Position on the Climate Policy Priorities in Ukraine and the World before the UN Climate Change Conference (COP30)

On November 10–21, 2025, the 30th Conference of the Parties (COP30) of the United Nations Framework Convention on Climate Change (UNFCCC) will take place in Brazil. The choice of venue this year is symbolic: The city of Belem is located in the heart of Amazonia, which should highlight the importance of preserving tropical forests and the interconnectedness of climate and nature.[1]

The conference serves as a key international platform for agreements on combating the climate crisis and as a basis for countries' national policies. All 198 Parties to the UNFCCC, including Ukraine, are eligible to participate in the conference to synchronize their climate policies and search for solutions to stop the average temperature increase at 1.5°C above the pre-industrial levels in accordance with the Paris Agreement goals.

Global efforts at climate negotiations are critical, as the 2023 Intergovernmental Panel on Climate Change estimated that **the past decade (2011–2022) had already reached a global warming rate of 1.1°C above the pre-industrial levels**.[2] Unfortunately, the figures are only increasing, with the last 10 years, i.e., 2015–2024, being the 10 warmest on record.

This year's COP is anticipated to become an "implementation COP" focused on the rapid search for solutions to implement the nationally determined contributions (NDCs). The key discussion areas this year should include defining indicators to assess progress toward the Global Goal on Adaptation, scaling up climate finance for developing states, and advancing a Just Transition to a low-carbon economy.[3] Finally, a dialogue on the implementation of the first Global Stocktake conclusions is expected.

The negotiation process will be accompanied by the Action Agenda[4] involving six thematic areas and striving to mobilize voluntary climate action from civil society, business,

[1] What is COP30 and why does it matter for the climate? Chatham House, September 5, 2025. URL: https://www.chathamhouse.org/2025/09/what-cop30-and-why-does-it-matter-climate

[2] Climate Change 2023 Synthesis Report. *IPCC* (2023). p. 42. URL: https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf

[3] COP30: The UN Climate Change Conference. *UNDP*. URL: https://climatepromise.undp.org/news-and-stories/cop30-un-climate-change-conference

[4] COP30 Action Agenda. COP30 official website, August 28, 2025. URL: https://cop30.br/en/action-agenda

investors, cities, and states to accelerate emissions reductions, climate change adaptation, and transition to a sustainable economy. The Action Agenda aims to engage conference parties who are not negotiating agreements but play a crucial role in their implementation.

The climate talks in Bonn in June 2025 were neither a failure nor a breakthrough. Though there was some technical progress on the indicators for the Global Goal on Adaptation (GGA) and the Just Transition Agenda, there are still differences in opinions on the indicators and means of Global Stocktake (GST) implementation and tracking its results,[5] while financial issues remain open. In Bonn, Brazilian representatives defined three key priorities that they believe can make COP30 a success: the GGA, the Just Transition Work Programme (JTWP), and the implementation of the first GST conclusions.[6] Importantly, 2025 is also the year when countries must submit their updated NDCs (3.0). The COP30 President is already preparing for the states' disputes on the results of the new NDCs submitted.[7]

The geopolitical context of COP30 is important as well.

Noteworthy is the current direction of the **EU** climate and industrial policy and its role for Ukraine. In particular, in February 2025, the EU presented the Clean Industrial Deal, i.e., a framework that should turn decarbonization into a driver of competitiveness: affordable energy, boosting demand for clean products, financing the clean transition, circularity and access to materials, as well as developing workers' skills and creating quality jobs.[8] In parallel, the Net-Zero Industry Act, adopted in June 2024, provides a regulatory "support" for scaling up clean technologies production in the EU.[9] In addition, starting January 1, 2026, the Carbon Border Adjustment Mechanism (CBAM) enters the "paid" phase: EU importers will have to purchase CBM certificates corresponding the emissions "embedded" in imported products.[10] For Ukraine, this assumes direct price risks for steel, cement, and aluminum exports[11] unless the decarbonization of supply chains is accelerated (as importers can shift the economic

[5] What COP30 needs after the June milestone: a to-do list for the second half of 2025. *IDDRI*, July 3, 2025. URL: https://www.iddri.org/en/publications-and-events/blog-post/what-cop30-needs-after-june-milestone-do-list-second-half-2025

[6] Адаптація, справедлива трансформація, кліматичні фінанси - про що говорили на переговорах в Бонні та що чекати від COP30 у Бразилії. *Екодія*, 17 липня 2025 року. URL: https://ecoaction.org.ua/adaptatsia-spravedlyva-transformatsia-klimfin-perehovory-v-bonni2025.html

[7] COP30 president prepares for clash of views on how to respond to NDCs. *Climate Home News,* August 19, 2025. URL: https://www.climatechangenews.com/2025/08/19/cop30-president-prepares-for-clash-of-views-on-how-to-respond-to-ndcs/

[8] Clean Industrial Deal. *European Commission.* URL: https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en

[9] The Net-Zero Industry Act: Making the EU the home of clean technologies manufacturing and green jobs. *European Commission.* URL: https://single-market-economy.ec.europa.eu/industry/sustainability/net-zero-industry-act_en

[10] Carbon Border Adjustment Mechanism. *An official website of the European Union.* URL: https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en

[11] Breilean I., Gupte E. Ukraine's industry faces risks without CBAM exemptions as definitive phase approaches. *S&P Global*, July 28, 2025. URL: https://www.spglobal.com/commodity-insights/en/news-research/latest-news/energy-transition/072825-ukraines-industry-faces-risks-without-cbam-exemptions-as-definitive-phase-approaches

burden to suppliers by undercutting purchase prices and generally switching to product manufacturers with a lower carbon footprint). At the same time, the Clean Industrial Deal opens the "windows of opportunity" – the European Commission is planning to introduce Clean Trade & Investment Partnerships (CTIPs) to diversify supply chains and develop investment partnerships,[12] which could be a chance to integrate Ukrainian "green" projects and technologies.

Prior to international climate negotiations, the EU Council forms a position and outlines a framework for the member states to act together. [13] In particular, in July 2025, the European Commission proposed amendments to the European Climate Law to include a new target of 90% emission cuts by 2040. [14] Meanwhile, before COP30, the Council stated in its Position that the European Union aims to lead in promoting global climate efforts, with its main priorities including enhancing global ambitions to reduce emissions to keep the 1.5°C target within reach, achieve adaptation goals, strengthen climate finance mobilization, and accelerate the energy transition.[15]

European integration certainly remains extremely important for Ukraine, but moving toward it solely by reactively responding to external demands is not enough. Ukraine's European integration should be considered not only as fulfillment of obligations but also as an opportunity to implement the best practices that will help Ukraine both during the war and after it ends. Such an approach will allow Ukraine to not just "catch up" with the EU's policies and requirements but to form its own contribution to the European and global climate agenda, since combating climate change is in the country's national interest.

With the change of authorities in the **United States of America**, its approach to the country's climate positioning has changed as well. On his first day in office in January 2025, President Donald Trump initiated the process of the US withdrawal from the Paris Agreement. The US is the second largest emitter of greenhouse gases,[16] and therefore steps moving away from active climate efforts harm the negotiation progress.[17] This could slow the pace of US emission reductions, decrease the pressure on other countries to increase their NDC

[12] Clean Industrial Deal. *European Commission.* URL: https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en

[13] EU at COP29 Climate Change Conference. *An official website of the European Union*. URL: https://commission.europa.eu/topics/climate-action/eu-un-climate-change-conference/eu-cop29-climate-change-conference_en

[14] 2040 climate target. *An official website of the European Union*. URL: https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2040-climate-target_en

[15] COP30: Council sets EU position for the climate conference in Belém. *European Council*. URL: https://www.consilium.europa.eu/en/press/press-releases/2025/10/21/cop30-council-sets-eu-position-for-the-climate-conference-in-belem/

[16] GHG emissions of all world countries: 2025 report. *An official EU website.* URL: https://edgar.jrc.ec.europa.eu/report_2025

[17] Aberg A. What is COP30 and why does it matter for the climate? *Chatham House*, 5 September 2025. URL: https://www.chathamhouse.org/2025/09/what-cop30-and-why-does-it-matter-climate

ambitions, and complicate negotiations on financing for developing states. However, no other country has yet followed the US example and withdrawn from the Paris Agreement.

Adoption of the **advisory opinion by the International Court of Justice on the climate commitments of states** in July 2025 became an important global shift.[18] The court confirmed that limiting global warming to 1.5°C is the main goal of the Paris Agreement, with countries being obliged to submit NDCs that reflect their "highest possible ambition." Moreover, it stressed that failure to meet these commitments could cause serious legal consequences under international law. Separately, the Court noted that the production and consumption of fossil fuels, as well as granting licenses for the exploration of mineral deposits or state subsidies, can be qualified as "internationally wrongful acts" attributable to specific states.[19]

Russia's role in climate negotiations should also be noted. Russia uses international climate platforms for its own propaganda, creating an illusion of participation in climate initiatives and support of Global South countries. In its public statements, it repeatedly emphasizes its climate progress, which, nevertheless, is not true. At COP29 in Baku, the Russian delegation was among the largest ones, with more than 900 people involved, including oil and gas lobbyists.[20] Though Russia ranks third in the world in historical greenhouse gas emissions, its role is rarely highlighted in terms of responsibility. It is important for Ukraine to stress the fact that while Russia lacks additional funds to support Global South countries, it does spend billions on the war in Ukraine.

It is in these circumstances that Ukraine is entering the COP30 negotiations.

For Ukraine, participation in COP is an opportunity to better understand global challenges and stay informed about the latest approaches to reducing emissions, just transition, adaptation, and financing — thus adopting the best techniques into its own national policy and local practices. Ukraine should take part in developing solutions that determine global climate policy. At the same time, participation in COP30 is an opportunity for us to shape new narratives internationally and promote the idea of interconnection between climate, war, and security.

[18] Obligations of states in respect of climate change. Advisory opinion. 2025. *International court of justice,* July 23, 2025. URL: https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf

[19] Obligations of states in respect of climate change. Advisory opinion. 2025. *International court of justice*, July 23, 2025. Paragraph 427. URL: https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723- adv-01-00-en.pdf

[20] $300 млрд на клімат: що вирішили на COP29 і чому це важливо для України? *Екодія*, 31 грудня 2024 р. URL: https://ecoaction.org.ua/300-mlrd-na-klimat-cop29.html

KEY RECOMMENDATIONS

While participating in COP30, it is important for Ukraine to:

- **support the complete abandonment of fossil fuels** within the agreed timeframe to contain the climate crisis, as well as join the global initiative aimed at reducing dependence on fossil fuels, i.e., the Beyond Oil & Gas Alliance;

- **advocate renewable energy sources (RES) and energy efficiency to other states** not only as sustainable climate solutions, but also — considering the Russian-Ukrainian war experience — as measures to increase energy security. To this end, specific cases should be used to demonstrate how RES and energy efficiency enhance security (for example, through the installation of rooftop solar power plants on critical infrastructure facilities or thermal modernization of buildings). In addition, statements on accelerating energy efficiency measures and deployment of RES capacities should be particularly emphasized during negotiations, which will align with the Global Renewables & Energy Efficiency Pledge;

- **support the establishment of the Belém Action Mechanism (BAM)** — a UNFCCC-based framework for promoting just transition in all sectors of economy within and between countries through international cooperation (sharing practices and resources, implementing joint initiatives, etc.);

- **to establish cooperation with the International Methane Emissions Observatory (IMEO)** and actively contribute to the practical implementation of the *Global Methane Pledge* initiative. Reducing methane emissions is one of the fastest and most effective ways to slow down climate change in the short term. Collaboration with IMEO will provide access to state-of-the-art satellite-based methodologies for monitoring methane emissions, technical expertise, and international best practices, which are critically important for fulfilling Ukraine's commitments under the Global Methane Pledge.

- **actively participate in negotiations to agree on indicators for assessing adaptation measures progress within the GGA** and ensure their further integration into the new National Adaptation Strategy and sectoral adaptation program documents in Ukraine. This will create a unified monitoring and reporting system, increase the effectiveness of adaptation measures, and contribute to the country's long-term climate resilience;

- **consistently advocate for the need to place greater climate responsibility on Russia** toward developing countries, demonstrating solidarity with vulnerable states, and highlighting Russia's historical and current contribution to the global climate crisis. In this regard, it is necessary to prioritize deeper cooperation with Global South countries, combining efforts in a common pursuit of decolonization and climate justice, exposing

imperial narratives, in particular by emphasizing Russia's role as a "fossil empire," and promoting the "polluter pays" principle;

- **actively advocate against the UNFCCC's acceptance of Russian reports containing data on emissions in the temporarily occupied territories of Ukraine,** as well as send a statement to the secretariat regarding Russia's illegal inclusion of the occupied territories of Ukraine in its report together with an explanation of why the information on the so-called "voluntary accession" to Russia (which Russia has repeatedly submitted) is not true;

- **avoid supporting wrong climate solutions,** such as nuclear energy development, use of carbon capture and storage technologies, geoengineering, widespread use of hydrogen instead of real emission reductions "at the source," as well as inappropriate and inefficient production and use of alternative fuels.

The position below presents a vision of the decisions to be taken at the international and national levels in Ukraine to achieve the goals of the Paris Agreement.

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1. Abandoning Fossil Fuels

Incineration of fossil fuels is the key driver of anthropogenic climate change. For almost three decades of negotiations, the Parties to the Convention avoided directly mentioning the need to abandon fossil fuels in their decisions. It was not until 2023, at COP28 in Dubai, that for the first time, countries agreed to phase out fossil fuels, enshrining this in the GST[21] of the Paris Agreement with the wording "transitioning away from fossil fuels." This was an important step forward, but not a point of clear abandonment of coal, oil, and gas within a specific timeframe. The "loopholes" in the text leave room for the continued use of fossil fuel and adoption of wrong decisions, distracting from real climate action. **The GST also states that to achieve the 1.5°C target, greenhouse gas emissions need to be reduced by 43% by 2030 and by 60% by 2035 compared to 2019, with the net-zero emissions achieved by 2050 (para 27 of the GST).**

In 2025[22], 2024[23] and 2023,[24] the Council of the European Union, in its pre-COP decisions, confirmed the need to urgently reduce dependence on fossil fuels and respective subsidies. However, the focus was precisely on phasing out "unabated fossil fuels," i.e., fuels lacking emission reduction technologies (with the possibility of using fossil fuels if greenhouse gas emissions are prevented). Herewith, among other things, it was emphasized that:

- emission reduction technologies operate on a limited scale and should be applied only in exceptional sectors rather than to postpone climate action;
- it is important that the energy sector is largely free of fossil fuels well before 2050, and the global energy system is fully or at least largely decarbonized by the 2030s.

[21] Para 28(d) GST: "Transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science."

[22] Outcome of Proceedings: Preparation for the 30th Conference of the Parties (COP30) of the United Nations Framework Convention on Climate Change (UNFCCC) – Council conclusions. *Council of the European Union*, Brussels, 21 October 2025. URL: https://data.consilium.europa.eu/doc/document/ST-14310-2025-INIT/en/pdf

[23] Council of the EU, "Preparations for the 29th Conference of the Parties (COP29) of the United Nations Framework Convention on Climate Change (UNFCCC)," [URL: https://data.consilium.europa.eu/doc/document/ST-14459-2024-INIT/en/pdf], para 26, 27

[24] Council of the EU, "Preparations for the 28th Conference of the Parties (COP28) of the United Nations Framework Convention on Climate Change," [URL: https://data.consilium.europa.eu/doc/document/ST-14285-2023-INIT/en/pdf], para 14, 15.

While some progress has been made globally, joint plans should include a complete phase-out of fossil fuels within a certain timeframe to prevent further aggravation of the climate crisis.

For Ukraine, transitioning away from fossil fuels is closely related to strategic decisions on the development of the energy sector and its recovery after the large-scale Russian attacks. At the national level, the country has already set:

- a goal to achieve the country's climate neutrality by 2050 in accordance with the Law of Ukraine "On the Basic Principles of the State Climate Policy"[25];
- a goal to achieve climate neutrality of the energy sector of Ukraine by 2050 in accordance with the Energy Strategy of Ukraine up to 2050[26];
- a goal to reduce the use of coal-fired generation until its complete decommissioning in 2035 in accordance with the National Energy and Climate Plan up to 2030[27];
- a goal to reduce methane emissions by 30% by 2030 compared to 2020 levels, in accordance with the National Energy and Climate Plan for the period up to 2030[28];
- a goal to reduce greenhouse gas emissions from transport by 90% compared to 2021 levels in accordance with the National Transport Strategy up to 2030[29].

In the face of large-scale challenges amid the Russian aggression, it is important for Ukraine to make practical strategic decisions that will shape the country's future progress. The restoration and development of the energy sector cannot proceed on a "business as usual" basis. Moving away from fossil fuels is not only a climate issue but also an important aspect of Ukraine's energy independence and security.

Therefore, strategic development should prioritize increasing both decentralized small-scale generation from RES and the number of energy storage systems while simultaneously developing electricity grids. RES facilities are less vulnerable to Russian attacks and have a relatively short commissioning period. Ukraine should accelerate their installation and increase its ambitions, as current national targets for RES development remain insufficient, especially in the context of the energy crisis. This will also reduce

[25] Закон України "Про основні засади державної кліматичної політики" від 08.10.2024 р. № 3991-IX. URL: https://zakon.rada.gov.ua/laws/show/3991-20#Text

[26] Розпорядження Кабінету Міністрів України "Про схвалення Енергетичної стратегії України на період до 2050 року" від 21 квітня 2023 р. № 373-р. URL: https://zakon.rada.gov.ua/laws/show/373-2023-%D1%80#Text, Національний план з енергетики та клімату на період до 2030 року, схвалений розпорядженням Кабінету Міністрів України від 25 червня 2024 р. № 587-р. URL: https://me.gov.ua/view/bb0b9ef5-ea96-4b8a-8f2f-471faf32c9df, стор. 39

[27] Національний план з енергетики та клімату на період до 2030 року, схвалений розпорядженням Кабінету Міністрів України від 25 червня 2024 р. № 587-р. URL: https://me.gov.ua/view/bb0b9ef5-ea96-4b8a-8f2f-471faf32c9df, стор. 40

[28] Національний план з енергетики та клімату на період до 2030 року, схвалений розпорядженням Кабінету Міністрів України від 25 червня 2024 р. № 587-р. С. 40. URL: https://me.gov.ua/view/bb0b9ef5-ea96-4b8a-8f2f-471faf32c9df, стор. 40

[29] Постанова Кабінету Міністрів України "Про схвалення Національної транспортної стратегії України на період до 2030 року та затвердження операційного плану заходів з її реалізації у 2025-2027 роках" від 27 грудня 2024 р. № 1550. URL: https://zakon.rada.gov.ua/laws/show/1550-2024-%D0%BF#n22

dependence on fossil fuels in the transport sector, while growing electromobility will, in turn, reduce sectoral greenhouse gas emissions. Increasing energy efficiency will help reduce the need for energy resources.

2. Ukraine's Participation in Global Initiatives

It is important that national policies are consistent and aligned with the commitments that Ukraine has made, as well as with the initiatives it has joined. In addition, it is important to monitor and publicly report on the progress in implementing these initiatives.

In 2021, more than 100 states, including Ukraine, joined the ***Global Methane Pledge***, which provides for a 30% reduction in methane emissions by 2030 compared to 2020 levels.[30] Following carbon dioxide, methane is a greenhouse gas with the second most significant impact on climate change. Methane decomposes rapidly in the atmosphere, and its global warming potential is 82.5 times higher than CO_2 during the first 20 years after emission. Reducing methane emissions is one of the fastest and most effective ways to slow climate change in the short term. This gas is difficult to detect and measure, but preventing its leakage is one of the simplest and cheapest climate solutions that does not require significant technological developments. In 2023, the Cabinet of Ministers of Ukraine approved an action plan to implement Ukraine's climate policy within its participation in the global methane emissions reduction initiative *"Global Methane Pledge."*[31] In implementing the policies and measures under Ukraine's participation in the *Global Methane Pledge*, special attention should be paid to methane emissions associated with the extraction and transportation of fossil fuels, including imported ones. It is critically important for Ukraine to establish a mandatory system of monitoring and reporting on methane emissions across the entire fossil fuel supply chain — from extraction to final consumption. Such an approach is consistent with the EU requirements on transparency and sustainability of supply chains and will facilitate Ukraine's preparation, as a future EU member, for the introduction of carbon border adjustment mechanisms in relation to imports from third countries.

Ukraine also needs to strengthen its engagement in the implementation of the *Global Methane Pledge* by moving from formal participation to the active implementation of concrete measures. To this end, it is recommended to ensure public reporting on progress toward the goal of reducing methane emissions by 30% by 2030, including annual reports on the implementation of the approved action plan with clear sectoral indicators (energy, agriculture, and waste). Furthermore, Ukraine should enhance its participation in international platforms and initiatives. It is essential to establish cooperation with the *International Methane Emissions Observatory (IMEO).* Collaboration with IMEO will provide access to the latest satellite-based methodologies for methane emissions monitoring, technical expertise, and international experience — all of which are critically important for

[30] Україна долучилася до Глобальної ініціативи зі скорочення викидів метану. Що це означає?. *Екодія*, 3 листопада 2021 р. URL: https://ecoaction.org.ua/global-methane-pledge.html

[31] Розпорядження Кабінету Міністрів України від 7 липня 2023 р. № 607-р "Про затвердження плану заходів з реалізації кліматичної політики України в рамках участі в глобальній ініціативі зі скорочення викидів метану "Global Methane Pledge." URL: https://zakon.rada.gov.ua/laws/show/607-2023-%D1%80#Text

fulfilling Ukraine's commitments under the *Global Methane Pledge* and for preparing its future Nationally Determined Contributions (NDCs).

During COP28 in 2023, a coalition of 118 states, including Ukraine, signed the ***Global Renewables and Energy Efficiency Pledge***. According to this document, the participating countries agreed to work toward: (1) tripling the global installed capacity to at least 11,000 GW by 2030; (2) doubling the rate of energy efficiency improvement from 2% to 4% per year by 2030; and (3) using the principle of energy efficiency as the "first fuel" ("energy efficiency first") for policy development, planning, and major investment decisions.[32] Countries are to take comprehensive domestic measures to contribute to the achievement of this commitment, in particular by adopting ambitious national policies on renewable energy and energy efficiency and reflecting this ambition, e.g., in NDCs and cooperation with cities. Ukraine still needs to accelerate the pace of installation of renewable energy facilities and increase its ambitions, as currently national RES development targets are still insufficient, especially in the context of the energy crisis.

It is also noteworthy that, as a result of COP28, Ukraine has joined the following Declarations:

- ***Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action***.[33] This Declaration was signed by 134 countries, including Ukraine, representing 5.7 billion people and 75% of all emissions from global food production and consumption.
  The states supporting the Declaration committed to accelerating the integration of agricultural and food systems' issues into climate change actions. This should be reflected, in particular, in national adaptation plans, NDCs, long-term strategies, as well as national biodiversity strategies and action plans. The Parties declared their intention to cooperate and expeditiously reduce the harmful impacts of agriculture and food systems by conserving, protecting and restoring land and natural ecosystems, as well as transitioning to more sustainable production and consumption;

- ***Declaration on Climate and Health,***[34] which aims to enhance the integration of health issues into national climate policy, take them into account when developing NDCs, national adaptation plans, etc., and include climate issues in national health programs and policies;
- ***Declaration on Climate, Relief, Recovery and Peace***,[35] in which states call for bolder collective action to increase climate resilience needed in highly vulnerable countries, especially those at risk or affected, e.g., by conflict;

[32] Global Renewables and Energy Efficiency Pledge. URL: https://energy.ec.europa.eu/system/files/2023-12/Global_Renewables_and_Energy_Efficiency_Pledge.pdf

[33] COP28 UAE Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action. *SDG2*. URL: https://sdg2advocacyhub.org/latest/cop28-uae-declaration-on-sustainable-agriculture-resilient-food-systems-and-climate-action/

[34] COP28 UAE Declaration on climate and health. *World Health Organization.* URL: https://www.who.int/publications/m/item/cop28-uae-declaration-on-climate-and-health

[35] COP28 Declaration on Climate, Relief, Recovery and Peace. *COP28 official website.* URL: https://www.cop28.com/en/cop28-declaration-on-climate-relief-recovery-and-peace

– ***Declaration on Children, Youth and Climate Action***.[36] The Declaration itself was developed and signed by states back in 2019 at COP25, and Ukraine joined it in 2023. The document recognizes the crucial role of children and youth as agents of change and provides for strengthening their capacity to mitigate climate change effects and adapt by establishing and investing in climate change and environmental education.

Ukraine's participation in global initiatives aiming to reduce dependence on fossil fuels should be strengthened.

Ukraine should join the ***Beyond Oil & Gas Alliance*** (BOGA)[37] countries, an international coalition of governments and partners working together to promote the phase-out of oil and gas production. One can join the alliance as:

(a) a core member. In this case, it is necessary to make a commitment to stop new concession agreements, licenses, and permits for subsoil use to produce oil and gas;

(b) an associate member. In this case, it is necessary to take one or more concrete steps that help reduce oil and gas production (like including relevant targets in the NDCs, reforming the sector, ending subsidies for oil and gas production, etc.);

(c) friends of BOGA. In this case, it is necessary to sign a joint declaration.

At COP29 in Baku, the European Commission and BOGA announced a new partnership to accelerate a just and equitable transition away from fossil fuels in Europe and globally.[38]

3. Climate Finance: Operationalizing Figures

Climate finance remains an important element of international climate negotiations as it determines the ability of states around the world to implement measures to reduce emissions and adapt to climate change. At COP29, the Parties reached an agreement on a new collective financial target, i.e., the *New Collective Quantified Goal* (NCQG). As a result of their joint work, two main sub-goals were fixed within the NCQG[39]:

– developed countries should take the lead in directing at least **$300 billion annually by 2035** to overcome the climate crisis. Previously, in 2009, developed states agreed to mobilize $100 billion annually by 2020 to support climate action in developing countries. In 2015, in accordance with the Paris Agreement, the Parties agreed to extend this target until 2025, and at COP29, they decided to increase the new target from $100 billion to $300 billion annually by 2035. However, the agreed target has been widely criticized due

[36] Declaration on Children, Youth and Climate Action. *UNICEF*. URL: https://www.unicef.org/environment-and-climate-change/climate-declaration#declaration

[37] The Beyond Oil and Gas Alliance Declaration. URL: https://drive.google.com/file/d/176fTn0z5aNr-vhUecAsLOD8Jg110dQMF/view

[38] BOGA and European Commission announce partnership at COP29. *BOGA*. URL: https://beyondoilandgasalliance.org/boga-and-european-commission-announce-partnership-at-cop29/

[39] Baku-Belèm Roadmap: The Path to COP30. *ECCO,* 22 April 2025. URL: https://eccoclimate.org/baku-belem-roadmap-the-path-to-cop30/

to it being significantly lower than the actual needs of developing states, estimated at over $1 trillion per year. [40]

- it is necessary to ensure that all participants cooperate to increase financing for developing countries from public and private sources to **$1.3 trillion per year by 2035**. To scale up this financing, the ***"Baku-to-Belém Roadmap"*** was launched.[41] The *Baku-to-Belém Roadmap* is one of the key initiatives that Brazil has identified for itself at COP30. It aims to outline strategies for reforming multilateral financing, improving access to climate finance, building internal capacity, and unlocking opportunities for large-scale investment.

The Belém talks are thus expected to contribute to the operationalization of financial targets to ensure a just and effective financial aid for developing nations.

Ukraine should consistently support solutions that provide grant and concessional financing for countries most affected by climate crisis effects (in particular, to close the funding gap for Loss and Damage compensation), as well as solutions that ensure the compatibility of financial flows with the Paris Agreement goals. This is a matter of not only justice but also solidarity with the countries mostly representing the Global South. According to the UNFCCC, Ukraine belongs to *Annex I* as a state with an economy in transition. This status means that it is not a donor of climate finance (*Annex II*) while also not belonging to the group of developing states, and it is therefore not a priority party for claiming climate finance.

Russia also belongs to *Annex I* as a state with an economy in transition. However, its actual status — a state whose economy mostly relies on the use and export of fossil fuels and which finances the war with these revenues — raises the issue of the irrelevance of its current status. **Ukraine should consistently advocate that Russia must bear greater climate responsibility toward developing states. Thus, Ukraine will be able to demonstrate more solidarity with and support for vulnerable countries, as well as highlight Russia's role and the need for its climate responsibility.**

Changing a state's affiliation to a particular Annex is quite complicated, though procedurally possible. Status review can be initiated within Article 15 of the Convention (amendments to the Convention or its Annexes), which allows making decisions by consensus or, in its absence, after all efforts have been exhausted, by a three-quarters majority of the Parties present and voting.[42] In practice, this assumes submitting a proposal for amendments to the Annex I and Annex II lists to the Secretariat according to the procedure outlined in Articles 15 and 16, no later than six months prior COP.[43] The change in Turkey's status should

[40] COP29: чим завершився головний кліматичний саміт світу та яка в ньому роль України. *Екодія*, 29 листопада 2024 р. URL: https://ecoaction.org.ua/cop29-chym-zavershyvsia.html

[41] Baku-Belém Roadmap: The Path to COP30. *ECCO*, 22 April 2025. URL: https://eccoclimate.org/baku-belem-roadmap-the-path-to-cop30/

[42] United Nations Framework Convention on Climate Change. *United Nations,* 1992. URL: https://unfccc.int/resource/docs/convkp/conveng.pdf

[43] Proposals to Amend the Lists in Annexes I and II of the Convention. *UNFCCC*. URL: https://unfccc.int/process-and-meetings/the-convention/history-of-the-convention/proposals-to-amend-the-lists-in-annexes-i-and-ii-of-the-convention

be particularly noted: Following COP7 in Marrakesh (2001), the Parties adopted Decision 26/CP.7, which removed Turkey from Annex II and recognized its "special circumstances" as an Annex I Party.[44]

Importantly, the International Court of Justice has stated in its advisory opinion that "the status of a state as developed or developing is not static" and depends on "the current circumstances of the state concerned." This is a major notion, since current definitions of these terms (which determine who is expected to provide financing and to which countries) rely on an early 1990s classification.[45]

4. Nationally Determined Contributions

When implementing the first Global Stocktake (GST-1) decisions, states should take decisive action, in particular, to incorporate GST-1 results into their new NDCs. To date, the link between the GST-1 results and the third round of NDCs (NDC 3.0) lacks efficiency, while the process of further implementation is not sufficiently defined. That is, NDCs poorly reflect and consider the GST-1 conclusions and recommendations: The connection between them is limited and there is no clear logic as to how the GST-1 signals will be operationalized in targets and measures.

In its 2025 advisory opinion, the International Court of Justice[46] emphasized that the submission of NDCs alone is not sufficient to meet obligations under the Paris Agreement: NDCs' content must be able to ensure an "adequate contribution" to achieving the 1.5°C goal. The Court also confirmed that limiting global warming to 1.5°C is the agreed goal of the Paris Agreement, while states should be guided by the best available scientific knowledge and the principle of *common but differentiated responsibilities (CBDR)*. Moreover, the judges noted that the obligation to prevent significant damage to the climate system extends to fossil fuel production, consumption, and infrastructure, thereby emphasizing the requirements arising from the GST-1 results.

Prior to COP30, the UNFCCC Secretariat published an updated *NDC Synthesis Report*[47] assessing the cumulative impact of the new commitments submitted to date. As of September 2025, only 64 states had provided their updated NDCs, covering about 30% of global greenhouse gas emissions, while their collective expected emissions reductions were about 17% below 2019 levels. Though the structure of the NDCs submitted has improved, the pace and scale of action are still insufficient to ensure that the 1.5°C target is met. The "Emissions Gap"[48] is likely to remain dangerously large, with this year's report by the Secretariat

[44] Report of the Conference of the Parties on its seventh session, held at Marrakesh from 29 October to 10 November 2001. *UNFCCC*, January 21, 2002. URL: https://unfccc.int/resource/docs/cop7/13a04.pdf

[45] Obligations of states in respect of climate change. Advisory opinion. 2025. *International court of justice,* July 23, 2025. Paragraph 226. URL: https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf

[46] Obligations of states in respect of climate change: Advisory opinion. *ICJ*, July 23, 2025. Paragraph 242. URL: https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf

[47] 2025 NDC Synthesis Report. *UNFCCC*. URL: https://unfccc.int/sites/default/files/resource/cma2025_08.pdf

[48] Emissions Gap Report 2024. *UNEP*, October 24, 2024. URL: https://www.unep.org/resources/emissions-gap-report-2024

confirming what is already known: Much greater ambition and bold actions are needed. [49] At the same time, these findings will be important for this year's COP, where countries will define the next steps to close this gap. States will need to answer the question of what happens next after their NDCs and how to transform ambition into action and preserve the possibility of a safer future. [50] The last such report, published in 2024, indicated that full implementation of current national plans would result in total 2030 emissions of 51.5 $GtCO_2e$.[51]

Ukraine, like other countries, was supposed to submit its updated NDC 3.0 within the extended deadline of September 2025. However, it was only on 29 October that the Cabinet of Ministers of Ukraine, by its Resolution, approved Ukraine's Second[52] Nationally Determined Contribution to the Paris Agreement[53] (the text of the document itself is yet to be made publicly available). Taking into consideration the experience gained during the preparation of the current NDC, Ukraine should draw appropriate conclusions to improve the preparation of the next NDC. Importantly, any NDC is not only a document that records the goal and the main policies and actions a state is planning to implement to overcome the climate crisis and adapt to its consequences. It also contains information on financing, technology, and capacity building needed to fulfil the necessary measures or, vice versa, on the provision of financing and appropriate technologies.[54] When updating Ukraine's NDC, it is also worth ensuring the development of an investment plan for NDC implementation, including investment opportunities' analysis, which will help facilitate the formation of policy frameworks and, hence, the attraction of private and public financing and mobilization of resources from international donors.[55]

Furthermore, Ukraine's updated NDC should meet the national goal of climate neutrality by 2050, provide a clear target for reducing emissions by 2035, and contain components regarding measures for adapting to climate change, ensuring their financing, and integrating policies for preserving natural ecosystems and biodiversity. The NDC should also take into account the need for a just transition, the target for absorbing greenhouse gases, and the GST results.[56]

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[49] Srouji J. Are countries` new climate plans ambitious enough? What we know so far. *World Resources Institute,* June 2, 2025. URL: https://www.wri.org/insights/assessing-2025-ndcs

[50] 2024 NDC Synthesis Report. *UNFCCC*. URL: https://unfccc.int/process-and-meetings/the-paris-agreement/nationally-determined-contributions-ndcs/2024-ndc-synthesis-report#Adaptation-component

[51] COP30 president prepares for clash of views on how to respond to NDCs. *Climate Home News,* August 19, 2025. URL: https://www.climatechangenews.com/2025/08/19/cop30-president-prepares-for-clash-of-views-on-how-to-respond-to-ndcs/

[52] *Національно визначений внесок, який подається Україною в рамках третього циклу оновлення НВВ.*

[53] Розпорядження Кабінету Міністрів України «Про схвалення Другого національно визначеного внеску України до Паризької угоди» від 29 жовтня 2025 р. No 1172-р. URL: https://zakon.rada.gov.ua/laws/show/1172-2025-%D1%80#Text

[54] 2024 NDC Synthesis Report. *UNFCCC*. URL: https://unfccc.int/process-and-meetings/the-paris-agreement/nationally-determined-contributions-ndcs/2024-ndc-synthesis-report#Adaptation-component

[55] Третій НВВ України: яким він повинен бути? Рекомендації та міжнародні підходи. *Екодія*, 7 липня 2025 р. URL: https://ecoaction.org.ua/tretij-nvv-ukrainy-iakym-vin-povynen-buty.html

[56] NDC 3.0. *UNFCCC*. URL: https://unfccc.int/ndc-3.0

Consistency with the European course affects Ukraine's lawmaking and planning framework as well. The European Climate Law[57] enshrines EU neutrality by 2050, and the updated European Commission proposal[58] sets ***a benchmark for 2040 — to reduce emissions by 90% compared to 1990 levels*** (with further coordination of sectoral policies). The EU benchmark of reducing emissions by 90% compared to 1990 levels is crucial for Ukraine, too: It should be considered when forming national climate goals and detailing sectoral trajectories.

NDC success depends not only on the fact of its preparation, but also on its actual subsequent fulfilment. It is important that after submitting the updated NDC in 2025 and participating in COP30, Ukraine takes into account the experience gained to develop a quality action plan for the updated NDC and its further implementation.

5. Just Transition

Just Transition is one of the system-forming elements of climate policy, combining decarbonization with the protection of workers and communities in vulnerable regions. It assumes forming a state climate policy that ensures a decent life and income for all workers and communities affected by the transition to low-carbon development and the achievement of climate neutrality.

Over the past decade, Ukraine has demonstrated tangible progress and political will in defining the concept of just transition, but all its processes are currently inextricably linked to and directed exclusively at its coal regions. However, a full and successful decarbonization of the entire country's economy requires expanding the scope and understanding of just transition beyond the current focus on only one region type. The government's just transition policies should also cover other carbon-intensive and mono-industrial communities, such as those dependent on oil, gas, and other fossil resources, as well as fossil fuel-dependent enterprises (like the metallurgy sector) that will transition to new low-carbon technologies, scale down their activities, or close down completely.

At COP30, **Ukraine has a unique chance to support the establishment of the Belém Action Mechanism (BAM) — a framework for promoting a just transition across economies within and between countries through international cooperation relying on the UNFCCC and the principles of equity and *common but differentiated responsibilities and respective capacities (CBDR-RC)*.**

The Belém Action Mechanism will focus on:

- developing and accessing knowledge and best practices on just transition, in particular through the continuation of the JTWP launched at COP27 in Egypt and strengthened at COP28 in the UAE;
- supporting actions and providing technical assistance to expand access to implementation and capacity-building means needed to implement the pathways of just transition and

[57] European Climate Law. *European Union.* URL: https://climate.ec.europa.eu/eu-action/european-climate-law_en

[58] EU Climate Law: new way to reach 2040 targets. *European Commission,* July 2, 2025. URL: https://commission.europa.eu/news-and-media/news/eu-climate-law-new-way-reach-2040-targets-2025-07-02_en

expand its means, including identifying debt-free grant financing or technology transfer and capacity-building for developing states, e.g., by coordinating and channeling new and existing financing mechanisms for just transition policies, plans, programs, and practices;
- coordinating just transition initiatives within and beyond the UNFCCC, including identifying and addressing gaps and obstacles to their achievement, creating synergies, providing recommendations, and avoiding duplication of efforts between the mechanisms and bodies within and beyond the UNFCCC, and finding ways to further develop international cooperation.

6. Climate Change Adaptation and Global Goal on Adaptation

Adaptation will be one of COP30 priorities. This priority logically elaborates on the issues discussed during the negotiations in Bonn this year, in particular those on the definition of indicators for assessing the *GGA* progress.

Back in 2015, in the text of the Paris Agreement, countries agreed on a common vision for the need to adopt a global adaptation goal together with a global emission reduction goal aimed at limiting the increase in the average global temperature to 1.5°C. In particular, Article 7 of the Paris Agreement not only provides for the development of such a goal but also recognizes that adaptation is a global challenge at the local, national, regional, and international levels.[59] Hence, global progress on adaptation remains limited, slow, and poorly coordinated, failing to meet objective needs.[60]

The Glasgow-Sharm el-Sheikh Work Programme on the GGA, launched at COP26, included a series of negotiations to develop an operational GGA framework by COP28.[61] At COP28, the GGA framework was adopted — the UAE Framework for Global Climate Resilience. Within this program, a two-year UAE-Belen Work Programme on Indicators was initiated, aiming to develop indicators and methodologies to measure progress toward the adaptation goals set out in the Global Climate Resilience Framework.[62] In other words, the global framework does not replace national action but provides common goals and metrics to enhance coordination and financing of adaptation measures, as well as to raise topic visibility at the level commensurate with mitigation.

In Bonn this year, participants discussed 490 potential indicators selected from 9,000 indicators proposed by expert working groups. Of these, 100 indicators are to be agreed upon at COP30 to ensure systemic monitoring of countries' adaptation efforts. The discussion of the "Means of Implementation" (MoI) of adaptation goals was a separate challenge, in

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[59] Global Goal on Adaptation. *Global Adaptation Network.* URL: https://www.unep.org/gan/what-we-do/global-goal-adaptation

[60] Understanding the Paris Agreement's "Global Goal on Adaptation." *World Resources Institute,* March 28, 2025. URL: https://www.wri.org/insights/global-goal-on-adaptation-explained

[61] Global Goal on Adaptation. *Global Adaptation Network.* URL: https://www.unep.org/gan/what-we-do/global-goal-adaptation

[62] Submission: UAE-Belem Work Programme on Indicators. *Climate Action Network International,* April 2024. URL: https://climatenetwork.org/resource/submission-uae-belem-work-programme-on-indicators/

particular the financial support needed to implement adaptation measures in developing countries. The issue of finance in adaptation has become one of the obstacles to further progress around the negotiations on GGA implementation and respective indicators.[63]

Due to the lack of climate finance to adapt to the increasingly severe impacts of climate change, the 2021 *Glasgow Climate Pact*[64] called on developed states to at least double[65] their collective adaptation financing by 2025 compared to 2019. Besides, some governments and civil society organizations call for a new adaptation financing target at COP30, as the current target (agreed at COP26) expires this year.[66]

Within the UNFCCC and the Paris Agreement, there is an *Adaptation Fund* — a special financial mechanism for projects and programs on climate change adaptation in developing states that are most vulnerable to climate change impacts. Since the Adaptation Fund does not have a regular replenishment mechanism, annual resource mobilization at COP conferences is of great importance to ensure its stability and ability to implement its mandate. Achieving and increasing resource mobilization targets is critical for the Adaptation Fund not only to strengthen the Fund itself but also to fulfill its commitment under the *New Collective Quantified Goal on Climate Finance (NCQG)*.

It is crucial for Ukraine to actively participate in negotiating the agreement of indicators to track the effectiveness of climate change adaptation measures. Integrating the agreed indicators into national policies and documents is particularly relevant due to the requirements of the Law of Ukraine No. 3991-IX *"On the Basic Principles of the State Climate Policy"* stipulating that within two years from the date that the law enters into force (by October 30, 2026), the following must be done:

- a new National Strategy for Adaptation to Climate Change must be developed and approved;
- sectoral program documents for adaptation to climate change must be developed and approved;
- regional and local strategies for adaptation to climate change must be prepared and approved.

Finally, the results of COP30 negotiations must be considered when developing national acts, which should include an adaptation component.

[63] Адаптація, справедлива трансформація, кліматичні фінанси - про що говорили на переговорах в Бонні та що чекати від COP30 у Бразилії. *Екодія,* 17 липня 2025 р. URL: https://ecoaction.org.ua/adaptatsia-spravedlyva-transformatsia-klimfin-perehovory-v-bonni2025.html

[64] Glasgow Climate Pact. *UNFCCC*, 2021, URL: https://unfccc.int/documents/310475

[65] Doubling adaptation finance: efforts to respond to the call of the Glasgow Climate Pact. *UNFCCC,* 2024. URL: https://unfccc.int/sites/default/files/resource/Doubling%20Adaptation%20Finance_Efforts%20to%20Respond%20to%20the%20Call%20of%20the%20Glasgow%20Climate%20Pact.pdf

[66] What is COP30 and why does it matter for the climate? *Chatham House,* September 5, 2025. URL: https://www.chathamhouse.org/2025/09/what-cop30-and-why-does-it-matter-climate

7. Ecosystems and Synergy between the Three Rio Conventions

Within the Action Agenda at COP30, the Brazilian Presidency has included the "Stewarding Forests, Oceans and Biodiversity" axis into its six priority work areas in the framework of *Action Agenda*.[67] The last year's COP16 decision on the Convention on Biological Diversity (Colombia, November 2024) regarding biodiversity and climate synergy, as well as the advisory opinion of the International Court of Justice (July 2025) on the obligations of the Convention on Biological Diversity in the context of ensuring climate system protection, **created a unique moment for active action on biodiversity and climate, which should be reflected in COP30 outcomes**.

In 1992, Brazil had already become the place where three fundamental international agreements were formed, establishing a framework for global cooperation in international environmental law. Then, during the Earth Summit (the United Nations Conference on Environment and Development) in Rio de Janeiro, states signed the United Nations Framework Convention on Climate Change (*UNFCCC*) and the Convention on Biological Diversity (*CBD*) and agreed to sign the United Nations Convention to Combat Desertification (*UNCCD*).

One of the expectations from COP30 is to **establish synergies between these three agreements (the so-called "Rio Conventions").** The key issues are how to coordinate countries' actions on climate, biodiversity, and combating land degradation within these agreements. This could be implemented, for example, through a joint mandate of the three Rio Conventions and the development of reliable indicators within the GGA to record the state of both ecological integrity and ecosystem collapse risk.

In this context, during COP30:

- the Parties should agree to include the issue of synergies between biodiversity conservation and climate on the agenda and pay attention to it during the negotiations. To achieve ambitious results, the Parties should prioritize the issue of synergies between the three Rio Conventions within the SBSTA item on cooperation with other international organizations. The decision on this issue should not be limited to the declaration of intent but should contain specific elements and ways of interaction between the above-mentioned conventions, such as enhanced cooperation between the conventions' Secretariats and the intention to develop a joint work program;
- the Parties should ensure the establishment of a reliable system of indicators to monitor countries' progress in achieving the GGA. In particular, for goal 9.d on reducing climate change impact on ecosystems and biodiversity, **indicators should take into account the key role of ecological integrity, ecosystem connectivity, and risk of ecosystem collapse measures**;
- the Parties should raise the issue of forest destruction and degradation (as well as ecosystem protection in general) to the highest political level and reflect this in formal negotiations. In addition, following the results of the global dialogue on forests and land use and the *Mitigation Work Programme (MWP)*, the Parties should propose ambitious recommendations that will contribute to the full and equitable implementation of the

[67] COP30: Action Agenda. *An official COP30 website,* August 28, 2025. URL: https://cop30.br/en/action-agenda

global commitment to both halt deforestation and forest degradation and transition to a reforestation trend by 2030.

In order to strengthen its role in the negotiation processes, **Ukraine should consider the "Stewarding Forests, Oceans and Biodiversity" axe at COP30 (with regard to its own context) and use the opportunities to combine active actions to preserve biodiversity and climate.** This task is particularly relevant in the context of the full-scale war that causes considerable damage to biodiversity[68] and climate.[69]

One way to achieve common biodiversity and climate goals could be to actively expand the network of interconnected and effectively managed protected areas at the national and international levels, which would allow stopping the degradation of natural ecosystems and launching their restoration, in particular in the territories affected by Russian aggression. Regarding forest conservation, Ukraine, having one of the largest areas of old-growth[70] and virgin forests in Europe, can become a European leader in combating forest degradation and advocate internationally the need to stop deforestation and forest degradation.

8. Developing RES and Improving Energy Efficiency

In 2023, during COP28 in the UAE, Ukraine became a signatory to the *Global Renewables & Energy Efficiency Pledge*,[71] which sets out the intention to triple global installed RES capacity and double the rate of energy efficiency improvement by 2030. The Brazilian presidency of this year's conference identified 30 key COP30 goals within the Action Agenda, putting this goal first.[72]

During COP30 — within the negotiation process and broader participation framework — **Ukraine should separately focus on statements concerning the acceleration of both RES capacity deployment and energy efficiency measures implementation**, which will align with the priorities identified by the Brazilian COP presidency and the *Global Renewables & Energy Efficiency Pledge*.

Moreover, Ukraine has a unique possibility to advocate RES and energy efficiency to other countries not only as sustainable climate solutions, but also as measures to increase energy security in an increasingly volatile world, given the experience of the Russian-Ukrainian war. Therefore, it is important for Ukraine, using concrete examples, to demonstrate that RES is a security tool as well (like installing rooftop solar power plants on

[68] Environmental consequences of the war in Ukraine. August-September 2-2025. *UWEC*, October 4, 2025. URL: https://uwecworkgroup.info/category/ecosystems/

[69] Climate damage caused by russia's war in Ukraine: 24 February 2022 – 23 February 2025. *Ecoaction*, October 8, 2025. URL: https://en.ecoaction.org.ua/climate-damage-caused-by-russias-war-in-ukraine-24-february-2022-23-february-2025-full-assessment.html

[70] 4750 Hectares of Old-Growth Ukrainian Forest Receive the Highest Level of Protection. *WWF*, September 16, 2020. URL: https://wwf.panda.org/wwf_news/?715711/old-growth-protected-in-ua

[71] COP28: Global Renewables and Energy Efficiency Pledge. *Official website of COP28.* URL: https://zakon.rada.gov.ua/laws/show/3991-20#Text

[72] COP30: Action Agenda. *Official website of COP30,* August 28, 2025. URL: https://cop30.br/en/action-agenda

critical infrastructure facilities to ensure autonomy during blackouts, conducting thermal modernization of buildings, etc.).

The national climate and energy policy should, in particular, prioritize the accelerated installation of RES facilities, development of distribution networks for electrification, and implementation of energy efficiency measures.

9. Carbon Markets

9.1. Trading Carbon Units under Article 6 of the Paris Agreement

Article 6 of the Paris Agreement[73] establishes a framework for international carbon trading as a form of cooperation between countries through bilateral exchanges of internationally transferred mitigation outcomes (ITMOs) under Article 6.2 and a centralized mechanism for trading carbon units (emission reduction or removal units) under the auspices of the UNFCCC under Article 6.4. According to **Article 6.2**, states may cooperate directly with each other to trade emission reduction outcomes under the principles of transparency, environmental integrity, avoidance of double counting, and appropriate adjustments to their national accounts. **Article 6.4** establishes a centralized mechanism where carbon credits are generated through specific projects that reduce or remove emissions. Countries can use these credits (with the authorization of the state where the project is implemented) to achieve their climate goals or transfer them as an ITMO under Article 6.2 with appropriate adjustments.

Ukraine signed agreements with Switzerland in 2022 and Japan in 2024, which should contribute to the development of market mechanisms in accordance with Article 6 of the Paris Agreement.[74] Herewith, there is a risk relevant both now and during post-war reconstruction: weakening of domestic achievements due to emission reduction results being transferred, i.e., situations when units necessary to achieve the goals of a country's own NDC will be transferred and credited to other states. This can de facto make Ukraine a "donor" of external indicators at the expense of its own goals. In other words, after the authorization of transfers and implementation of respective adjustments, Ukraine will no longer be able to count such reductions for its NDC implementation. Hence, participation in such mechanisms should be limited and subjected to strict safeguards, in particular, allowing support to only those projects that meet the additionality criterion, that is those that could not be implemented without income from the sale of carbon units. Additionality verification should be carried out through independent verification by accredited third parties (*Designated Operational Entities*).[75]

The priority of domestic emission reductions by all Convention Parties should be basic. Any international transfers (under Article 6.2 or Article 6.4) should take place exclusively on the condition that they do not undermine the achievement of the NDC 3.0 goals and national

[73] Паризька угода, ратифікована Законом України № 1469-VIII від 14.07.2016 р. URL: https://zakon.rada.gov.ua/laws/show/995_l61#Text

[74] Міндовкілля об'єднує стейкхолдерів для зеленого відновлення України. *Офіційний веб-сайт* ***колишнього*** *Міністерства захисту довкілля та природних ресурсів України,* 15 серпня 2024 р. URL: ttps://mepr.gov.ua/mindovkillya-ob-yednuye-stejkholderiv-dlya-zelenogo-vidnovlennya-ukrayiny/

[75] Designated Operational Entities. CDM Glossary. *UNFCCC*. URL: https://cdm.unfccc.int/DOE/index.html

trajectory to climate neutrality, as well as considering the need to prevent double counting of reductions through *corresponding adjustments*. And, most importantly, transfers should be allowed only for excess reductions compared to the target trajectory after independent verification.[76]

Only **high-quality units** with proven additionality and sustainability and reliable verification can be traded. **The counting of actions already financed by state/mandatory instruments is unacceptable.** Buyer participation should be limited to entities that already demonstrate significant reductions "at the source," while international credits should be used only for residual emissions, i.e., those that remain after the implementation of all possible reduction measures.

In the absence of the above conditions and full transparency, carbon trading involves unacceptable risks of greenwashing and weakening of domestic climate goals. Ukraine should not become a source of "offsets" for foreign companies or governments — **rapid emission reductions within the country should remain the primary task, with international transactions being only an additional, narrow, and clearly regulated element.**

9.2. Introducing the Emissions Trading System in Ukraine

Although the creation of the national emissions trading system (ETS) is not a direct topic of the COP climate negotiations, Ukraine should consider it when presenting its own climate plans and intentions. When formulating statements and positions at the international level, it is important to take into account that ETS is not a universal and most effective solution or guarantee for reaching emissions reduction goals. In fact, the future effectiveness of the Ukrainian ETS will depend on the quality of the institutional, economic, and regulatory prerequisites discussed below.

Launching the ETS in Ukraine is seen as a commitment to European integration and an essential tool for achieving climate neutrality by 2050. **However, the system's effectiveness will be determined not by the fact of its creation but by the quality of its future work, preceded by the formation of proper design, defining an ambitious total limit, allowances distribution rules, price stabilization mechanisms, ensuring institutional capacity, regulator independence, and transparency of accumulated revenues use.**[77]

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[76] Considerations for Article 6 engagement: The host country perspective. *German Environment Agency,* Climate Change 41/2020. URL: https://newclimate.org/sites/default/files/2020/11/NewClimate_Article6_Engagement_HostCountryPerspective_Nov2020.pdf

[77] Позиція щодо запровадження національної системи торгівлі квотами на викиди парникових газів в Україні. *Екодія*, 4 серпня 2025 р. URL: https://ecoaction.org.ua/pozytsia-natsi-system-torhivli-kvotamy-na-vykydy.html

According to the Action Plan to create a national greenhouse gas emissions trading system,[78] approved by the Cabinet of Ministers of Ukraine's Order, the preparatory stage will take place in 2025–2027, launching the first operational phase will start in 2028, and the second operational phase will start no earlier than three years after the lifting of martial law.

The following should be considered when launching the national ETS:

- the total limit should ensure real, stable reductions, be aligned with the NDC 3.0 targets, and include an obligatory annual reduction. It is advisable to determine the baseline limit based on current data from the greenhouse gas emissions monitoring, reporting, and verification system (MRV) (during the first 2–3 years after resuming mandatory reporting from 2025) while avoiding pre-war emissions indicators from enterprises, as they may lead to artificial inflation of available allowances. It is the determined total limit that should send an investment signal for modernization, notably the transition to low-carbon technologies;
- an excessive number of free allowances will undermine decarbonization incentives; therefore, free allowances should be granted only based on benchmarks (indicators) of "the most efficient in the industry" and during the transition period. Besides, auctions must start in the first operational phase, shaping market prices and ensuring transparent participation rules. Revenues from auctions should be directed specifically toward climate investments and social programs for a just transition (energy efficiency, RES, industry decarbonization, and supporting vulnerable households and workers from the fossil fuels extraction sector), with clear targeting criteria and public accountability. At the same time, any additional mechanisms (subsidies, transition funds, temporary free allowances) should be provided only if specific decarbonization measures are implemented and if transparent criteria are used. To mitigate the impact on vulnerable consumers, targeted aid should be provided through auction revenues, together with investing in RES and energy efficiency for a stable reduction of energy costs;
- predictable dynamics of emission price growth and built-in stabilizers are needed: a price corridor (minimum and maximum prices) and a market stability reserve similar to the *Market Stability Reserve* in the EU;[79]
- an independent regulator with a mandate to monitor compliance with the new market rules and meet European criteria for transparency and accountability is needed to oversee the system.

The ETS should be designed as a tool for achieving climate goals and stimulating decarbonization; otherwise, it risks transforming into a formal mechanism with little impact on emissions volumes.[80]

[78] Розпорядження Кабінету Міністрів України від 21 лютого 2025 р. № 146-р "Про затвердження плану заходів щодо створення національної системи торгівлі квотами на викиди парникових газів." URL: https://zakon.rada.gov.ua/laws/show/146-2025-%D1%80#Text

[79] Market Stability Reserve. *An official EU website.* URL: https://climate.ec.europa.eu/eu-action/carbon-markets/eu-emissions-trading-system-eu-ets/market-stability-reserve_en

[80] Позиція щодо запровадження національної системи торгівлі квотами на викиди парникових газів в Україні. *Екодія*, 4 серпня 2025 р. URL: https://ecoaction.org.ua/pozytsia-natsi-system-torhivli-kvotamy-na-vykydy.html

10. War Impact on Climate, Russia's Accountability, and Its Reporting

Since 2014, Ukraine has faced the challenge of Russia's war against it. The full-scale invasion has greatly influenced and continues to impact the aggravating climate and environmental situation in Ukraine and worldwide.

Although Russia has significantly contributed to greenhouse gas emissions, the COP focus on Russia as an "antihero" is rather weak. Therefore, it is crucial to explain at different platforms and to different process participants Russia's past and present role in worsening the climate crisis, in particular that:

- historically, Russia is the world's third-largest greenhouse gas emitter,[81] and its policy envisages further growth in greenhouse gas emissions, promoting the extraction, consumption, and export of fossil fuels;

- Russia is a big player in the fossil fuels market. Russia's federal budget is largely formed by revenues from oil and natural gas exports. According to estimates, during 3.5 years of the full-scale war in Ukraine, Russia earned more than USD 960 billion[82] in revenues from fossil fuel exports;

- Russia's financial climate contributions are estimated by the Climate Action Tracker as "critically insufficient."[83] Since the adoption of the Paris Agreement, Russia has not made any significant contributions to international climate funding, showing a lack of support for developing countries. It is essential to communicate that, instead of using costs for funding its own aggression against Ukraine, this money could be directed at reaching climate goals and supporting developing countries that suffer from the climate crisis;

- three years of Russia's full-scale war against Ukraine have likely led to almost 237 million tCO_2e.[84] Considering the social cost of carbon as USD 185 / tCO2e, the climate damage caused by the war has exceeded USD 43 billion. Russia must be held accountable for the emissions during the war as well as for the future emissions from the reconstruction of infrastructure facilities in Ukraine, damaged in the course of combat actions. At COP29, Ukraine has presented, for the first time, the methodology developed for calculating

[81] Evans S. Analysis: Which countries are historically responsible for climate change? *Carbon Brief,* 10 May 2021. URL: https://www.carbonbrief.org/analysis-which-countries-are-historically-responsible-for-climate-change/

[82] Financing Putin's war: Fossil fuel imports from Russia during the invasion of Ukraine. *CREA*. URL: https://energyandcleanair.org/financing-putins-war/

[83] Climate Action Tracker. URL: https://climateactiontracker.org/countries/russian-federation/

[84] Climate damage caused by russia`s war in Ukraine: 24 February 2022 - 23 February 2025. *EcoAction*, October 8, 2025. URL: https://en.ecoaction.org.ua/climate-damage-caused-by-russias-war-in-ukraine-24-february-2022-23-february-2025-full-assessment.html

climate damage caused by war.[85] Further approval of the methodology and its advocacy at the international level should be proactive. Ukraine should also document the climate damage caused by war in the Register of Damage for Ukraine[86] (category B3 — Damage to the environment and natural resources).

It is important for Ukraine to consistently and clearly communicate at the international level Russia's role and promote the need for Russia to take responsibility for climate damage, both to Ukraine and other countries around the globe.

We also stress that it is unacceptable for Russia to include emissions from the temporarily occupied territories of Ukraine in its national emissions inventory. Russia has systematically included emissions from the Autonomous Republic of Crimea since 2015 as belonging to Russia. In its submitted national inventory document for 2025 (covering the period of 1990–2023), Russia states that, *"This inventory includes estimates on greenhouse emissions and absorptions by managed ecosystems on the territory of 85 subjects of the RF due to lacking data regarding the lands on the territory of Donetsk People's Republic and Luhansk People's Republic, and Zaporizhzhia and Kherson oblasts, accessioned in September 2022."*[87] Thus, Russia uses climate reporting to the UNFCCC as a means of promoting and convincing others that Ukrainian territories belong to Russia.

Moreover, Russia has repeatedly submitted its statement on Ukraine's annual national report, describing the legitimacy of the occupation of Ukrainian territories and their being part of Russia.[88] At the same time, there are no publicly available counter-notices from Ukraine on the UNFCCC platforms regarding Russian statements on the "legitimacy of the occupation" or the inclusion of Ukrainian territories in the Russian inventory. **It is crucial that Ukraine continues to actively advocate against the acceptance of such Russian reports regarding the occupied territories of Ukraine, along with an explanation of why Russia's data on the so-called "voluntary accession" to its territory does not reflect the reality.**

11. Relations and Solidarity with Global South States

Another challenge that needs Ukraine's active engagement is cooperation with countries representing the Global South (African countries, Latin America, Asia, Oceania, etc.).

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[85] На COP29 Україна вперше презентувала методологію підрахунку кліматичних збитків від війни. Екодія, 21 листопада 2024 р. URL: https://ecoaction.org.ua/ukraina-vpershe-prezentuvala-pidrakhunku-klimatychnykh-zbytkiv.html ;
Methodological guidance to estimate conflict-related GHG emissions. Ecoaction, March 19, 2025 p. URL: https://en.ecoaction.org.ua/wp-content/uploads/2024/11/20241107_Guidance_Conflict_Emissions.pdf

[86] Реєстр збитків для України. *RD4U*. URL: https://rd4u.coe.int/uk/home

[87] Russia`s National Inventory Report 1990-2023. *UNFCCC*, 2025. P. 258. URL: https://unfccc.int/sites/default/files/resource/RUS_NIR_2025_v1_rev_2025-04-18.pdf

[88] Statement with regard to Ukraine's Annual National Greenhouse Gas Inventory Report for the period 1990-2021. *UNFCCC*. URL: https://unfccc.int/sites/default/files/resource/Statement_RF_English.pdf; Documents. *UNFCCC*. URL: https://unfccc.int/documents?f%5B0%5D=country%3A399

Russian politics actively exploits the historical conflict between Europe and the United States, on the one hand, and with other countries of the world, on the other. Meanwhile, Russia also tries to position itself as an "ally" of the Global South.

Ukraine should develop closer relations with Global South states. Working with them, it is crucial that Ukraine explains its common colonial experience, which, although manifested in various forms, nevertheless had similar consequences. Shared challenges can form the foundation for mutual understanding between Ukraine and the Global South.[89]

One of the issues that Ukraine should work on with these countries is promoting the "polluter pays" principle and ensuring the priority of supporting the most vulnerable states. An important step in this context is to change the approach to defining donors of climate financing *(Annex II)*: Some of the biggest polluting countries, such as Russia, still do not belong to the donor group, which undermines their real accountability for the climate damage caused.

Considering this, **deepening cooperation with Global South states should become one of the priorities of Ukraine's international policy in the climate field.** Therefore, it is crucial to gain support from the countries of Asia, Africa, Latin America, and Oceania, which, in turn, should put pressure on the Russian regime. It is equally important to consistently counter deceptive Russian narratives about supporting Global South states. With its unfounded claims, Russia diverts attention from its "fossil fuel empire" status, the climate damage it causes, and the lack of adequate financial responsibility. Ukraine should explain Russia's role in the aggression, emphasizing that Russian politics is a continuation of imperial colonialism, which poses a threat not only to Ukraine.

12. Preventing Emissions during Post-War Reconstruction

For Ukraine to remain on track to meet the Paris Agreement goals, post-war recovery must be green. **Each solution in the energy, construction, or industry sectors can either increase emissions or bring us closer to climate neutrality**.

Future reconstruction is estimated to account for around one-fourth of war-related emissions. Research shows that the reconstruction of civil infrastructure (primarily due to the use of cement and steel) can cause ca. 62 million tCO_2e,[90] making reconstruction one of the most significant sources of climate damage caused by war. Reconstruction of buildings and infrastructure is a carbon-intensive process due to the use of materials with a considerable share of "embedded carbon." Therefore, delaying the integration of climate criteria into recovery processes could result in significantly greater environmental and economic consequences. That is why climate-friendly reconstruction according to the "*build back*

[89] *At the same time, the "Global South" term needs a critical review. Its unconscious use often leaves Ukraine and countries of Eastern Europe, Caucasus, and Central Asia (EECCA) behind this category. This is caused by both geographical and historical differences: Ukraine has a different experience of colonial oppression — mostly from Russia rather than Western European countries.*

[90] Climate damage caused by russia`s war in Ukraine: 24 February 2022 – 23 February 2025. *Ecoaction*, February 24, 2025. URL: https://en.ecoaction.org.ua/climate-damage-3-years-numbers.html

better" principle should combine nature-based and low-carbon solutions to increase the long-term resilience of the economy, ecosystems, and communities, **in particular:**

- **Introduction of modern energy efficiency and decarbonization standards.** In 2024, the EU adopted the updated Energy Performance of Buildings Directive *((EU) 2024/1278)*, implying the transition from *Near-Zero Emission Buildings (NZEB) to Zero-Emission Buildings.*[91] In Ukraine, NZEB requirements came into force on April 1, 2025. This is an important step that should be backed up by design, certification, and control practices.
- **Pilot projects as change drivers.** Currently, the implementation of NZEB requirements is voluntary, which limits their real impact. Pilot projects can demonstrate practical advantages of these standards, build demand, and create conditions for a gradual transition to their mandatory use.
- **Mandatory use of NZEB for state and municipal buildings.** The requirement to use NZEB when renovating state- and municipally-owned buildings could be a practical first step toward large-scale decarbonization of the sector.
- **Reduction of "embedded carbon"** implies choosing low-carbon materials, reusing building elements, developing the circular economy, and adopting eco-design.
- **Integration of climate criteria into permitting procedures.** Further implementation requires reliable mechanisms for checking NZEB compliance and coordination of national and regional plans, as well as financing instruments that foster low-carbon solutions.

Ukraine has a unique chance to exemplify green reconstruction for the whole world. For that, international partners' and donors' support is needed, as well as access to modern technologies allowing implementing the *build back better* principle — with benefits for the climate, communities, and the economy. COP is the key platform where Ukraine can voice its aspiration to achieve climate neutrality through reconstruction, which will not only rebuild damaged infrastructure but also transform the country into an example of sustainable development.

13. Preventing the Promotion of Faulty Climate Decisions

13.1. Nuclear Energy: Additional Risks for Climate Targets

At the global level, nuclear energy does not yield quick reductions in emissions to help fight the climate crisis. According to the Intergovernmental Panel on Climate Change (IPCC) report, published in March 2023, nuclear energy is one of the two least effective ways to mitigate climate change.[92] Limited potential and a high expense rate (compared to RES in particular) mean more "lost time" and a higher price for reducing tCO_2 than alternatives that can be scaled right now.

[91] Mearly-zero energy and zero-emission buildings. European Union. URL: https://energy.ec.europa.eu/topics/energy-efficiency/energy-performance-buildings/nearly-zero-energy-and-zero-emission-buildings_en

[92] Synthesis Report of the IPCC Sixth Assessment Report. IPCC. P. 28. [URL: https://report.ipcc.ch/ar6syr/pdf/IPCC_AR6_SYR_SPM.pdf]

Within COP, it is important to avoid supporting initiatives that increase nuclear capacity and position nuclear energy as an effective tool for achieving climate goals. This applies, in particular, to attempts to include technologies for generating electricity from nuclear reactions in the classification of "clean" technologies or in the lists of investment priorities during international climate negotiations. Such initiatives divert attention from truly effective and cost-effective decarbonization measures, such as renewable energy development, energy efficiency, and decentralized solutions. Ukraine must oppose narratives that legitimize nuclear energy as a "green" solution and support the positions of countries and organizations that promote real climate solutions.

Here are the reasons why investing in nuclear energy is a bad idea, especially for Ukraine:

- ***High cost and long construction period.*** Back in 2021, the state nuclear company Energoatom signed a memorandum with *Westinghouse Electric Company*, according to which it planned to build nine new large reactors in Ukraine using the AP1000 technology.[93] Importantly, *Westinghouse's* construction experience in the US has demonstrated at least a doubling in price (from USD 14 billion to 30 billion for two power units) and an over six-year delay. Therefore, by building nine similar power units, Ukraine risks losing considerable costs and getting nuclear "long-term constructions" that will not produce any energy for years to come. Besides, the future reactors will require costs for waste treatment and decommissioning. There is a separate fund for decommissioning nuclear facilities in Ukraine, which has accumulated UAH 5,096,468 over 12 years (as of early 2024[94]). However, this sum will be insufficient for decommissioning even one power unit;
- ***Nuclear energy is more expensive than energy from renewable sources.*** In recent years, energy from renewable sources has become significantly cheaper worldwide, while nuclear energy has become the most expensive. Currently, a megawatt-hour of nuclear energy costs several times more than the same amount of energy from the sun or wind;[95]
- ***Nuclear energy is not "climate-friendly."*** If we consider the entire life cycle of a nuclear power plant, including fuel production and waste disposal, greenhouse gas emissions per unit of energy produced in nuclear power will be higher compared to renewable energy sources — 66 gCO_2e/kW (while for wind energy it is 10 gCO_2e/kW and for solar — 22 gCO_2e/kW);[96]
- ***Nuclear energy produces large amounts of nuclear waste.*** According to the International Energy Agency (IEA) estimates, a 1 GW light-water reactor produces

[93] Герман Галущенко: Меморандум про взаєморозуміння між Енергоатомом та Westinghouse Electric Company - крок до значних інвестицій в атомну енергетику України. *Урядовий портал,* 31.08.2021 р. URL: https://www.kmu.gov.ua/news/german-galushchenko-memorandum-pro-vzayemorozuminnya-mizh-energoatomom-ta-westinghouse-electric-krok-do-znachnih-investicij-v-atomnu-energetiku-ukrayini

[94] Баланс (звіт про фінансовий стан) ДП "НАЕК "Енергоатом." *ДП "НАЕК "Енергоатом."* URL: https://old.energoatom.com.ua/parts/pdf-file/report-2023.pdf?utm_source=chatgpt.com

[95] Lazard LCOE. *LCOE*, June 2025. URL: https://www.lazard.com/media/eijnqja3/lazards-lcoeplus-june-2025.pdf

[96] Атомна енергетика: питання та відповіді. *Екодія*, 2019. URL: https://ecoaction.org.ua/wp-content/uploads/2019/04/atomka_pytannia_i_vidpovidi_web-2019.pdf

30–50 tons of spent nuclear fuel per year of operation. Reactors to be built by *Westinghouse* in Ukraine are also of this type, with a capacity of 1 GW each. Therefore, additional nine reactors will produce large volumes of new nuclear waste requiring considerable costs and resources for retention, storage, and disposal.[97]

- ***Small modular reactors (SMR) are an ineffective alternative.*** Even according to the most optimistic estimates, they will not be able to generate energy for Ukraine for at least the next 10 years. According to a study[98] on the SMR concept, they may face economic competitiveness challenges compared to RES. Even taking into account certain stated advantages of SMRs (such as standardized design and modularity), they still face high construction costs. In addition, this technology does not solve the problems of waste produced by the nuclear industry and the need for fossil fuels.

In this regard, the inclusion of the completion of power units No. 3 and No. 4 of the Khmelnytsk Nuclear Power Plant in the Government's Action Program is not advisable.[99] The plan envisaged updating the feasibility study by October 2025, submitting a new draft law on the location, design, and construction of power units by the end of 2025, and starting construction work by the end of 2026.

Therefore, in its policy for achieving climate goals, Ukraine should not concentrate efforts and investments on developing expensive nuclear energy capacities that could generate energy only in the long run, but instead focus on developing decentralized renewable energy sources.

13.2. Carbon Capture and Storage Technologies — A False Solution Perpetuating Fossil Fuels Dependency

Carbon capture and storage technologies (CCS) are a set of solutions aimed at preventing CO_2 from entering the atmosphere, removing it from the atmosphere, compressing and transporting it, and then pumping it into deep geological formations for long-term storage.

The key risk of CCS technologies is that they maintain the dependency on fossil fuels rather than reducing it. CCS is an expensive and unreliable solution with limited potential that does not guarantee controlled, secure, and permanent CO_2 storage.[100] For instance, CCS use at power plants increases overall energy demand, which in turn increases expenses, air

[97] Скільки відходів продукує атомна енергетика та як їх переробляють. *Екодія*, 12 травня 2023 р. URL: https://ecoaction.org.ua/iaderni-vidkhody.html

[98] Steigerwald B. and others. Uncertainties in estimating production costs of future nuclear technologies: A model-based analysis of small modular reactors. *Energy*, V. 281, 15 October 2023. URL: https://www.sciencedirect.com/science/article/pii/S0360544223015980#bib1]

[99] Розпорядження Кабінету Міністрів України від 10 вересня 2025 р. № 1003-р "Про затвердження плану пріоритетних дій Уряду на 2025 рік." URL: https://zakon.rada.gov.ua/laws/show/1003-2025-%D1%80#Text

[100] Позиція Екодії щодо використання технологій уловлювання та зберігання вуглецю для боротьби зі зміною клімату. *Ecoaction*, April 20, 2021. URL: https://ecoaction.org.ua/pozytsiia-ulovliuvannia-ta-zberihannia-vuhletsiu.html?

pollutant emissions, and power plants' water needs. That is why CCS technologies cannot be considered as a sustainable climate solution.

Ukraine must prioritize the most effective and available tools to truly reduce greenhouse gas emissions. These include energy efficiency measures, renewable energy development, and nature-based solutions. Particularly, these include green roofs and facades that reduce the need for cooling (and therefore energy consumption) and improve the microclimate; greening public spaces, streets, and transport corridors; or using local ecosystems in designing passive cooling and heating. Such solutions not only foster carbon capture but also increase the adaptability to climate change.

13.3. Geoengineering

Geoengineering is a set of measures and actions that involves active intervention in the Earth's natural systems to deliberately change climatic conditions. These technologies are expensive and risky. There is a wide range of proposed geoengineering methods, such as *Solar Radiation Management (SRM*) or solar geoengineering *Carbon Dioxide Removal (CDR)* in onshore and ocean ecosystems. Approaches focused on ocean ecosystem geoengineering have recently drawn increasing attention despite the lack of proof of their efficiency or of management and monitoring mechanisms. This is happening alongside quite real negative effects and unknown environmental and social consequences. Although marine geoengineering (sometimes referred to as *Ocean Carbon Dioxide Removal)* is not a new concept, renewed interest in various technologies designed to remove, store, and offset carbon is a serious concern and requires a clear position from the Parties to the Convention.

Geoengineering cannot be viewed as a climate solution within the UNFCCC, while any discussions must be based on the *precautionary principle* and held according to the existing concepts and agreements that forbid the deployment of marine geoengineering in nature (Convention on Biological Diversity, London Convention for the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, etc.). Moreover, no marine or onshore geoengineering solutions can be considered during negotiations as climate change mitigation actions resulting in emissions reductions and should not be included in the methodology and guidance regarding *removals* within Article 6 of the Paris Agreement.

Therefore, Ukraine is advised not to support geoengineering solutions as climate solutions in the course of climate negotiations and not to choose them as a focus for implementation at the national level.

13.4. Risks and Limitations of Hydrogen Use

The key risk of hydrogen energy development is that, under the general term "hydrogen" production technologies based on fossil fuels are often promoted. Such approaches do not foster emissions reduction but instead preserve dependence on gas and oil, creating additional environmental threats from the emission of methane and other substances. For instance, the use of "blue" hydrogen, accompanied by carbon capture and

storage, combines all the disadvantages of CCS technologies — high cost, unreliability, and limited climate impact.[101]

That is why hydrogen derived from fossil fuels cannot be considered a sustainable climate solution. In the context of scenarios to keep global warming within 1.5°C, **it is advisable to develop only renewable ("green") hydrogen produced from RES. At the same time, "green" hydrogen should be used selectively — in sectors where direct electrification is technically impossible (e.g., in steel production or chemical industry).**

Therefore, Ukraine should prioritize direct energy-efficiency measures and renewable energy development. The use of "green" hydrogen can be considered only as an additional tool, but not as an alternative to large-scale emissions reductions and transition to clean energy.

13.5. Alternative Fuels Issues

The Alternative Fuels Infrastructure Regulation (AFIR), adopted in 2024, is aimed at reducing transportation emissions in the EU to 55% by 2030 compared to the 1990 level.[102] Along with the goals, the Regulation states that it applies to various modes of transport (road, rail, water, etc.) and various alternative fuels.

The risks of hydrogen use are described above in section 13.4. Another solution that has been tested in practice is the use of biofuels, but there are nuances to it. A recent study by the European organization "*Transport&Environment*"[103] found that biofuels generate 16% more CO_2 than fossil fuels. This indicator includes the indirect impact of agriculture and deforestation. At the same time, the mentioned data do not mean that the correct solution lies in using fossil fuels. The problem is with the biofuel production approach. Land resources can be used more sustainably and rationally: Instead of planting only crops that serve as the basis for biofuels, sustainable agriculture can be combined with the development of renewable energy sources. The effectiveness of such a solution for Ukraine is also an element of infrastructure decentralization and ensuring network stability. **In the transportation sector, Ukraine and the world should keep a focus on developing electric mobility, building electric charging infrastructure by expanding RES, and forming sustainable urban mobility practices that optimize travel around the city and reduce the need for private cars.**

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[101] Позиція Екодії щодо використання водню. *Ecoaction*, December 14, 2020. URL: https://ecoaction.org.ua/pozytsia-vykorystannia-vodniu.html

[102] Alternative Fuels Infrastructure Regulation. European Comission. URL: Alternative Fuels Infrastructure - Mobility and Transport

[103] Biofuels globally emit more CO2 than the fossil fuels they replace – study. *T&E,* October 9, 2025. URL: https://www.transportenvironment.org/articles/biofuels-globally-emit-more-co2-than-the-fossil-fuels-they-replace-study?utm_source=T%26E+News&utm_campaign=b5ea9477a2-EMAIL_CAMPAIGN_2025_10_08_08_26&utm_medium=email&utm_term=0_-b5ea9477a2-380004635&mc_cid=b5ea9477a2&mc_eid=5c5dbf24c5