

## **Submission by Ghana: Views on the scope of the review of the work of the improved forum based on the agreed scope of the review as contained in the Annex of the draft conclusions.**

Ghana a low middle-income developing country, welcomes the invitation by the Subsidiary Body for Implementation (SBI) and the Subsidiary Body for Technological Advice (SBSTA) at their 48<sup>th</sup> session to Parties to submit their views on the work of the improved forum based on the agreed scope of the review as contained in the annex of the draft conclusions. With reference to the decision FCCC/SB/2018/L.4 and the guidance questions therein and based on the discussions, Ghana would like to submit its views:

### **Guiding questions on the work programme of the improved forum**

1. *How has the forum's work programme in the areas of economic diversification and transformation and just transition of the workforce, and the creation of decent work and quality jobs supported the functions and objectives of the forum as outlined in decision 11/CP.21?*

### **Objective**

An objective of the improved forum as per its relevant principles and provisions of the Convention especially in Articles 2, 3 and 4 that relates to the economic and social consequences of response measures states: "That Parties shall give full consideration to what actions are necessary under the Convention, including actions related to funding, insurance and the transfer of technology, to meet the specific needs and concerns of developing country Parties arising from the adverse effects of climate change and/or the impact of the implementation of response measures and Parties should cooperate to promote a supportive and open international economic system that would lead to sustainable economic growth and development in all Parties, particularly developing country Parties". "Measures taken to combat climate change, including unilateral ones, should not constitute a means of arbitrary or unjustifiable discrimination or a disguised restriction on international trade".

### **The Functions as set in 11/CP.21 also states:**

1. Provide a platform allowing Parties to share, in an interactive manner, information, experiences, case studies, best practices and views on the socioeconomic consequences of response measures.
2. Facilitate assessment and analysis of the impact of the implementation of response measures with a view to recommending specific actions on the socioeconomic consequences of response measures.
3. To enhance the capacity of Parties, in particular developing country Parties, arising from the adverse effects of the implementation of response measures to meet their specific needs and concerns and by taking into account all relevant policy issues of concern.

### **Economic diversification and transformation**

In Ghana's opinion the improved forum's work programmes in the areas of *economic diversification and transformation and just transition of the workforce, and the creation of decent work and quality jobs* partially supported the functions and objectives of the improved forum as outlined in decision 11/CP.21. "to address the needs of all Parties, in particular developing country Parties and shall be informed by assessment and analysis of impacts, including the use and development of economic modelling" The work carried out mainly at workshops and discussions under the improved forum including the Technical Expert Group (TEG) meeting and interaction with international organisations, clearly demonstrates that no significant work has been undertaken at the internal level to assess cross border impacts of implementation of response measures. Though, some limited experiences of assessment of impacts at the domestic level exists in developed countries none in developing countries.

Also, the objective states that "Parties should cooperate to promote a supportive and open international economic system that would lead to sustainable economic growth and development in all Parties, particularly developing country Parties". (This Article has not yet been fully realized in practical terms). "Measures taken to combat climate change, including unilateral ones, should not constitute a means of arbitrary or unjustifiable discrimination or a disguised restriction on international trade has not been addressed in this current work program".

In Ghana's view economic diversification is not the only effective means of reducing the adverse impact of response measures in the country. For example, economic diversification and transformation are included in the country's long term national sustainable development priorities in particular the country's current coordinated programme of economic and social development policies (2017-2024) dubbed **"An Agenda for Jobs. Creating Prosperity and Equal Opportunities for all"**. The country has embarked on the most ambitious programme of social and economic transformation aimed at putting the country on the path of progress and prosperity. This programme is hinged on key policy interventions to combat climate change, a comprehensive diagnostics of the country's social economic challenges and the approaches to addressing them, on restructuring the institutions of governance, modernising agriculture to enhance its productivity, a clear industrial policy, and rationalising the financial sector to support growth in agriculture, and growth in manufacturing and industry.

Ghana fully agrees with the Arab Republic of Egypt on behalf of African Group of Negotiators (AGN) that the work programme has not yet supported some aspects of the objectives, but moving forward the work programme of the improved forum should support African countries unique domestic economic diversification and transformation plans and economic growth in response to climate change. Noting that the added burden of having to deal with cross border response measures taken by developed countries that threatens to disrupt domestic plans and inclusive growth is a negative impact where cooperation of parties and support are needed to allow for inclusive growth. And urging for progress on this issue Ghana endorses the need for relevant information from assessments and analysis of response measures policies taken by developed countries and their cross-border impacts on developing country parties and support the need for regional and national assessments.

Ghana strongly believes that the work programme on economic diversification and transformation must promote examination of both short-term and long-term solutions and wish to state that it is interested in supporting a work programme that recognises how the implementation of response measures can impact economic diversification and transformation and sustainable development.

### **Just transition**

As mentioned in the technical paper prepared by the Secretariat, that, there is limited experience in applying a Framework for Just Transition. Despite its Limitations, Ghana endorses the proposed recommendations by the Paper that there is a need to undertake additional analytical work to assist developing country Parties in their just transition initiatives. This according to the Paper may include: (a) Reviewing national experiences through country case studies; (b) Reviewing sectoral experiences through case studies in specific sectors (e.g. mining, fossil fuels, energy-intensive industries and agriculture); (c) Identifying and promoting existing national and international guidelines in relation to just transition and decent work.

Irrespective of its limitations in its application of the Framework for Just Transition, technical papers prepared including on economic diversification and transformation by the United Nations Framework Convention on Climate Change (UNFCCC) Secretariat and technical presentations by some Parties, international organisations such as the The International Labour Organization (ILO), multinational organisations and external experts did provide in some way a platform for sharing in an interactive manner, information, experience, case studies, best practices, learnt lessons and exchanged views.

For instance, **"The workshop on views and experiences on economic diversification and transformation and on just transition of the workforce and the creation of decent work and quality job"** held in Doha Qatar in 2016, representatives of Parties and relevant international organizations and experts at the workshop exchanged information, experiences, case studies and views exchanged in relation to: (1) economic diversification and transformation and (2) just transition of the workforce and the creation of decent work and quality jobs, which served as input to Parties' in-forum discussions at the forty-fifth sessions of the subsidiary bodies that proposed priority areas for advancing the work of the improved forum on the impact of the implementation of response measures.

At the above workshop, Ghana showcased its national approaches to implementing climate action and sustainable development and recommended the following:

- (a) *Comprehensive assessment of impacts (in qualitative and quantitative terms);*
- (b) *Development of institutional linkages between mitigation policies, labour, trade and employment policies;*
- (c) *A comprehensive national strategy on the impact of response measures that is gender-responsive; and*
- (d) *Mapping and tracking of climate policies and measures.*

The “**Workshop on maximize the positive and minimize the negative impacts of future climate change mitigation policies**” in Bahrain in March 2018, introduced various theories on capacity-building opportunities from the ILO related to the just transition of workforces, decent work and quality jobs. Information was also provided to Climate Negotiators on the Green Jobs Assessment Institutions Network (GAIN) methodology on How to measure and model social and employment outcomes of climate policies. But the fact of the matter is, the climate negotiators are not the ones to develop models. The two workshops provided good examples, showed how certain policy initiatives have an impact on developing countries, and how there is a need for *ex ante* and *ex post* assessments, but it also highlighted gaps and the lack of empirical studies. Ghana’s perspective on the gaps are in monitoring the implementation of measures of developed countries adverse impacts of response measures in developing countries and implementing measures to address adverse impacts of response measures accordingly.

Ghana notes with appreciation the substantial contribution of ILO to this process and the building of synergies and linkages between UNFCCC and organisations and institutes such as ILO, Cambridge Econometrics, GAIN, International Trade Union Congress (ITUC) and World Trade Organisation (WTO) among others.

2. *To what extent has the work programme been effective in providing a platform allowing Parties to share, in an interactive manner, information, experiences, case studies, best practices and views, and to facilitate assessment and analysis of the impact of the implementation of response measures, on the positive and negative impacts and on ways to maximize the positive and minimize the negative impacts, with a view to recommending specific actions?*

The work program includes activities that aim at providing a platform allowing Parties to share, in an interactive manner, information, experiences, case studies, best practices and views as elaborated below:

1. Workshop on views and experiences, including on case studies, considering decision 11/CP.21, paragraphs 1 and 6, in the context of sustainable development, to implement the work of the improved forum on: (1) Economic diversification and transformation; (2) Just transition of the workforce and the creation of decent work and quality jobs.
2. Work of ad hoc technical expert group, as appropriate.
3. In-forum training workshop on use of economic modelling tools related to the work programme on the improved forum on the impact of the implementation of response measures.

The work programme has achieved some activities but these have not been necessarily effective in providing a platform to allow Parties to share, in an interactive manner, information, experiences, case studies, best practices and views, especially to facilitate assessment and analysis of the impact of the implementation of response measures, on the positive and negative impacts and on ways to maximize the positive and minimize the negative impacts, with a view to recommending specific actions.

Again, Parties shared experiences and examples, but no concrete case studies on developing countries and methodologies to separate the impacts of climate change policies from the impact of other policies have been facilitated by the Improved forum. Indeed, Reports have compiled measures to minimize negative impacts, but no assessments and analysis have been done to identify and make recommendations to the COP on measures to minimize negative impacts or even maximize positive impacts. The improved forum only had time for two in-forum workshops and one intersessional workshop. Given the limited time at the negotiation sessions there was always limited time for the in-forum discussions.

The activity on the work of ad hoc technical expert group (TEG), as appropriate was especially challenging as developed countries serially prevented a detailed report from the TEG from being written and discussed

with a view to recommending specific actions to the COP as is the practice in other agenda items under the UNFCCC and as was required by the work program with a view to recommending specific actions. This further emphasizes the huge gaps in the work program which focused on existing work or case studies in developed countries and no new case studies on assessments or analysis of response measures taken by developed countries and their impacts on developing countries. This is why Ghana believes it's imperative that the improved forum needs to put in place appropriate technical systems, provide adequate time and support at international, regional and national levels to be able to facilitate assessment and analysis of the impact of the implementation of response measures, on the positive and negative impacts and on ways to maximize the positive and minimize the negative impacts, with a view to recommending specific actions

Ghana maintains that seemingly efforts has been made since COP21 to understand the impacts of the implementation of the response measures. The country also shares the view that the Improved Forum's work programme has in a way enhanced awareness and increased knowledge and information about the subject of response measures and has also caused the sharing of knowledge and information from various experts on workshops to maximize the positive and minimize the negative impacts of implementation of climate change response measures. It has also provided limited avenue for discussions, negotiations, conclusion, and decisions on response measures. But, there are still significant gaps in knowledge and understanding of the issue that need to be addressed and that developing countries especially have little or no experience with modelling tools, as well as lack capacity to invest in them because this is linked to the lack of awareness of the impacts of climate change mitigation policies.

An area of recognition by Ghana is the efforts of the UNFCCC and ILO Partnership that has assisted the country to benefit immensely from the underlisted:

- (a) Ghana selected as one of the three pilot countries for the application of the policy guidelines on 'Just Transition towards Environmentally Sustainable Economies and Societies'.
- (b) Training on 'Promoting a just transition to low carbon and climate resilient development' in Turin Italy 2017;
- (c) Global Forum on Just Transition and the GAIN Conference in Geneva Switzerland in December 2017; Ghana is a member of the GAIN.
- (d) **"National dialogue on decent work and just transition to an environmentally sustainable economy and society for all"** held on January 2018 in Accra, Ghana. The dialogue led to an identification of priority areas for work on just transition in Ghana. Two areas of support were proposed: 1) an evaluation of the impacts of environment-related policies, particularly the Nationally Determined Contributions (NDC) on jobs and the labour market with a view to inform the updating of Ghana's NDC by 2020, and 2) support towards strategy development for green jobs promotion. The priorities identified in the dialogue, and recent consultations have provided the basis for the development of the objectives and outputs on the new phase of the project on Just Transition in Ghana.
- (e) The establishment of a Working Group on Response Measures 13 institutions form the working Group.
- (f) Ongoing Public awareness on Response Measures in the print media.
- (g) Ghana developed and adopted a new National Employment Policy in 2015.
- (h) Scoping Study on Decent Work and a Just Transition to an environmentally sustainable economy and society for all in Ghana to ensure a just transition is attained in the implementation of Ghana's NDCs conducted in December 2017.

Ghana is also mindful of the fact that there is limited experience in applying the framework for just transition, and therefore urges the Secretariat to facilitate assistance on the need of the country to undertake additional analytical work that may include: (a) Reviewing national experiences through country case studies; (b) Reviewing sectoral experiences through case studies in specific sectors (e.g. mining, fossil fuels, energy-intensive industries and agriculture).

Suffice to say, Ghana is concerned that the several workshops and discussions, has demonstrated that there is limited or no existing work on assessment of impacts of implementation of response measures, especially cross-border impacts; because quantitative discussions yielded no result due to lack of quantitative data on the prevalence and size of cross border impacts. Equally, there is also limited knowledge in the use of modelling

tools for developing countries to learn from. The country notes also that there are gaps also in Capacity building at national and regional levels on assessments of impacts of implementation of response measures. Additionally, at national level, the country does not have the capacity to undertake such assessments and modelling.

3. *To what extent has the work programme been effective in focusing the work under the improved forum on providing concrete examples, case studies and practices to enhance the capacity of Parties, in particular developing country Parties, to deal with the impact of implementing response measures?*

Some of the concerns regarding this is raised above. Notwithstanding, Ghana would like to highlight that the improved Forum has provided some limited awareness on available economic modelling tools that could be used for assessing the impact of response measures. The compilation reporting from Annex 1 Parties under Article 3.14 of Kyoto Protocol also do not demonstrate that adequate cross border impacts assessments are carried out by developed countries. There is no existing work on assessment of cross border impacts including on the use of modelling tools for developing countries to learn from; and Ghana as a developing country does not have the capacity to undertake such assessments. Now, in order to fulfil the mandate from COP 21 for the improved forum there is a need to enhance capacity building for developing countries including Ghana under the work programme of the improved forum. A cautionary remark from Ghana is it is not the country's negotiator to undertake modelling and therefore recommends that relevant institutions should be part of the regional workshops.

4. *To what extent has the work programme been effective in addressing the needs of all Parties, in particular developing country Parties, informed by, inter alia, the assessment and analysis of impacts, including the use and development of economic modelling, taking into account all relevant policy issues of concern?*

Ghana subscribes to the usefulness of Modelling tools which are increasingly becoming the basic tool used by policy makers for decision making and to produce specific assessment on different sectors of the economy such as tourism, aviation industry, agriculture, etc., and on consequences of response measures of developed country Parties on, inter alia, trade, investment, income, employment, economic growth rates of developing countries. Presently, there is no exercise which has been undertaken to understand whether the existing modelling tools are adequate for assessing cross border impacts and decision making. Therefore, the country recommends such an exercise that will also elaborate models that reflect the circumstances and contexts of the country, by accommodating variables that capture the uniqueness of national characteristics, considering its social and socio-economic factors and specific national priorities, conditions and needs.

Ghana acknowledges that the in-session workshop conducted on use and development of economic modelling tools was useful. However, experts who conducted the workshop sessions clearly highlighted the arduous nature, demands and that the complexity of data in modelling requires a different platform other than an in-session training workshop to conduct such an activity. They highlighted the importance of involving key experts from respective fields and the country looks forward to the importance of establishing long-term capacity building programmes for economic modelling and assessments.

Considering the recent work carried out (mainly through workshops and discussions), under the current improved forum including the ad hoc TEG meeting and interaction with international organizations, clearly demonstrates that no significant work has been undertaken at the international level to assess cross border impacts of implementation of response measure on developing countries. However, some experiences of assessment of impacts at the domestic level exists in developed countries, yet the wider and cross border impacts to be assessed has not been undertaken. There is no existing work on assessment of cross-border impacts including on the use of modelling tools for developing countries to learn from; and once again a developing country like Ghana does not have the capacity to undertake such assessments.

5. *To what extent has the implementation of the forum's work programme facilitated the provision of recommendations to the subsidiary bodies on specific actions for their consideration, with a view to*

*recommending those actions, as appropriate, to the Conference of Parties, beginning at its twenty-third session?*

Ghana shares the concerns of Egypt on behalf of the African Group (AGN) that not much technical work has been done during the three years. This implies that the needs of Ghana in capacity building in applying various tools to assess the impact of response measures has not yet been met. The country needs more training in actual application of the modelling tools in relevant sectors and areas. It notes that the one TEG that was held over two days produced valuable insights however, developed countries serially prevented the improved forum from examining the work of the TEG in more details and making recommendations to the COP. The country also agrees with the Arab Republic of Egypt on behalf of AGN that there is the need for the TEG output to be considered by the forum and recommendations made to the COP at COP twenty-four. The principle of no backsliding should apply in this context because this was a mandate of the three-year work plan and is a function of the improved forum that key recommendations from the TEG should be taken up in decisions in COP 24.

Ghana supports the Arab Republic of Egypt on behalf of AGN, and reiterates the underlisted on key recommendations raised from the TEG that included the need to have work areas focus on:

1. *Case studies on assessment of cross-border social-economic impacts for specific countries and regions*
2. *Regional training programme on assessment and modelling support*
3. *Inventory of response measures as the first step towards identification and quantification of impacts, including their economic, social and environmental implications*

Regrettably, Ghana notes that not many recommendations to COP has been done apart from the awareness raising workshops which fall short of meeting the needs of developing country parties who need enhanced capacity on issues of response measures. There is the need for more areas of capacity enhancement but also including awareness raising to be part of the work program moving forward.

### **Next steps-Work program**

Ghana is in sync with the Arab Republic of Egypt on behalf of the AGN that the work program of the improved forum must fully address all areas of the objective and all policy issues of concern to all developing country parties. It also concedes that equal time, activities and resources should be used to address all the areas, and that the work program should include a work area which addresses “Parties should cooperate to promote a supportive and open international economic system that would lead to sustainable economic growth and development in all Parties, particularly developing country Parties. Measures taken to combat climate change, including unilateral ones, should not constitute a means of arbitrary or unjustifiable discrimination or a disguised restriction on international trade”.

The work programme has not fully addressed all functions of the forum especially the functions on:

1. Facilitate assessment and analysis of the impact of the implementation of response measures with a view to recommending specific actions on the socioeconomic consequences of response measures
2. To enhance the capacity of Parties, in particular the specific needs and concerns of developing country Parties, arising from the adverse effects of the implementation of response measures by taking into account all relevant policy issues of concern.

Therefore, the next work program should focus work on the above functions and the output from these functions should be used to support the in-put for the platform of sharing of views and experiences in a more practical and balanced manner and with the underlisted:

- (a) Economic diversification and transformation (activities should focus on economic transformation).
- (b) Just transition of the workforce, and the creation of decent work and quality Jobs (activities should focus on creation of decent work and quality jobs).
- (c) International Trade and policy issues of concern.
- (d) Cooperation with relevant external organizations and bodies to facilitate assessment and analysis of the impact of the implementation of response measures with a view to recommending specific

actions on the socioeconomic consequences of response measures and to enhance the capacity of developing countries.

(e) Assessment and analysis including modelling of the impact of the implementation of response measures with a view to recommending specific actions on the socioeconomic consequences of response measures.

(f) Capacity enhancement/building of Parties, in particular on the specific needs and concerns of developing country Parties, arising from the adverse effects of the implementation of response measures by taking into account all relevant policy issues of concern.

### Guiding questions on the modalities of operation of the improved forum

6. *How effective have the forum's modalities been in supporting the forum's functions and work programme?*

- (a) Technical papers;
- (b) Submissions from Parties and organizations;
- (c) Interactions with external experts and relevant institutions and organizations;
- (d) Workshops;
- (e) The ad hoc technical expert group;
- (f) In-forum discussions as contact group;
- (g) Review of the work of the improved forum every three years.

(a) **Technical papers** prepared by the Secretariat and the ILO were found to be extremely useful and helpful to Ghana because the papers showed certain policy initiatives having an impact on developing countries, and how there is the need for *ex ante* and *ex post* assessment. Specifically, the technical paper on the concept of Just Transition of the national workforces, and the creation of decent work and quality jobs in relation to the implementation of climate change mitigation policies provided a step-by-step guide for Parties, in particular developing country Parties, on how to undergo such a transition. Furthermore, the paper provided input to assist Parties in elaborating on the work programme of the improved forum. However, it also revealed the gaps in implementing the technical papers and in Ghana's view thematic areas with wider and different country contexts and analysis of cross-border impacts needs to be conducted to inform and enrich the technical papers and that assessments and research needs to be conducted to be part of these technical papers.

(b) A standpoint from Ghana is the usefulness for the call for **Submissions from Parties and organisations**. It has not only been useful but timely and has progressed the work of the improved forum. This should continue but to boost its usefulness especially for Post 2020 submissions there is the need for more awareness raising and capacity building for developing countries including Ghana to be able to fully participate in this. Ghana also notes that the technical papers by the UNFCCC Secretariat was enriched with the submissions because it provided relevant information contained in their national inventory reports (NIRs), national communications (NCs), biennial reports (BRs) and biennial update reports (BURs).

(c) Ghana acknowledges that **interactions with external experts and relevant institutions and organisations** have been useful because the papers presented by them did not only give information and knowledge, but enlightened Parties and the external experts' minds to further identify more gaps. Ghana does not only propose a deepening of this interactions but as recommended by the Arab Republic of Egypt on behalf of AGN Ghana supports the idea that there is the need to expand the cooperation with other relevant institutions and organisations.

(d) Ghana is of the opinion that **workshops** remain a relevant modality and have been useful in some ways. However, the in-session training workshops are challenging and limits participation of the right audience and does not allow for adequate training time and capacity building. For instance, the training workshop on modelling and an in-session training was the most unlikely venue for modelling for negotiators and experts from developing countries and for adequate time for training. The topics were packed for the time available and there was no time for hands on training or break-out groups for adequate skill transfer.

That is why Ghana recommends that training workshops need to be held regionally and to bring together the appropriate audience, and adequate time needs to be given for skills transfer and hands on training. Also, more case studies needed on Ghana and on other developing countries to facilitate availability of concrete and relevant examples.

- (e) In terms of modalities, the **ad hoc technical expert group (TEG)** usefulness to promote technical analysis and discussions cannot be disputed as was evidenced during the meeting of the TEG. It also allowed for more dedicated, independent discussions that were fruitful for identifying gaps to enhance the ability of the improved forum. It was rather disconcerting that, only two days was allocated during the two years although 11/CP.21 requests the subsidiary bodies to advance the work of the improved forum, to constitute ad hoc technical expert groups. It was also discouraging that the improved forum did not optimize the use of the ad hoc TEG because there was continuous resistance from developed countries. However, since then the TEG has not taken the issues identified by the TEG forward. Also, the TEG was supposed to make recommendations to the COP but this was not done. Ghana would like to advance the case that the forum needs to take forward these issues as recommendations at COP24.

In this respect the forum has failed to have relevant technical work over the period because there is no permanent TEG that will have ample time to coordinate technical work in a systematic manner and provide the needed expertise for technical work. For this reason, and for optimum technical work to be done under the forum Ghana concurs with the Arab Republic Egypt on behalf of AGN that there should be a permanent technical body to implement the various activities.

- (f) The **In-Forum discussion as contact group** is an important modality that should continue to provide avenues for discussions and negotiations and not for technical work as this hinders advancement of technical work and limited opportunity and time for technical engagements with key stakeholders such as ILO, ITUC, WTO and Cambridge Econometrics. It's obvious that discussions in the improved forum have evolved and therefore greater space and time for technical discussions for targeted work programme is imminent and that is why the permanency of the TEG is paramount.
- (g) Ghana is in consent that there should be a **Review of the work of the improved forum every three years** to review, take stock, identify, and address the limitations of the improved Forum but also to consider and assess the continuation of the improved forum and modalities and its effectiveness especially as countries continue to implement their Nationally Determined Contributions (NDCs) to increase ambition to set the goals of keeping global average temperature rise well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above preindustrial levels; and enhancing global adaptive capacity, strengthening resilience and reducing vulnerability to climate change.