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Climate Change Action Plan

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*pls make a file -
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TO: Katie McGinty
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FROM: T.J. Clauthier
(Phone: (202) 778-9631 Fax: (202) 293-9211

DATE: October 30, 1992

RE: U.S. Action Plan for Climate Change Treaty

Katie, I know you're flat out on very short-term issues for the campaign right now, so this is largely background at the moment.

The attached document is a copy of the comments that we sent to the State Department today regarding the Administration's proposed outline for the U.S. Action Plan under the Climate Change Convention. As you will see, we are quite critical of the present approach and want to register that as early as possible.

I hope we can work together after Tuesday to get the U.S. role in the treaty's "prompt start" onto the right track!

World Wildlife Fund

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Incorporating The Conservation Foundation. Affiliated with World Wide Fund for Nature.





October 30, 1992

Mr. Robert A. Reinstein
Deputy Assistant Secretary for Environment,
Health and Natural Resources
U.S. Department of State
Room 7825
2201 C Street, NW
Washington, D.C. 20520

Dear Bob:

Thank you for the opportunity to comment on the outline and process for preparing the U.S. Action Plan under the Framework Convention on Climate Change. We are glad to see the U.S. government taking a position as one of the first nations to draft its Action Plan and hope this is an indication that we will see strong support for actions in many areas to ensure the "Prompt Start" for the treaty endorsed by many nations in Rio.

We also want to add our congratulations on the success of the U.S. ratification process. It is noteworthy that the U.S. has become only the fourth signatory, and the first industrialized one, to ratify the Convention. We at WWF appreciated the spirit of cooperation demonstrated in the ratification process by all agencies, Members and staff of Congress, and NGOs.

Broad Comments

At this time, we have four broad comments on the preparation of the U.S. Action Plan, and then offer a few specific comments. We look forward to the opportunity to review the draft in more detail as it develops, and will try to respond with comments and suggestions as promptly as possible.

First, we urge you to ensure that the Action Plan actually anticipates returning emissions of carbon dioxide and other greenhouse gases to 1990 levels by the year 2000. That is the clear aim of Section 4.2 of the Convention, and any Action Plan

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which does not anticipate achieving that goal cannot be considered a good faith effort to implement the Convention.

It is important for the U.S. to avoid just repackaging the last draft of the "U.S. Views on Global Climate Change," which was distributed April 24, 1992, at the continuation of the fifth session of the INC negotiations, and which formed the basis for the emissions estimates in the "U.S. Actions for a Better Environment", distributed at the UNCED Conference in June. That set of measures, according to those documents, would still leave U.S. greenhouse gas emissions 1.4 to 6 percent above 1990 levels at the year 2000. Clearly, either additional measures and/or more effective implementation are needed in order to have an Action Plan that meets the treaty's goal.

Second, we at WWF believe that the major focus of the Action Plan should be on measures to limit anthropogenic emissions of greenhouse gases, not on national circumstances, vulnerability, or adaptation actions. These other topics are important in some contexts, but they should not be major chapters of an Action Plan. In fact, in the detailed outline of the U.S. Action Plan, these topics take up two-and-a-half pages, while the mitigation measures take up only half a page, one fifth as much!

Again, it may be useful to refer back to Section 4.2 of the Convention for guidance. The intent of the Convention is clear that the Action Plans are for each developed country to report "detailed information on its policies and measures" to limit its emissions of greenhouse gases and to protect and enhance its greenhouse gas sinks and reservoirs. In this document, we should concentrate our attention and our efforts on the actions we will take to solve this problem. There are other fora where we can describe how our country will be impacted and how we might adapt, if necessary.

Third, we feel there is an important element missing from the Action Plan outline, and that is an evaluation and replanning element. Any plan needs to be monitored and revised over time. The Convention itself requires countries to assess the effects of the measures and "the extent to which progress toward the objective of the Convention is being achieved" (Article 7). Section 4.2.d of the Convention requires two such reviews by December 31, 1998 and additional reviews thereafter at regular intervals "until the objective of the Convention is met."

The U.S. Action Plan should incorporate a mechanism for tracking the progress of implementation of the measures and their effectiveness in actually reducing greenhouse gas emissions over time. The Plan also should contain specific plans for how that data will be used to evaluate the program, to revise implementation programs in specific areas, and to add additional measures to the Plan over time, as needed.

Fourth, we believe there must be opportunity for substantial public input and comment in the preparation of the U.S. Action Plan. We appreciate the current opportunity to comment on the outline and process. It should be followed by a similar opportunity to review the draft text and emissions estimates that U.S. agencies assemble over the next few weeks. If a draft is shared with other countries at the December INC meeting, there will not be time to conduct a full public review and the report should clearly be labelled a "working draft" with the understanding that it is for discussion purposes only at that time. Furthermore, frankly, if there is a change in Administrations following the election, then the incoming Administration must have the opportunity to make revisions and additions to the Action Plan before its final submission.

Specific Comments

We have a few specific comments on the outline:

(1) Section A. National Circumstances: The outline of this section seems heavily weighted toward topics that are either irrelevant, as noted above, or could be used to make excuses for why our nation will not easily be able to meet the targets of the Convention. We encourage you, instead, to use this section to identify the opportunities for action and effective measures to reduce emissions in the U.S.

The greatest contribution this section can make is to provide a clear overview of our country's energy intensity relative to other countries and to the available state-of-the-art practices and technologies. That could help provide the context for the later discussion of measures, implementation plans, and expected results.

(2) Section B. Vulnerability: As stated above, this section is not relevant to the Action Plan and should be omitted. The information is important for a full understanding of the issue and its importance to the country, but it belongs in a separate document.

The Action Plan will be most easily understood and used if it stays close to its purpose, which is to explain what measures the U.S. will undertake in support of the treaty's objective, how we will implement those measures, and what results we expect from them.

(3) Section C. Greenhouse Gas Inventory: This is an important section and the outline seems appropriate. Obviously, one can only summarize the data in the Action Plan, so we expect a separate, detailed volume will be referenced or prepared.

(4) Section D, Adaptation: While information on adaptation actions is interesting, it is not relevant to the objectives of the Action Plan, as pointed out above.

(5) Section E, Mitigation Actions: This is the heart of the Action Plan. The outline seems to list the right general headings, but it is so brief that we have difficulty commenting on its adequacy. It therefore will be necessary to review the full text to provide useful comment.

Naturally, it will be important to make the measures consistent with those in the national energy bill which was finally signed into law earlier this month. The "U.S. Views" paper from April 1992 included a number of measures that were anticipated to be in the legislation, but which may not all have survived. Similarly, there may be some programs in the final legislation that are new or expanded.

In addition to identifying the list of measures that the U.S. will undertake, it is important to describe in detail precisely how those are to be carried out. In particular, the Action Plan should describe the policies and actions that will directly affect the timing and "market penetration" of various programs and new technologies. We need to know not simply what the assumptions are regarding market penetration of technologies such as advanced heat pumps or solar thermal water heaters, but also what policies and actions the government will take in order to achieve those penetration levels.

(6) Section F, Emission Trends with Mitigation: It is important to summarize the effects of the various measures on emissions over time. This must be done at the level of individual greenhouse gases, so we can understand the changes that result. For the same reason, we need data on gross emissions and absorption by sinks--not simply data presented on a net emissions basis. Finally, it will be valuable to receive this data in the form of longer term trend projections, beyond the year 2000, a basis for on-going evaluation and planning.

(7) Section G, International Cooperation: As with many other sections, the outline is so brief that it is difficult to comment until we see the full text. One item of interest will be what policies and actions the U.S. will take in order to make technology cooperation a decentralized activity and not just a government-to-government program. We hope for specific reference to the incentives that will be provided to individual corporations and other organizations to encourage their active partnerships in developing countries.

(8) Section H, Research: This section should really be changed into one on tracking and evaluation of the measures. The basic climate research topics seem largely irrelevant to the scope of

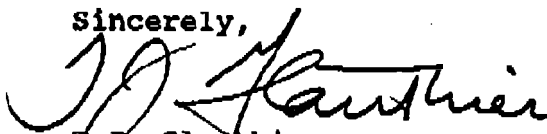
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the Action Plan. The applied research topics should be focused on the measures and their results over time.

(9) Section I, Plan Preparation: This section is appropriate, but the outline contains no substance on which to comment. As stated above, we feel it essential that the plan be developed with a high degree of public participation and input.

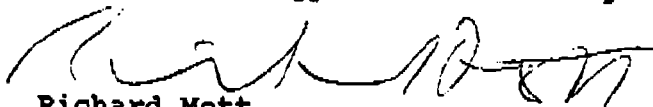
We hope this is helpful to you and those in the other Departments and Agencies who are responsible for preparing this initial draft of the U.S. Action Plan. We are very interested in it and would be happy to discuss any of these comments with you in more detail. We look forward to an opportunity to review the full text and offer constructive comments on that soon.

Sincerely,



T.J. Glauthier

Director, Energy & Climate Change



Richard Mott

Treaties Officer