

06 October 2009,

Bunker Fuels, Target setting and Copenhagen
Coreper 1, 07 October 2009.
Input from the NGOs at UNFCCC in Bangkok active on bunker fuels

Dear Deputy Ambassador,

At the 07 October Coreper 1 discussions on bunker fuel emissions and target setting for the UNFCCC process, we seek your support for the EU proposing robust emission reduction targets for international aviation and marine bunker fuels for adoption at Copenhagen.

We welcome the EU's decision to seek to have the UNFCCC set global sectoral emission reduction targets for bunker fuels at Copenhagen. In the twelve years since the Kyoto Protocol assigned ICAO and IMO the task of reducing these emissions, both Organisations have failed completely to address the issue of target setting let alone adopt mitigation measures for these sectors with rapidly growing emissions. The carbon neutral growth 2020 "target" that ICAO may consider at its High Level Meeting this week in Montreal is a sham. It would encourage airlines to increase GHG as fast as possible for the next decade, and even after that date there is no intention for aviation to pay its external costs, merely for emissions above the 2020 level to be retired through offsets. IMO agreed a second two year "workplan" on market-based instruments last July to report at the end of 2011. It is so vague and open-ended that no confidence can be placed in IMO addressing targets anytime soon.

Any proposal for international aviation and shipping targets needs to take account of the science and be consistent with the EU's overall ambition to ensure that global warming stays well below 2°C. NGOs believe that this requires at least a 40% reduction on 1990 bunker emission levels by 2020 and at least an 80% reduction by 2050. Any EU bunkers target proposal which falls short of the current EU commitment to cut its overall emissions by 20% on 1990 levels by 2020 would be condemned by NGOs as tacit admission that two of the most rapidly-growing sources of GHG emissions can be allowed to undermine cuts in all other sectors.

The target proposal needs to be robust – there will inevitably be negotiations. Furthermore, the target should be expressed in relation to a 1990 baseline to allow for clear comparison with the level of reduction effort in other sectors, and in order not to disguise the substantial growth in emissions since that time.

We also urge EU governments to come forward now with a proposal which specifies how the revenues raised by global mitigation action on bunkers can make a substantial contribution to the necessary climate finance under the UNFCCC. A robust EU position supporting the allocation of bunker revenues to mitigation and adaptation activities in developing countries could be key to breaking the deadlock that currently prevents international action on bunkers. Consideration of the bunker issue is starting to move in UNFCCC with the convening in Bangkok of a drafting group on the issues, so clarity of the EU's position on allocating bunker revenues to climate purposes in developing countries is now urgent. The EU's position will be critical when issues of substance are addressed in the coming weeks.

Yours sincerely,

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On behalf of Danish Ecological Council, German Watch, Seas at Risk, Transport and Environment and WWF.

