Brazil: NDC We Don’t Want

On December 09, 2020, Brazil submitted its “Updated first NDC” to the UNFCC.

It contains an “indicative long-term objective” and presents the same targets as the previous NDC. Our analysis indicates, however, that Brazil’s commitments represent a backslide from its previous 2015 ones mainly in two aspects: the current targets will actually allow additional emissions in 2025 and 2030; and the country seems to have moved from unconditional to conditional targets. According to the Climate Action Tracker (CAT), the new NDC targets have moved Brazil’s NDC from “Insufficient” to ‘Highly Insufficient” to holding global warming to below 2°C, let alone 1.5°C.

Considering that Brazil is one of the world’s biggest emitters, the largest economy in South America and that its 2020 NDC violates the Paris Agreement’s progression principle, our analysis concludes that it is an NDC We Don’t Want.

Gaps

Level of Ambition: Brazil’s new NDC reduces its ambition compared to the first NDC. The emission levels in the base year, 2005, were considered to be 2.1 GtCO2e in the first NDC, but have increased to 2.8 GtCO2e because of methodological changes in the emissions inventory. In other words, the previous absolute target levels of net emissions of 1.3 GtCO2e in 2025 and 1.2 GtCO2e in 2030 increase to 1.8 GtCO2e in 2025 and 1.6 GtCO2e in 2030. That means Brazil could emit an additional 500 MtCO2 by 2025 and 400 MtCO2 by 2030. The new NDC does not express the absolute emission targets in CO2 tons; it maintains the percentage reduction for 2025 (reduction of 37% in relation to 2005) and converts what was in the previous NDC an indicative target for 2030 (reduction of 43% in relation to 2005) into an official 2030 target.

According to the NDC proposal prepared by the Brazilian civil society represented by the Climate Observatory, launched at the beginning of the week, Brazil’s net emissions in 2030 should be 0.4 GtCO2e to be compatible with the 1.5°C temperature increase limit. Allowing much higher emissions in 2025 and 2030 compared to the previous NDC also clearly constitutes backsliding, especially in light of the greater historical responsibility indicated by the emission levels in the revised inventory.

2060 indicative target: The fact that the 2020 NDC contains an “indicative long-term objective” towards neutrality by 2060 could be seen as an advance. However, the wording is far from clear on whether this constitutes a real target or not and the time horizon is also questionable, as most countries and other non-state actors have been pledging net-zero emissions by 2050.

Financial conditionality: At the same time, the new NDC omitted an important element from the previous one – the statement that “The implementation of Brazil’s iNDC is not contingent upon international support”. This
unconditional nature was an important element of Brazil’s NDC. The new NDC leaves open the question of whether the commitments in it for 2025 and 2030 are conditional or not on international support and agreement on carbon market rules. Some elements of the new NDC appear to establish such conditionalities. For example, by indicating that meeting the targets depends on agreement on carbon market rules, the requirement to receive US $ 10 billion / year to meet its various challenges including protection of native vegetation – which will be essential to meeting its 2025 and 2030 targets. This would constitute a clear case of backsliding, which would be a serious violation of the rules and spirit of the Paris Agreement that each new NDC must be a progression from the last one. Besides, the amount required seems to be unrealistic given that Brazil is still among the top 10 global economies, with a GDP of US$ 1.86 trillion.

The Brazilian government seems to have indicated that the new NDC should be considered by the UNFCCC Secretariat as a new version of Brazil’s First NDC, rather than as the Second NDC, which would make more sense since it covers a different time frame than the previous one. This appears to be a maneuver to avoid the accusation of backsliding from one NDC to the next, in light of a reduction in ambition in relation to the commitments already made.

Confusing and lacking specifics: Achieving the targets depends, among other things, on the establishment and implementation of public policies in the economic sectors with significant emissions. Therefore, the omission of measures to reduce deforestation, fossil fuel emissions and subsidies, and to encourage forest restoration actions and the adoption of integrated crop-livestock-forest systems, among other areas (included in the 2015 NDC) make the new NDC a vague and unfocused proposal compared to the previous one. Likewise, the new NDC makes only a brief mention of the National Climate Change Policy. It does not mention that the government will fail to met the goal established by this policy of reaching a level of deforestation in the Amazon by less than 3,925 km² in 2020 (currently it is over 11 thousand km²).

Adaptation: Although the government notes Brazil's position as a developing country, citing the social dimension as strategic, the new NDC does not include adaptation actions to protect Brazilian society from climate change impacts and to build resilience, which were included in the 2015 NDC. The lack of adaptation actions affects several important sectors of the economy, including agriculture.

Participation and Inclusiveness: The lack of participation and public consultations for the updated NDC is a major gap. Emissions reductions require a collective effort by various stakeholders, which is why the preparation of NDCs must be a participatory process, open to academia, civil society, the private sector, and affected groups such as indigenous peoples and local communities. The new NDC mentions some institutional arrangements for the participation of society, but they were not used at all.