

Current Japan's Climate Change Policy Package and its decision making process

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The new "Guideline of the Measures to Prevent Global Warming", revised in March 2002, is virtually a government climate change policy package and is inserted in the important section, "chapter 3 (Policies and Measures)" of the Third National Communication of Japan. There are significant problems of this Guideline (in other words, the government climate change policy) and its decision making process.

1. Decision Making Process; Lack of Transparency and Public Participation

At well as the previous Guideline of the Measures to Prevent Global Warming in 1998, the new Guideline was decided in March 2002 without any public participation and opportunity of public comments.

By January 2002, there were minimum level of open process at the Central Environment Council of the Ministry of Environment and the Industrial Structure Council of the Ministry of Economy, Trade and Industry. Both Councils examined that policies and measures (PaMs) of the previous Guideline were not enough to meet the Kyoto target and proposed several PaMs to be introduced additionally. However, after receiving the reports from those Councils, the governments' officials took over the process to revise the Guideline and didn't reflect reports of those Councils. Appropriateness of the existing policies was not assessed and most of the policies were simply maintained. Adjustment of "sectional" polices between ministries was merely concerned. No information or draft was revealed to public before final decision, even to the members of the Diet (parliamentarians). Thus, the Guideline made by bureaucrats has significant lack of transparency. The guideline decided without public participation has, of course, little support from public and therefore the effectiveness is quite doubtful. This opaque process is totally unacceptable and it should never be repeated again.

2. Unrealistic plan to achieve Kyoto Target

- From the fact that GHG emissions are still increasing, it is widely recognized that additional measures
 is inevitable to meet the Kyoto target. However, the framework of 6% reduction approach in new
 Guideline kept almost the same as previous one, which was nothing more than a mixture of odds and
 ends of existing policies.
- The new Guideline includes already impossible plan, e.g. 30% increase of nuclear power generation, and unrealistic reduction assumption, e.g. reduction from individual activities. Whereas, proved effective measures, such as carbon-tax, standards for facilities and buildings, and renewable energy feed-in-tariff law, are not introduced. So-called "Step-by-Step Approach" was used as an excuse for another delay of implementation.
- A number of PaMs are listed in the Guideline, but from our research only about 20% of them has legal measures that ensure expected reduction. About 40% of them rely on reduction only through public awareness or individual voluntary action in which there's no assurance. 30% of them are Industry's voluntary action which reductions aren't also ensured. It shows the Guideline has significant lack of effective measures.

At the occasion of ratification, the government missed very important opportunity to review and strengthen policies and measures, which is quite unfortunate. In order to meet the Kyoto target, it is clear that the government have to revise the guideline fundamentally and start "open" process as soon as possible.

Targets for each of GHG and other segments in the Guideline

Contents		1998 guideline	2002 guideline
Domestic	Energy Related CO2	± 0.0%	± 0.0%
Reduction	non-energy related CO2, CH4, N2O	-5.0%	-5.0%
	Innovative technologies, activities of various sector and public	-2.0%	-2.0%
	Fluorinated Gases (HFC/PFC/SF6)	+2.0%	+2.0%
Others	Sinks (domestic)	-3.7%	-3.9%
	Kyoto Mechanisms (JI/CDM/IET)	-1.8%	-1.6%
Total		-6.0%	-6.0%

- (1) Energy related CO2(±0%); It accounts for more than 90 % of Japan's CO2 emissions and to address its emissions reduction is most important. However, stabilization target at the 1990 level has not changed and remains insufficient.
- (2) Innovative technologies and promotion of further activities of various sectors and public (-2%); It relies on mid-future technological development and activities of individuals. Even if those are very important for climate mitigation and need to be encouraged, the amount of their reduction is hard to predict. It is inappropriate to rely on such unpredictable reduction in order to comply the Kyoto target.
- (3) **Sinks (-3.9%);** The figure (-3.9%) is from the cap that Japan can use as forest managements (under Article 3.4 and JI) stipulated by the Marrakech Accords. After Marrakech conference, the government have changed its plan to use sinks from -3.7% to -3.9% out of 6% reduction target. However, the background data of "-3.9%" is not given by the government and remain unclear. Concerning the aging Japan's forest, achieving -3.9% from sinks seems impossible and this figure, with no scientific proof, is again very unrealistic. Aiming to use maximum amount of sinks that the Marrakech Accords allows is very risky, and including such unpredictable figure to Kyoto target achievement plan dangers whole Japanese climate policy. It should hold to use sinks at a minimum, which is certain to get.
- (4) **F gases (+2%);** The target "2% increase (just looking at F gases a 50% increase) from 1995 level" has not changed, too. Not only its sharp increase of F gases is very problematic but also its target is significantly inconsistent with reality. Industries' own estimate is 0% stabilization of 1995 levels (just looking at F gases a 4% increase) in 2010. And actual reduction from F gases by 2001 is about 1.5% out of 6% targets (just looking at F gases 38% reduction). Recognizing this trend, there's no convincing reason to keep its high allowance of emission increase. It only gives bad message to industry. It has to be changed to tougher target, immediately.
- (5) **Kyoto Mechanisms (1.6%);** The number "−1.6%", is not specified in the guideline and it is the remaining from other categories. Change from previous −1.8% to −1.6% is only the reflection of slight change of the sinks.

3. Insufficient Data and Inconsistent figure

The guideline lacks some important data and it makes entire plan of the Guideline very unclear.

- Business as Usual (BAU) Scenario is not clear (not specified in the Guideline)
 New guideline only shows the estimated additional reduction from the previous Guideline.
- CO2 emissions from Energy Conversion Sector is not clear (not specified in the Guideline) Within the energy related CO2, the figure of energy conversion sector is missing.
- The sum of the reduction of each additional measure is not consistent with the total reduction. From those insufficient data availability and less information disclosure, it is very difficult to understand the basis of the calculation that government have done for the review and causes a lot of confusion. More precise, sufficient and appropriate information is desperately needed.