

Mitigation work programme should not be vehicle to impose national targets

Baku, Nov 14, (Radhika Chatterjee) - In the discussion at the Baku climate talks on the 'Sharm-el-Sheikh mitigation ambition and implementation work programme' [commonly referred to as the 'mitigation work programme' (MWP)], many developing countries stressed that the programme should not be a vehicle to impose national mitigation targets, undermining the nationally determined nature of each country's contributions to climate action. They also highlighted the importance of means of implementation in raising their ambition.

The talks showed strong divergences over what the content of the outcome should be, in view of the existing mandate of the MWP, and concerns over the changing of the mandate given the outcomes of the global stocktake (GST) decision adopted in Dubai last year.

[The MWP decision adopted in 2022 prior to the GST outcome last year, states that *"the work programme shall be operationalized through focused exchanges of views, information and ideas, noting that the outcomes of the work programme will be non-prescriptive, non-punitive, facilitative, respectful of national sovereignty and national circumstances, take into account the nationally determined nature of nationally determined contributions (NDCs) and will not impose new*

targets or goals". The MWP is supposed to continue its work till 2026 before the adoption of a decision on further extension of the work.]

Informal consultations on the MWP began on November 12 under the UNFCCC's Subsidiary Bodies and are presided over by newly appointed co-facilitators **Ursula Fuentes (Germany)** and **Maesela John Kekana (South Africa)**. The co-facilitators invited Parties to share their views on substantive elements they would like addressed under the MWP and its outcomes.

Some of the key issues of divergence among Parties include: whether the MWP decision text should include any high level political messages; whether there should be any linkage between the MWP and the GST decision from Dubai last year; whether the MWP should be a vehicle for implementation of the mitigation section of the GST outcome; and the relationship of the MWP and the nationally determined contributions (NDCs), especially in light of all Parties needing to communicate their next NDCs by February 2025 (for the 2031-2035 period). The importance of means of implementation as a crucial element of raising mitigation ambition and implementation was also highlighted.

Several developing countries including the **Like-minded developing countries (LMDC)**, the **African Group** and the **Arab Group** stressed that the MWP should not be used to impose any targets on countries, as the objective of the programme was to facilitate dialogues and exchange views to provide an opportunity for Parties to share experiences and learn from each other. These groups along with **Group SUR (Brazil, Ecuador, Paraguay, and Uruguay)** and the **Independent Alliance of Latin American and the Caribbean (AILAC)** emphasized the importance of means of implementation in scaling up mitigation ambition.

They said that the focus of the MWP should rather be on improving the global dialogues which are mitigation-related and the investment focused events held under the programme, to ensure that Parties are able to make the most out of the dialogues conducted. They further added that the exchange of information was a very useful exercise for them, as it helped their experts to learn about different country experiences.

They said the purpose of the MWP was to inform the current implementation of mitigation actions and not future NDCs. They further argued that any kind of imposition of new mitigation targets on developing countries through the inclusion of key messages would result in going beyond the mandate of the MWP and add a burden on developing countries.

[The global dialogues this year under the MWP focused on the topic “Cities: buildings and urban systems”. Under the guidance of the Co-chairs of the MWP **Amr Osama Abdel-Aziz (Egypt)** and **Lola Vallejo (France)**, the secretariat prepared an Annual Report on the global dialogues and investment focused events held in 2024.]

Group SUR proposed an alternative way forward for the MWP and asked for the mode of the MWP to be shifted from negotiations to being implementation-centric. As part of this shift, it said, some of the things which would could be discussed in the MWP are the importance of means of implementation for developing countries in raising and implementing mitigation action, the impact of unilateral measures imposed by developed countries on developing countries, and a

discussion on “how developed countries are taking the lead in transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, whilst moving faster in net zero commitment, so as to enable the world to achieve net zero by 2050”.

Developed countries and some developing countries especially the **Alliance of Small Island States (AOSIS)** and the **Least developed countries (LDCs)** on the other hand, insisted on having “strong outcomes” from the MWP by scaling up mitigation ambition keeping in mind the “urgency” of the situation. This they said was to be done through the insertion of key messages under the MWP. Some of the key elements they emphasized for these messages are: having mitigation action aligned with the 1.5 °C goal, creating a strong linkage between the MWP and the GST according to paragraph 186 of the GST outcome document; scaling up mitigation action in line with paragraph 28 of the GST decision; and using the MWP to inform the process of updating NDCs.

[Paragraph 186 of the [GST decision](#) states: “Invites the relevant work programmes and constituted bodies under or serving the Paris Agreement to integrate relevant outcomes of the first global stocktake in planning their future work, in line with their mandates;” and paragraph 28 relates to global mitigation efforts including that of “transitioning away from fossil fuels”.]

China, for the **LMDC**, expressed its appreciation for the positive progression achieved in the global dialogues and investment focused events (IFEs) held under the MWP. It said the group sees great value in exchanging views to learn about the experience of mitigation policies and implementation measures, including the identified challenges, needs and opportunities, which would be super beneficial for the further implementation of action. It also commended improvements made to the format of the IFEs and the ‘pitch hub events’ held under it, as an effort that would serve to fit the needs of Parties and a ‘solutions hub’ that provided the space for a creative session.

Calling out the developed countries for dragging their feet on raising mitigation ambition, the LMDC spokesperson expressed disappointment in some

Parties being hypocritical, who are urging others to enhance ambition but themselves are not implementing and are even back-sliding on their climate actions.

China added that “some Parties have already forgotten the principles and provisions of the Paris Agreement, including equity and common but differentiated responsibilities and respective capabilities (CBDR-RC), the nationally determined nature of the NDCs”, emphasizing that “support shall be provided to developing country Parties for the implementation of Article 4 of the Agreement, in accordance with Articles 9, 10 and 11, recognizing that enhanced support for developing country Parties will allow for higher ambition in their actions”.

It said some Parties are intending to make every item in the negotiations to be the place for “discussing the limited components of the GST” and “ignoring the original principle and mandate of the items”. It added that since ‘ambition’ and ‘implementation’ are the two key words for the MWP, it proceeded to present “some crucial facts” that relate to these words.

Elaborating further, China said that the urgency from the science is very clear but what is more important is to identify the fact that results in the urgency to achieving the global goal, which is the gap on implementation. “The projected total greenhouse gas (GHG) emissions of Annex I Parties in 2030 are expected to be 0.5 % higher than in 2020. Annex I Parties, which are supposed to be the leading group, in this critical decade, their GHG emission is rising. None of the Annex I Parties are projected to achieve their 2030 NDC targets ... They push for enhancing 2035 NDCs, but none of them could realize their 2030 NDCs.”

Further, said China, there are huge gaps on the pre-2020 period in both mitigation ambition and implementation by developed country Parties, compared with the Intergovernmental Panel on Climate Change’s requirement which indicated that developed countries must reduce emissions by 25–40% below 1990 levels by 2020, which was not achieved.

It highlighted that one of the Parties mentioned that “nothing is more important than mitigation ”,

but this interpretation is totally wrong. Since the leading groups are not taking the lead on mitigation actions, and also not taking the lead to provide finance, the LMDC wanted to emphasize that “nothing is more important than finance for us”.

Responding to the comments made by other Parties on ways of taking forward the work of the MWP, it said that things like inclusion of high-level messages and using the MWP as an implementing vehicle of the GST, were already included in the GST outcome, and it may not be valuable to duplicate those in the MWP. The MWP should focus on optimizing the global dialogues and the IFEs instead of duplicating the work of the GST, it stressed, adding that there is need for “shifting the ambition-centric discussion” to focus “on implementation.”

Finally, on the point about producing a text, China said it was premature to do so now and that the group would like to work on the “skeleton” to find common ground instead of focusing on those elements where there are “huge divergences”.

India highlighted some shortcomings in the Annual Report of the MWP, which it said, “does not capture all views,” adding that “while it says it is comprehensive, but it also says it is not exhaustive of all issues and indeed many aspects discussed during the dialogues are not included ... We can support elements that focus on improvements in the way in which the IFE can be structured and can deliver on its promise”.

It further said that “new [scientific] literature ... clearly shows that the mitigation targets highlighted by some of our colleagues from the GST outcomes, are results of scenarios that not only assume that the world will remain highly unequal till 2050, and none of the sustainable development goals will be met, but also that there will be increased risk of hunger as a result of the pathways that have been projected for mitigation. It will not only be absurd but also unscientific to use these results without saying all that lies beneath these numbers. After all the very beauty of the “best available science” is that better science always keeps becoming available. If we ignore all the caveats and qualifiers that must scientifically be used while communicating these results, we would

be saying that we are perfectly fine with hiding the fact that a large majority of people in developing countries will continue to face poverty and hunger. That would indeed be very “absurd”, won’t it be?” asked India, in an apparent reference to **South Korea**, which kept saying that it was “absurd” not to discuss the GST outcome on mitigation efforts in the MWP.

India also stressed that “finance [is a] critical enabler of climate action. It is also important to remember, that the GST relevant to mitigation would and must also include discussions on finance, on pre-2020 gaps in implementation, an emphasis on meeting the goals of the [Paris Agreement] based on equity and CBDR-RC. We have not heard any inclination to discuss these issues. Any discussion on ambition must be foregrounded on why we need ambition from even the poorest regions of the world today – and the crux of this is the inaction in the past of those who are to take the lead”.

Saudi Arabia, for the **Arab Group**, expressed that the MWP has showcased good progress and a facilitative exchange of views, adding that “this year’s exchanges have demonstrated the immense value of dialogue in promoting mutual understanding. Through the constructive exchanges and learning opportunities provided, we’ve gained a deeper appreciation of the need to tailor solutions to local socio-cultural and economic contexts. The principles of CBDR-RC and equity have shown to be integral when it comes to effective implementation. This has also enhanced our understanding of the barriers and challenges, especially regarding capacity building, technology transfer, and finance. The dialogues offered us a platform to explore the complexity of the various topics we face. In reflecting on these discussions, it is clear that a one-size-fits-all approach is neither feasible nor desirable. The experts have underscored the importance of context-specific, solutions over prescriptive or punitive measures”.

Regarding the Annual Report, it noticed that the report “fails to capture all the views. This presents an area for improvement for a future annual report. It must be a comprehensive reflection of all views... It is not fair to consider something a key finding based on popularity. We all know that developing countries are not well represented in these

discussions which puts us at a disadvantage. As opposed to trying to draw key findings, we need to think of ways to promote inclusivity, increase representation and bring the right people in the room”.

On the issue of selecting key messages from the Annual Report, Saudi Arabia said, “it would not be constructive to cherry-pick certain solutions from a report or declare universal solutions or set of recommendations based on a single-day dialogue. It is just not possible to account for every possible circumstance, and it would go against the notion of a no one size fits all approach, as well as the non-prescriptive approach. This exercise would merely simplify complex issues and prove to be counterproductive. We are not here to give endless signals that lead us down rabbit holes [one after] another. We can give signals all day, however this does not enhance implementation. What truly can enhance implementation is the means of implementation; it is capacity building, finance, and technology transfer. What will drive implementation is overcoming Investment barriers and the need for funding from developed countries. We can address this in the MWP, and we have the space for this in MWP which is in the IFE. So far, it has not been leveraged. This is where we need to focus our efforts”.

On the issue of using the MWP as a vehicle for implementing GST, it said that “we heard an admission that this is not the natural place, and the natural place exists somewhere else. Yet, there is still a push to enforce ... regardless of the mandate... Thus far, our work has adhered to the original mandate (which) emphasizes the importance of a facilitative, non-punitive, non-prescriptive, and respectful approach to the MWP ... To be prescriptive, to introduce targets, and to turn the nationally determined nature of NDCs upside down ... This is exactly what the calls for follow up, to track progress, to implement GST, to send the high-level messages [mean]. It is turning this facilitative process into a top down, equal playing field, taking away developing country flexibility, eroding the CBDR and nationally determined nature of NDCs, and separating completely mitigation from finance”.

It further added, that “the MWP cannot set specific targets or ambitions for NDCs or offer directives on

their content. These contributions reflect each country's unique circumstances, priorities, and sovereign choices, as envisioned in the PA. This is sacred."

Zimbabwe, for the **African Group**, said it envisaged the meeting to advance improvements of IFEs in the context of match-making, as the events have "the potential to unlock financing, technology capacity building". All of which are "critical enablers to drive mitigation ambition," it said, adding that it would like to explore alternative means of financing including public and grant based financing, which needed to be promoted along with other funding streams. It said, "at this COP we can discuss further improvements and enhancements to address mitigation implementation."

South Africa said that the several messages that have been proposed by Parties "go beyond the very specific discussions" that were held in the global dialogues and IFEs. It said the GST decision is a "package outcome", that includes several paragraphs, and cherry-picking messages from it would not be a good use of time." On the Annual Report, it said that even though the report may have been comprehensive and balanced, it was also non-exhaustive and did not represent the views of all Parties. Further, it said that the MWP is not the place to duplicate efforts of NDCs and GST as countries are already in the process of updating their NDCs in a nationally determined manner, as part of its bottom-up nature.

Brazil, for **Group SUR**, said for "unlocking the full potential of the MWP," it invited all Parties to shift the MWP from a negotiation-focused process to an implementation-focused programme, pragmatically and equitably centered on scaling up and speeding up the effective implementation of the Paris Agreement (PA) and the relevant decisions. It proposed "structural improvements to the MWP, transforming it into a safe space for experimentation, where networks of actors ... continuously collaborate to identify technological, technical, and financial solutions to specific challenges. The focus should be on the implementation of the GST and of Parties' NDCs, within the facilitative and non-punitive framework of the MWP".

Highlighting the needs of developing countries, it said for "this pursuit of actionable solutions to be successful, it is essential that the needs of developing countries, including financial support, technology transfer, and capacity-building, are fully taken into account. The MWP should evolve into a hub for cooperation, an incubator of solutions, and a connector of resources and stakeholders. It should build capacity at the local level, create value in local supply chains, and support sustainable development and efforts to eradicate poverty and reduce inequalities both within and among countries".

Brazil said that "in relation to para 28 (of the GST on global mitigation efforts), in addition to finance, technology and capacity-building for developing countries, it would welcome discussions on how developed countries are taking the lead in transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, whilst moving faster in net zero commitment, so as to enable the world to achieve net zero by 2050". It added further that "it is important that the MWP acknowledges that the implementation shall be done in a nationally determined manner, taking into account the PA".

Bangladesh for LDCs said the MWP should facilitate Parties to reflect on the reality of urgency and the need for mitigation ambition in forthcoming NDCs in 2025, in light of different national circumstances and capabilities, and that the MWP should facilitate the implementation of relevant GST outcomes and "must facilitate mobilization of financial resources ... particularly for the implementation of the conditional [aspects] of NDCs".

Iran said that the "scope of the MWP should be based on broad thematic areas without targeting specific sectors. So we are of the view that the IFE could be a good place for exchanging views about how countries can unlock financial resources for climate actions in different sectors as a good signal of implementation".

Egypt said the enhancements to the IFE are recognized and noticeable. The IFE provides a platform for in-depth discussion particularly on the structural barriers to investment and these events can be further enhanced. It further added

that the pitch hub provides another space that requires further improvements and visibility in order to be fit for purpose. It also highlighted issues from the Annual Report like “the need for equity within countries and among developing and developed countries with developed countries taking the lead in mitigation and reach net zero by 2030, and that solutions are context specific that takes the development stage of countries into consideration.”

On the question of including key messages in the decision, Egypt highlighted the need for clarity and assurances that the aim of such messages does not provide any prescription for Parties on how to implement their NDCs. “Those messages will not translate any global targets to national targets, and they do not interfere with national sovereignty or provide any specific direction to Parties,” it stressed further.

Colombia for **AILAC** said there is a need for accelerating implementation of ambition on climate action and that means of implementation are needed for supporting transition, adding that the MWP “should include calls to action as long as they are intrinsically connected to calls on financing with ambition. This approach is key to accelerating ambition and enhancing alignment with 1.5°C.” It also said that the MWP could be “fixed if messages are meaningfully considered”. It said COP29 should deliver the space for following up on GST outcomes and the “UAE dialogue is the natural space for that ... If that does not materialize, the follow up should occur in this room, or in a new space”.

[The UAE dialogue refers to paragraph 97 of the GST outcome which is under the section on ‘Finance’ of the decision.]

Samoa for **AOSIS** called on all Parties to do their most and come up with 1.5°C aligned policies to reduce their GHGs. It said modality improvements in the dialogues and IFEs were needed, particularly in the selection of topics, and asked for a greater representation of issues related to SIDS (Small Island developing States). For this purpose, it highlighted the need for regional dialogues so that special needs and circumstances of SIDS and LDCs could be addressed. It also asked for “looking at key findings and actionable solutions” from the past

two years of work in the MWP.

Switzerland for the **Environmental Integrity Group (EIG)** wanted to see high level messages which could recall the state of play, importance of the 1.5°C goal, express commitment to submit 1.5°C aligned NDCs and the need for reducing emissions, signal the need for economy wide targets across all sectors and gases and highlighted the importance of NDCs being informed by the GST and the PA. It saw an opportunity for addressing barriers and learning from the best available science. Regarding logistical improvements in the MWP, it said issues like how to improve follow up from previous discussions, and possibly with dialogues at the regional level and how to address barriers could be addressed.

The **United States** hoped for a substantive outcome in the MWP and was “supportive of an overall ambitious mitigation outcome.” Elaborating further, it said it wanted an overall package of mitigation from COP29, which was not limited to text in the MWP, and that it wanted “to make sure” that Parties come out of this COP with an “appropriate decision”. Referring to paragraphs 28 and 33 (on global efforts to reducing deforestation and forest degradation by 2030) of the GST outcome, it emphasized the urgent need for action and said NDCs and long-term global strategies need to be aligned with 1.5°C, adding that the roadmap for this was laid in the GST decision.

It also said that it was important to “find a home” for mitigation discussions to expand understanding of what is working and how challenges could be overcome. It said this could be done in various places like the MWP, Just Transition Work Programme (JTWP), and the UAE dialogue so that it could be ensured that opportunities to address mitigation aspects of GST are addressed. It said further that such issues could be “better captured in a cover decision” but if that would not happen, it “would like to make sure they are covered somewhere.” It also asked for the MWP to give a call for reducing emissions and include high level messages from the Annual Report of the global dialogue and IFE to send a “clear message to the broader community” that Parties are “making progress” on mitigation.

[Some observers in the room viewed with surprise the US intervention, when the in-coming Trump Administration plans to exit the PA and to expand fossil fuel production, reversing any ambition on mitigation.]

The **European Union** said it wants to see a mitigation outcome that covers follow up of the GST and mentioned paragraphs 28 and 33 of the GST outcome in this context. It also said it would like to see messages on NDCs that are due for submission early next year. Expressing its interest in securing a substantial decision on MWP, it referred to paragraph 186 of the GST outcome. The EU further said that based on the “good and constructive discussions” that Parties had during the global dialogues and IFEs, it would like to create messages on topics that have been discussed so far. The implementation of mitigation, it said, could be taken up in NDCs. It also proposed to have a report on “tracking progress of implementation of global mitigation efforts”.

Australia said it is “crucial that we show the world that we are committed to full implementation of GST” by reaffirming its outcomes, operationalizing paragraph 28, implementing mitigation elements of GST outcome, including goals of tripling renewable energy and doubling energy efficiency. Highlighting the need for ambitious NDCs by 2025 with alignment with 1.5°C pathways, it said the MWP was the “best home” for discussing mitigation. It said securing a strong outcome on mitigation “is a priority for us” and that issues like

the urgency of action and key messages from the Annual Report should be highlighted in the decision. These messages would “not prescribe national action but consider these opportunities in different national contexts”. Stressing that MWP has a role in implementation of the GST, it reiterated paragraph 186 of the GST outcome and invited the co-chairs “to consider how the MWP can support implementation of GST through its dialogues and IFEs”. In terms of process improvements, it said it would like to see “virtual follow up discussions” and “regional sessional dialogues”, among other things.

The **United Kingdom** said it would like to see an ambitious mitigation outcome, including among other things, 1.5°C aligned NDCs and announcement of high levels of ambition from everyone. It wanted to see a follow up of GST outcomes and include key messages in the MWP decision from the global dialogues and IFEs. Expressing the need “to ensure more than a procedural outcome”, the UK outlined specific elements it would like to see in the MWP decision that includes recognizing and welcoming elements of the global dialogues and IFEs, and key messages relating to scaling up renewable energy, doubling energy efficiency and so on. Asking for an evidence-based outcome, it called for action to decarbonize urban systems.

Canada, Norway, South Korea, New Zealand and Japan made statements similar to the positions of the US, the UK, the EU and Australia.