



March 30, 2026

To: Mr. André Corrêa do Lago, COP30 President
COP30 Presidency
Submitted via email to COP30-TAFF-Roadmap@unfccc.int

Cc: UNFCCC

Re: Center for Biological Diversity's Contributions re: COP30 Presidency Roadmap for Transitioning Away from Fossil Fuels in a Just, Orderly and Equitable Manner (paragraph 28.d/GST1)

Dear COP30 President do Lago and COP30 Presidency Officials:

The Center for Biological Diversity, an observer organization admitted to the UNFCCC, submits these comments in support of the COP30 Presidency's Roadmap for Transitioning Away from Fossil Fuels in a Just, Orderly and Equitable Manner (paragraph 28.d/GST1). We commend President do Lago for commencing this inclusive and participatory process to chart out the roadmap of implementing the landmark decision to "transition[] away from fossil fuels in a just, orderly, and equitable manner," adopted at COP28 (paragraph 28.d of the Global Stocktake (GST)).

For ease of reference, this comment will only address the Presidency's **question (b): What potential levers, whether economic, financial, institutional, social or technological, exist for accelerating the implementation of the transitioning away commitment?**¹

A. Mandate the Submission of National and Subnational Fossil Fuel Phaseout Plans as Part of Annual Reporting and Nationally Determined Contributions (*Sub-topic: Energy Transition: Supply-Side Perspective*)

It is imperative that Parties submit national and subnational plans to end fossil fuel expansion and phase out fossil fuels to realize the Dubai COP28 decision. ***The COP30 President should propose and reach a consensus-voted decision that mandates Parties to submit national and subnational plans to end fossil fuel expansion and phase out fossil fuels as part of an annual reporting requirement and a sub-part of Parties' Nationally Determined Contributions, due every five years.*** Specifically, national and subnational plans to end fossil fuel expansion and phase out fossil fuels are critical "supply side" measures that must be paired

¹ COP30 Presidency Invitation to Submit Contributions to (A) the COP 30 Presidency Roadmap on the Transition Away from Fossil Fuels in a Just, Orderly and Equitable; and (B) the COP 30 Presidency Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030, https://unfccc.int/sites/default/files/resource/COP30Presidencyinvitation_to_submit_contributions.pdf.

with “demand side” measures to implement a full, equitable clean energy transition. Fossil fuel phaseout plans should continue to set the Paris Agreement’s 1.5°C limit as the guidepost; set, implement, and enforce phaseout targets and timelines that reflect equity, common but differentiated responsibilities and respective capabilities; and be aligned with plans for the corresponding equitable ramp-up of clean renewable energy and transportation.

- Even though overshoot of 1.5°C is almost certain, the goal of limiting overshoot of 1.5°C to the lowest possible level and returning temperature rise below 1.5°C before 2100 should be the guide for ambition and action to avoid catastrophic damages.
- International scientific assessments (IPCC, UN, IEA) make clear that, to meet the 1.5°C benchmark, governments must immediately stop approving new fossil fuel extraction and infrastructure projects, and phase out existing projects. Fossil fuel extraction and infrastructure projects already in operation and under development would release enough greenhouse gases to heat the planet well past 1.5°C. Targets and timelines for fossil fuel phaseout should be updated from existing work such as the Production Gap reports and Tyndall Centre for Climate Change Research (e.g., Phaseout Pathways for Fossil Fuel Production Within Paris-compliant Carbon Budgets, 2022). Wealthy countries like the United States most responsible for fossil fuel emissions and with most capacity to act bear the greatest responsibility for ambitious climate action, including significant climate finance and support to poorer countries.
- Fossil fuel phaseout plans must be coordinated with the implementation of equitable plans for the ramp-up of clean renewable energy and transportation, to ensure energy and transit affordability, access, and availability for all.

Fossil fuel phaseout plans should include the following elements:

- Policies to stop new fossil fuel extraction and infrastructure through regulation, legislation, and other tools, to minimize damage, carbon lock-in, and stranded assets.
- Decommissioning plans for fossil fuel infrastructure that phase out extraction and infrastructure on a timeline and scale that is coordinated with the corresponding ramp-up of clean, renewable energy and transit. Decommissioning plans should factor in liability issues, industry asset retirement obligations, industry clean-up and remediation responsibilities, and protections from fossil fuel industry challenges.
- Polluters pay mechanisms to hold the fossil fuel industry accountable for its damages and deception. Mechanisms include “polluters pay” laws requiring fossil fuel companies to pay a share of the damages from climate change; government nuisance and fraud lawsuits

against major fossil fuel corporations for deceiving the public about their central role in the climate crisis; and requirements for the fossil fuel industry to pay for cleanup and environmental remediation of oil and gas wells, mines, and fossil fuel infrastructure.

- Just transition mechanisms that center on helping disadvantaged communities and workers in the transition, including economic diversification, worker training and economic support programs, and prioritizing the decommissioning and clean-up of aging fossil fuel infrastructure in overburdened communities.
- Policies to restrict the expansive, entrenched financial and political influence of the fossil fuel and petrochemical industries, including ending subsidies and legal loopholes and restricting financial influence on elections and policymakers.
- Avoiding “false solutions” that perpetuate and often subsidize fossil fuel extraction and infrastructure, such as carbon capture and storage (CCS) and hydrogen made from fossil fuels.
- Public outreach and education on the high costs of continued fossil fuel dependence. While difficult to fully quantify, estimates of the damages caused by the “carbon majors”—the biggest-emitting fossil fuel companies—range into many trillions of dollars, including loss of life, soaring power costs, escalating health costs, emissions-intensified climate disasters, diminished ecosystem services, climate adaptation costs, and geopolitical and economic instability.

B. Use Institutional and Technology Transfer Obligations to Promote the Mass Deployment of Renewable Distributed Energy Resources (*Sub-topics: Energy Transition: Demand-Side Perspective and Technological Solutions and Innovation Pathways*)

It is imperative that the alternative solution to fossil fuels not replicate exploitative practices of the incumbent fossil fuel electricity system, but instead promote renewable energy that is accessible, distributed, and affordable. *The COP30 President should propose and reach a consensus-voted decision to promote renewable distributed energy resources—like rooftop solar and storage—as part of the technology transfer and finance commitments within the UNFCCC.* Deploying distributed renewable energy systems is a key solution in both Global South and Global North countries to advance the transition off fossil fuels in a fair, affordable, and equitable manner. They are low-cost, fast and efficient to erect, and ultimately provide climate resilience that large grids and fossil-fueled systems are vulnerable to. Moreover, there is severe lack of access to electricity pandemic across the Global South; distributed renewable energy systems tackles this access to energy problem in a way that is immediate, affordable, and

ultimately climate resilient. It also serves to improve health and give a pathway for community ownership and governance, does not increase energy burden or poverty, as opposed to top-down corporate, fossil-fueled energy systems.

Distributed renewable energy systems should include: (1) rooftop and distributed solar and storage on-site; (2) microgrids and larger battery storage to connect neighboring properties for backup; (3) demand management technologies to balance local supply and demand; and (4) demand reduction technologies, including energy-efficient appliances.

In addition, the supply chains of renewable energy systems must address fundamental human rights and environmental destruction so as not to repeat the exploitative practices of the fossil fuel system. There must be safeguards to minimize harms to communities, workers, and the environment during the extraction of critical minerals necessary for renewable expansion—including optimizing extraction methods, minimizing critical mineral demand through recycling and repurposing, and consulting with potentially impacted communities.

Along with electricity delivery systems, governments must also enact policies for affordable and equitable access to electric cars and trucks, charging stations, electric public transit, and micro-transit, while reducing the need to drive through electric public transit investment and mixed-use development.

C. Mandate Reporting on Artificial Intelligence Fossil Fuel Use (*Sub-topic: Energy Transition: Supply-Side Perspective*)

The rise of artificial intelligence (AI) data centers poses a new lifeline for the fossil fuel industry and must be a key part of reporting and transparency of Parties moving forward. ***The COP30 President should propose and reach a consensus-voted decision that mandates Parties to include in their annual emissions reporting and Nationally Determined Contributions a specific report on greenhouse gas emissions deriving from Artificial Intelligence Data Centers and related infrastructure. In addition, a mechanism should be established to facilitate technology and financial transfers from wealthy to poor countries to ensure that any AI infrastructure is not powered by fossil fuels and is accessible to the Global South.***

Artificial intelligence is taking the world by storm, with rapidly expanding data center development demanding huge amounts of energy, water, and other resources to power it. According to the International Energy Agency (IEA), projections of data center energy consumption rises to more than 1,700 TWh by 2035, based on an assumption of broader AI adoption and fewer constraints on data center development.² In particular, the U.S.—which has the highest per capita consumption of AI data centers and is thus disproportionately responsible

² International Energy Agency, Energy and AI (2025), at 15, <https://iea.blob.core.windows.net/assets/601eacc9-ba91-4623-819b-4ded331ec9e8/EnergyandAI.pdf>.

for AI climate pollution—is projected to power the majority of the new infrastructure using fracked gas and coal, instead of renewables.³ In the U.S., this amounts to 10% of the economy-wide emissions and 44% of the power sector emissions allowable to meet the U.S. 2035 climate target, or nationally determined contribution (NDC).⁴ U.S. data centers’ projected climate pollution in 2035 amounts to more than 350 million metric tons of carbon emissions (mmt CO₂e) — roughly equal to Italy’s 2023 emissions.⁵

Powering data center development with gas and coal risks entrenching dirty energy and its attendant harms, while moving further from the 2023 Dubai climate summit to transition away from fossil fuels. The AI data center boom risks entrenching fossil fuels even as extreme heat, intense wildfires, and superstorms all show we need to harness renewables to fight the climate emergency. In addition to social, technological, and economic impacts, AI data center expansion carries enormous risks for the climate, public health, and the natural world.

AI sits at the intersection of climate chaos and global security. The United Nations recently launched two AI governance bodies: the Global Dialogue on AI Governance and the Independent International Scientific Panel on AI, both intended to usher in a more inclusive form of international governance of AI. Consequently, the UNFCCC and subsequent climate negotiations should address the potential climate harm from AI infrastructure and require countries to disclose how much AI infrastructure contributes to their greenhouse gas emissions. Specifically, countries should submit NDC commitments that include zeroing out the carbon emissions of the AI industry by using renewable energy and distributed energy resources. A mechanism should also be established to facilitate technology and financial transfers from wealthy to poor countries to ensure that any AI infrastructure is not powered by fossil fuels and is accessible to the Global South.

Respectfully submitted,

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³ *Id.* at 87.

⁴ John Fleming and Jean Su, Center for Biological Diversity, Data Crunch (2025), https://biologicaldiversity.org/programs/climate_law_institute/pdfs/DataCrunch_report.pdf.

⁵ *Id.* at 2.