



Comments by the Climate Change Working Group of the [IUCN Spanish Committee](#) to the IUCN Position Paper for UNFCCC COP28 United Nations Framework Convention on Climate Change Twenty-eighth session of the Conference of the Parties (COP28). 30 November - 12 December 2023, Dubai, United Arab Emirates

Dear friends,

first, we would like to congratulate you, and thank you for your superb document. We are confident that it embraces the main ideas and values of IUCN.

As a Working Group in the Spanish Committee, we are very concerned about these issues. Therefore, after a careful lecture and study, we would like to give you some insights that could be of interest and consideration in the debate sessions.

Inputs from NGOs

- It is crucial to highlight that in certain regions, the average temperature increase and alterations in precipitation patterns exacerbate the impact. This is particularly evident in the Iberian Peninsula and the Mediterranean region. Therefore, achieving the 1.5-degree target is of utmost importance under minimal conditions.
- There is a special concern regarding water management, with a focus on safeguarding underground aquifers and the entire water cycle. We propose that it should be regulated and allocated based on supply rather than demand, as is currently the case in some countries (such as Spain).
- It is imperative to prevent Climate Change from becoming a source of inequality, as we are witnessing in our own territory. There are regions, communities, and economic sectors experiencing a disproportionately higher impact. These are often vulnerable communities whose situation is leading to structural issues, such as the depopulation of many inland areas (commonly referred to as "Spain's emptied regions")
- In **section IV**, second point, where the following statement is made:
"IUCN welcomes the efforts made by the Parties to date, but there remains considerable potential to further increase ambition, especially considering the manifold social benefits provided by healthy ecosystems."

We would add another significant example, in addition to blue carbon, focusing on aquatic ecosystems such as peatlands, coastal wetlands, and Mediterranean wetlands. These ecosystems possess a high capacity for carbon storage and emissions reduction. When in good conservation status, they sequester carbon; however, in a state of degradation, they can become substantial GHG emitters. We have attached a document positioning our stance on the EU's Carbon Removal Certification (Annex I) framework, from a network of entities dedicated to wetlands and peatlands, which provides crucial information to substantiate this assertion.

Inputs from Sub-regional Government

Concerning section V.

- Expanding on the impact, it is essential to consider not only indigenous communities, but also the entire population, including those residing in developed countries, who lack the means to shield themselves from the adverse effects of climate change such as floods, heatwaves, crop losses, and housing disruptions.
- Furthermore, it is imperative to ensure, by all means possible, that the assistance provided to countries in need effectively reaches the entities capable of implementing them in their intended destinations. This is to prevent any potential misallocation or



diversion of resources along the way, emphasizing the need for a refined and reliable distribution system.

Inputs from Scientific Societies linked to Geodiversity

- This is a contribution located on the fourth page, second column, following the citation of Armstrong and Mackay, 2022. It explicitly addresses the threats of climate change, particularly potential impacts on coastal geomorphological processes and the functioning of karst systems (Gordon et al., 2022. *Geoheritage* (2022) 14:126 <https://doi.org/10.1007/s12371-022-00753-1>).
 1. It asserts the existence of geodiversity and geological heritage as integral components of Natural Heritage.
 2. Emphasizes that geodiversity underpins both biodiversity and human activities.
 3. Highlights the pivotal role of paleoclimatic records in comprehending the consequences of climate change, as articulated in IPCC reports featuring dedicated chapters on this topic. Therefore, geological research is crucial for adaptation to and mitigation of climate change.
 4. Points out that climate change impacts key geodiversity that supports ecosystems, as well as geological heritage that warrants protection.
 5. Advocates for the inclusion of measures addressing critical geodiversity (landforms, soils, and processes) and geological heritage in climate change adaptation strategies.

Possible inclusion in **section VII**:

- We advocate for the swift and equitable phase-out of solid fuels without further delay, and the fair and accelerated deployment of sustainable clean energy generation systems. In our country, this has been termed as a Just Transition, and it has been achieved by rapidly phasing out coal utilization. However, this rapid transition has resulted in a lack of planning in many regions due to varying criteria. Consequently, there are areas experiencing strain due to the placement of wind and solar generation parks without comprehensive impact studies. In many cases, this leads to installations on natural heritage sites, ultimately compromising the landscape. There are regions with significant geological heritage that is being disregarded. Transition is essential, but not at any cost.

Other considerations:

1. Geodiversity encompasses much more than rocks, minerals, and fossils. It significantly influences our history, culture, and ecosystems, providing resources and services that are challenging to quantify in monetary terms.
2. The orientation and topography of our valleys shape how we inhabit the land, simultaneously influencing its climatic variations. The water stored and supplied by our mountains and soils sustains us, as well as thousands of plant and animal species dependent on it. Rocks break down and form soils, serving as the foundation for our forests, agriculture, and food supply. Geological diversity provides the substrate for our biological diversity and ecosystems. The raw materials and fuel required by our society are also derived from geodiversity.
3. In essence, our geodiversity not only furnishes us with wealth and materials for development, but also supplies water, fertile soils, ecosystems, culture, and something

much harder to measure: a sense of belonging to a land of extraordinary natural and cultural landscapes.

Inputs from Local administration

Section 1: *"In this regard, IUCN urges all Parties to explicitly support, in the decision text of COP28, the gradual and time-limited phase-out of all fossil fuels, including oil and gas, within a framework ensuring a just transition."*

As important as this point is, it is equally crucial to contemplate a transformation in the internal metabolism of cities. The reduction of fossil fuels must be coupled with a shift in how cities operate, encompassing changes in transportation and mobility, consumption habits, and the prevalence of linear services over circular ones, which collectively constitute half of emissions.

Section 3: Addressing biodiversity loss necessitates a recognition of the reciprocal relationship between mitigation and adaptation efforts. However, climate change itself is altering many nature-based solutions, both in urban and rural settings. As such, clear and distinct strategies should be defined based on the (un)predictable future conditions. For instance, urban environments, especially those in the southern regions, often face water scarcity that conditions adaptation solutions.

"IUCN also underscores the importance of ensuring greater operational synergies in all key international policy processes governing global terrestrial, freshwater, coastal, and marine ecosystems, particularly, among others, the three Rio Conventions. It emphasizes the need to establish and strengthen appropriate functional connections between the key instruments and mechanisms of these policy processes."

This section is crucial, as policies are often developed from a highly compartmentalized perspective. Predictive models that encompass the entirety of functional ecosystems are needed. Additionally, it's important to highlight the potential of marine ecosystems in both mitigation and adaptation strategies.

Section V. Financing: Furthermore, it is urged that funding conditions prioritize projects with significant positive impact, particularly those that directly, measurably, and quantifiably reduce GHGs.

Section VI: This should be complemented with a study of Best Available Techniques (BAT), which can only progress to the extent that economic resources for R&D are made available.