

São Paulo, April 10, 2026.

**To:** The Presidency of the 30th Conference of the Parties to the United Nations Framework Convention on Climate Change.

**Subject:** Contribution to the COP30 Presidency Roadmap for Transition Away from Fossil Fuels.

In response to the invitation from the COP30 Presidency to submit contributions to the “**Part I - COP 30 Presidency Roadmap on the Transitioning Away from Fossil Fuels in a Just, Orderly and Equitable Manner**”, we respectfully present our considerations.

## **Context**

These submitted contributions aim at integrating COP30 context because a global consensus for the elimination of fossil fuels was not achieved, generating the commitment by the COP30 presidency to undertake additional work to develop the “Roadmap on the Transitioning Away from Fossil Fuels,” and the “Roadmap for Halting and Reversing Deforestation and Forest Degradation”.

The objective of reducing fossil fuels must be global, but differentiated from country to country, taking into account both the approach and the pace. This gradual reduction depends on the existing energy profile, the availability of natural resources, and the level of economic development. This roadmap needs to be well structured, serving as a long-term planning instrument and being properly monitored.

It is very important to mention that in COP 28, the First Global Stocktake called on Parties to contribute to the following global efforts, taking into account their different national circumstances, pathways and approaches:

- (a) Tripling renewable energy capacity globally and doubling the global average annual rate of energy efficiency improvements by 2030;
- (b) Accelerating efforts towards the phase-down of unabated coal power;
- (c) Accelerating efforts globally towards net zero emission energy systems, utilizing zero- and low-carbon fuels well before or by around mid-century;
- (d) 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;
- (e) Accelerating zero- and low-emission technologies, including, inter alia, renewables, nuclear, abatement and removal technologies such as carbon capture and utilization and storage, particularly in hard-to-abate sectors, and low-carbon hydrogen production;
- (f) Accelerating and substantially reducing non-carbon-dioxide emissions globally, including in particular methane emissions by 2030;
- (g) Accelerating the reduction of emissions from road transport on a range of pathways, including through development of infrastructure and rapid deployment of zero-and low-emission vehicles;
- (h) Phasing out inefficient fossil fuel subsidies that do not address energy poverty or just transitions, as soon as possible.

Although privileged by a predominantly renewable energy matrix, and with actions for a gradual energy transition, Brazil also faces barriers to this substitution and diversification.

According to Fourth National Communication of Brazil to the UNFCCC, the fuel combustion activities (categorized as Energy) are the second largest emitter of greenhouse gases in the country, responsible for 28.9% of emissions, with transportation being the main emitter in this Energy category. Brazil is extremely dependent on road transport, making decarbonization in this sector a major challenge.

**(a) What are the most critical barriers — whether physical, economic, financial, institutional, technological or social— preventing a transition away from fossil fuels?**

**Sustainable Transport**

Investment in the modernization and expansion of infrastructure (charging stations, electric buses and heavy vehicle fleet, railways, waterways, and biofuel infrastructure), as well as investments in urban mobility systems.

**Renewable Energy Sources**

Investments to expand solar, wind, and biomass power plants.

**Energy Storage and Distribution Infrastructure**

Investment in energy storage and distribution systems.

**Subsidies**

It is important to calculate and disclose subsidies for alternative energy sources, prioritizing the low-carbon energy transition.

**Industry**

Industrial thermal energy matrix heavily dependent on fossil fuels.

Economic barriers (such as high interest rates for credit and financing), as well as the complexity of the current tax system, making new investments more difficult, particularly in technology and innovation.

**Some common bottlenecks include:**

- Economic and technical feasibility for scalable and low-cost technologies;
- Availability of clean energy at a competitive cost;
- Adequate infrastructure for new business models;
- Logistical challenges and costs, especially in the North and Northeast regions;
- Technological pathways still under development or facing cost and infrastructure challenges;
- Lack of economic incentives;
- High tax burden.

**To reduce dependence on fossil fuels, the country must invest in and strengthen the following areas:**

- Renewable energy sources;
- Energy storage and distribution, including in the Northern region;
- Development and use of sustainable biofuels and electrification solutions;
- Sustainable urban mobility;
- Industrial decarbonization (progressively replacing fossil fuels with biofuels and electrification, new technological routes for industrial processes, developing carbon capture technologies).

**(b) What potential levers, whether economic, financial, institutional, social or technological, exist for accelerating the implementation of the transitioning away commitment?**

- Green finance (BNDES, Climate Fund, Sustainable Sovereign Bonds);
- Eco Invest Brasil program;
- Review of Brazil’s NDCs and adjustment of targets to the country’s specific circumstances;
- Implementation of the Brazilian Carbon Market (established by Law No. 15.042 of December 11, 2024);
- Carbon Market – mechanisms under Articles 6.2 and 6.4 of the Paris Agreement;
- Effective implementation of the Fuel for the Future (Law No. 14.993, of October 8, 2024), which promotes sustainable low-carbon mobility and carbon capture and geological storage and establishes programs such as ProBioQAV, PNDV, and incentives for biomethane;
- Legal framework for Low-Emission Hydrogen (Law No. 14.948 of August 2, 2024);
- Green Mobility and Innovation Program - Mover Program (Law No. 14.902, of June 27, 2024);

- Support for research, development, innovation, and diffusion of low-carbon technologies;
- Facilitation of access to credit and financing for transition projects;
- Implementation of energy efficiency incentive programs for industry;
- Creaction of dedicated financing lines for industrial thermal transition;
- Incentives and competitive financing lines for micro and small enterprises.

**(c) What country, regional or sector roadmap experiences, best practices, and lessons learned can be shared?**

- Chile: roadmap for a just transition in renewable solar electricity generation;
- India: the Production Linked Incentive (PLI) program – initiative to boost domestic manufacturing, reduce import dependency, and create global manufacturing champions;
- EU: Carbon Border Adjustment Mechanism (CBAM) - climate policy tool introduced by the European Union to put a price on the carbon emitted during the production of carbon-intensive goods entering the EU;
- Sustainable Sovereign Bonds issued by Brazil;
- RenovaBio: National Biofuels Program, created to stimulate the production and use of renewable fuels.

**(d) How can a just, orderly and equitable transition best reflect the diverse realities of countries at different stages of development and with different degrees of dependence on fossil fuels?**

- Stimulating regional development;
- Integrating climate solutions with economic development.

**Core recommendation to the COP30 Roadmap**

The energy transition depends on a profound restructuring of the economy, which will require significant investments, access to capital, and professional training in all regions of the country. It is essential that any transition proposal be guided by energy security, legal security, and the preservation of industrial competitiveness.

We remain at your disposal to further contribute to this process and to support the development of this important initiative.