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CLIMATE CHANGE AND GLOBAL EFFORTS: THE ROAD AHEAD

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ABSTRACT

Climate change is a natural phenomenon. The earth that we live in today was framed due to these phenomena. Yet climate change has become a global threat today. The reason for this drastic change in temperature now is no more natural but it is manmade. Understanding the long term effects in 1992 the International community¹ responded to the threat of global climate change by adopting the United Nations Framework Convention on Climate Change (UNFCCC) at the United Nations Conference on Environment and Development in Rio de Janeiro. UNFCCC established the first (non-legally binding) guidelines for energy policy. Although much has been spoken about the effects of climate change on human beings and other creations on earth yet not much has been done practically. The paper looks into the policies on paper and how far the same has been effectively applied and implemented at various levels. The paper emphasis the efforts of United Nations along with its specialized agencies United Nations Environment Programme (UNEP) and initiative taken up by regional agencies like European Union in curbing the green house gases which is one of the causes of climate change. The paper concludes by bringing in comparision between the policies framed to curb the effects of climate change in its implementation.

KEYWORDS

Climate Change, Green House Gases, Intergovernmental Panel On Climate Change (IPCC), Policies, United Nations Framework Convention On Climate Change(UNFCCC).

INTRODUCTION

cientists for a very long time have been observing the changing face of the earth which is a very interesting subject. But what has changed in this observation is the speedy change in the structure and working of the natural system due to human influence and it is clear from studies that recent anthropogenic emissions of greenhouse gases are the highest in history. Recent climate changes have had widespread impacts on human and natural systems. Hence the study about climate change and its harsh impact on humanity becomes interesting.

In 2011 the world population reached 7 billion. It is expected to grow to 9 billion by 2043, placing high demands on the Earth's resources.²As we are well aware the natural resources cannot renew in the phase in which human beings are exhausting them. Some of these resources are non renewable. The indiscriminate use of these resources are not just depleting them but the unscientific way in which it is being exploited has led to increase in environmental pollution and also warming of the earth's crust. Scientists have spent decades figuring out what is causing global warming. They've looked at the natural cycles and events that are known to influence climate. But the amount and pattern of warming that's been measured can't be explained by these factors alone. The only way to explain the pattern is to include the effect of greenhouse gases (GHGs) emitted by humans.³

AIMS AND OBJECTIVES

Human beings are rationale creatures. They can distinguish right from wrong and good from bad. Law has played a very important role in the evolution of human race. The present legal system in which the human beings are living are helping them to decide the future path.

International law is not similar to that of the state law. States being sovereign have a choice of accepting/rejecting or partially accepting/rejecting with minor changes of the laws made by the International Institutions. One such area where the International Organisations like the Intergovernmental Panel on Climate Change (IPCC) under the aegis of the United Nations (UN) is working on is about Climate Change, Green House Gases and Global Warming. Hence the aim of this paper is to emphasise on the legal regime that is in place relating to climate change. The paper aims to trace the path in which the climate change legal regime has developed and the future of these laws and its effective implementation by the states.

METHODOLOGY

The methodology has been both qualitative and quantitative in nature. The qualitative research for the paper has been in the form of searching for meanings, concepts, definitions, characteristics, and descriptions of things relating to the issue of climate change the quantitative research has been on hard core data and reports of various international institutions in the form of synthesis reports, Conference of Parties(CoP), Working Groups Reports and many other data and survey which has helped in the culmination of this research paper.

INTERNATIONAL SCENARIO – EFFORTS AND DRAWBACKS

The UN family is in the forefront of the effort to save our planet. In 1992, its "Earth Summit" produced the *United Nations Framework Convention on Climate Change* (UNFCCC) as a first step in tackling the problem. In 1998, the World Meteorological Organization (WMO) and the United Nations Environment Programme (UNEP) set up the Intergovernmental Panel on Climate Change (IPCC) to provide an objective source of scientific information.⁴ This group of scientists called the Intergovernmental Panel on Climate Change, meets every few years to review the latest scientific findings and write a report summarizing all that is known about global warming. Each report represents a consensus, or agreement, among hundreds of leading scientists.⁵

These reports have been very helpful in understanding the way in which the human activities are changing the face of the earth. In many regions, changing precipitation or melting snow and ice are altering hydrological systems, affecting water resources in terms of quantity and quality. Many terrestrial, freshwater, and marine species have shifted their geographic ranges, seasonal activities, migration patterns, abundances, and species interactions in response to ongoing climate change.

It is true that there will be more frequent hot and fewer cold temperature extremes over most land areas on daily and seasonal timescales, as global mean surface temperature increases. (*fig 1*)

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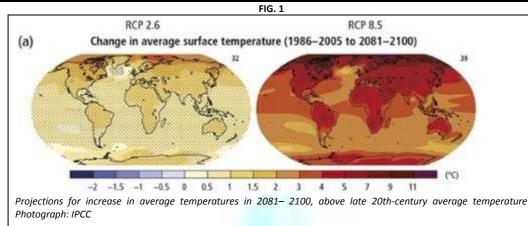
¹ Currently, there are 196 Parties (195 States and 1 regional economic integration organization) to the United Nations Framework Convention on Climate Change.

² http://www.un.org/en/globalissues/climatechange/ accessed on 20-09-2014

³ http://environment.nationalgeographic.com/environment/global-warming/gw-causes assessed on 20-09-2014

⁺ http://www.un.org/en/globalissues/climatechange/ accessed on 20-09-2014

⁵http://environment.nationalgeographic.com/environment/global-warming/gw-causes assessed on 20-09-2014



Due to the increase in the temperature in urban areas, climate change is projected to increase risks for people, assets, economies and ecosystems, including risks from heat stress, storms and extreme precipitation, air pollution, inland and coastal flooding, calamities like landslides, drought, water scarcity, sea-level rise, and storm surges. The risks in rural areas are amplified as there would be major impacts on water availability and supply, food security, infrastructure, and agricultural incomes, including shifts in the production areas of food and non-food crops around the world.⁶

The increase in temperature is due to the excessive of Green House Gases(GHGs) in the atmosphere which has accumulated over the years due to human activities. (Industrialisation, deforestation etc). Many greenhouse gases occur naturally in the atmosphere, such as carbon dioxide, methane, water vapor, and nitrous oxide, while others are synthetic. Those that are man-made include the chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs), as well as sulphur hexafluoride (SF₆)

As the global population has increased and our reliance on fossil fuels (such as coal, oil and natural gas) has been firmly solidified, so emissions of these gases have risen. This has inturn increased the temperature of the planet which the scientists have termed as Global Warming. The changes in the climate has been also due to the global warming. This has led to the rise in the sea levels due to melting of glaciers which are a threat to many island nations and coastal areas.

Global sea level rose by about 120 m during the several millennia that followed the end of the last ice age (approximately 21,000 years ago), and stabilised between 3,000 and 2,000 years ago. Sea level indicators suggest that global sea level did not change significantly from then until the late 19th century. The instrumental record of modern sea level change shows evidence for onset of sea level rise during the 19th century. Estimates for the 20th century show that global average sea level rose at a rate of about 1.7 mm yr^{-17}

These being some of the issues concerning climate change the greatest challenge that the United Nations is facing is to bring in a consensus among the nations to accept a common legal regime which can reduce the emission level which in turn would reduce the effects of climate change. Distribution of global emissions reinforces the need for broad multilateral cooperation in mitigating climate change. Fifteen to twenty countries are responsible for roughly 75 percent of global emissions, but no one country accounts for more than about 26 percent. Efforts to cut emissions (mitigation) must therefore be global. Without international cooperation and coordination, some states may free ride on others' efforts, or even exploit uneven emissions controls to gain competitive advantage. And because the impacts of climate change will be felt around the world, efforts to adapt to climate change (adaptation) will need to be global too.⁸

Hence the United Nations Framework Convention On Climate Change (UNFCCC) (Frame Work Convention) was ratified. The foundation for the international climate change regime is this Framework Convention, a treaty with practically global participation by governments. The Framework Convention was opened for signature in 1992 and garnered a sufficient number of ratifications to enter into force in 1994.⁹ The Framework convention as the name suggests acts as a framework for further action and cooperation on the issue of climate change. This is one of the efforts which brought in global consensus on the ill effects of climate change on all nations. Hence it may be said that this Framework Convention serves as a constitution-like document guiding intergovernmental cooperation on the issue of climate change but the UNFCCC does not establish binding limits on GHG emissions for any nations.

By 1995, countries realized that emission reductions provisions in the Framework Convention were inadequate. They launched negotiations to strengthen the global response to climate change, and, two years later, adopted the Kyoto Protocol. The Kyoto Protocol legally binds developed countries to emission reduction targets. The Protocol's first commitment period started in 2008 and ended in 2012. The second commitment period began on 1 January 2013 and will end in 2020. There are now 195 Parties to the Convention and 192 Parties to the Kyoto Protocol.¹⁰

The Kyoto Protocol is seen as an important first step towards a truly global emission reduction regime that will stabilize GHG emissions, and can provide the architecture for the future international agreement on climate change.

In Durban, the Ad Hoc Working Group on the Durban Platform for Enhanced Action (ADP) was established to develop a protocol, another legal instrument or an agreed outcome with legal force under the Convention, applicable to all Parties. The ADP is to complete its work as early as possible, but no later than 2015, in order to adopt this protocol, legal instrument or agreed outcome with legal force at the twenty-first session of the Conference of the Parties and for it to come into effect and be implemented from 2020.¹¹

With all these efforts yet the Framework Convention and its Conference of Parties(COPs) are not without criticisms. The greatest drawback of the Kyoto Protocol is the non consensual part between the developing and developed countries about how to interpret a fundamental underpinning of the Framework Convention and Kyoto Protocol namely the principle of "common but differentiated responsibilities" among industrialised (Annex-1) and developing(non-Annex 1) countries particularly when it comes to meaningful mitigation targets.

At the most basic level, countries disagree over climate monitoring and financing stipulations in the Kyoto Protocol and other legally binding accords. Climate frameworks struggle to effectively monitor greenhouse gas outputs, especially in developing countries. Many countries lack the domestic capacity to audit their total emissions; even if they are able to monitor national levels, some fear that reporting such numbers would encourage international pressure to cap their emissions. Others, like China, argue that an international monitoring system represents an infringement on national sovereignty and that developing states should be afforded some leniency in emissions as they are currently in critical stages of economic development.

The climate regime does not adequately address the sources of financing needed to help developing countries cope with climate change. The Green Climate Fund is in place but the allocation of the funding has to be clearly defined.

⁶ http://www.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_SPM.pdf - *CLIMATE CHANGE 2014 SYNTHESIS REPORT* Approved Summary for Policymakers, 1 November (2014).

⁷ http://www.ipcc.ch/publications_and_data/ar4/wg1/en/faq-5-1.html - IPCC Fourth Assessment Report: Climate Change 2007.

⁸ "The Global Climate Change Regime." Jul 2012. Council on Foreign Relations. Nov 2014

⁹ http://unfccc.int/essential_background/convention/items/2627.php accessed on 10-10-2014

¹⁰ http://unfccc.int/essential_background/items/6031.php accessed on 10-10-2014

¹¹ http://unfccc.int/kyoto_protocol/items/2830.php accessed on 10-10-2014

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The international climate regime is at its strongest when it comes to understanding the threats posed by climate change. The IPCC has through its panel of scientists are constantly looking at the changes happening and releasing assessment reports, which synthesize global data on climate change. The IPCC reports are central in policy discussions of climate change, and their estimates play an outsized role in setting benchmarks for international action. The IPCC also produces occasional reports on urgent subjects such as carbon capture and technology transfer. Yet, the infiltration of politics into the climate change debate has hampered the legitimacy and pervasiveness of new findings.¹²

The IPCC reports have been critizised as being politically driven and few believe that IPCC reports overestimate the state of the problem. The main drawback has been about lagging behind the current state of science because of its long and bureaucratic approval process. At a time when many studies are raising the possibility of extreme climate change, this may tend to bias the IPCC conservatively. Many reforms have been brought about in its working but nevertheless the findings and working of the IPCC cannot be undermined as the present awareness created among the nations has been through the findings of the IPCC.

REGIONAL ARRANGEMENTS - THEIR CONTRIBUTIONS

MAJOR ECONOMIES FORUM (MEF)

Many countries have tried to find an alternative way which may in the long run be more flexible and effective approach to combat the effects of climate change like the United States and other emitters have begun to turn to "à la carte multilateralism,"(small arrangements) focusing on smaller, less formal frameworks, such as the Major Economies Forum (MEF) and the Group of Twenty (G20)

The Major Economies Forum on Energy and Climate (MEF) was launched on March 28, 2009. The 17 major economies participating in the MEF are: Australia, Brazil, Canada, China, the European Union, France, Germany, India, Indonesia, Italy, Japan, Korea, Mexico, Russia, South Africa, the United Kingdom, and the United States.¹³

Together, MEF member countries are responsible for over 80% of global GHG emissions and make up 75% of global gross domestic product (GDP).¹⁴ Their aim is to facilitate a candid negotiation among developed and developing economies so as to achieve a successful outcome at the annual UN climate negotiations and initiate a joint venture in clean technology thus cutting green house gases.

GROUP OF TWENTY (G20)

The G20 membership comprises a mix of the world's largest advanced and emerging economies, representing about two-thirds of the world's population, 85 per cent of global gross domestic product and over 75 per cent of global trade.

The members of G20 are Argentina, Australia, Brazil, Canada, China, France, Germany, India, Indonesia, Italy, Japan, Republic of Korea, Mexico, Russia, Saudi Arabia, South Africa, Turkey, the United Kingdom, the United States and the European Union.¹⁵ The Green Climate Fund by these nations now stands at \$7.5 billion following pledges by the United States, Japan, France, Germany, Mexico and South Korea. That is within sight of a \$10 billion goal, brightening prospects for a U.N. climate pact next year.¹⁶

ASSOCIATION OF SOUTH EAST ASIAN NATIONS (ASEAN)

ASEAN has also contributed to the ongoing efforts to curb climate change. Southeast Asia is highly vulnerable to climate change as a large proportion of the population and economic activity is concentrated along coastlines; the region is heavily reliant on agriculture for livelihoods; there is a high dependence on natural resources and forestry; and the level of extreme poverty remains high.

A study carried out by Asian Development Bank (ADB) revealed that the mean temperature in the region increased by 0.1 to 0.3 degree Celsius per decade between 1951 and 2000; rainfall trended downward from 1960 to 2000; and sea levels have risen 1 to 3 millimetres per year. Heat waves, droughts, floods, and tropical cyclones have also become more intense and frequent.¹⁷

The same study projects a 4.8 degrees Celsius rise in mean annual temperature and a 70 centimetres rise in mean sea level by 2100 in Indonesia, the Philippines, Thailand and Vietnam. A rise in sea level would result in major problems for many of ASEAN's largest coastal cities, such as Jakarta, Bangkok and Manila. Millions of people may have to be resettled and massive expenditures incurred to protect the coastal cities.

ASEAN Member States, though not the source of significant emission of greenhouse gases, have taken actions to address climate change through various environmental, economic and social activities over the years. Several ASEAN Member States have announced voluntary mitigation targets, including Indonesia (emission reduction of 26% from business-as-usual (BAU) by 2020, and can be increased to 41% with enhanced international assistance), Malaysia (reduction of 40% in terms of energy intensity of GDP by 2020 compared to 2005 levels), Philippines (deviate by 20% from BAU of their emission growth path), and Singapore (emission reduction of 16% below BAU by 2020). Collectively, ASEAN countries have been responding to climate change by focusing on the implementation of relevant actions in following ways:¹⁸

- 1. ASEAN Socio-Cultural Community (ASCC) Blueprint 2009-2015. Section D10 of ASCC speaks about Responding to Climate Change and addressing its impacts.
- 2. ASEAN Working Group on Climate Change (AWGCC) was established in 2009 to oversee the implementation of the relevant action lines in the ASCC Blueprint.
- 3. The Action Plan on Joint Response to Climate Change was also developed in 2012 to provide a more detailed reference in implementing the Blueprint.
- 4. ASEAN Environmentally Sustainable Development Film Festival held on 18 October 2011 in Phnom Penh, Cambodia to inspire and promote awareness among ASEAN citizens of the importance of multi-stakeholder participation in addressing climate change.
- 5. ASEAN-India Expert Meeting on Regional Programme of Climate Change was held on 27-29 June 2012 in Bangalore, India, to exchange information and develop a framework for collaboration and discuss ways forward to address climate change both on mitigation and adaptation fronts.
- 6. The Yogyakarta City Greenhouse Gases (GHG) Emissions and HEAT+ Launch and Training: In collaboration with International Council for Local Environmental Initiatives (ICLEI) Local Governments for Sustainability, the ASEAN-US technical Assistance and Training Facility (ASEAN-US TATF) held a two-day workshop on 20-21 September 2012, in Yogyakarta, Indonesia, to present the Yogyakarta City Greenhouse Gases (GHG) Emission Inventory Report and to demonstrate the use of ICLEI's internationally recognized monitoring software system the Harmonized Emissions Analysis Tool (HEAT+). In 2012, Yogyakarta became an ASEAN pilot city to demonstrate a systematic and standardized methodology to measure and monitor citywide carbon emissions. The pilot will serve as a model for other ASEAN cities, and is expected to encourage them to adopt a systematic approach for inventorying GHG emissions and the use of tools such as the HEAT+ software, allowing ASEAN cities to become better equipped to measure and monitor carbon emissions and, in turn, develop effective strategies for low carbon economic growth and climate resiliency
- 7. ASEAN Action Plan on Joint Response to Climate Change was adopted on 26 September 2012, to implement Joint Response and implementation on Climate Change.
- Climate Leadership Academy (CLA) on Urban Climate Adaptation for Cities in Southeast Asia was held on 13-15 August 2013 in Jakarta as the first activity of the CityLinks Pilot Partnership project between the United States (US) and ASEAN Member States (AMS). With the theme "From Risk Barriers to Results – Managing the social, Political, Environmental, and Financial Risk of Urban Infrastructure,"

¹² "The Global Climate Change Regime." Jul 2012. Council on Foreign Relations. Nov 2014.

¹³ http://www.majoreconomiesforum.org/ accessed on 25-07-2014

¹⁴ http://climate-l.iisd.org/news/major-economies-forum-calls-for-urgent-climate-action/ accessed on 25-07-2014

¹⁵ https://www.g20.org/about_g20/g20_members accessed on 25-07-2014

¹⁶ http://www.reuters.com/article/2014/11/19/us-australia-france-climatechange-idUSKCN0J307K20141119 accessed on 25-07-2014

¹⁷ http://environment.asean.org/asean-working-group-on-climate-change/ accessed on 27-08-2014

¹⁸ For more details on the initiatives seehttp://environment.asean.org/asean-working-group-on-climate-change/

THE AFRICAN UNION COMMISSION (AUC)

The African Climate Policy Centre (ACPC) is an integral part of the Climate for Development in Africa (ClimDev-Africa) programme, which is a joint initiative of the United Nations Economic Commission for Africa (UNECA), the African Union Commission (AUC), and the African Development Bank (AfDB).¹⁹

THE PACIFIC ISLAND FORUM

The Pacific Island Forum represents Heads of Government of all the independent and self-governing Pacific Island countries, Australia and New Zealand. In 2005 the Leaders endorsed the Pacific Islands Framework for Action on Climate Change. The Framework's goal is to ensure that Pacific Island peoples and communities build their capacity to be resilient to the risks and impacts of climate change with the key objective to deliver on the expected outcomes under the following Principles²⁰

EUROPEAN UNION (EU)

The European Union has long been committed to international efforts to tackle climate change. It has taken many climate-related initiatives since 1991, when it issued the first Community strategy to limit carbon dioxide (CO 2) emissions and improve energy efficiency. These include a directive to promote electricity from renewable energy, voluntary commitments by car makers to reduce CO 2 emissions by 25% and proposals on the taxation of energy products.

The EU has long been a driving force in international negotiations on climate change and was instrumental in the development of the UN Framework Convention on Climate Change (UNFCCC) and the Kyoto Protocol. EU is instrumental for UN's negotiations are under way to draw up a new global climate agreement covering all countries to achieve greater cuts in global emissions over the rest of this decade. The aim is to keep global warming below 2°C compared to the temperature that prevailed in pre-industrial times.

The new framework is to be finalised by 2015 and implemented from 2020. As part of the transition to the future global climate regime, the EU is taking part in a second phase of the Kyoto Protocol running from 2013 to 2020.

As the world's leading donor of development aid, the EU also provides funds to developing countries to tackle climate change. It gave just over €7.3 billion in "fast start" financing to developing countries over 2010-2012 and is continuing to provide climate finance every year.²¹

SHORTCOMINGS IN THE POLICIES

The very important consensus among countries about climate change has been the United Nations Framework Convention on Climate Change(UNFCCC) and Kyoto Protocol. The continued fight between the developed countries and the developing countries about the standard of emission of green house gases has not been resolved. Countries like the United States which always talks about the global warming and curbing climate change has not committed itself to the norms laid down in the Kyoto Protocol. This as usual has led to a debate among other developed countries as to the binding effect of this protocol on nations when one of the major developed countries is not a part of the above. The other drawback found in the protocol is the cap on the emission levels for the developing nations and its strict compliance. Countries like India and China whose economy is booming if the framework does not specifically lay down the curb on the emission then the same would become an example for other countries whose economies are under development. Hence the regime still falls well short of promoting needed action to effect positive change, including committing to a post–Kyoto framework.

Another major drawback is the about the consensus among nations. From Kyoto to Copenhagen and Cancun to Durban the issue still continues. Nations are not able to commit as to when the commitments would strictly be enforceable and till when should the Kyoto protocol be extended. Also when it comes to strict enforceability the weakness of International law comes in the way as to what is the mechanism that should be adopted which is the major issue as all the nations are sovereign and can this be compromised for laying down standards for greenhouse gas emissions.

At the most basic level, countries disagree over climate monitoring and financing stipulations in the Kyoto Protocol and other legally binding accords. Climate frameworks struggle to effectively monitor greenhouse gas outputs, especially in developing countries. Many countries lack the domestic capacity to audit their total emissions; even if they are able to monitor national levels, some fear that reporting such numbers would encourage international pressure to cap their emissions. Others, like China, argue that an international monitoring system represents an infringement on national sovereignty and that developing states should be afforded some leniency in emissions as they are currently in critical stages of economic development.²²

Another issue of concern is the parallel minilateral arrangements made between nations made on major issues like trade, commerce public health, finance etc. They also have a significant effects on various issues including climate change though not directly. Despite concern that alternative efforts to the UNFCCC process might undermine the credibility and success of that universal forum, yet every small effort is helps in bringing in positive changes. The drawback is the lack of coordinated policies and programs which can be a problem and lead to redundancy.

The variance between commitment and action remains an obstacle to the development of a comprehensive solution. Despite the arguments, disagreements and shortcomings the hard work of the United Nations specifically UNFCCC is commendable. Even a small change in the attitude of the nations will go a long way curbing the effects of climate change. The nations also must be appreciated for their individual and collective efforts which has led though not a gigantic change but definitely a positive change which in the long run will yield success. The best example for this is Canada. The government has already taken action on two of Canada's largest sources of GHG emissions: transportation and electricity. As a result of this action:

- Canada became the first major coal user to ban the construction of traditional coal-fired electricity generation units.
- In the first 21 years, the coal regulations are expected to result in a cumulative reduction in GHG emissions of about 214 megatonnes (Mt)—the equivalent of removing 2.6 million personal vehicles from the road per year over this period.

As a result of the above effort:

- In 2012, Canada's GHG emissions were 5.1 per cent lower than in 2005, while the economy grew by 10.6 per cent during the same period.
- Canada boasts one of the cleanest electricity systems in the G7 and in the world, with 79 per cent of our electricity supply emitting no greenhouse gases.
- Emissions intensity (emissions per dollar of GDP) has been decreasing—a trend that is projected to continue to 2030.
- Furthermore, Canada's per capita GHG emissions are now at their lowest level since tracking began in 1990, all while the economy has grown.
- A 2013 report by the International Energy Agency ranked Canada number two worldwide in energy efficiency.²³

CONCLUSION

Thus the road to success in nullifying the effects of climate change is indeed very far but the tiny mile stones touched by nations and international and regional organisations cannot be sidelined or undermined. The success of any negotiations regarding this issue is in consensus as nations must be aware that we may be divided as nations geographically but all these nations are on one planet called Earth and anything that affects one nation will definitely have its serious repercussions on another nation. Hence all the nations must frame policies keeping these issues in mind. Sovereignty over a territory can be enjoyed if the territory can be preserved from calamities.

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¹⁹ http://www.uneca.org/acpc accessed on 24-07-2014

²⁰ http://www.sprep.org/climate_change/pycc/documents/PIFACC.pdf accessed on 24-07-2014

²¹ http://ec.europa.eu/clima/policies/brief/eu/index_en.htm accessed on 21-11-2014

²²"The Global Climate Change Regime." Jul 2012. Council on Foreign Relations. Nov 2014.

²³ For more details http://www.climatechange.gc.ca/default.asp?lang=En&n=72F16A84-1 accessed on 21-10-2014

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