

## **PHILIPPINE SUBMISSION ON SBSTA 56 AGENDA ITEM 13:**

### **Guidance on Cooperative Approaches Referred to in Article 6, paragraph 4, of the Paris Agreement and Decision 3/CMA.3**

#### **(Emissions Avoidance Issue)**

**August 2022**

#### **Inclusion of Emissions Avoidance in Cooperative Approaches**

1. The Convention and its Protocols have consistently recognized and affirmed the right of developing country Parties to sustainable socio-economic development. We think that no developing country Party intends to remain in its current state of under development. It will always aspire to develop more, especially if it has a portion of its population below the poverty line.
2. This continuing development problem will force developing countries to examine and assert their right to develop socio-economically using every means at their convenience. Asserting this right can be problematic if they do not have the means to leapfrog to a clean and climate-friendly future for them and the rest of the world. It, therefore, makes sense for them to have their means, especially climate-friendly technologies, and know-how now instead of later.
3. The emissions trajectory of developed and developing country Parties are not the same and therefore, not comparable. Developing countries' will be theoretically increasing under a worst-case scenario of not having enough means to pursue a climate-friendly future. This will still be true even if what we will emit are survival emissions.
4. The Philippines' position is clear: we need to expand the definition of mitigation options to include emission avoidance. Doing otherwise will limit the options and restrict opportunities for developing countries to contribute to mitigation and achieve sustainable development and growth. This is a pragmatic approach which we believe will deliver results based on the targets we have set.
5. Given these points, we don't think that this debate on the inclusion of Emissions Avoidance in cooperative approaches should be prolonged. It should be proposed as a type of eligible actions under Cooperative approaches as soon as possible.

**We refer to Paragraph 7(h) of the CMA.3 decision on the “consideration of whether Internationally Transferred Mitigation Outcomes or ITMOs could include Emissions Avoidance”.**

As a proponent for the inclusion of Emissions Avoidance as an eligible mitigation action under the cooperative market and non-market mechanisms of Article 6 of the Paris Agreement, the Philippines would like to present the following points:

1. In the context of threat management which we understand is our main goal under the Climate Convention and its Protocols, we need to systematically address the problem in all its potential forms and manifestations such as risks, as well as, impacts.
2. Those of us using risk management as a framework for crisis management know that Prevention of the adverse impacts can happen if we avoid the source of the problem. If we have readily accepted Emissions reduction as a risk management measure which will prevent the potential adverse impact of the source of risks. Emissions Avoidance which will thoroughly prevent the problem from happening or aggravating.
3. It is surprising that we have not applied the whole scope of mitigation options comprising this the Risk Management Framework. Even more surprising is that we are debating on the inclusion of the most important option, Emissions Avoidance, which will give us the biggest opportunity to address the global warming the soonest.
4. This continuing development problem will force developing countries to examine and assert their right to develop socio-economically using every means at their convenience. Asserting this right can be problematic if they do not have the means to leapfrog to a clean and climate-friendly future for them and the rest of the world. It, therefore, makes sense for them to have their means, especially climate-friendly technologies and know-how now instead of later.
5. The emissions trajectory of developed and developing country Parties are not the same and therefore, not comparable. Developing countries' will be theoretically increasing under a worst-case scenario of not having enough means to pursue a climate-friendly future. This will still be true even if what we will emit are survival emissions.
6. To simply elaborate, avoidance is just another word for prevention which is a major solution to climate change problem because unnecessary emissions will no longer be generated by developing countries if they have already acquired the means of implementation, rather than having the actual emissions that should be cleaned up or mitigated later on. Emissions avoidance can be integrated in policies and measures (PAMs) with GHG displacement potential which may include mitigation technologies and approaches on the verge of commercialization.
7. As an example, emissions can be fully displaced or avoided through non-GHG emitting technologies; or avoided emissions from planned fossil fuel-based projects or

facilities for energy generation, transport, industries, etc.; or it can be avoided emissions due to land use change from forest to agriculture. All these would translate to zero emissions and corollary zero risk for impacts.

8. This represents higher GHG mitigation impact than projects or interventions that simply reduce emissions (e.g. energy efficiency, absorption/removals of emissions through sinks which are not sufficient enough to achieve net zero emission. We should be reminded that developing countries not having the means of Implementation to shift significantly or fully to zero GHG emitting technologies, are guaranteed by the Convention the right to use whatever means for their sustainable socio-economic development. Hence, the proposal for full GHG avoidance projects to be eligible for the Article 6 mechanisms of the PA.

### **Philippines' reiteration of its views on Emissions Avoidance**

As the proponent for the inclusion of Emissions Avoidance as an eligible mitigation action under the cooperative market and non-market mechanisms of Article 6 of the Paris Agreement, the Philippines would like to reiterate its views on Emissions Avoidance as these were not well captured in the draft Informal Note by the Co-Facilitators:

Avoidance is just another word for prevention which is a major solution to climate change problem because unnecessary emissions will no longer be generated by developing countries if they have already acquired the means of implementation, rather than having the actual emissions that should be cleaned up or mitigated later on. Emissions avoidance can be integrated in policies and measures (PAMs) with GHG displacement potential which may include mitigation technologies and approaches on the verge of commercialization.

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### **Philippines' Clarification / Comments on the Informal Note:**

Para 43 of the Informal Note on Emissions Avoidance:

## On Bullet #s 1 and 2

- *A definition and concept of emission avoidance is necessary as it goes beyond removals and emission reductions*

Preliminarily, however, Emissions Avoidance could be defined as the full displacement or prevention of GHG emissions expected to be generated by planned GHG emitting actions in energy, transport, manufacturing, agriculture, human induced deforestation, and other GHG emitting development activities. Full prevention of GHGs will translate to full avoidance of impacts from GHGs which aggravate global warming which translate to accelerated climate change.

- *Emissions Avoidance's relation to prevention of emissions and impact assessment and risk management;*

Risk management as a framework for crisis management would tell us that Prevention of the adverse impacts can happen if we Avoid the source of the problem and if we have readily accepted Emissions reduction as a risk management measure which will prevent the potential adverse impact of the source of risks- which in this case, are the greenhouse gases. Emissions Avoidance will thoroughly prevent the problem from happening or aggravating.

Full prevention of GHGs will translate to full avoidance of impacts from GHGs which aggravate global warming which translate to accelerated climate change.

## Bullet #3

- *Avoidance does not have a place in Article 6.2;*

Article 6.2 specifically mandates the deliberation on Avoidance by the SBSTA (per decision 2 /CMA.3, para 4-c), on whether it can be an eligible class of activities under 6.2. What we are expecting is its inclusion in the relevant decision(s) in the forthcoming CoP 27, to correct a gross oversight and mistake during the last CoP. The Philippines was not remiss in introducing the concept as early as CoP 25 in Madrid. It is a pity that it was not seriously taken forward in the correct form in the CoP 26 decisions to which we are responding now.

## Bullet #4

- *Removals and Emission reductions are well defined and understood;*

They do not, however, categorically recognize and include the potential GHGs which will be generated by developing economies, for example, which we expect to be massive, if we do not have the technological means to use climate-friendly technologies.

#### Bullet #5

- *This issue may be revisited in light of real case and review outcomes;*

We recognize that this body will simply be recommendatory. The formal adoption will be by the CoP/CMA. However, we cannot go on a protracted process where even this competent body cannot make a categorical recommendation on the use of a concept (avoidance of emissions through the use of zero GHG emitting technologies and approaches) when in fact, it has been specifically mandated by CoP/CMA to do so.

#### Bullet #6

- *It is important to recognize avoidance, particularly for the land use change;*

This is confusing. Why is land use change simply the only option singled out here when there are other direct opportunities through the use of non-GHG emitting technologies?

#### Bullet #7

- *If there is a counterpart, activities can already be undertaken based on avoidance.*

What does counterpart mean? Our understanding is that our work as Parties under the Convention and the PA is normative... we define the ground rules based on hard science (this being a science-centric agreement), providing the clear opportunities for Parties to work together to solve the climate change problem. We should not be adjusting the ground rules based on the availability of actors who are working under the identified mechanisms that we also decided as Parties that would not be responsive to the needs of developing country Parties.

### **Definition of Emissions Avoidance in the UNFCCC**

The Philippines hereby responds to the issue on the needed “clarity on the concept of avoidance and conservation enhancement as they are not officially defined under UNFCCC or IPCC.”

The concept of Emissions Avoidance is embedded in the risk management concept: actions that prevent, reduce and address the causes and impacts of a threat, in this case, climate change.

The main concept of elaborating it is "avoiding or averting climate change" as stipulated in the preambular paragraphs of the Convention and all throughout the operative text.

The specific word may not be there but the concept is distributed all over the text. The principle, from which are drawn successive actions includes the precautionary principle

(Principle 3 of the Convention) that affirms that – “Parties should take precautionary measures to anticipate, prevent or minimize the causes of climate change and mitigate its adverse effects.”

As long as the concept or idea is in the main agreement (the UNFCCC) subsequent decisions can interpret according to practiced rules and standards where Prevention or Avoidance is one of them. Parties should not just be satisfied with given palliative solutions like Emissions reduction or even Emissions absorption like sinks which will never result to net zero global emissions if they do not drastically use the option of Emissions avoidance.