms;
- Agreement on other considerations, including adoption, amendment, entry into force, reservation and options.\textsuperscript{132}

The African Group also supports that the 2015 Agreement should integrate mechanisms and institutions built under the Bali Roadmap, to support the delivery of commitments by various Parties. These include the mechanisms for adaptation, finance, technology,
capacity building, and the mitigation related instruments on markets, response measures, and transparency. The group sees the operationalisation of these mechanisms as an enabling confidence builder in the multilateral system for the 2015 Agreement. 133

Venezuela: In the Bonn June 2015 session Venezuela held an opening speech on behalf of the ALBA group (Cuba, Bolivia, Dominica, Ecuador, Nicaragua and Venezuela). According to Venezuela, ALBA is committed to reach an Agreement that takes effect in 2020 to limit emissions of greenhouse gases and achieve less than 1.5°C global warming, considering that in COP-21 the other Parties are committed to this objective. According to ALBA, the Agreement to be reached in Paris should strengthen the existing climate change regime: the UNFCCC and its Kyoto Protocol, not to replace it. The provisions of the UNFCCC should be taken into account in the Agreement, and differentiation should be based on the principle of CBDR, recognized by the Convention. 134

In Lima COP20 Venezuela suggested addressing “the elephant in the room,” namely that one set of parties seeks a mitigation-based outcome and another feels it should be based on all the elements of the Bali Action Plan. Venezuela also opposed reference in the preambular paragraphs of the Agreement to the catalyzing role of sub-national authorities in enhancing the impact of implementation of policies on reducing emissions and vulnerability, and building resilience.

Mitigation

Argentina: Argentina stated in 2012 that developing countries have undoubtedly demonstrated their efforts in combating climate change through the implementation of voluntary mitigation actions, while most developed countries are reluctant to exercise the leadership assigned to them by the Convention in combating climate change. Argentina has been especially unimpressed that many Annex I Parties are not taking part in the second commitment period of the Kyoto Protocol. Argentina supports legally binding commitments for Annex I Parties and voluntary actions for non-Annex I Parties.

Bolivia: Bolivia has proposed that mitigation commitments should be based on a “global emissions budget” approach, where the remaining emission budget is divided between Parties. In Bolivia’s view, the effort to share the remaining global emissions budget should be based on the implementation of a “Compound Index of Countries Participation in the Global Emissions Budget”. The compound index of countries participation in the global emission budget would consider the integration of the following indexes:

- Index of Historical Responsibility
- Index of Ecological Footprint
- Index of Capabilities (technological and financial)
- Index of the State of Development: including multidimensional poverty, poverty by income, and
  index of human development (SDI).

133 African Group submission to ADP Workstream 1, April 2013
134 Venezuela on behalf of ALBA group, ADP opening words, Bonn June 2015.
This method implies that countries with higher historical responsibility, higher ecological footprint, higher capabilities, and higher state of development, will also have a lower share in the emissions budget. In the February 2015 Geneva session Bolivia stressed the need for inclusion of alternative, non-market, and joint mitigation and adaptation approaches, and for adding text on “the protection and integrity of Mother Earth.”

Bolivia has also suggested that the 2015 Outcome should establish a new “Mechanism for Climate Resilience and Sustainable Development” in order to enhance mitigation and adaptation actions, and sustainable development. The main outcomes of the Mechanism would be related to the generation of mitigation actions jointly with adaptation co-benefits, addressing issues of sustainable development and poverty eradication in a comprehensive manner. The Mechanism would be oriented to support developing country parties. The mitigation and adaptation outcomes could be monitored through proxies, indicators and standards as appropriate. The Mechanism would develop its work in a sectoral and programmatic approach, considering all sectors of the economy, including energy, industry, human settlements and infrastructure, among others, in accordance with national circumstances and priorities of Parties.

**Ecuador:** According to Ecuador, the ADP needs to take into account a new consideration regarding mitigation, in that way it needs to achieve a net balance reduction and avoidance of greenhouse gas emissions, at the national and global levels. In Ecuador’s view, policies and measures to address climate change should take into account different socio-economic contexts, be comprehensive, and cover all relevant sources and sectors, sinks and reservoirs of greenhouse gases.

**Iran:** No own submissions.

**Malaysia:** No own submissions.

**Saudi Arabia:** In Lima COP20 Saudi Arabia said that the country will not support the new agreement if it does not adequately address the issue of response measures.

**Sudan:** The African Group supports a differentiated approach across all mitigation elements (form of commitment, counting, accounting, adequacy and fairness, compliance) as per relevant Convention principles and provisions. According to the Group, developed countries should commit to absolute and economy-wide emission reduction commitments (covering all sectors and gases), and to zero-carbon emission pathways. For Annex I parties there should be a quantification of their global carbon budget at the start of any commitment period to meet the agreed global goal. In the group’s view developing countries should commit to relative emission reductions, including through Nationally Appropriate Mitigation Actions (NAMAs). For non-Annex I

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135 Bolivia’s submission to the ADP on Global Emission Budget, November 2014
136 IISD Earth Negotiation Bulletin, Geneva ADP 2.8 Summary
137 Bolivia’s submission to the ADP on a Mechanism for Climate Resilience and Sustainable Development, June 2014
138 Ecuador’s submission to the ADP Workstream 1, March 2013
139 IISD Earth Negotiation Bulletin, COP20 Summary
Parties there should be an aggregate consideration of contributions, and consideration for available support.¹⁴⁰

**Venezuela:** No own submissions.

**Adaptation**

**Argentina:** Support the G77+China position. In addition, Argentina further reiterates that national communications are quite difficult, and that the reporting burden needs to be kept in mind with respect to an agreement on adaptation – no new reporting burdens. Argentina would like to see the current text nourished with many parts of the Geneva text. Argentina is in favour of using language that connects long term vision with the principles of the convention and should be science based. On institutions, includes reference to including and strengthening existing institutions such as the Adaptation Committee and Adaptation Fund. Argentina is concerned about adaptation commitments under the convention. They note that common but differentiated responsibilities should be linked with commitments of support, and that there should be provisions that include enhancing developing country adaptation actions. Adaptation should also be viewed in relation to poverty eradication. Finally, there needs to be reference to MRV of support.

**Bolivia:** Bolivia is negotiating adaptation on behalf of the G77+China group and therefore most recent view is presented above under G77+China. In addition, Bolivia specifically points out that - Traditional indigenous knowledge should be integrated into adaptation. Integrating best available science requires a great deal of capacity, it is not simple.

**Ecuador:** No individual position presented.

**Iran:** No individual position presented.

**Malaysia:** No individual position presented.

**Saudi Arabia:** Support the LMDC position and the G77+China position. Build on existing institutions for adaptation. The country recommends against reporting obligations in the text. Are not in support of placing human rights language within the context of adaptation and would prefer such language in the context with the general objective in the Agreement

**Sudan:** Supports G77+China. What countries do for adaptation should be consistent with the Convention. Sudan noted the common point of agreement between parties to, in general, raise the profile of adaptation in the Paris Agreement, and that they key word of “planning”, should be in the long term vision for adaptation.

**Venezuela:** No individual position presented.

¹⁴⁰ African Group submission to ADP on mitigation, June 2014
ALBA: In addition to the above, three countries of the report analysis group – Bolivia, Ecuador and Venezuela, support the position of the Alianza Bolivariana para los Pueblos de Nuestra América (ALBA) group. The ALBA group support the positions of G77+China and the LMDC position. According to ALBA, adaptation to climate change is a central theme within the future international climate regime, given the high vulnerability of countries developing. Adaptation must understand the needs and priorities of sectors in national development, and work towards eradication of poverty. ALBA would like to see balance between mitigation and adaptation.

ALBA urges the developed countries to provide the necessary financial resources for the Adaptation Fund of the Convention and to maintain operational implementation of the Green Climate Fund. The funding issue is undoubtedly one of the most important, to be channelled through the institutions created under the Convention. The agreement must be legally binding for all countries and should consider monitoring and verification of compliance with objectives (adaptation, compensation for loss and damage and emissions reduction) and goals (provision of funding and technology transfer).

G77+China: The LMDC’s most recent submissions and positions support the G77+China. The most recent position on adaptation by the G77+China, was represented by Bolivia at the Intersessional in Bonn (13th August-4th September). The position put forward was that adaptation must be in the Paris Agreement. The Paris Agreement needs to link the appropriate institutions to adaptation and how these institutions will coordinate work on adaptation, but at this issue, specific prescriptive points on this should be done in drafting (in upcoming sessions). The G77+China noted that adaptation is a continuous, reiterable long term process and this needs to be based on national circumstances. There needs to be flexibility in any communication requirements cognizant of the different outputs and outcomes that come from the process of adaptation.

During the recent intersessional in Bonn (August 31st – September 4th) in addition to discussing institutions for adaptation, there was a focus on the reporting expectations, which are often linked with the finance. The G77+CHINA position cited that National Adaptation Plans need to be referred to, but should not be exclusive. It should be noted that national communications can be a helpful tool, but they are also difficult in terms of their reporting requirements. Technical Needs Assessments (TNAs) for adaptation have not been getting the support that they deserve, and consequently technical transfer for adaptation has been limited so far. There is a need to strengthen knowledge management and research which should be encouraged and supported by finance.

With respect to language on how adaptation would read in the Paris Agreement, the G77+CHINA have not yet committed to language on a global goal for adaptation or long term vision, and would prefer to leave the issue open for the moment.

141 Submission by Bolivia and Venezuela on Behalf of ALBA. 1st June 2015.
Finance

Argentina: According to Argentina’s submission in 2012 Annex I and II Parties have achieved significant levels of development at the cost of serious disturbances to the atmosphere, thus generating a historical environmental debt towards developing countries. In Argentina’s view developed countries should redouble their efforts in terms of financial and technological resources to comply with articles 4.3, 4.5 and 4.7 of the Convention. According to Argentina the commitments announced in Copenhagen, Cancún and Durban are insufficient and imprecise.\(^{142}\)

Bolivia: Bolivia has proposed the Global Emissions Budget approach (see above in Mitigation section). In Bolivia’s view using the “Compound Index of Countries Participation in the Global Emissions Budget” allows implementing in a comprehensive manner the Article 4.7 of the Convention, which means providing support from developed countries to developing countries (through finance, technology transfer and capacity building) for using their remaining share of emissions with a view of building their sustainable development pathway and achieving poverty eradication goals.\(^{143}\) In the February 2015 Geneva session Bolivia, on behalf of the G77 and China, suggested that the finance section of the 2015 Agreement should be arranged in clusters on, e.g. scale of resources, assessment and review, and sources of finance.\(^{144}\) In the Bonn June 2015 session Bolivia said finance is among the overarching goals of the 2015 Agreement, and should be reflected in all relevant sections of the text.\(^{145}\)

Ecuador: No own submissions.

Iran: No own submissions.

Malaysia: No own submissions.

Saudi Arabia: In the Geneva session Saudi Arabia, for the Arab Group, stated that financing should be primarily public, including grant-based finance.\(^{146}\)

Sudan: According to Sudan (on behalf of the African Group), financial resources to be provided under the 2015 Agreement should be based on a quantified target that is in line with the 2 degrees goal, and the finance should be transparent. In Sudan’s view the lack of a clear collective pathway to reach the $100 billion goal by 2020 is a major concern for developing countries. According to the Africa Group the level of finance should increase to about US$ 600 per year by no later than 2030. Sudan also states, similarly to the LMDC group, that any commitment in mitigation by developing countries should be balanced by a commitment on finance and technology transfer by developed countries.\(^{147}\) The African Group stresses that public sources are the main source of finance, but notes

\(^{142}\) Views on ADP workplan, including submission by Argentina, April 2012
\(^{143}\) Bolivia’s submission to ADP on Global Emissions Budget, November 2014
\(^{144}\) IISD Earth Negotiation Bulletin, Geneva ADP 2.8 Summary
\(^{145}\) IISD Earth Negotiation Bulletin, Bonn June 2015 Summary
\(^{146}\) Ibid.
\(^{147}\) Sudan on behalf of the African Group submission to ADP on finance, June 2014
that the scale of resources needed and the type of investments required will make it necessary for governments to work more closely together with the private sector. Private sector investors, such as banks, pension funds and insurance companies, already constitute important sources of climate finance, however there is significant potential to increase their roles in generating revenues for projects and in developing countries. Different sources of finance need to be considered based on clear criteria to avoid incidence on developing countries, and clarify the sources' sustainability, predictability and additionality.\textsuperscript{148}

According to Sudan, adaptation finance should be given a priority and fair share in line with its importance and priority for developing countries. Finance should be based on criteria, meaning that each continent gets it share in line with the challenges it is facing, so fair allocation to Africa should be ensured in line with its adaptation needs and mitigation potential. Sudan also believes that Parties must promote country ownership through enhancing direct and facilitated access to resources, enhancing national needs assessments, while promoting continuous follow up of such assessments. Also the role of the Standing Committee of Finance should be strengthened, in particular on the assessment of needs related to finance and reporting on the disbursement and evaluation and analysis of the financial flows.\textsuperscript{149}

Sudan (on behalf of the African Group) proposed on December 2014 that the financial mechanism of the Convention shall serve as the financial mechanism of the 2015 legal agreement. The related funds established under the Kyoto Protocol under the financial mechanism of the Convention shall also serve as instruments of the legal agreement. This will also apply to all rules and guidelines developed by the COP and CMP in relation to the operation of the financial mechanism, its operating entities, and associated Funds, as well as to decisions related to the transparency and MRV of support.\textsuperscript{150}

**Venezuela:** No own submissions.

**Technology**

**Argentina:** Argentina has not covered the issue of technology in its own submissions to the ADP, but in Lima COP-20 Argentina stated that technology transfer should proceed under the principles and provisions of the Convention, and that there should be differentiated obligations for developed and developing countries regarding technology-related commitments. Argentina also preferred anchoring institutional arrangements on technology in the TEC and CTCN.\textsuperscript{151}

\textsuperscript{148} Sudan on behalf of the African Group submission to ADP on finance, December 2014

\textsuperscript{149} Sudan on behalf of the African Group submission to ADP on finance, June 2014

\textsuperscript{150} Sudan on behalf of the African Group submission to ADP on finance, December 2014

\textsuperscript{151} IISD Earth Negotiations Bulletin, COP20 Summary
Bolivia: In the February 2015 Geneva session Bolivia emphasized technology originating from indigenous peoples and local communities.\(^{152}\)

Ecuador: No own submissions.

Iran: No own submissions.

Malaysia: No own submissions.

Saudi Arabia: In the February 2015 Geneva session Saudi Arabia, for the Arab Group, called for linking technology to the effective implementation of developing country INDCs.\(^{153}\)

Sudan: Sudan, on behalf of the African Group states that both developing and developed countries need to cooperate in the development, application and diffusion of technologies, including technology transfer. Developing country actions should build on Technology Needs Assessments and Technology Action Plans for mitigation and adaptation, and there should be recognition of such actions. Developed countries should have obligations in promoting, facilitating and financing the transfer of and access to technologies by developing countries. The Agreement should define and provide further guidance to the TEC and CTCN.\(^{154}\) In the Geneva session Sudan, for the African Group, called for a technology framework to consider technology needs assessments, research and development and enabling environments.\(^{155}\) In the June 2015 Bonn session Sudan, for the African Group, proposed text on such framework for scaling up technology development and transfer, explaining it would provide a strategy to guide the Technology Mechanism.\(^{156}\)

Venezuela: No own submissions.

**Capacity building**

Argentina: In COP20 in Lima Argentina stated that Argentina said private funding for capacity building should be complementary to public funding, and that Parties should identify their own capacity caps.\(^{157}\)

Bolivia: No own submissions.

Ecuador: No own submissions.

\(^{152}\) IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary

\(^{153}\) Ibid.

\(^{154}\) Sudan on behalf of African Group submission on Workstream 1 elements, May 2014

\(^{155}\) IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary

\(^{156}\) IISD Earth Negotiations Bulletin, Bonn June 2015 Summary

\(^{157}\) IISD Earth Negotiation Bulletin, COP20 Summary
Iran: No own submissions.

Malaysia: No own submissions.

Saudi Arabia: In the June 2015 Bonn session Saudi Arabia called for a governing body to coordinate capacity-building efforts.\(^{158}\)

Sudan: The African Group states that capacity building is cross-cutting in nature, and as such requires a more coordinated approach with a view of strengthening both the ability and effectiveness of specific adaptation and mitigation actions aimed at implementing objectives of the Convention. In the Group’s view this is the rationale for capacity building being treated as a stand-alone chapter in the Agreement. Also the links between capacity building and other mechanisms of the Convention, such as adaptation, mitigation, finance and technology, should be clearly defined in the 2015 Agreement.\(^{159}\)

The African Group proposes a permanent Capacity Building Committee, addressing:

- MRV of support received for capacity building against needs identified by Parties, such that capacity is not a barrier to implementation beyond 2020
- Provision for the critical assessment of implementation of the effectiveness of capacity building interventions.

The institutional arrangements should be established at the earliest, and their operation should begin well ahead of 2020 to make sure that capacity gaps at all implementation levels: i.e. individual, institutional and enabling environment does not become a barrier during the implementation phase of the 2015 Agreement.\(^{160}\)

Venezuela: No own submissions.

Transparency

Argentina: In Lima COP20, when discussing the scope of MRV, Argentina cautioned against a bias towards mitigation. Argentina also emphasized differentiation in MRV, calling for maintaining the existing “two-track” approach.\(^{161}\)

Bolivia: No own submissions.

Ecuador: In Ecuador’s view it will be important to develop robust mechanisms for compliance, accountability and transparency so that the Agreement is not a new instrument that “will once again not be fulfilled”. Ecuador sees that the situation we are facing now with the Kyoto Protocol not only weakens the multilateral system, but puts at

\(^{158}\) IISD Earth Negotiation Bulletin, Bonn June 2015 Summary

\(^{159}\) African Group ADP 2.5 statement on capacity building, June 2014

\(^{160}\) African Group ADP 2.5 statement on capacity building, June 2014

\(^{161}\) Ibid.
In Lima COP20 Ecuador called for adopting an MRV mechanism as part of the 2015 Agreement to increase transparency.

**Iran:** No own submissions.

**Malaysia:** No own submissions.

**Saudi Arabia:** Saudi Arabia supports including MRV provisions in the 2015 Outcome. Any provisions related to MRV should be built on current practices and methodologies under the Convention, the Cancun Agreements and the Kyoto Protocol. In Saudi Arabia's view, enhancing the level of reporting and review of an individual Party's implementation of its mitigation and adaptation INDCs should be self-determined and based on the procedures provided for under the Convention and relevant COP decisions, taking into account improvements that reflect the agreed outcome in Paris. To enhance MRV for mitigation, Parties need to consider reporting under the Convention, the Cancun Agreements, and the Kyoto Protocol, with accountability pursuant to the ICA and the International Assessment and Review (IAR) processes. Adaptation measures should be reportable under both the National Communications and the BURs. Any accountability should be carried out under a national review process. International assessment can be performed for Parties utilizing the Consultative Group of Experts model.

**Sudan:** The African Group supports integration of the reporting systems already agreed under the Convention into the 2015 Agreement. The provisions for National Communications, BURs, the IAR and the ICA would provide a sound platform for transparency in the Agreement through facilitative compliance. According to the African Group, the periodic review starting in 2013-15 provides a basis from which a review mechanism under the 2015 Agreement should be premised, with the objective of assessing the adequacy of the long term global goal, as well as the progress towards achieving the commitments. In Lima COP20 The African Group emphasized gaps in developed countries’ MRV frameworks on markets and LULUCF.

**Venezuela:** No own submissions.

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**Equity and responsibility post-2020**

**Argentina:** In its submission in 2012 Argentina states that the principle of historical responsibility shall be firmly sustained in the 2015 Agreement as one of the ways to ensure that developing countries can continue their development processes, especially in regard to the eradication of poverty and promotion of social inclusion. In Argentina’s view...
Annex I Parties should strive to implement policies and measures in such a way as to minimize adverse effects developing countries, including adverse effects of climate change, effects on international trade and social, environmental and economic impacts.\textsuperscript{167} In it INDC Argentina states that climate change increases inequalities that already exist among countries, creating a new barrier for the development of countries. Thus the full application of the principle of CBDRRC is fundamental to the success of the Paris Agreement.\textsuperscript{168}

**Bolivia:** In the ADP 2.10 session in Bonn, Bolivia together with Venezuela supported referring to the integrity of Mother Earth and the right of developing countries to development.\textsuperscript{169}

**Ecuador:** According to Ecuador, climate change is a global problem that requires collective action based on equity in the use of the global atmospheric space, the recognition of the historical responsibility of developed countries in terms of their greenhouse gas emissions and the respect to the right of developing countries to achieve their economic development in a sustainable manner. In Ecuador’s view it should be recognized that the eradication of poverty, and a development based on equity and solidarity, are the legitimate priorities of developing countries. Any activity to combat climate change must include upgrading the quality of life, the life expectancy, as well as increasing the capabilities and potential of the population within the framework of the principles and rights.\textsuperscript{170}

**Iran:** Iran delivered the opening statement of the Bonn June 2015 session on behalf of the LMDC group. In the statement Iran said that Paris should reflect the equitable principles of the Convention, particularly the principle of common but differentiated responsibilities, and will result in enhanced action in the context of sustainable development in implementing the UNFCCC both before and after 2020. Iran also reminded that, despite the multiple challenges that developing countries continue to face in terms of social and economic development and poverty eradication, they have undertaken ambitious domestic actions on climate change including on mitigation and adaptation.\textsuperscript{171}

**Malaysia:** Malaysia delivered the opening statement of the Bonn August-September 2015 session on behalf of the LMDC group. In this statement Malaysia stressed that both the Agreement and the COP decision need to reflect the principles and provisions of the Convention, particularly the principle of CBDR. In its speech Malaysia reminded that a single climate-related disaster can set back development progress of developing countries by years or decades. Malaysia also stated that the concepts or approaches such as “evolving CBDR”, “Parties in a position to do so”, “single transparency system” or

\textsuperscript{167} Argentina’s submission about views on the ADP workplan, April 2012\textsuperscript{168} Argentina’s Intended Nationally Determined Contribution, October 2015\textsuperscript{169} IISD Earth Negotiation Bulletin, ADP 2.10 Summary\textsuperscript{170} Ecuador’s submission to ADP Workstream 1, March 2013\textsuperscript{171} Iran on behalf of the LMDC, ADP opening speech in Bonn June 2015 session
“mitigation-centric cycle” are not consistent with the principles of the Convention and are not acceptable. Therefore these concepts must be removed from the Agreement text.\textsuperscript{172}

**Saudi Arabia:** In the Bonn ADP 2.10 session Saudi Arabia called for reflecting CBDR and equity in the objective of the Agreement. Saudi Arabia also called for replacing gender equality with “gender responsiveness” and opposed inclusion of human rights in the objective section without qualification.\textsuperscript{173}

**Sudan:** Sudan on behalf of the African Group sees that the 2015 Agreement should be under the Convention and in accordance with its principles, especially CBDRRC and equity.\textsuperscript{174} Sudan also states that the 2015 Agreement should include recognition of sustainable development, gender issues, and poverty eradication that are the priorities for Africa and other developing countries. Therefore the Agreement should reinforce a fair, multilateral rule-based regime that brings to effect the right to equitable access to sustainable development, further recognizing the developmental context of environmental policies. In Sudan’s view standards applied by some countries may be an inappropriate and/or unwarranted economic and social cost to other countries, in particular developing countries, in line with the principles and provisions of the Convention.\textsuperscript{175}

**Venezuela:** Venezuela held an opening speech in the Bonn June 2015 session in Spanish, on behalf of the ALBA group. In this speech Venezuela stated that the 2015 Agreement should not reinvent the Convention principles (including CBDRRC), but to enhance transformation towards an equitable, just and sustainable society in harmony with the cycles of nature. In Venezuela’s view this transformation must also be fair and equitable rather than deepen existing inequalities. According to Venezuela the atmospheric space is not being used in an equitable manner, as all countries have not contributed the same amount of global greenhouse gas emissions, and all countries should thus not have the same level of compliance to limit these emissions.\textsuperscript{176}

**Time frames and process for assessment of contributions**

**Argentina:** No own submissions.

**Bolivia:** No own submissions.

**Ecuador:** No own submissions.

**Iran:** Iran stated in its opening speech in Bonn June 2015 that increasing ambition includes holistically reflecting the integrated treatment of mitigation, adaptation and the

\textsuperscript{172} Malaysia on behalf of the LMDC, ADP opening speech in Bonn ADP 2.10 session

\textsuperscript{173} IISD Earth Negotiation Bulletin, ADP 2.10 Summary

\textsuperscript{174} Sudan on behalf of the African Group, opening speech in Bonn ADP 2.10 session

\textsuperscript{175} Sudan on behalf of the African Group submission to ADP on Elements of Agreement, May 2014

\textsuperscript{176} Venezuela on behalf of ALBA group opening speech in Bonn June 2015 session
provision of finance, technology development and transfer and capacity building support to developing country Parties. In the February Geneva session Iran indicated that the cycle process has to be conditional on support from developed countries.

**Malaysia:** No own submissions.

**Saudi Arabia:** According to Saudi Arabia (on behalf of the Arab Group), the following paragraphs listed in the Agreement text in the Chair’s tool from July 2015 are more appropriately placed in a COP Decision and thus should be moved to Section J of Part Two:

- Timing of communications
- Upfront information
- Adjustments
- Housing
- Maintaining a schedule
- Periodic updating
- Conduct of review / assessment
- Periodic review.

In the Geneva session Saudi Arabia, for the Arab Group, emphasized that the cycles must be linked to reviewing ambition and implementation of all six elements under the Durban mandate, and called for differentiation in the cycle for developing countries. Saudi Arabia also highlighted the complementary nature of mitigation, adaptation and MOI, stressing that cycles should take into account all these elements.

**Sudan:** No own submissions.

**Venezuela:** No own submissions.

### Land use and forests

**LMDC:** The scope must include the following elements: mitigation, adaptation, forest activities, finance, technology development and transfer, loss and damage, transparency of action, and support and capacity-building. It also must build on the achievements under the Bali Action Plan and the Kyoto Protocol in enhancing the implementation of the Convention. In this context, the work of the ADP should build on and be informed by the work of the subsidiary bodies and other relevant bodies of the Convention and its Kyoto Protocol, without duplicating the work or renegotiating the outcomes of these bodies.

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177 Iran on behalf of LMDC opening speech in Bonn June 2015
178 IISD Earth Negotiation Bulletin, Geneva ADP 2.8 Summary
179 Saudi Arabia in behalf of Arab Group submission to ADP on Co-Chair’s Tool, August 2015
180 IISD Earth Negotiation Bulletin, Geneva ADP 2.8 Summary
181 Philippines on behalf of the LMDC Group, Submission on the ADP Work Plan, 13th March 2013
Another important lesson to take stock of is the current collapse of the carbon markets. In this light, the effectiveness, viability and environmental integrity of market mechanisms for mitigation need to be reviewed and considered with caution, especially proposals for their expansion. The role of non-market mechanisms and approaches, including in relation to forests management takes on additional significance and need to be considered and advanced to enhance global mitigation action.

The ADP must have a full and comprehensive discussion, as part of its work, on the application and operationalization of the principle of equity. Other issues of great importance to developing countries, include the use of non-market approaches to the reduction of emissions such as those related to forest activities.

Bolivia\(^\text{182}\); The Bolivian Submission to the UNFCCC on Non-market based approaches in the context of policy approaches and positive incentives on issues relating to REDD+: Joint mitigation and adaptation mechanism for the integral and sustainable management of forests, is a long submission consisting of the following chapters:

1. Background
2. Rio +20 United Nations Conference on Sustainable Development
3. The needs for a Joint Mitigation and Adaptation mechanism
4. The development of different approaches in the context of Dec. 2/CP.17
5. The joint mitigation and adaptation mechanism as a non-market based approach
6. Comparison between approaches: REDD+ and JMA for the integral and sustainable management of forests
7. Forest Mitigation and Adaptation Window to be established under the GCF
8. JMA approach for the integral and sustainable management of forests at the national level

The Bolivian position under the UNFCCC is driven by all elements, and the history of the formulation of the document is given. In 2010 and to this current day, the Plurinational state of Bolivia has questioned the implementation of REDD+ market based schemes. They question the linking of forests to global carbon markets for ethical reasons since this authorizes the effective conversion of Mother Earth, considered sacred by Bolivian Society, into a commercial commodity, thus allowing the transfer of responsibilities for mitigation of climate change from developed to developing countries, fostering the alter to continue subsidizing the former.

Bolivia’s proposal for Joint Mitigation and Adaptation is driven by the IPCC’s Fourth Assessment Review (AR4) – the report highlights the impact of climate change on forest ecosystems and new findings indicate that negative impacts may be stronger than previously projects, particularly in South America. In addition, Bolivia note that it has been agreed to consider ecosystem based adaptation with forest links under

\(^{182}\) UNFCCC (2012) Non-market based approaches in the context of policy approaches and positive incentives on issues relating to REDD+: Joint mitigation and adaptation mechanism for the integral and sustainable management of forests. Submission by the Plurinational State of Bolivia to the UNFCCC. https://unfccc.int/files/bodies/awg/application/pdf/adp2_workstream2_panel_bolivia.pdf
SBSTA. Therefore they see that the circumstances are ripe for proposing Joint Mitigation and Adaptation in the context of forests.

The Bolivian proposal notes that the mitigation approach for forests is based on a transaction: tCO2e from REDD+ which is MRV’d. In the context of Joint Mitigation and Adaptation, in order to promote public funding, it is necessary to fully develop non-market based approaches. The paper outlines a process on how to link forest mitigation and adaptation approaches under a non-market mechanism. In addition, the role of Non-carbon benefits are also explored and examined in this context.

The forest mitigation and adaptation window should be constituted in the context of the UNFCCC as a dedicated window to be established under the GCF. The funding should be made of both public and private finance (outside of markets). In this sense the financial support can be derived from the following sources:

- External Public funds, transferred to the GCF
- Ethical private funds, fundraising activities targeting international private funds outside carbon markets, which can be channelled directly to the national level.

Sudan (on behalf of AGN): Activities and programs to “reducing emissions from deforestation and forest degradation including the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries” (REDD+) have the potential to generate multiple non-carbon benefits (NCBs). The inclusion of these benefits in REDD+ programs can reduce the risk of failing to meet REDD+ expectations while strongly supporting the long-term success of these programmes.

Such a direction is seen as broadening forest policy objectives beyond carbon and to address the many direct and indirect drivers of deforestation and forest degradation. It also means that NCBs are not limited to emission reduction activities but include NCBs from the other three activities of REDD+ namely promoting conservation, promoting sustainable forest management and enhancing carbon sinks.

The AGN believes that the chances of delivering NCBs at scale will be enhanced if their consideration is not limited to and go beyond safeguards, and if they are included early in the design of REDD+ activities, strategies and policies with clearly defined incentive mechanisms. To further buttress this, it is worth pointing out that at the heart of national REDD+ strategies or action plans of most African countries is the implementation of NCBs during Phases I and II. Therefore in the African context, effective implementation of NCBs should be considered as an important prerequisite for the successful implementation and long-term sustainability of REDD+.

African Group (includes Sudan): Non-Annex I and Annex I countries need to have common but different approaches for mitigation. With respect to forestry and land use, for

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accounting rules, Sudan refers to applying LULUCF rules drawing on REDD+. This infers to applying IPCC GPG Guidance, as appropriate for developing countries. Rules need to be established for offsetting and joint implementation mechanism. In addition, there needs to be non-market options for delivery on contributions \(^{184}\).

**Adaptation – Loss & Damage**

**Argentina:** Loss and damage should be built into the agreement and separated from adaptation. The Warsaw International mechanism (WIM) needs to be further reinforced in the Paris Agreement.

**Bolivia:** While recognition of Loss and Damage can be done in the preamble, this alone will not suffice.

**Ecuador:** See the LMDC position, which they specifically support.

**Iran:** No own submission.

**Malaysia:** No own submission.

**Saudi Arabia:** See the LMDC position, which they specifically support. Loss and Damage needs more deliberation and consideration but should be included in the agreement and also anchored to the WIM in the agreement. There is already several platforms under the UNFCCC and these needs evaluation to assess their effectiveness (referring to the evaluation of the Warsaw International Mechanism (WIM) evaluation scheduled for 2016).

**Sudan:** No own submission.

**Venezuela:** No own submission.

**Carbon pricing and carbon markets**

**Argentina:** In the February 2015 Geneva session Argentina opposed the inclusion of markets in the 2015 Agreement, emphasizing together with China, that proposals on market mechanisms in relation to the land-use, maritime transport and aviation sectors should be deleted.\(^{185}\)

**Bolivia:** In the February 2015 Geneva session Bolivia, calling for an alternative approach supported by public climate finance, opposed market mechanisms in the new Agreement.

\(^{184}\) African Group of Negotiators, Submission to ADP 2-5 on 8th August 2014: https://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_2-5_submission_by_african_group_mitigation_20140608.pdf

\(^{185}\) IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary
In Bolivia’s view they would be transferring responsibilities to developing countries and the private sector; promoting inefficient technologies; and increasing inequalities.\(^{186}\)

**Ecuador:** No own submissions.

**Iran:** No own submissions.

**Malaysia:** No own submissions.

**Saudi Arabia:** In the Geneva session Saudi Arabia, for the Arab Group, encouraged waiting until the commitments of developed countries are understood and agreed, and for the outcome of discussions on markets under other bodies of the Convention before further discussing the issue of markets.\(^{187}\)

**Sudan:** Sudan, on behalf of the African Group, stated in its submission on finance in December 2014 that there are a number of proposals to address the contribution of resources under the 2015 legal agreement, one if which is “increasing options for leveraging a greater share of the carbon market-related proceeds including options for carbon pricing”.\(^{188}\) According to Sudan, building on the agreed outcome, and existing mechanisms under the Convention, the Paris negotiations should agree on market and non-market mechanisms, implementation of REDD+, further guidance to the NAMA Registry, and a mechanism for Response Measures in order to enhance environmental integrity and understanding of effort under the Agreement.\(^{189}\)

**Venezuela:** In the Geneva session Venezuela indicated there is no reason for including a market mechanism in the 2015 Agreement. Venezuela stressed that trading an “artificially created commodity” can cause the market to collapse, leading to the collapse of the climate system. Venezuela also stated that the concept of voluntary cancellation of credits counting as climate finance would allow governments to avoid their financial commitments. Also, if developing countries are to benefit from markets, it needs to be specified in the Agreement text how they will benefit. Venezuela also said (together with China) that if there would be a market mechanism in the 2015 Agreement, it would need to be voluntary to use for developing countries, and that there should be eligibility requirements for its use.\(^{190}\)

\(^{186}\) Ibid.

\(^{187}\) Ibid.

\(^{188}\) Sudan on behalf of the African Group submission to ADP on finance, December 2014

\(^{189}\) Sudan on behalf of the African Group submission on Elements of agreement, May 2014

\(^{190}\) IISD Earth Negotiations Bulletin, Geneva ADP 2.8 Summary