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UNDER2° Secretariat CLIMATE GROUP

THE LOCAL GOVERNMENTS AND MUNICIPAL AUTHORITIES (LGMA) CONSTITUENCY

COP31 Guidance for Negotiators on

ADAPTATION

The LGMA Guidance for Negotiators accompanies the LGMA COP31 Position and provides detailed recommendations, context and proposed negotiating text, setting out how each ask can be operationalized.

cities-and-regions.org/cop31-lgma-position

Purpose

This document is written for negotiators. It sets out what the Local Governments and Municipal Authorities (LGMA) Constituency is advocating for on adaptation at COP31, and the specific language it proposes.

Background

A large share of adaptation measures is implemented at the local and subnational levels. Local and subnational governments hold the mandates that decide whether adaptation actually happens: land-use planning, water and sanitation, drainage, housing, emergency response, health and social services, and the stewardship of ecosystems and cultural heritage. They also absorb the first fiscal shock of every flood, heatwave, and drought, often without dedicated financial support. Yet only around 17% of adaptation finance reaches the local level, and international funds remain structurally hard for them to access.

The LGMA has worked on adaptation across successive negotiation cycles and processes: on the UAE Framework for Global Climate Resilience and its targets, on adaptation finance and direct access, on National Adaptation Plans (NAPs), and throughout the UAE–Belém work programme, where it submitted views on successive indicator lists and advocated for indicators that capture local and subnational planning.

Our asks are grounded in Article 7.2 of the Paris Agreement, which recognizes the local and subnational dimensions of adaptation; decision 2/CMA.5, which affirms adaptation as a multilevel challenge; and paragraph 161 of the first Global Stocktake decision, urging multilevel and cooperative action.

NAPs co-developed with the subnational governments that hold the relevant mandates are better grounded in local risk, can be implemented faster, and are less exposed to maladaptation. Systematic local and subnational data flows would also strengthen Parties' own reporting on the UAE Framework for Global Climate Resilience and its targets, and the quality of adaptation information in adaptation communications and Biennial Transparency Reports. Local and subnational governments already bear much of the cost of preparing for and recovering from climate impacts. Improving their access to finance is not a parallel ask but a direct lever for Parties to close their own adaptation finance gap and reduce the fiscal burden of future disasters.

Main calls to action

1. Belém–Addis Vision: allow for subnational representation in the technical task force

The LGMA calls on Parties to constitute the technical task force under the Belém–Addis Vision through an open call for nominations, with published selection criteria and timeline, balanced geographical and gender representation, and representation of subnational and territorial expertise spread across the 11 targets, including expertise in subnational and territorial monitoring and data systems.

Much of the data behind the Belém Adaptation Indicators is produced and held at a local and subnational level. A task force that carries that expertise from the outset will deliver metadata and methodologies that Parties can trust and use.

Proposed text for negotiators

Decides that the composition of the technical task force under the Belém–Addis vision on adaptation shall include representatives from subnational and local governments, and allow for expertise in subnational and territorial monitoring and data systems, alongside balanced geographical and gender representation and expertise across the targets referred to in paragraphs 9–10 of decision 2/CMA.5;

2. Belém–Addis Vision: make the Belém Adaptation Indicators usable at territorial scale

To ensure the operationalization of the Belém Adaptation Indicators, the CMA7 decision established the Vision, a two-year Party-driven "policy alignment process" aimed at developing guidance to operationalize the Belém Adaptation Indicators.

The LGMA calls on Parties to mandate the technical task force to identify, for each Belém Adaptation Indicator, the scales at which it can be disaggregated, including subnational and territorial scales, and to develop guidance for Parties that wish to report disaggregated data.

Indicators should also capture access to local social and care services and the differentiated impacts of climate risks on women, older persons, persons with disabilities, and other groups with increased care needs, services often delivered by local and subnational governments.

Adaptation outcomes are territorial. Flood exposure, heat mortality, water stress, and ecosystem conditions vary by an order of magnitude within a single country. Therefore, an indicator reported only at national level cannot show a Party, or the second Global Stocktake, whether adaptation is working where the risk is.

Proposed text for negotiators

Requests the technical task force to establish an inclusive consultation mechanism with local and subnational government networks, Indigenous Peoples, and local communities during the testing and finalization phase of the indicators, in order to ensure their relevance and applicability in the field;

Requests the technical task force to specify for each indicator the spatial and administrative scales at which it can be disaggregated, including, where technically feasible, taking into account the progress of subnational government and territorial level ;

Further requests the technical task force to develop guidance to support Parties wishing to report disaggregated data, drawing on data collected by subnational governments, and, where appropriate, community-generated data, including from informal settlements, where such data are available;

3. Baku Adaptation Roadmap: open a workstream on means of implementation

The LGMA calls on Parties to establish a dedicated workstream on means of implementation under the Baku Adaptation Roadmap, covering finance, technology development and transfer, and capacity-building across all 11 targets, with at least one workshop before the conclusion of the Belém–Addis Vision, and with the participation of local and subnational governments.

Each of the 11 targets carries an implementation cost, and it falls largely on the level of government closest to the impact: water systems, health services, drainage, ecosystems, and heritage are financed, built and maintained locally. Because means of implementation are discussed target by target, they are never assessed as a whole. A dedicated workstream would establish what finance, technology and capacity each target requires, and where the capacity to absorb them already exists, giving Parties a structured basis for the next phase of the roadmap.

> **Proposed text for negotiators**
>
> *Decides* that the Baku Adaptation Road Map shall include a dedicated workstream on means of implementation, addressing the provision of finance, technology development and transfer, and capacity-building in relation to the targets referred to in paragraphs 9–10 of decision 2/CMA.5;
>
> *Requests* the subsidiary bodies to convene at least one workshop under this workstream, with the participation of Parties, relevant constituted bodies and observer organizations, including representatives of local and subnational governments;
>
> *Decides* that capacity-building activities under the Baku Roadmap should include a targeted training program for territorial actors, focusing on the collection, management, and use of disaggregated climate data.

4. Adaptation finance: make the tripling of adaptation finance target operational

The LGMA invites Parties to give the commitment to at least triple adaptation finance by 2035 a defined baseline, a base year, and a delivery pathway; to provide grant-based and concessional finance for adaptation; and to create simplified access windows through which adaptation finance can reach subnational governments.

Subnational governments carry a substantial share of adaptation costs through resilient infrastructure, ecosystem management, and public services, including the social and care services that protect communities during floods, heatwaves, and other climate disasters. Yet they are structurally disadvantaged in accessing international climate finance: accreditation requirements, project size thresholds, and sovereign-guarantee conditions exclude precisely the level of government that delivers and reinforce the need for direct access modalities.

Proposed text for negotiators

Urges Parties to substantially and predictably increase their provision of adaptation finance, prioritizing grant-based and concessional, non-debt-creating instruments, in support of the formulation and implementation of National Adaptation Plans;

Invites Parties to establish simplified access windows for adaptation projects proposed by, or implemented through, local and subnational governments, including through enhanced direct access modalities;

Invites Parties to reflect, in their reporting under the enhanced transparency framework, adaptation finance provided to or through subnational governments;

5. National Adaptation Plans: engage subnational governments in formulation and implementation

The LGMA calls on Parties to provide for structured engagement of subnational governments in the formulation, implementation of and integration into National Adaptation Plans, and to encourage the integration of bankable subnational adaptation projects into NAPs.

The LGMA invites the Global Implementation Accelerator to support that engagement in its work on NAPs, including the preparation of subnational adaptation investment pipelines.

Proposed text for negotiators

Encourages Parties, in formulating and implementing their National Adaptation Plans (NAPs), to strengthen vertical coordination with subnational and territorial governments by establishing arrangements for their structured participation, ensuring that local and subnational contributions are fully reflected in national adaptation communications, and considering the integration of investment-ready subnational adaptation projects into national planning and implementation.

Invites the Global Implementation Accelerator, in supporting the implementation of National Adaptation Plans, to include support for engagement with local and subnational governments and for the preparation of subnational adaptation investment pipelines;

Resources from the LGMA community

- ICLEI Europe's recommendations on climate adaptation finance
- RegionsAdapt Brief for Action: How to apply the Global Goal on Adaptation and its indicator to local and regional realities?

Adaptation Working Group

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