



Will Low Carbon Growth Plans Help or Hurt Low Carbon Growth?

Navroz K. Dubash

Over the past year of climate negotiations, the idea of “low carbon growth plans,”¹ also called “low carbon strategies”² or “low-emission development strategies,”³ (for convenience I use the term “low carbon growth plan” (LCGP) in this note) have gained considerable currency. Indeed, “major economies” agreed to prepare low carbon growth plans in their L'Aquila Declaration of the Major Economies Forum on Energy and Climate of July 9, 2009. Political momentum, therefore, is growing to include this approach as part of a Copenhagen climate deal. However, the concept of carbon strategies or plans is ill-defined, making it extremely challenging to understand the implications of enshrining such plans in the global climate regime.

This note undertakes a preliminary exploration of LCGPs in order to inform discussions on the appropriate role, if any, of this device in the global climate regime. What is the rationale for LCGPs? What exactly constitutes a LCGP and what are the implications with regard to monitoring, reporting and verification for a country undertaking a LCGP? To what extent and how does the embedding of plans in a global climate regime change domestic incentives for low carbon growth and with what effects? What further work needs to be done to better understand this device of LCGPs?

The underlying message of this note is that while low carbon growth plans (LCGP) may well be a useful political device toward a climate deal, there are reasons to doubt whether LCGPs will, in practice, support low carbon development when they are undertaken as part of a global climate regime. Specifically, there may be trade-offs between using LCGPs as a device to drive low-carbon growth domestically, and LCGPs as a political device to signal a measure of commitment under a global climate regime. As a result, under some circumstances

plans may actually hinder rapid, innovative and inclusive low carbon development.

Twin Rationales of LCGPs: Substantive and Political

The concept of LCGPs builds on a few high profile climate planning efforts by several developing countries, including India, Brazil, China, South Africa, and Mexico.⁴ These national plans and strategies differ widely in their stated objectives, underlying analytics, areas of emphasis, and specificity regarding both policies and future emissions trajectories.⁵ Some, such as the South African effort, are strategies in that they focus on analyzing and discussing a pathway toward a low carbon future, but do not elaborate plans. Others, such as the Indian and Chinese documents, detail plans but do not discuss in great detail alternate emissions pathways. Despite these differences, these national efforts have collectively lent impetus to the idea of explicit national efforts that combine scenarios and plans as a way of addressing both climate mitigation and adaptation. Drawing on these national experiences in developing countries, various Annex 1 parties have put forward proposals to formalize this planning process within the global climate regime.

From their inception, these plans have combined a substantive and political rationale. For developing countries undertaking plans, LCGPs presumably have a primary substantive rationale. They provide analysis-based policy-formulation; a basis for national debate and discussion; and thereby improved policy making and enhanced outcomes. However, it is likely that they also have an important political rationale: to signal serious political intent about climate mitigation and adaptation to the global community.⁶

Developed countries have been the primary proponents of embedding national plans within the global legal framework based on a political rationale for plans. LCGPs provide a useful conceptual middle ground between quantitative commitments and bottom-up “nationally appropriate mitigation actions” (NAMAs). They could therefore simultaneously allow Annex 1 countries to claim to their domestic audiences that developing countries are taking on significant mitigation measures, while allowing non-Annex 1 countries to claim that they have preserved some measure of differentiation. This would help address the political deadlock over burden-sharing. In addition, by packaging NAMAs within an economy wide framework and linking this framework to a global carbon budget, LCGPs solve two additional and related problems of concern to Annex 1 countries. First, they provide a basis for limiting leakage from sectoral and project approaches. Second, they provide a way of linking the provision of climate finance to economy wide benchmarks, which could reassure domestic constituencies that funds are being spent well. Annex 1 parties reason that developing countries should welcome this approach, since it recognizes what are, at root, their home-grown planning processes.

The idea of embedding national plans in the global legal framework has, however, run into strong opposition from some developing country parties. Although the idea of low carbon plans originated in developing countries, non-Annex 1 countries have resisted the aggregating element implicit in emissions trajectories and the *formal* linkage between their plans and the global climate regime. Specifically, non-Annex 1 parties have argued that linking these plans to a global regime would infringe on their sovereignty.

Implicit in arguments in favour of LCGPs is the assumption that both substantive and political objectives of LCGPs can be obtained simultaneously. However, as I explain further below, this is an assumption worth probing. Before assessing the implications of LCGPs for domestic actions, it is necessary to first understand the LCGP proposals currently on the table.

Understanding Low Carbon Growth Plans

Several countries and some non-governmental bodies have included reference to LCGPs in their proposals. In an early formulation, the European Commission called for developing countries (except the least developed countries) to commit to producing low carbon development strategies.⁷ Australia,⁸ the United States,⁹ and Japan¹⁰ all make reference to plans in their proposed draft protocols or implementing agreement. Finally, a non-governmental entity, Project Catalyst, has issued an analysis of existing plans and a proposal of low carbon plans and how they might be defined

within the scope of a protocol.¹¹ Although the Project Catalyst proposal is non-governmental, it is arguably the most detailed available proposal, and hence I include it in the discussion here. Table 1 below summarizes these proposals. In addition, Non-Papers 28 and 51 contain references to low carbon strategies that draw on these proposals.¹²

As Table 1 shows, the proposals are relatively thin on details, leaving many significant issues open to interpretation or further elaboration. This lack of specificity leaves open a wide range of interpretations of plans, from structured statements of aspiration to a back-door route to commitments with intrusive review.

One important area of ambiguity pertains to whether only developing countries are required to prepare plans, as the European Commission and Japanese proposals advocate, or whether all countries are required to prepare plans. Requiring all countries to prepare plans creates an impression of parity across countries. However, since Annex 1 parties are likely to take on quantitative emission limitation commitments, construction of an emissions pathway is a trivial additional requirement. Whether preparation of a corresponding plan to achieve this scenario is a substantial additional commitment depends on the nature of the review process, as discussed further below. By contrast, constructing an economy-wide emissions scenario is a potentially significant step for developing countries that goes beyond articulation of NAMAs, since the scenario could hold implications for future discussions over quantitative commitments. Again, much rests on the details of the review process.

The extent and stringency of LCGP review is critical to the implications of these proposals, particularly for developing countries, but also to the use of plans as a political commitment device. Again, the level of detail is wanting. The EC and Project Catalyst proposals explicitly call for a technical assessment, which implies a set of judgements against an implied agreement on best practice approaches. The other proposals leave details of review open to be specified later, presumably by the COP, which will also be the reviewing body. However, there is an implied basis for review in the EC statement, which calls for an assessment of level of ambition against capacity and overall emission reduction required. Similarly, the US statement calls for preparation of strategies “consistent with the level of ambition needed to contribute to the overall objective.”

These formulations imply the need for a review of adequacy of developing countries' proposed emissions trajectory and the strategy with which to achieve this trajectory. The review of adequacy could potentially

be required both of the emissions trajectory and the specific NAMAs required to achieve that trajectory. Moreover, since the totality of NAMAs would be reviewed, this formulation also implies review of unilateral NAMAs in addition to supported NAMAs. Notably, no review of adequacy for Annex 1 parties is implied, since the EC proposal does not require Annex 1 countries to prepare LCGPs, and the US proposal only requires Annex 1 parties' strategies to be consistent with domestic legislation rather than with an overall level of ambition. Based on the detail available, therefore, proposals for LCGPs open the door to far reaching review of plans, without making explicit the basis and form of that review.

Based on this discussion, review of plans could also be tied to financing. The EC communication explicitly calls for preparation of LCGPs as a “prerequisite” for international support for mitigation action. To apply this condition would require agreement on the threshold level of acceptability for a plan. The Project Catalyst proposal also explicitly ties funding to the results of a review, without specifying the benchmarks against which review will be conducted. To explore the

linkages between review of LCGPs and financing will require exploring the details of proposals for MRV of NAMAs, which is beyond the scope of this note.

In sum, the various proposals for LCGPs leave unclear at least three important sets of issues. First, what defines an LCGP as recognized by the global legal process? Second, will all countries or only non-Annex 1 parties be required to prepare LCGPs? Third, what are the benchmarks against which review will be conducted, will these benchmarks be the same or different for Annex 1 and non-Annex 1 countries, and what body will conduct that review? Fourth, what are the links between review and financing of non-Annex 1 parties' mitigation actions, particularly as these links pertain to unsupported NAMAs?

In what follows, I explore whether and how requiring LCGPs as part of a global climate regime shifts domestic incentives and practices in developing countries. Here, I limit myself to understanding the implications for developing country parties, based on an assumption that, for reasons spelled out above, the potential for inconsistencies between substantive and

Table 1: Summary of Proposals for Low Carbon Growth Plans/Strategies

	European Commission	United States	Japan	Australia	Project Catalyst (non-governmental)
Term	Low Carbon Development Strategies	Low Carbon Strategies	National Action Plan	Low emission development strategy	Low Carbon Growth Plan
Who should prepare?	Developing, except least developed	All Parties	Non-Annex 1 Parties	All parties (implied)	All parties
What is to be prepared?	Credible pathway to limit emissions through NAMAs that cover key emitting sectors Required level of support	<i>All parties:-</i> strategy with emissions pathway to 2050 <i>Developed country parties</i> strategy for net emission reductions of [specified amount] <i>Developing country parties with greater responsibility or capability</i> strategy for net emissions reductions by 2050 consistent with the level of ambition needed to contribute to overall objective of the Convention	Policies and measures for mitigation, including quantified elements. Methodologies and guidelines to be produced by COP	Function and relationship to schedules to be specified National emissions pathway to 2050 <i>Developed:</i> quantitative emission limitation or reduction commitment <i>Developing:</i> NAMAs aimed at substantial deviation from baseline	- National circumstances - Assessment of vulnerability - GHG inventory - Long-term vision - Plan for specific investments for decreased vulnerability – with and without support - GHG mitigation plan including a projection of BAU emissions – with and without support - NAMAs and NAPAs - Incremental cost of NAPAs and NAPAs
How is it to be reviewed?	Low Carbon Development Strategies are a prerequisite for financial support Technical assessment to match support to need Assessment of level of ambition against capacity and overall emission reduction required	COP review of implementation and progressive development of Implementing Agreement	COP review of plans according to COP guidelines Technical assessment of all aspects of implementation	To be specified according to responsibilities and capabilities and according to type of commitment or action (unilateral or supported)	Review by technical and economic panel established by COP Funding based on review

political objectives of LCGPs are greater for developing countries.

Structural Tensions and Perverse Incentives in LCGPs

There are a number of pathways through which the substantive and political objectives of LCGPs are likely to be in tension. I elaborate on these pathways below, occasionally drawing on Indian policy context for illustration.

Perverse Incentives: An 'Uncertainty Principle' for Climate Policy

As described above, formalizing LCGPs provides possible gains of predictability and measurability against a global carbon budget, meeting both political and substantive objectives. However, the more firmly national low carbon strategies are bound to an emergent global climate regime through reviews of adequacy and funding links, the greater are the perverse incentives to limit the scope of plans and to game the regime. This effect suggests an 'uncertainty principle' for climate policy -- putting in place a prediction system may, ironically, change incentives and modify that which is being measured.

To achieve the substantive goal of shifting development paths in the direction of low carbon growth LCGPs must be as comprehensive as possible; few areas of development policy are free of climate linkages. A short list of relevant sectors includes energy, agriculture, forests, urban planning, water and health. In all these areas, practical policy making requires making trade-offs between climate and other competing objectives, recognizing there may also be complementarities. However, if plans are to be reviewed for adequacy and implementation by a global regulatory framework that systematically privileges climate objectives, developing country parties will have an incentive to circumscribe the scope of their plans.¹³ Eviscerated climate plans may be worse than no plans at all if they perpetuate public perceptions that it is possible and even necessary to draw clear lines between climate policy and development policy.

In addition, it is quite likely that LCGPs could amplify the incentives to game the global climate regime. In particular, in the current context of disagreement over burden sharing, generating emissions pathways as part of a LCGP are likely to become exercises in inflating national baselines. To be sure, these incentives have domestic roots and cannot entirely be attributed to LCGPs alone. For example, in India, the omnibus Integrated Energy Policy projects a need of approximately 800 GW to 1000 GW of total electricity capacity by 2031-32, starting from a base of 160 GW in

2003-04.¹⁴ This implies a five-fold increase over about 25 years, with an average capacity addition of about 150-200GW every five years (the planning period) for twenty years. The Plan itself notes that historically, plan targets are seldom met, and the likely capacity addition in the most recent five year plan period is likely to be 28 GW against a target of 41 GW. Even if existing constraints of manufacturing capacity, financing and a skilled workforce were to be overcome, emerging constraints of land and water availability are likely to become a growing problem.¹⁵ This tendency to over-forecast is by no means an Indian pathology alone – one study examining US energy forecasts for 1950-1980 find a systematic tendency to overestimate demand and underestimate the potential for surprises arising from technology and new social systems.¹⁶ Far from providing an opportunity to challenge prevailing supply mindsets in most countries and to orient policy toward energy services, embedding national planning in an internationally reviewed LCGP framework risks reinforcing and amplifying domestic tendencies to inflate demand projections and emissions.

With regard to mitigation actions, the LCGP approach risks introducing additional substantial transactions costs. For example, the European Commission calls for developing countries to divide actions into “autonomous,” “supported” and credit generating actions¹⁷ and the Australian proposals calls for dividing actions into supported and unsupported categories. This approach signals, whether intentionally or not, that not all NAMAs will necessarily be supported by climate finance, and that some actions have to be taken with domestic financial support. While there may be a case for arguing that negative cost options and those that bring substantial co-benefits should be supported domestically, the proposed solution of categorising NAMAs based on whether their costs should be borne domestically or not is almost certain to introduce substantial transactions costs and invite gaming.

For instance, it is almost impossible to truly determine what is negative and what positive cost. Attempting to do so invites the tautological assertion that any action that remains unimplemented must, by definition, be a positive cost action. Compact fluorescent lamp programs, which are almost always cost effective but have highly limited penetration, are a good example of a policy that is ostensibly negative cost, but appears to have positive cost in practice. Following this logic, a country faces an incentive *not* to implement or to implement late an action that is otherwise in its interest, in order to assert positive costs and build a case for climate finance. Ironically, while the rationale for LCGPs includes curbing the worst excesses of the CDM, LCGPs risk amplifying manifold the problem of credible baselines and perverse incentives that

characterized the CDM.

These transactions costs arise out of any efforts at measuring additionality, including of stand-alone NAMAs, and are not unique to LCGPs. However, adding the packaging of LCGPs, combined with the need for plans to be comprehensive, potentially increases the scale of this problem many fold.

Learning from Development: The Importance of Experimentation

The past few decades of experience with development carry important lessons for low carbon growth. A substantial literature now suggests that successful development is closely tied to the nature of economic, political and social institutions. This, in turn, suggests that there are multiple and country specific paths to development rather than a single pre-specified road. Recent thought on development therefore emphasizes the need for policy and institutional experimentation rather than the mechanical replication or transplant of policies from one context to another as epitomised by the “Washington Consensus” of the 1990s.¹⁸ Will low carbon growth plans support this approach to development?

When accompanied by a stringent process of review to assess adequacy of policies, LCGPs suggest a mindset oriented toward a limited menu of “best-practice” approaches, rather than an openness to experimentation. A technical review process, almost by definition, presupposes a set of consistent benchmarks built around existing practices. The result may be a framework that is hostile to innovative approaches, much as the Washington Consensus was to heterodox economic policies.¹⁹

In particular, practical policy making often calls for environmental policies to be leavened by attention to locally important political factors in a case by case manner.²⁰ For example, the US state of Arizona introduced a Renewable Portfolio Standard as part of a larger “Solar Development Strategy” that included additional incentives for power sourced from Arizona and for manufacturing and installations based in Arizona, thereby winning local political support. Similarly, Denmark's wind energy promotion strategy explicitly built in incentives for locally important cooperatives and guilds as primary actors in wind energy supply. Both these innovative policies are contrary to economic orthodoxy that frowns on use of performance standards and discriminatory treatment in investment.²¹ But in both cases, these measures were necessary to win local political support. Creative packaging of policy to achieve multiple objectives may be particularly necessary in developing countries such as India, where there are acute and contradictory social, political, economic and bureaucratic pressures on policy making in an environment of capacity shortfalls,

low ability to pay, and acute mismanagement.

These approaches inherently require exercise of judgement, including on political trade-offs, issues a technical review panel would be ill-placed to assess. Hence, LCGPs are likely to face a direct trade-off between embracing diversity as a virtue and developing a robust, because uniform, review system. The rich history of development experience suggests the first option is more likely to lead to innovative low-carbon development.²²

Decentralized or Centralized Decision-Making

The prospects for innovation are likely to be enhanced if ideas for carbon mitigation emerge from a wide range of actors within the economy. One of the presumed virtues of the NAMAs approach to developing country mitigation is that it encourages experimentation and creativity from the bottom-up. Theoretically, ideas for NAMAs could emerge from civil society actors, sub-national governmental actors, the private sector and other such groups, all of whom are closer to the ground than central governments. However, the act of wrapping up NAMAs in a plan, and then subjecting it to international review, could create pressures to re-centralize decision-making.

Central governments are more likely to centralize the generation of NAMAs and their costing decision-making when decisions are linked to international review or obligations. Under such circumstances, governments will want to have control over the scope of the plan to manage sovereignty intrusions, the ambition of the plan to leave leeway for gaming and to minimize down-side risks, and the costing of various measures in order to best position the country for climate finance. Statements about the desirability of stakeholder engagement²³ are of little use in the face of incentives for national governments to hold tight control over a planning process. By introducing pressures to centralize, LCGPs risk under-cutting the creative potential of NAMAs.

The Importance of “Ownership”

Can requiring preparation of LCGPs induce broader stakeholder participation, policy coherence and realignment toward low-carbon development in countries? Here, the lessons of development assistance are instructive. During the 1980s and 1990s, development assistance made liberal use of loan conditions as a way of inducing compliance with development orthodoxy. After two controversial decades of experience with this approach, donor agencies concluded that inducing “ownership” over policy programs through conditions was a failed strategy.²⁴ In response, aid agencies have experimented with more subtle approaches to forging joint policy programs with borrower governments, such as

through preparation of “Poverty Reduction Strategy Papers” (PRSP). While an independent review of the PRSP approach based on a multi-country study finds some incremental improvements in policy-making, it concludes that results are heavily shaped by particular country histories and traditions, and that there was little change in downward accountability.²⁵ In brief, the process of linking national policy to an international process was of limited use in re-shaping national priorities and policies, let alone politics.

As with the PRSP, the LCGP offers a form of “process conditionality” as a way of nudging governments in the right direction. Both are based on encouraging governments to create a program for transformation over which they will have ownership and which can be supported by the international community. The PRSP experience, however, suggests it is unlikely that LCGPs will prove a useful device to change the direction of countries’ planning processes or their outcomes. Instead, existing national traditions of planning are likely to continue. For example, while advocates of LCGPs detail the benefits of stakeholder involvement in LCGPs, citing the South African experience,²⁶ it is unclear whether this approach can be induced from above. South Africa has a particular post-apartheid tradition of deliberation that other countries are unlikely to replicate unless there is internal domestic pressure to do so. Similarly, to raise policy low carbon development up the priority list of policy objectives is unlikely to occur on the back of plans for external consumption. The only contribution that process conditions can bring is forced engagement with questions which provide an opening for domestic actors to engage their own governments. The lesson of development assistance is that there are no short-cuts to building domestic ownership for policy change through national democratic process.

Conclusion

Low carbon growth plans have emerged as a politically useful device through which to embed nationally appropriate mitigation actions. Any analysis of this approach is hampered by a lack of detail on the proposal. Based on available information, however, there are reasons to be concerned that tradeoffs exist between the substantive goal of achieving low-carbon development and the political goal of providing a device to resolve the disagreement over burden-sharing between Annex 1 and non-Annex 1 parties.

To assess whether and how these trade-offs may shape discussion will require a great deal more clarity on the LCGP idea. In particular, it is important to understand:

- What defines a LCGP?
- Will LCGPs be prepared only by non-Annex 1

countries or also by Annex 1 countries? If the latter, what is the relationship of plans to quantitative emission limitation obligations?

- Against what objective will review of LCGPs be carried out? Will review include the overall emissions trajectory? Will it also include a review of NAMAs against a projected emissions trajectory? Will the benchmarks and process of review be the same or different for Annex 1 and non-Annex 1 parties?
- To what extent and how will climate finance be linked to review of LCGPs?

Based on the discussion here, it appears likely that the stronger the review mechanisms, the greater are the possible trade-offs with actually achieving low carbon development. These include incentives to inflate baselines, introducing additional transactions costs for NAMAs, diminishing scope for experimental policies, undermining innovation through incentives to centralize, and under-cutting ownership of low-carbon development policies. To be clear, these problems are not inherent in national planning for low carbon development. Instead, they arise from efforts to bind national plans within a global regime through processes of review, possibly tied to financing.

Conversely, if LCGPs are subject only to reporting and not a stringent review of adequacy, they become instruments designed primarily around stimulating domestic action. Low carbon growth plans stand a better chance of actually producing low carbon growth if they are de-linked from the global process.

Admittedly, doing so would leave unsolved the problem of finding a political solution to the deadlock over burden sharing and the associated question of how best to represent the full range of developing country mitigation efforts within the global climate regime. However, the contours of a possible solution to this problem do exist, in the form of NAMAs and the details of measurement, reporting and verification procedures for NAMAs. Resorting to low carbon growth plans as a back door solution to burden-sharing risks exacerbating the underlying and larger problem of creating incentives to stimulate actual low carbon growth, rather than just planning for a low carbon world.

Endnotes

¹ Commission of the European Communities, “Towards a Comprehensive Climate Change Agreement in Copenhagen,” Brussels, 28.2.2009. COM (2009) 39 Final.

² See Draft implementing agreement under the Convention prepared by the Government of the United States of America for adoption at the fifteenth session of the Conference of the Parties, FCCC/ CP/2009/7, 6 June 2009.

³ Non Paper 28, of the Contact Group on Enhanced Action on Mitigation and its Associated means of Implementation, 09/10/09. Available at http://unfccc.int/meetings/ad_hoc_working_groups/lca/items/5012.php

⁴ Prime Minister's Council on Climate Change, Government of India, National Action Plan on Climate Change (NAPCC), 2008, <http://pmindia.nic.in/Pg01-52.pdf>; Interministerial Committee on Climate Change, Government of Brazil, National Action Plan on Climate Change (PNMC), Decree No. 6263 November 2007, http://www.mma.gov.br/estruturas/imprensa/arquivos/96_11122008040728.pdf; National Development and Reforms Commission, People's Republic of China, National Climate Change Program, June 2007, <http://www.ccchina.gov.cn/WebSite/CCChina/UpFile/File188.pdf>;

Ministry of Environment (Secretaría de Medio Ambiente y Recursos Naturales), Government of Mexico, Special Program on Climate Change (PECC), August 2009, <http://www.semarnat.gob.mx/queessemarnat/politicaambiental/cambioclimatico/Pages/pecc.aspx>;

Department of Environment Affairs and Tourism, South Africa, Long Term Mitigation Scenarios (LTMS), October 2007, <http://www.environment.gov.za/HotIssues/2008/LTMS/A%20LTMS%20Scenarios%20for%20SA.pdf>

⁵ Nine such plans have been usefully summarized in Project Catalyst, "Low Carbon Growth Plans," Working Draft, 7 August, 2009, Available at www.project-catalyst.info/

⁶ For example, the Indian National Action Plan on Climate Change was somewhat hastily put together immediately before the G-8 meeting at Heigeldamm in July 2008. Informed observers suggest the timing was more than coincidental.

⁷ Commission of the European Communities, "Towards a Comprehensive Climate Change Agreement in Copenhagen," Brussels, 28.2.2009. COM (2009) 39 Final.

⁸ Draft Protocol under the Convention prepared by the Government of Australia for adoption at the fifteenth session of the Conference of the Parties, FCCC/ CP/2009/5, 6 June 2009.

⁹ Draft implementing agreement under the Convention prepared by the Government of the United States of America for adoption at the fifteenth session of the Conference of the Parties, FCCC/ CP/2009/7, 6 June 2009.

¹⁰ Draft Protocol to the Convention prepared by the Government of Japan for adoption at the fifteenth session of the Conference of the Parties, FCCC/ CP/2009/3, 13 May 2009.

¹¹ Project Catalyst, "Enshrining Low Carbon Growth Plans in the Copenhagen Agreement," Working Draft, 6 August, 2009. Available at www.project-catalyst.info/

¹² Available at http://unfccc.int/meetings/ad_hoc_working_groups/lca/items/5012.php

¹³ The only conditions under which they will not minimize the scope is if developing countries are arm-twisted into not doing so, or if there are substantial foregone financial gains from not doing so, or if domestic civil society is convinced of the need for aggressive linkage of climate and development policy and has sufficient voice. None of these appear likely given the increased clout of large developing countries in global politics, the meagre finances on offer, and the schizophrenia many civil society organizations feel between holding their own governments to account and supporting their governments

against the perceived injustice of the global climate regime.
¹⁴ Planning Commission, Government of India, Integrated Energy Policy, August, 2006.

¹⁵ I am grateful to MV Ramana and Girish Sant for discussion on this point.

¹⁶ Paul P. Craig, Ashok Gadgil, and Jonathan G. Koomey, "What can History Teach Us? A Retrospective Examination of Long-Term Energy Forecasts for the United States," Annual Review of Energy and Environment, Vol. 27 (2002), pp. 83-11.

¹⁷ Commission of the European Communities, "Towards a Comprehensive Climate Change Agreement in Copenhagen," Brussels, 28.2.2009. COM (2009) 39 Final.

¹⁸ See, for example, Dani Rodrik, "Goodbye Washington Consensus, Hello Washington Confusion? A Review of the World Bank's Economic Growth in the 1990s: Learning from a Decade of Reform", Journal of Economic Literature, Vol. XLIV (December 2006), pp. 973-987; Peter Evans, "Development as Institutional Change: The Pitfalls of Monocropping and the Potentials of Deliberation," Studies in Comparative International Development, Winter 2004, Vol. 38, No. 4, pp. 30-52; Ha-Joon Chang (ed.) Institutional Change and Economic Development, New York: United Nations University Press.

¹⁹ For example, Chile's imposition of a currency transaction tax to slow down speculative financial flows or China's use of village and township enterprises rather than private enterprise were contrary to the then orthodoxy but both, while not without their critics, are seen as successful experiments.

²⁰ Albert Cho and Navroz Dubash, "Will Investment Rules Shrink Policy Space for Sustainable Development? Evidence from the Electricity Sector," In Kevin Gallagher (ed.) Putting Development First: The Importance of Policy Space in the WTO and IFIs, London: Zed Books, 2005.

²¹ Cho and Dubash. "Will Investment Rule Shrink Policy Space for Sustainable Development?"

²² It is important to note that this argument for diversity and against review need not apply with the same force to NAMAs. NAMAs are typically understood as being at a relatively fine level of detail, and hence are likely to shape institutional choices that determine development outcomes.

²³ Project Catalyst, "Low Carbon Growth Plans."

²⁴ World Bank, Assessing Aid: What works, what doesn't, and why, World Bank, Washington, D.C., 1998.

²⁵ Laure-Helene Piron with Alison Evans, "Politics and the PRSP Approach: Synthesis Paper," ODI Working Paper 237, March, 2004.

²⁶ See, for example, Project Catalyst, "Low Carbon Growth Plans," Working Draft, 7 August, 2009, Available at www.project-catalyst.info/

Navroz K. Dubash is a Senior Fellow, Centre for Policy Research and can be reached at ndubash@gmail.com. I am grateful to Lavanya Rajamani and Sharad Lele for comments and to the Ford Foundation for funding support. The author remains responsible for all facts and opinions outlined in this brief.

The Centre for Policy Research (CPR) is an independent think tank set up in 1973. The Centre conceives its larger role as one of stimulating advanced thinking on major policy issues and suggesting alternative policy options.

CPR's Climate Initiative seeks to generate research and analysis on the global climate negotiations, and on the links between the global climate regime and domestic laws, policies and institutions in India. It also seeks to create a platform from which scholars and activists can engage in policy and academic debate on climate change.

For further details on our work visit, www.cprindia.org