

**Submission from Brazil on subparagraph 1.b.i of the Bali Action Plan
(mitigation by Annex I countries)**

The Bali Action Plan calls for enhanced national/international action on mitigation of climate change. Annex I countries, who have the responsibility of leading international mitigation efforts, must enhance their efforts by means of ambitious, economy-wide, quantified emission reduction commitments for all. National actions must be directed towards the fulfillment of a quantified emission reduction commitment, otherwise they will not help to ensure an adequate contribution by Annex I countries to the global mitigation effort.

As the Bali Action Plan has a mandate to define enhanced action, it cannot generate a result that reduces the level of mitigation ambition and legal rigor of current commitments under the Kyoto Protocol. The quantified emission reduction commitments that are being negotiated for Annex I Parties in the second commitment period of the Kyoto Protocol are the reference for the mitigation commitments to be defined for non-Kyoto Protocol Annex I Parties under subparagraph 1.b.i of the Bali Action Plan.

The Bali Action Plan establishes a comparability requirement for the efforts of all Annex I Parties. Such a requirement does not exist for the negotiations under the AWG-KP. Therefore, the result of 1.b.i must be comparable to the result of the AWG-KP, not the other way around. This confirms that, without a concrete and ambitious result in the AWG-KP negotiations, comparability cannot be established and a result in the AWG-LCA negotiations will not be possible. Mitigation under 1.b.i must be elevated to the level of mitigation ambition and legal rigor of the Kyoto Protocol.

The concept of “nationally appropriate”, regarding Annex I countries, must be compatible with quantified emission reduction commitments for all Annex I countries. Specific actions by Annex I countries will be nationally appropriate and will reflect national circumstances, but their sum result, in each Annex I country, should be directed towards fulfilling a economy-wide, quantified emission reduction commitment. Subparagraph 1.b.i does not allow for a bottom-up approach, by which each developed

country would select the nature of commitments it wishes to adopt. This would not suffice to ensure comparability or the level of mitigation ambition needed from developed countries as a group.

Comparability of form is ensured as all Annex I countries adopt economy-wide, quantified emission reduction commitments. Comparability in magnitude must also be ensured. The magnitude of mitigation by each Annex I country must reflect its historical responsibility for global temperature increase and the magnitude of mitigation by Annex I countries as a group should allow for compliance with ambitious midterm and long term mitigation targets. The same compliance requirements should also be applied for all Annex I countries, as a necessary aspect of comparability.

What is measured, reported and verified, regarding Annex I countries, is compliance with economy-wide, quantified emission reduction commitments. To ensure the same conditions of measuring, reporting and verifying, Kyoto Protocol rules should be applied for all Annex I countries. This includes articles 5 (estimation of emissions and removals), 7 (information on compliance with commitments), 8 (review by expert teams) and associated guidance defined by the COP.