

INTERSESSIONAL MEETING OF THE
WORKING GROUP ON REDUCTION OF
GHG EMISSIONS FROM SHIPS
3rd session
Agenda item 2

ISWG-GHG 3/2/4
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ENGLISH ONLY

**FINALIZATION OF THE DRAFT INITIAL IMO STRATEGY ON REDUCTION OF
GHG EMISSIONS FROM SHIPS**

Ensuring Paris temperature goal-compatible GHG reduction from the Initial Strategy

Submitted by Kiribati, Marshall Islands, New Zealand, Solomon Islands and Tuvalu

SUMMARY

Executive summary: This document comments on the draft Initial IMO GHG Strategy with regard to its alignment with the Paris Agreement temperature goals and reviews ways in which current ambiguity can be resolved

Strategic direction, if applicable: 3

Output: 3.2

Action to be taken: Paragraph 22

Related documents: MEPC 71/WP.5, MEPC 71/WP.7, MEPC 71/17; ISWG-GHG 1/2/2; ISWG-GHG 2/3; MEPC 72/7/7; ISWG-GHG 2/2/12 and ISWG-GHG 3/2

Introduction

1 ISWG-GHG 3 and MEPC 72 represent a crucial moment for the global community and in particular IMO. The finalization of IMO's Initial GHG Strategy will send a clear statement on our ability to work together to tackle climate change. These ISWG meetings are a test of whether a United Nations agency can produce a GHG reduction strategy compatible with the GHG reductions necessary to achieve the Paris Agreement temperature goals.

2 From the work done by the IPCC and in numerous scientific publications, there is a clear understanding of the scale of GHG reduction that is needed to achieve the temperature goals "well below 2°C" and "pursuing efforts to limit the temperature increase to 1.5°C". The co-sponsors also know from this evidence that for their countries, their very survival, and for all countries, the scale of the damage and danger, remains contingent on the efforts made towards avoiding temperature rise above 1.5°C.

3 The co-sponsors know from that evidence of the scale of GHG reduction that the timescale set by IMO for its GHG reduction Roadmap does not afford us the luxury of further reviews and revisions to make up for a failure in the Initial GHG Strategy to make efforts towards the 1.5°C goal. The date of the Revised Strategy in 2023, and the further delay to the time-consuming measure development and implementation processes, would render decarbonization consistent with aiming for 1.5°C impossible. The only chance IMO has to signal its compatibility with the Paris Agreement 1.5°C temperature goal is in this Initial GHG Strategy.

4 The co-sponsors also note the submission of France and Marshall Islands to MEPC 72 (MEPC 72/7/7) tabling the "Tony de Brum Declaration" that recalls that the Initial IMO GHG Strategy must not compromise the achievement of climate objectives by creating distortions of competition and therefore that its provisions should apply equally to all ships regardless of their flag.

5 Given the significance of the Initial IMO GHG Strategy's outcome to all of the global population, it is clear that the Initial Strategy will be closely scrutinised and interpreted by many. To avoid any risk of misinterpretation of IMO's alignment with the Paris Agreement's temperature goals, the Strategy must be unambiguous on this point.

6 The risk we face, even more so at ISWG-GHG 3 than ever before, is that in striving to achieve a compromise and an outcome, the very essence and reason for the GHG reduction strategy – to achieve a GHG reduction aligned with the Paris Agreement – gets lost. This must not be allowed to happen.

7 This document reviews the ways in which the Initial IMO GHG Strategy, particularly as drafted in document ISWG-GHG 3/2, could ensure that IMO does not fail to ensure a Paris temperature goal-compatible GHG reduction commitment.

Areas where the Initial IMO GHG Strategy can unambiguously signal its compatibility with the Paris Agreement temperature goals

8 Within the Initial IMO GHG Strategy's structure, there are a number of different subheadings where it is possible to clarify the alignment of the Initial Strategy to the Paris Agreement temperature goals. The co-sponsors propose that the following different subheadings could either individually, or in combination, be used to send an unambiguous message and suggest a set of tests that could be used to evaluate whether this has been achieved:

- .1 Objectives: are the Paris temperature goals explicitly referenced and central to the GHG reduction Strategy?
- .2 Vision: does the vision statement incorporate a range of rates of decarbonization which include full decarbonization by 2050?
- .3 Levels of ambition: do the levels of ambition incorporate at least a range of rates of decarbonization which include full decarbonization by 2050?
- .4 List of candidate short-, mid- and long-term measures with possible timelines and their impacts on States: are there short-term measures in place or that can be implemented imminently that will achieve significant further absolute GHG reductions in the short-term? Are there mid- and long-term measures that can achieve full decarbonization by 2050? and

- .5 Follow-up actions towards the development of the Revised IMO GHG Strategy: does the Action plan include the urgent development of the short-term candidate measures that can achieve significant absolute GHG reductions in the short-term?

9 The draft document ISWG-GHG 3/2 currently fails all of these tests. As written, including all the options in square brackets, it will send a signal that IMO is not making sufficient efforts to achieve the Paris Agreement temperature goals.

10 This can still be remedied and the following are suggestions of how one or more of the five sections could be used to ensure that a clear effort towards achieving the Paris Agreement temperature goals is communicated.

Vision

11 The proposal drafted in document ISWG-GHG 3/2 is not compatible with the Paris Agreement temperature goals, given that making efforts to limit global temperature increase to no more than 1.5°C would require aiming for full decarbonization by all sectors before 2075.

12 As noted in earlier meetings, the Vision must be compatible with the Levels of ambition and one should not constrain the other (e.g. the ambition expressed in the Vision statement should not be lower than the ambition expressed in the Objectives).

13 Because of the connection between Vision and Levels of ambition, a less quantitative and precise vision statement than "...full decarbonization by 2050..." could be used, as long as the Objectives used in the Levels of ambition were unambiguously aligned to the need to make efforts towards 1.5°C.

Level of ambition

14 Two of the four proposed Objectives could express making efforts towards 1.5°C, in particular Objective 2 and Objective 4. Objective 1, as it only impacts newbuild specifications, which take time to penetrate the fleet, would be very challenging to use to communicate "making efforts towards 1.5°C". Objective 3, as currently written sets a "ceiling" or upper bound on emissions, and therefore is also not suitable for communicating "making efforts towards 1.5°C".

15 The Objectives, due to their quantitative nature, are one of the clearest ways to communicate, and therefore to test whether the Initial IMO GHG Strategy has made efforts towards 1.5°C. It is therefore fundamental that the numbers included in the Initial IMO GHG Strategy Objectives communicate an effort towards a rate of GHG reduction consistent with full decarbonization by 2050.

16 The use of "...at least..." to imply that the Objectives set a lower bound for what would be aimed for, is ambiguous and provides no clarity or certainty that IMO's Initial GHG Strategy is genuinely making efforts to achieve the Paris Agreement's temperature goals.

Measures

17 The short-, mid- and long-term measures listed do have the potential to achieve GHG reduction consistent with the temperature goals. However, as the Initial IMO GHG Strategy defines these as candidate measures, with no certainty of their adoption let alone the timescale of their adoption and implementation, the measures section falls short.

18 A clear and credible way that IMO could communicate the Initial GHG Strategy's alignment to the Paris Agreement temperature goals would be to have already progressed, evaluated and be imminently implementing GHG-reducing short-term measures. In the absence of this progress, it is all the more important that the signal for IMO's Initial GHG Strategy's alignment to the Paris Agreement temperature goals, comes from the other sections of the Strategy.

Action plan

19 The Action plan must contain urgent and imminent next steps that retain the momentum built during the development of the Initial IMO GHG Strategy for the implementation of measures to achieve absolute GHG reductions in the short-term.

20 The Action plan must remove the ambiguity expressed in paragraph 4.2 of annex 1 of document ISWG-GHG 3/2, which leaves open the possibility that GHG reductions might only start in 2023.

21 Failure of the Action plan to ensure imminent GHG reduction will have knock-on effects on the Objectives. This is because for a given climate impact, the later that emissions peak and start rapidly declining, the sooner the date at which full decarbonization must be achieved. Two earlier submissions, document ISWG-GHG 2/3 (zero emissions by 2035) and document ISWG-GHG 2/2/12 (zero emissions by 2050), are both equal in terms of total GHG emissions reduction. The latter though is only possible because it assumes imminent rapidly declining emissions.

Action requested of ISWG-GHG 3

22 The Group is invited to consider the information and comments provided in this document and take action as appropriate to amend the relevant sections of the Initial IMO GHG Strategy.
