

Mr. Erik Solheim,  
Minister of Environment and Development

Ms. Hanne Inger Bjurstrøm  
Minister, Head of the Norwegian UNFCCC delegation

Oslo, November 23

Dear Ministers

In these critical days before Copenhagen, establishing the right basis for a final set of negotiations is vital.

Norway has historically been a constructive voice in the debate on international aviation and maritime (so-called 'bunker') emissions. However, the text put forward in Barcelona is a highly surprising departure from this position and raises serious concerns for NGOs.

While it helpfully seeks to solve the problem with Kyoto Protocol 2.2 by referring to "Parties" rather than "Annex 1 Parties", the remainder of the text shows a disappointing lack of urgency or ambition.

ICAO and IMO have had 12 years to develop "sufficiently ambitious mid and long-term goals", but a reduction target is not even on the IMO agenda, while the fuel efficiency pledge adopted by ICAO in Montreal last September merely measures expected improvements in efficiency of the fleet. It is not an emissions reduction target. The Norwegian text regrettably risks undermining efforts by the EU and Australia to address the long-standing target issue.

There is also no sense of urgency in the text regarding the work of ICAO and IMO. Both bodies are simply encouraged to "report progress" to COP17 in two year's time – a weak formulation that does not seek to accelerate the disappointingly open-ended process established at IMO last July on market-based measures or take issue with the dearth of credible mitigation proposals being considered by ICAO. Other bunker proposals in the LCA track seek to secure agreement on binding measures by the end of 2011 latest.

Finally, there is no mention at all in the text of the use of revenues from bunker measures. Indications over recent months are that pledging to spend these revenues on climate change action in developing countries is the key to bringing those Parties on board with global mitigation measures.

We hope that Norway can review its position and support a robust push to remove the obstacles preventing global action on bunkers at Copenhagen. An ambitious text which we would expect from Norway, would

- Strengthen the modest reduction targets proposed by the EU and press for their agreement in Copenhagen
- Recognise that progress in ICAO and IMO has been far too slow and ensure that any follow-up work done by these bodies after Copenhagen follows urgent timelines
- Recognise that Copenhagen provides an opportunity to address CBDR by differentiating the revenues and thus meeting climate finance needs in developing countries

Yours sincerely,

Lars Haltbrekken  
Norges Naturvernforbund

On behalf of Aviation Environment Federation, Bellona, The Danish Ecological Council, Seas at Risk, Transport and Environment, WWF.

