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

**International**
6. Greenpeace International
7. WWF International
8. International Rivers
9. Carbon Market Watch

**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 Developpement
14. Actions Communautaires pour le Développement integral (ACDI/ONGD)
15. Ethiopia: Forum for Environment (FE)
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 Salvadoreno de Tecnologías Apropiadas (CESTA)
33. Movimiento Salvadoreño pora Defensa de la Vida ante el Cambio Climático (MOSDEVI)
34. Alternativa Salvadoreña de Cooperativas (ALSACOOP)
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. ANAFAE
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 (CI EL)  
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 Forrum  
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  

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-solida rische Energie- & Weltwirtschaft e.V.  
126. **Greece**: MedSOS  
127. **Italy**: Legambiente  
128. **Luxembourg**: 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. Greenitiative Association  
144. Centrul de Informare asupra Organismelor Modificate Genetic (InfOMG)  
145. Asociatia ARIN  
146. Asociatia Romana a lubitorilor 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