



WWF Expectations for UNFCCC COP28

TAKING STOCK, TAKING ACTION: CHANGING COURSE TO KEEP BELOW 1.5°C

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INTRODUCTION: THE STATE OF PLAY OF CLIMATE ACTION IN 2023

The findings of the Global Stocktake (GST) technical phase – informed by up-to-date science and policy relevant information, as well as climatic disruptions appearing daily in headlines around the world – hammer home a by now familiar message: humanity needs to change course immediately, by accelerating the shift away from fossil fuels and building low carbon climate resilient economies.

Failure will mean missing the chance to limit global warming to 1.5°C this century, condemning the world to increasingly catastrophic impacts. Already, more than three billion people are vulnerable to climate change impacts. This number will rapidly increase with rising temperatures, amplifying the urgency for accelerated actions on all fronts to combat climate change, including getting the Loss and Damage Fund up and running quickly with substantial new and additional resources.

COP28 must be the moment when the world rallies to meet the climate challenge.

While the ambition gaps are well known, political momentum in the lead-up to COP28 is largely lacking. Progress in G20 and G7 has stalled or moved backwards. The UN Climate Ambition Summit and related events in September failed to deliver the signals we required – that the global community is willing to take the hard decision necessary to course

ESSENTIAL OUTCOMES REQUIRED FROM COP28:

- A successful Global Stocktake, which paves the way for stronger NDCs to correct course to 1.5°C.
- A decision to phase out fossil fuels no later than 2050.
- Full operationalization of the Loss and Damage Fund, with pledged funds.
- A decision on a comprehensive framework for the Global Goal on Adaptation.
- Scaling up finance by developed countries to beyond \$100 billion per annum.
- Alignment of all private and public financial flows with climate objectives.

correct our climate efforts. Though it did yield some new announcements and put a spotlight on the need to break free from our dependence on fossil fuels.

The GST is the Paris Agreement's stress-test mechanism to compel governments and other actors to collectively face up to the consequences of their actions and inaction. The first GST - notably the only relevant GST from the point of view of keeping 1.5°C within reach - is set to conclude that global efforts to date are woefully insufficient. We are far off course! The response by Parties will determine the kind of future the global community and future generations will face. There is still time to make the right choices that limit the ravages of climate change to manageable levels and head off a global climate-driven catastrophe.

NEEDED: AN ENHANCED IMPLEMENTATION STRATEGY

Since the Glasgow COP26, there has been much talk of a ‘shift to implementation’, with little progress so far. At COP28, in addition to the important GST outcomes, it is imperative that Parties agree on a strategy for enhanced implementation of the actions, policies, and measures needed to meet current targets. These must enable the more ambitious targets needed to close the mitigation and adaptation ambition gaps, and build the climate resilience of people and nature. Elements of such a strategy should include:

- **Moving from target-setting to coordinated policies and implementation of actions in the UNFCCC/Paris Agreement process:** National emissions reductions targets and adaptation outcomes should continue to play a central role under the Paris Agreement. Targets are meaningless if they are not backed up by national policies and the implementation of transformative actions. These need not be left to parties to implement in isolation at the national level. There are countless opportunities to accelerate and strengthen implementation through international coordination and cooperation at the sectoral level, and in many cases across sectors. Effective design and implementation of sectoral actions will require engagement of relevant decision-makers, including Ministers responsible for the different sectors. Some topics that could benefit from greater international collaboration are in energy efficiency in areas such as cooling technologies, accelerated expansion of power production based on renewable energy sources, transportation, and hard to abate sectors such as steel and cement.
- **Aligning regimes and institutions to support implementation:** Because of its universality, the multilateral regime created under the climate convention and the Paris Agreement must continue to play a central role in global efforts to combat climate change. But this issue is currently being addressed across a wide range of multilateral regimes and institutions, including by international financial institutions, UN agencies, and regional and plurilateral processes. The UNFCCC and Paris regime should be more open to constructive engagement, dialogue, and cooperation with these initiatives, to achieve synergies, ensure accountability, leverage resources and build political momentum. This openness to relevant parallel initiatives should also increasingly include non-state and sub-national initiatives, such as the Global Climate Action Agenda and the work of the UNFCCC High Level Champions.
- **Strengthening accountability and credibility:** There is currently no mechanism that can ensure that the Parties’ individual efforts add up to the global effort required to meet agreed goals, and Parties cannot be held legally accountable for not meeting their commitments. If Parties are not able to demonstrate in their response to the first Global Stocktake by 2025 that they are able to agree on measures and targets to close the emissions gap, they should consider strengthening the bottom-up, nationally determined and largely voluntary nature of the Paris climate regime. For countries, we believe that credible commitments must be reflected in national legislation; and be accompanied by appropriate planning and implementation at the sectoral level, with the engagement of line Ministries. WWF supports the UN Secretary General’s call for developed countries to reach net-zero by 2040. The High Level Expert Group on Net-Zero Emissions Commitments of Non-State Entities has presented useful recommendations to ensure credibility of commitments that should be rapidly and fully implemented, including through regulatory measures at the national level.

HEADLINE OUTCOMES FROM THE FORMAL COP28 NEGOTIATIONS

COVER TEXTS. With the conclusion of the Paris Rulebook and the shift to implementation, the Cover Texts of the COP and the CMA have taken on a new importance in the COP outcomes. They increasingly provide the site for negotiations over new directions for the global climate regime, sending political signals on the expectations about the urgency of actions to limit warming to 1.5°C such as eliminating fossil fuels and other issues that do not have a corresponding agenda item in other negotiation processes. WWF expects that, in addition to a decision on the GST outcomes, COP 28 will agree on a strong cover text decision that decides on and signals the importance of:

- Phasing out of all fossil fuels by no later than 2050 and ending fossil fuel subsidies immediately, with targets for expanding renewable energy - especially wind and solar, for access to clean energy for all, and for energy efficiency;
- Acknowledging and responding to the best available science including the potentially catastrophic impacts of temperatures rise above 1.5°C;
- A shift towards effective implementation at the sectoral level;
- Urgent, accelerated action towards, and mobilization of resources for, building climate resilience of vulnerable people and nature while also addressing loss and damage;
- Zero deforestation and ecosystem conversion;
- Conservation of 30-50% of land, freshwater and ocean sinks and protecting the complex role of nature in the fight against climate change, including through nature-based solutions for mitigation and adaptation;
- Transforming the global food system to deliver benefits for food and nutrition security, adaptation, resilience, and mitigation.

GLOBAL STOCKTAKE. In Paris, the Parties agreed to include the GST as an ambition level enhancement mechanism. At COP28, Parties will come together to consider the outputs of the first global stocktake, and define the UNFCCC political landscape for the next five years. Parties and key stakeholders must make all necessary efforts to strengthen the accountability of, and expectations on, Parties, and that all stakeholders stand ready to implement required measures across sectors and jurisdictions.

WWF's recommendations for high level political message from the global stocktake decision calls for Parties to: *revisit and strengthen pre-2030 commitments and communicate 2035 targets that amount to a reduction of emissions of 43% by 2030 and 60% by 2035: both in line with an equitable global pathway to 1.5°C with no or limited overshoot and taking into account the findings from the first GST.*

A successful first GST is about a robust outcome which will guide course correction addressing the various ambition gaps. As per the Synthesis Report on GST elements paragraph 696, the outcome should comprise the **CMA 5 decision, political declaration and technical annex.** Overall, the GST outcome should at a minimum:

- **Clearly identify results and gaps in terms of ambitions, implementation, and means of implementation.** WWF largely supports the findings of the First Technical Dialogue and calls for consideration of these elements in a GST decision. To supplement this WWF's expectations across the various aspects mitigation, adaptation, Loss and Damage and Finance are set out below.
- **Promote an integrated and transparent response across the UNFCCC to strengthen the next ambition cycle.**
- **Provide clear guidance and support mechanisms for Parties to have all elements at hand to develop and implement NDCs** in a nationally determined and participatory manner, which collectively respond to the GST outcome results and align with the 1.5°C temperature-limit of the Paris Agreement.

The outcome must provide a **global GST roadmap** to reset climate ambition and implementation in line with sustainable and equitable global pathways to 1.5°C with low or limited overshoot. This should signal the shift to urgent implementation, with the following elements:

- Recognising 1.5°C as the uppermost safe global warming limit;
- Providing further guidance (including workshops) on preparing enhanced Nationally Determined Contributions (NDCs) and Long Term Strategies (LT-LEDs).
- Providing clarity on financing, support needs and delivery mechanisms to implement the required actions, and responsibilities and proposals for providing that support.
- Providing guidance for measures, benchmarks and targets for a just transition of key emitting sectors at the national and sectoral level, and supporting international cooperation where this can accelerate actions, strengthen ambition and ensure synergies, including:
 - Ambitious targets for reducing and eliminating fossil fuels and expanding renewable energy, energy efficiency, and energy access;
 - Efforts to reduce global anthropogenic methane emissions in this critical decade;
 - Action and support to transform food systems by prioritizing approaches such as nature-positive food production, reducing food loss and waste, and shifting towards healthy and sustainable diets and nutrition.

OTHER ESSENTIAL OUTCOMES FROM COP28

NEW WORK PROGRAMMES ON MITIGATION AND ON JUST TRANSITION.

These work programmes provide an opportunity to accelerate sectoral decarbonization and a just transition to renewable energy. This will require deep engagement, alignment and agreement on the concrete actions, measures and milestones to inform and guide parties, subnational governments and non-State actors. The guiding vision for both tracks must include peaking global emissions immediately, reducing emissions by more than 43% from 2019 levels by 2030, and by 60% by 2035. The outcomes of these work programmes should inform and enable more ambitious NDCs in 2025 and 2030, international cooperation strategies and plans, and decisions by all actors, including the private sector and public and private financial institutions.

- **Mitigation Work Programme (MWP):**

We see the outcomes of this year as part of a globally agreed plan to phase out all fossil fuels under the theme of accelerating just energy transition. The MWP should contribute to the implementation of global and national policies and measures addressing financial, technological and capacity-building needs. Therefore we believe the MWP should continue working on the theme of 'just energy transition' until we get the strong outcomes we need on this topic.

We hope the next dialogues in 2024 remain constructive and solutions-focused, avoiding unnecessary discussions already contemplated in other work streams. The focus of the MWP should be to support countries to implement their current commitments and pave the way for stronger ones in the 2025 and 2030 NDCs. For that, the sectoral focus will be fundamental. Strengthening international cooperation should be front and center in the MWP and investment-focused events.

We expect the Ministerial at COP28 to build on the reports of the dialogues and provide strong guidance to enhance ambition and implementation from 2024 onwards, making the global stocktake recommendations actionable.

- **Work Program on Just Transition:** a decision creating this programme will be adopted at COP28, when the first Ministerial on the theme will also take place. Its objective, as decided in COP27, is the discussion of pathways to achieving the goals of the Paris Agreement. The Just Transition Work Programme should provide guidance to national governments on how to design such pathways in a just and equitable manner, with the full participation of all stakeholders and enhanced international cooperation. The current Just Transition initiatives by the G7 with South Africa, Indonesia and Viet Nam can provide valuable lessons for this work stream. WWF believes in a broader vision of Just Transition that goes beyond labor issues to include all affected communities and fosters a just societal transformation that leaves no one behind.

ADAPTATION AND LOSS AND DAMAGE. Every increment of warming will push many impacts beyond the limits of adaptation, and result in loss and damage, especially to people and nature in the vulnerable developing countries, most of which have contributed little to causing the problem. Climate justice requires helping the most vulnerable survive and thrive through the climate crisis. COP28 must deliver the following outcomes to scale up adaptation actions to protect them:

- **Glasgow–Sharm El-Sheikh work programme on the global goal on adaptation:** Decide on a comprehensive framework for the Global Goal on Adaptation (GGA) with the guided structured approaches as outlined at COP27, with defined mid- and long term (2030, 2040 and 2050) global targets and indicators for people and nature, in addition to key enablers for adaptation planning and implementation.. To achieve this overall objective, adequate means of implementation need to be put in place. In addition, parties also need to define how the GGA feeds into the global stocktake process.
- **Finance and support for Adaptation and building climate resilience:** Agree on a roadmap for doubling the adaptation finance commitment by 2025 with the baseline of 2019 as a minimum as agreed at COP26; and allocating at least 50% of public climate finance for adaptation as grants with simplified and direct access. Adaptation finance must also be a separate goal under the New Collective Quantified Goal.
- **National Adaptation Plans (NAPs):** Decide that developed countries should provide adequate support for the implementation of the developing countries NAPs. The decision should also encourage countries who have not submitted their NAPs to do so, and request the UNFCCC financial mechanism (Green Climate Fund, Adaptation Fund, Global Environment Facility) to provide necessary support with easy and direct access of funds for NAPs preparation and implementation.
- **Operationalizing the agreed Loss and Damage Fund:** Full operationalization of the Loss and Damage Fund which includes a stand alone Loss and Damage Fund with its own governance mechanism (i.e. Board, Trustee, Secretariat) which is under the authority and guidance of COP and CMA, substantial new public funding pledges, a process for examining and deciding on alternative sources of private finance, and a recognition of the role and limitations of broader existing funding arrangements. Loss and Damage finance must also be a separate element under the New Collective Quantified Goal.
- **Santiago Network on Loss and Damage.** The host for the Santiago Network on Loss and Damage (SNLD) is selected, and new and additional funding committed to allow the Santiago Network to function effectively and fulfill its mandate of providing technical assistance for developing countries on loss and damage.

FINANCE AND SUPPORT FOR DEVELOPING COUNTRIES. Finance, technology and capacity-building support are the glue that holds together the parties, architecture and cooperation under the Climate Convention and the Paris Agreement. Much of the promise of equity, justice and fairness that the climate regime embodies depends on adequate financial resources. The much discussed course correction expected this year will depend to no small extent on success in the following areas:

- **The USD 100 billion** - This goal has not been met so far, but meeting it is paramount for building trust in the negotiations. Closing the financial gap (i.e. mobilizing USD600 bn of climate finance between 2020 and the end of 2025) should be an obligation of all developed countries and one of the financial priorities during the incoming months and years. The positive signals from the Petersberg Climate Dialogue that developed countries could be on track to meet the USD100 billion goal this year is welcome. However, this must be achieved with scaled up public finance, and not through creative accounting that counts loans as if they were grants, entire project budgets where only a part is climate relevant, etc.
- **Doubling Adaptation finance** - COP 28 must also decide on the roadmap of how the doubling of adaptation finance will be met in line with the COP 26 decision. This goal should be included in both Green Climate Fund (GCF) and the Adaptation Fund Board, as those funds are in the front row for adaptation funding - and a significant amount of adaptation money should be directed via GCF, as per decision 1/CP.16.
- **New Collective Quantified Goal (NCQG)** - In Paris, via decision 1/CP.21, all parties agreed to a new collective quantified goal on finance, starting from the floor of USD100 bn by 2025. As it is a continuation to the USD100 billion per year goal, it should be mostly an obligation of developed countries, and since the Global Stocktake has identified the need to increase climate finance even 6-fold, it should deliver at least USD 600 bn per year by 2030, with dedicated sub-goals for mitigation, adaptation and loss and damage. However, there can be an additional goal also for other parties, as per the encouragement in article 9.2 of the Paris Agreement, to take into account the changing responsibilities and respective capabilities.
- **Delivering on Article 2.1c** - Making all financial flows consistent with the pathway towards low greenhouse gas emissions and climate resilient development is an important step towards reaching climate neutrality in 2050. While this goal should be pursued by all parties, it should not be an excuse for not delivering on the annual USD\$100 billion goal nor for delaying discussions on the new collective quantified goal. Maintaining a separation from provision of finance under Article 9 is fundamental,

while recognizing the overlaps. The crucial process of phasing out all environmentally harmful subsidies can be operationalized by decisions taken in this track of negotiations.

INTERNATIONAL FINANCE INSTITUTIONS REFORM. WWF proposes three practical principles to guide international financial institutions to deliver for climate change:

- **Do no harm:** stop financing and subsidizing fossil fuels, and significantly scale up finance for renewable energy systems that are low carbon and low conflict. Make climate disclosure mechanisms mandatory rather than voluntary. Align finance with national implementation plans (such as NDCs and National Adaptation Plans).
- **Do more good:** Step up climate finance, deliver on existing pledges such as the UNFCCC US\$100 billion and G7 pledges. Use debt relief as a mechanism to free up fiscal resources that can be redirected to climate action. Consider innovative approaches to benefit vulnerable countries (like the Bridgetown Initiative). Governments should channel resources and investments to climate innovation, research and development of disruptive mitigation solutions with financial gains. Governments and non-state actors should invest in climate action through the conservation and restoration of land, freshwater and ocean ecosystems.
- **Influence for good:** Mobilize private investment and unify decarbonization pathways. Multilateral institutions and agencies can encourage private sector participation in global development priorities such as the Sustainable Development Goals and the Paris Agreement. A further step to scale up and guide private climate investment (alongside public investment) is the adoption of a common climate scenario framework. To tackle the climate crisis, a rapid, system-wide and globally coordinated approach is needed from multilateral finance institutions.

ENERGY TRANSITION PACKAGE: WWF anticipates discussions in various fora across COP28 to touch on sectoral level ambition in the energy sector. Parties must take on the latest policy relevant scientific inputs including the IPCC 6th Assessment Report, as well as the outputs of first technical dialogue of the GST. Overall there must be strong signals acknowledging the role of the energy transition in the collective pathway to limit temperature rise to 1.5°C. This includes agreement on phasing-out all fossil fuels, and transformative collective targets, such as:

- Phasing out of all fossil fuels by no later than 2050; with oil and gas phase-out at the latest in 2040 in developed countries, and by 2050 in developing countries;
- No new oil and gas fields to be developed;
- To immediately end fossil fuel subsidies;
- At least tripling current renewable energy capacity by 2030 - especially wind and solar
- At least double the rate of energy efficiency improvements by 2030;
- Full commitment to a just energy transformation.

INDIGENOUS PEOPLES AND LOCAL COMMUNITIES. COP28 outcomes must ensure a rights-based approach for Indigenous Peoples and local communities to protect, govern and manage their traditional lands, enhance their traditional knowledge systems and sustain their livelihoods, as well as their contributions to address climate change and biodiversity loss. Indigenous Peoples and local communities and their knowledge systems should be integrally involved in the planning, design and implementation of climate actions.

FOOD SYSTEMS: Achieving net zero emissions globally by 2050 requires the transformation of all sectors of the economy, including food systems, responsible for a significant portion of global GHG emissions. The IPCC is also clear that the combination of supply-side action and demand-side interventions across the entire food system will have benefits for adaptation and for building resilience to climate impacts. Therefore, governments should take a food systems approach when tackling climate change, and leverage COP28 to transform food systems in a way that benefits food and nutrition security, adaptation, resilience and mitigation. A food systems approach should focus on scaling up nature-positive food production, shifting towards healthy and sustainable diets and nutrition, and cutting food loss and waste. Established at COP27, the four-year “Sharm el-Sheikh joint work on implementation of climate action on agriculture and food security” must integrate a food systems approach to climate action in its activities and go beyond a series of workshops. In this context, at COP28, governments must agree on a “roadmap for agriculture and food security” with concrete steps to implement climate action across the entire food system at the international and national levels, including and especially in NDCs, National Adaptation Plans and long term strategies.

OCEAN-BASED ACTION: The Ocean Climate Dialogue provides a critical forum for parties to explore how to strengthen the mitigation, adaptation and resilience potential of the ocean, as well as dependent communities and economies, and make the ocean a vital aspect of national climate change goals, policies, strategies and their implementation.

The 2023 Dialogue outcomes should:

- promote the inclusion of ocean-based climate solutions in nationally determined contributions (NDCs) and National Adaptation Plans (NAPs); and in long-term strategies (LT-LEDS);
- strengthen actions by Governments to advance nature-based solutions (NbS) and measures for ocean and coasts that are nature-positive and can deliver net-zero outcomes;
- highlight ways to ensure that clear timelines, enabling conditions and mechanisms are created and/or strengthened for Indigenous Peoples and local communities to have timely and equitable access to ocean-climate adaptation finance, technology transfer and capacity building;
- formulate concrete, actionable recommendations on how the relevant work programmes and constituted bodies under the UNFCCC, especially those on finance, technology, adaptation, and capacity building, should continue to integrate and strengthen ocean-based action in their mandates and work plans.

Such outputs from the Ocean Climate Dialogue should inform relevant COP28 negotiations, including the Global Stocktake, GGA, ocean-climate action across relevant conventions, and should be reflected in the informal summary report submitted to Parties at COP28.

ARTICLE 6 - MARKET AND NON-MARKET MECHANISMS. With the Article 6 rulebook finally in place, it's time to focus on the implementation of the Market and non-Market Mechanisms with environmental integrity. The flaws identified in the Voluntary Carbon Markets and the increasingly controversial practice of making carbon neutrality and offset claims must be addressed properly, making full use of the tools of the Paris Agreement such as corresponding adjustments. We need a global network of registries, ensuring the transparency and traceability of credits issued. The failure of the Art 6.4 Supervisory Body at COP27 to prepare an acceptable guidance concerning removals, must not be repeated. All measures possible must be taken to prevent the Article 6 markets from being undermined by low quality credits via the carry-over from the Kyoto mechanisms. The full potential of article 6.8 must be realized, including for funding results based actions for areas where markets have often proven problematic, such as land-based removals, nature-based solutions and carbon sequestration.



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