POLICY RECOMMENDATIONS FOR THE COP 26
UN CLIMATE CHANGE NEGOTIATIONS

Subsidiary Body on Implementation (SBI 52-55)
Subsidiary Body on Scientific and Technological Advice (SBSTA 52-55)
Conference of the Parties serving as the Meeting of the Parties of the Paris Agreement (CMA 3)
Glasgow, United Kingdom
31 October – 12 November 2021

At the last UN climate negotiations in December 2019 (COP 25), countries made positive progress on issues related to agriculture, inclusive participation, and oceans and climate change, but were unable to agree on the final rules for international cooperation through market and non-market mechanisms, among others. Due to the Covid-19 pandemic, the United Nations Framework Convention on Climate Change (UNFCCC) held several virtual sessions in the interim, during which countries shared views and continued to advance discussions on key issues in the lead up to the negotiations in Glasgow at COP 26 where countries must finalize outstanding rules for market and non-market cooperation to achieve global climate goals, advance important discussions related to agriculture, adaptation, and the ocean-climate nexus, as well as continue formal preparations for the Global Stocktake. The decisions on cooperative mechanisms will complete the Paris Agreement “Rulebook,” which already includes implementation guidance for countries related to setting national targets for greenhouse gas mitigation, climate change adaptation plans, finance mechanisms, reporting, tracking progress, and capacity building.

While progress on formal negotiations was slowed in 2020 and 2021, countries have continued to review and enhance the ambition of their nationally determined contributions (NDCs), assess national and sectoral strategies, and begin implementation, but notable gaps remain in collectively achieving the ambition and scale of implementation needed to meet the goals of the Paris Agreement. Natural climate solutions—the mitigation and adaptation benefits that come from nature—are essential for achieving the agreed global goals on climate change and must be implemented as part of countries’ NDCs. For the first time at COP 26, the UK Presidency will put a focus on climate action through nature as part of its goals to accelerate action and keep 1.5-degrees in reach through mobilizing finance and collaborative approaches. Conservation International believes that harnessing the full potential of nature to mitigate and help people adapt to climate change is critical to the success of the Paris Agreement.

Conservation International recognizes that the pandemic continues to present challenges for COP 26, including plans for country delegates, civil society, Indigenous peoples and local communities, and others to participate in-person. While being sensitive to these challenges, countries should advance key negotiations needed to facilitate ambitious climate action.
Key Recommendations

Conservation International proposes the following specific policy recommendations for SBI/SBSTA 52-55 and CMA 3:

**Increase efficiency for delivering climate goals and finance through cooperative mechanisms**
- Countries should ensure that international cooperation under Article 6 remains open to all sectors, including nature-based solutions, noting that no explicit reference to specific sectors is needed for this purpose.
- The language from Article 6.2 text related to non-permanence should remain in its current formulation and be reflected under Article 6.4 text.
- To support immediate implementation, Article 6 guidance should avoid establishing a work programme for topics related to the land sector and forestry as it could create uncertainty and delay investment in the sector.

**Ensure progress made under the Koronivia Joint Work on Agriculture (KJWA) is reflected in a call for accelerated action in the agriculture sector**
- Countries should deliver an outcome that recognizes how the KJWA has advanced the discussions related to agriculture under the UNFCCC, clarity on the needs of all countries to deliver action, and the role of the UNFCCC and its mechanisms to support technical and financial means of implementation.
- Countries should prepare a decision with a call for the UNFCCC and Paris Agreement mechanisms to facilitate ambitious climate mitigation and adaptation action in the agriculture sector, especially through national action in NDCs and National Adaptation Plans (NAPs) that harnesses the potential of nature-based solutions for improved land management.
- Countries should discuss options and topics for any needed future work on agriculture, such as advancing safeguards and the inclusive participation of smallholder farmers, Indigenous peoples and local communities.

**Ensure inclusive participation through the Local Communities and Indigenous Peoples’ Platform (LCIPP)**
- The LCIPP should agree upon a new three-year work plan (2022-2024) to ensure the full and inclusive participation of all relevant actors and regions, such as knowledge holders, women, Indigenous peoples and local communities in climate policy and action, whose involvement is key to achieving agreed global goals.
- The workplan should consider how to bolster the LCIPP with an effective program and funding to build the capacities of its constituencies at different levels.

**Continue building and enhancing urgent action on the ocean-climate nexus under UNFCCC mandates and national climate plans**
- Countries should call for a recurring dialogue on the ocean-climate nexus and advance ocean-climate issues in existing agenda items.
- Countries should request that the relevant Constituted Bodies to the UNFCCC incorporate and act on ocean-related issues under their respective mandates.
- Countries should work with the UK COP Presidency to call for increased finance and ambitious national action on ocean-climate issues, including through NDCs and NAPs.
Harness the role of nature to deliver results for national and global climate action

- Countries should collaborate with the UK COP Presidency, relevant partners and other countries to harness the potential of natural climate solutions to accelerate national climate action, including in their revised NDCs and NAPs, and support enhanced implementation efforts to signal a collective commitment to raising global climate ambition in line with meeting the goals of the Paris Agreement.

Voluntary Cooperation on NDCs through the Transfer of International Mitigation Outcomes

SBSTA, Agenda Item 15
CMA, Agenda Item 12
Relevant Documents: Informal note by the SBSTA Chair; Draft SBSTA Madrid Text for Article 6.2 – First Iteration, Second Iteration, Third Iteration; Draft SBSTA Madrid Text for Article 6.4 – First Iteration, Second Iteration, Third Iteration

Article 6 of the Paris Agreement establishes a broad framework for voluntary cooperation among Parties in delivering climate action. It sets out three approaches through which Parties may interact: 1) bilateral or regional cooperative approaches via internationally transferred mitigation outcomes (ITMOs); 2) a centrally governed UNFCCC mechanism to contribute to mitigation and support sustainable development; and 3) non-market approaches. Encouraging the transfer of high-quality emission reductions generated in all sectors, including the land sector, can drive needed flows of finance to climate actions addressing both sources and sinks, and generate opportunities for increased ambition particularly in developing countries.

Guidance on Article 6.2 and 6.4 should ensure the environmental integrity of all internationally transferred emission reductions, while promoting flexibility and higher ambition for meeting global mitigation goals. To that end, all Article 6.4 units that are internationally transferred should be subject to Article 6.2 guidance.

Parties are encouraged to consider the following technical elements when finalizing the Article 6.2 and 6.4 guidance:

1. APPLY A CORRESPONDING ADJUSTMENT FOR SECTORS AND GASES OUTSIDE OF A COUNTRY’S NDC

Any emissions reductions transferred from sectors or gases that are not covered in the scope of a country’s NDC should demonstrate robust baselines, monitoring, reporting and verification, and be subject to the same corresponding adjustment as other transfers. The requirement to “apply robust accounting” and “ensure environmental integrity and transparency” supports the application of corresponding adjustments to out-of-NDC-scope ITMOs. Unless both sides of a transaction account for the transfer, a mismatch is created between the sum of the host and acquirer’s inventory emissions and the sum of their accounted emissions. Such a mismatch is inconsistent with a straightforward interpretation of “robust accounting.” Applying special or differential treatment for mitigation originating outside of NDCs also risks creating a perverse

1 Paris Agreement, Article 6, Paragraphs 2, 4, and 8, respectively.
incentive for countries to keep those sectors outside their NDCs. Rules should ensure comparable accounting treatment of all mitigation outcomes, regardless of where they originate or toward what international commitment they are used.

2. APPLY A CORRESPONDING ADJUSTMENT FOR ITMOS USED FOR MITIGATION PURPOSES OTHER THAN TOWARD A COUNTRY’S NDC TARGETS

Any effort a country makes to mitigate emissions—whether through activities and sectors covered in its NDC, mitigation in sectors that fall outside its NDC, or to assist mitigation in other sectors (e.g., international aviation)—is ultimately mitigation delivered toward the Paris Agreement goal of keeping the global temperature increase to well below 2°C and pursuing efforts toward 1.5°C, as well as the UNFCCC goal of avoiding dangerous anthropogenic interference in the climate system. Parties must therefore prepare guidance and the necessary systems and tools to facilitate the acquisition and reporting of internationally transferred mitigation outcomes by Party and non-Party actors (such as by airlines using offset credits towards the offsetting obligations under the International Civil Aviation Organization’s (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)) in a way that ensures the avoidance of double counting.

As agreed at COP 24 in December 2018, Paragraph 77(d) of the Transparency Framework applies high-level reporting requirements for internationally transferred mitigation outcomes used toward an NDC or “the use of mitigation outcomes for international mitigation purposes other than achievement of its NDC,” which would include transfers to international airlines under CORSIA. This language in Paragraph 77(d) is an important foundation for ensuring no double counting; however, Parties should reaffirm and strengthen this provision in the more detailed Article 6 guidance.

3. KEEP ARTICLE 6 GUIDANCE OPEN TO ALL SECTORS AND FACILITATE IMMEDIATE IMPLEMENTATION

Parties should ensure that the implementation of Article 6 remains open to all sectors, including nature-based solutions. However, references to specific sectors in the Article 6 guidance are not needed and would not be in line with the spirit of the Article. The existing draft texts sufficiently keep the implementation of Article 6 open to all sectors; thus, it is imperative that countries maintain this framing and do not allow the text to backslide. For this purpose, the guidance should consistently reference mitigation outcomes as encompassing both emissions reductions and removals throughout. Furthermore, the language in the draft guidance for Article 6.2 related to non-permanence should remain in its current formulation—“minimizing the risk of non-permanence of mitigation and when reversals of emissions removals occur, ensuring that these are addressed in full”—and such language should also be reflected under the guidance for Article 6.4.

To support the immediate implementation of Article 6 investments across all sectors, Article 6 guidance should avoid establishing a work programme for topics related to the land sector and forestry, since there is already guidance related to this sector under the Warsaw Framework for REDD+. The adoption of a work programme specific to the land sector (including on permanence) with a lengthy mandate will generate unnecessary duplication of efforts, create uncertainty about the readiness of this sector and delay the flow of needed investments, including current initiatives being implemented under several REDD+ schemes. A more effective pathway for addressing broader concerns around accounting (including
approaches for accounting for reversals) is to establish capacity building support for countries under the Enhanced Transparency Framework to assist national-level implementation of the latest accounting methods and generating improved GHG data, in particular for those sectors where guidance gaps or methodological complexities can be found (i.e., agriculture).

Addressing misconceptions regarding non-permanence

Mitigation outcomes from all sectors are vulnerable to risks that challenge the long-term sustainability of results, including political risks, project management risks, financial risks, market risks, as well as risks from both human actions and impacts beyond human control (e.g., natural disturbances). In delivering mitigation outcomes, there is existing guidance and approaches to both minimize and address any potential for reversals.

We strongly support the current language on non-permanence in the Article 6.2 guidance text, as it adequately reflects the need to have a system in place that can address risks associated with any sector: “minimizing the risk of non-permanence of mitigation and when reversals of emissions removals occur, ensuring that these are addressed in full.” This language is more precise than previous formulations because risks of reversals can be detected, quantified, and addressed, and the risks of reversal can be quantitatively estimated, whereas “permanence” can never be measured or guaranteed across any sector. The non-permanence language under Article 6.4 guidance should be adjusted in order to be consistent with the Article 6.2 Annex Text.

Koronivia Joint Work on Agriculture

SBSTA, Agenda Item 8
SBI, Agenda Item 8

Relevant Documents: Informal note by the co-facilitators; Informal note by the co-facilitators on topic 2(d); Informal note by the co-facilitators on topic 2(e); Informal note by the co-facilitators on topic 2(f)

Under the Koronivia Joint Work on Agriculture (KJWA), countries have been working to address issues of agriculture and climate change through a Roadmap that laid out a series of workshops with the goal to move from technical knowledge exchanges towards the implementation of common strategies, arrangements and transformations needed to address climate change throughout the agricultural sector. These discussions on implementation are essential to ensure agriculture does not drive emissions from deforestation or other land use change, and to equip farmers with the tools and support needed to increase resilience to climate impacts while ensuring food security.

Though the KJWA Roadmap activities are almost officially completed, negotiations at COP 26 will be key to conclude KJWA and understand possibilities for guiding any future work on agriculture. To advance the negotiations at COP 26, we encourage Parties to:

- Focus on areas of agreement to deliver an outcome that recognizes how the KJWA has advanced the discussions related to agriculture under the UNFCCC, reflecting that countries now have a better understanding of the technical knowledge and best practices to deliver climate mitigation and adaption in the agriculture sector, the variety of countries’ needs to

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2 See guidance on risk mitigation in the IPCC Special Report on Land Use, Land-Use Change, and Forestry (Ch. 5) and the IPCC Special Report on Climate Change and Land (Ch. 6; Ch. 7). See guidance on application of REDD+ safeguards within the UN-REDD workspace.

3 First Iteration- Draft SBSTA Madrid Text, Article 6.2 Annex, Section IV, Subsection C, paragraph 22 (b)
accelerate action, and the role of the UNFCCC and its mechanisms to support technical and financial means of implementation.

- **Prepare a decision with a call for the UNFCCC and Paris Agreement mechanisms to facilitate ambitious climate mitigation and adaptation action in the agriculture sector, especially through action in NDCs and NAPs that harnesses the potential of nature-based solutions for improved land management.** This decision should also ensure that the knowledge generated through the KJWA workshops is distilled into guidance for countries to incorporate best practices for their agriculture sector into climate action plans, policies and interventions, as well as for increasing access to the technical and financial support needed for implementation. Any guidance should 1) underscore how robust national institutions and processes are necessary to incentivize the creation of a climate resilient food system that ensures diversified, sustainable landscapes and livelihoods for all; and 2) recognize the importance of including smallholder farmers, Indigenous peoples and local communities in national planning efforts to ensure the protection of their rights and food security along with conservation of forest cover in productive landscapes.

- **Discuss options and topics for any needed future work on agriculture, including how to advance the protection of safeguards in the agriculture sector and how to prioritize and ensure the full and inclusive involvement of key actors, such as smallholder farmers, Indigenous peoples and local communities, who are essential to delivery of national agricultural plans, protecting forest cover and ensuring food security in a changing climate.**

### Local Communities and Indigenous Peoples’ Platform

**SBSTA, Agenda Item 6**  
**Meeting of the Facilitative Working Group**

The Paris Agreement explicitly recognizes the rights of Indigenous peoples and local communities in the context of climate action. Parties agreed to develop a knowledge platform with local communities and Indigenous peoples (LCIP) as a first step to formally recognizing their contributions to addressing climate change. Under the UNFCCC, countries agreed to formulate a Facilitative Working Group to undertake the work of the LCIP Platform with representation from countries, Indigenous peoples and representatives of local communities, upon recognition of the local communities’ constituency.

At COP 26, countries will need to review progress to date on the current work plan and agree upon a new three-year work plan (2022-2024) for the Platform, including any activities where implementation was delayed due to the pandemic. In finalizing the 2022-2024 work plan, the LCIP Platform should continue to enhance and ensure the full and effective participation of local communities and Indigenous peoples by also connecting with knowledge holders on regional activities.

The Platform should be accompanied by an effective program to build the capacities of its constituencies at different levels to ensure that LCIPs are able to fully participate in climate-related processes at the international and national levels, such as the updates of NDCs and NAPs.

### Ocean-Climate Nexus

As an outcome of COP 25, also known as the “Blue COP”, the UNFCCC held the “Ocean and climate change dialogue to consider how to strengthen adaptation and mitigation action” as a virtual event in December 2020. The dialogue contemplated how ocean-related climate considerations can be mainstreamed within the existing negotiations. Recommendations emerging from the dialogue included a call to identify actions for the ocean within the UNFCCC entities and processes, maximize synergies
across UN mandates and bodies and other relevant multilateral environmental agreements (MEAs), expand national-level action on the ocean and climate change, and increase finance for ocean-climate action.

Parties have a unique opportunity at COP 26 to come together and agree on pathways to strengthen ocean and climate action under the UNFCCC. Parties should **continue to call for increased action on ocean-climate issues within existing agenda items and discussions**, as well as work with the UK COP Presidency to **promulgate clear actions for the ocean-climate nexus under the UNFCCC**. Parties are encouraged to:

- **Call for a recurring dialogue on the ocean-climate nexus** to create a formal and regular forum for countries and relevant stakeholders to exchange on lessons learned, challenges and opportunities as part of decision 1/CP.26 from COP 26.

- **Advance ocean-climate issues in existing agenda items to establish a stronger pathway for the protection of ocean and coastal ecosystems and strengthen recognition of their important role in addressing climate change.** Existing agenda items relevant to the ocean-climate nexus include NAPs, the Nairobi Work Programme (NWP) and its Thematic Expert Group on Oceans, the Warsaw International Mechanism for Loss and Damage (WIM), COP Guidance to the Green Climate Fund (GCF), COP Guidance to the Global Environment Facility (GEF), Technical Expert Review (TER), the Global Stocktake (GST), and Research and Systematic Observation (RSO).

- **Request the relevant Constituted Bodies to the UNFCCC incorporate and act on ocean-related issues under their respective mandates**, including the Paris Committee on Capacity-building (PCCB), Adaptation Committee (AC), Executive Committee of the WIM, Standing Committee on Finance (SCF), Technology Executive Committee (TEC), and Consultative Group of Experts (CGE).

- **Take national-level action on ocean-climate issues**, including through NDCs and NAPs.

For additional details and options on how Parties can strengthen ocean-climate action under the UNFCCC, please refer to an options paper prepared by Conservation International and partners titled, "**Building on the Ocean-Climate Dialogue**".