

## OPEN LETTER

**To: Environment Ministers and delegates of all UNFCCC Parties**

**Subject: Increase ambition and close loopholes at COP18**

Dear Minister, Dear Delegate,

We, 156 civil society networks, organisations and concerned citizens from 74 countries call on Parties to urgently and significantly increase their emission reduction commitments and close all loopholes. Without doing so, we will not stand a chance of preventing the catastrophic effects of climate change.

Experience with flexible mechanisms under the Kyoto Protocol has shown that the use of non-additional offset credits for compliance seriously undermines climate protection efforts. Given the urgency to reduce global greenhouse gas emissions, the future of market mechanisms must go beyond offsetting and achieve net emission reductions. We call on Environment Ministers to significantly raise ambition and close loopholes by taking action against hot air (surplus AAUs) and significantly restrict and avoid the issuance and use of non-additional Joint Implementation (JI) and Clean Development Mechanism (CDM) credits.

**Get rid of hot air now!** The gigantic surplus of emissions permits under the Kyoto Protocol threatens the viability of a second commitment period and any future climate deal. We urge Parties to agree to a solution that ensures the use of the surplus is severely restricted and limited to domestic compliance. **No new “hot air” surplus must accumulate in the second commitment period and the entire surplus must be cancelled permanently by the end of the second commitment.**

Under **Joint Implementation (JI)** hundreds of millions of non-additional credits have been issued by countries with very weak pledges and large AAU surpluses. Such “hot air” laundering must be stopped immediately. **JI baseline and additionality criteria must be strengthened and only countries that have taken emission reduction pledges below their 2012 emissions should be allowed to host JI projects.**

The Clean Development Mechanism (**CDM**) has not delivered on its two goals of delivering emission reductions and bringing sustainable development to non-Annex 1 countries. Research commissioned by the CDM Policy Dialogue estimates that until 2020 up to 3.6 billion CERs could come from non-additional CDM projects. When used to achieve emission reduction targets, such credits will increase global emissions. **Additionality rules need to be fundamentally reformed and significantly strengthened to avoid non-additional credits which further undermine already weak targets. Double counting of carbon offsets in host and investor countries must be stopped.**

Large-scale power projects, such as **large hydro and coal** power projects, are expected to generate the majority of offset credits between now and 2020. New research shows that these project types are highly unlikely to be additional and therefore undermine the environmental integrity of the CDM. **New large-scale power supply projects, in particular all fossil fuel-based projects, should be banned and the issuance of offset credits from existing projects should be ceased. Countries should use other mechanisms than project-based offsetting to promote lower-carbon power production.**

The CDM currently does not have any international standards or oversight (monitoring or compliance) to ensure that no harm is caused when projects are implemented. To provide a means to address social and environmental impacts before disputes escalate, we urge Parties to set up a grievance process for stakeholders to raise concerns

when negative impacts of a CDM project occur during its implementation. **As required by international law, including the UN Charter, human rights instruments are relevant in the context of the carbon market, and therefore human rights obligations and standards must be imposed on investors, so that projects that violate or threaten to violate human rights are made ineligible.**

Sincerely,

List of organisations supporting, by continent:

### Network

1. [CAN Europe](#)
2. [CAN Australia](#)
3. [Indigenous Environmental Network](#)
4. [Réseau Climat et Développement](#)
5. [GAIA - Global Alliance for Incinerator Alternatives](#)

### Africa

10. **Benin:** Eco-Benin
11. **Burundi:** Action volontaire pour la lutte contre les changements climatiques et les effets négatifs du soufre du diesel (AVOCHACLISD)
12. **Cameroon:** Green Horizon
13. **Congo RDC:** MEROU Développement
14. Actions Communautaires pour le Développement integral (ACDI/ONGD)
15. **Ethiopia:** Forum for Environment (FfE)
16. **Mali:** ONG Amade Pelcode
17. Femnet Mali
18. **Senegal:** ENDA Tiers Monde
19. **Togo:** Jeunes Volontaires pour l'Environnement
20. **Uganda:** Community Uplift
21. Pro-biodiversity Conservationists in Uganda (PROBICOU)

### Americas

22. **Argentina:** Asociacion Amigos de los Parques Nacionales
23. FUCEERA
24. Centro de Investigaciones del Mar y la Atmosfera (CIMA)
25. **Brazil:** NRG
26. **Canada:** Friends of the Earth Canada
27. **Colombia:** Mujeres del Común
28. Movimiento Social en Defensa del Río Sogamoso
29. Club Botanico Ambiental
30. **Chile:** Fundación Terram
31. Asociación Chilena de ONG ACCIÓN
32. **El Salvador:** Centro El Salvadoreño de Tecnologías Apropriadadas (CESTA)
33. Movimiento Salvadoreño por la Defensa de la Vida ante el Cambio Climático (MOSDEVI)
34. Alternativa Salvadoreña de Cooperativas (ALSACOOP)

### International

6. **Greenpeace International**
7. **WWF International**
8. **International Rivers**
9. **Carbon Market Watch**
35. Red Centroamericana de Incidencia ante el Cambio Climático
36. Directivas de Mejoramiento de Comunidades del Norte de Usulután (DIMECONU)
37. Confederación Nacional de Cooperativas Agropecuarias de El Salvador (CONFENACOA)
38. Asociación Salvadoreña de Ayuda Humanitaria, PROVIDA
39. **Guatemala:** Mesa Nacional de Cambio Climático
40. Anne
41. **Honduras:** OFRANEH
42. Fundación Popol Nah Tun
43. ANAFEA
44. Fundación Cosecha Sostenible de Honduras
45. Mesa Nacional de Incidencia para la Gestion del Riesgo, Minería y Cambio Climático
46. **Mexico:** Centro Mexicano de Derecho Ambiental (CEMDA)
47. Instituto Mexicano de Gobernanza Medioambiental
48. Comité Nacional de los 63 pueblos indígenas
49. Revuelta Verde / Rising Tide Mexico
50. Red Mexicana de Acción frente al Libre Comercio (RMALC)
51. Alianza Mexicana por la Autodeterminación de los Pueblos (AMAP)
52. Unión Popular Valle Gómez
53. Maderas del Pueblo del Sureste
54. Grupo de Tecnología Alternativa
55. Entornos Educativos
56. **Nicaragua:** Centro Humboldt
57. Mesa Nacional para la Gestión de Riesgo (MNGR)
58. Universidad Nacional de Ingeniería
59. **Panamá:** Centro de Incidencia Ambiental (CIAM)
60. Alianza Ambiental Pro Desarrollo Integral Unidos por Panama (AAPRODIUPA)
61. La Alianza para la Conservación y el Desarrollo (ACD)
62. Asociación Ambientalista de Chiriquí

- 63. **Peru:** IPAC-ONG AYACUCHO PERU
- 64. **Uruguay:** Amigos del Viento
- 65. **USA:** Black Rock Solar
- 66. Center for International Environmental Law (CIEL)
- 67. Institute for Agriculture and Trade Policy
- 68. Northwestern University
- 69. Center for Biological Diversity

## Asia and Oceania

- 70. **Australia:** Cases
- 71. **Bangladesh:** Network on Climate Change, Bangladesh (NCC,B)
- 72. Participatory Research Action Network-PRAN
- 73. Indigenous Peoples Development Facilitators Forum (IPDFF)
- 74. Angikar Bangladesh
- 75. Aid Organization (AO)
- 76. ISDE Bangladesh
- 77. SEDS
- 78. **China:** Greenovation Hub
- 79. **India:** Gujarat Forum on CDM
- 80. ParyavaranMitra
- 81. ADATS
- 82. FCN
- 83. Tristle
- 84. Evangelic Fellowship of India
- 85. Pro-Sikkim
- 86. Commission on Relief (EFICOR)
- 87. Regional Centre for Development Cooperation (RCDC)
- 88. Urban Research Centre
- 89. Gujarat University
- 90. Water Initiatives Odisha
- 91. South Asia Network on Dams, Rivers & People
- 92. All Zeliangrong Students' Union
- 93. Paryavaran Suraksha Samiti
- 94. Matu Jansangthan
- 95. North East Dialogue Forum
- 96. Himal Prakriti
- 97. Indigenous biodiversity & social welfare organisation
- 98. Abellon CleanEnergy
- 99. VEAG
- 100. North East Dialogue Forum
- 101. Living Farms
- 102. Samuha
- 103. **Iran:** Benfam Institute of Natural Living
- 104. **Nepal:** Global South Initiative
- 105. **Taiwan:** Taiwan Environmental Protection Union
- 106. **Thailand:** Focus on the Global South

## Europe

- 107. **Armenia:** Khazer Ecological and Cultural NGO
- 108. **Austria:** Global 2000
- 109. Nature Code

- 110. **Belgium:** Bond Beter Leefmilieu
- 111. Groupe One
- 112. **Bulgaria:** Za Zemiata (For the Earth)
- 113. **Czech Republic:** Centrum pro dopravu a energetiku
- 114. **France:** Reseau Action Climat France
- 115. CO2Solidaire
- 116. SciencesPO Environnement
- 117. ENERGIES 2050
- 118. **Germany:** Forum Environment and Development
- 119. Germanwatch
- 120. The Nature and Biodiversity Conservation Union
- 121. Bread for the World
- 122. Lernen - Helfen - Leben e.V.
- 123. LIFE - Education, Environment, Equality
- 124. Climate Concept Foundation
- 125. PowerShift - Verein für eine ökologisch-solidarische Energie- & Weltwirtschaft e.V.
- 126. **Greece:** MedSOS
- 127. **Italy:** Legambiente
- 128. **Luxemburg:** Action Solidarité Tiers Monde (ASTM)
- 129. Commission luxembourgeoise "Justitia et Pax"
- 130. etika asbl
- 131. Eurosolar Lëtzebuerg asbl
- 132. **Malta:** Nature Trust Malta
- 133. **Netherlands:** Both ENDS
- 134. Concerned Citizens against Climate Change
- 135. Ojalá
- 136. **Norway:** Friends of The Earth Norway
- 137. Norwegian ForUM for Environment and Development
- 138. **Portugal:** Quercus
- 139. **Romania:** TERRA Mileniul III
- 140. Institutul Verde
- 141. Asociatia MaiMultVerde
- 142. Ecology-Sport-Tourism
- 143. Greeninitiative Association
- 144. Centrul de Informare asupra Organismelor Modificate Genetic (InfOMG)
- 145. Asociatia ARIN
- 146. Asociatia Romana a Iubitorilor Naturii
- 147. Transmont Fagaraws
- 148. Asociatia pentru Dezvoltare Durabila: "Dunarea de Jos"
- 149. **Russia:** Ecodefense
- 150. **Slovenia:** Focus Association for Sustainable Development
- 151. **UK:** Kyoto2
- 152. Sussex University
- 153. The Green Belt Movement
- 154. **Ukraine:** The National Ecological Centre of Ukraine
- 155. Ecoclub Ukraine
- 156. Environment-People-Law