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THE LOCAL GOVERNMENTS AND MUNICIPAL AUTHORITIES (LGMA) CONSTITUENCY

COP31 Guidance for Negotiators on

MULTILEVEL GOVERNANCE OUTCOMES

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.

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Connecting global goals to local realities

Executive summary

A strong outcome at COP31 in Antalya, Türkiye, can deliver implementation of the Paris Agreement by empowering all levels of government - national, subnational and local - to act and collaborate on the climate crisis. The LGMA has three key asks for Parties at COP31 to unlock this multilevel cooperative action, that address the different aspects of the global climate action agenda:

1. **Embed and recognize** multilevel cooperative action, including the distinct role and contributions of local, regional and subnational governments, across COP31 negotiated decisions on just transition, finance and the Second Global Stocktake (GST).
2. **Deliver** multilevel cooperative action through initiatives including: the Global Implementation Accelerator, Belém 1.5 and the Coalition for High Ambition Multilevel Partnerships (CHAMP).
3. **Establish** a Multilevel Cooperative Dialogue for national and subnational governments to address implementation barriers - including climate finance, technology transfer and capacity-building - in response to the IPCC Special Report on Climate Change and Cities and as part of the Second Global Stocktake.

Proposed text for negotiators

Recognise (Preambulatory clause for cover decision): *Recalls* the Paris Agreement and Glasgow Climate Pact preambles recognising local, subnational and multilevel action, the UAE decision 1/CMA.5, paragraph 161 urging multilevel, gender-responsive and cooperative action, the Global Mutirão decision stressing the important role and active engagement of cities and subnational authorities, and notes the positive contributions made by Parties and non-Party stakeholders, including cities, towns, states, provinces and regions as summarised in, but not exclusive to, the annual report on the Sharm El Sheikh Mitigation Ambition and Implementation Work programme in 2024 on the topic 'Cities: buildings and urban systems.

Embed (Operational clause for Just Transition outcome): *Recognises* the importance of the role of non-Party stakeholders in enabling inclusive and participatory just transition pathways and decides that the mechanism's governance body shall include representatives from the nine constituencies to co-shape the activities under the mechanism together with Parties.

Embed (Operational clause in outcomes of matters relating to the global stocktake): *Requests* the Chairs of the Subsidiary Bodies and the co-facilitators of the Second Global Stocktake technical dialogue to convene dedicated in-session roundtables during the technical assessment phase to assess multilevel climate action and implementation, including the contributions, experiences and challenges of local and subnational governments, and to reflect the outcomes of these discussions in the outputs of the technical assessment.

Proposed text for negotiators

Establish (Operational clause in cover decision): *Requests* the Secretariat to facilitate a dialogue on multilevel cooperative action between Parties and subnational authorities in the UNFCCC process.

Background

Local and subnational governments deliver an estimated 69% of climate-significant public investment in OECD countries - covering mitigation and adaptation measures worldwide, generate more than 50% of global GDP and regulate, plan and tax to advance climate action. Local and subnational governments are on the frontlines of the climate crisis and are the first responders when climate impacts hit. In countries that have endorsed CHAMP, city climate commitments could close 37% of the gap between current Nationally Determined Contributions (NDCs) and a Paris-aligned trajectory. What we need now are international processes that can further enable and accelerate this progress.

While Parties have recognized this valuable contribution, the current COP process lacks a systematic way for national, subnational and local governments to jointly unlock implementation enablers - climate finance, technology transfer and capacity-building.

The urgency to take multilevel action continues to grow year-on-year. The Limiting Overshoot report from the UN Environment Programme clearly shows that every city, state and region will feel the impacts of climate change as we exceed 1.5 degrees. The need for immediate action is pressing, as evidenced by increasing extreme weather events. For mitigation and adaptation to advance together in this new era we need to work together across all levels of government urgently.

Enhancing the participation and space for subnational governments in the UNFCCC process can ensure that the global climate system effectively resources and scales place-based, lived climate action to deliver the Paris Agreement, including through the proposed Multilevel Cooperative Dialogue.

What the LGMA can offer

Since the first climate COP in 1995, the LGMA has served as the official voice for local and subnational governments within UN Climate Change, connecting them directly to global climate processes. The 2015 Paris Agreement recognized the essential role of these governments in enhancing NDCs and driving transformative action. Subnational governments, also with the support of their relevant city networks and associations, are ready to take this further and scale action across municipalities of different scales.

Multilevel action supports delivery of the Paris Agreement, evidenced through many case studies:

- **Accelerating multilevel urban climate implementation:** In Brazil, over 50 cities are transitioning from planning to action by preparing finance-ready, high-impact projects focused on sustainable transport and waste management. Working collaboratively with a broad ecosystem of partners and all levels of government, the initiative leverages a national AI-supported data platform to strengthen multilevel coordination, unlock local climate finance and integrate subnational contributions directly into national and international climate agendas.
- **Developing inclusive climate plans:** In Colombia, the national government ran an open application process for cities to contribute their specific climate initiatives for the development of Colombia's NDC in addition to running five workshops, with support from partners, across the country to proactively involve subnational governments and other stakeholders.
- **Developing inclusive climate projects:** In the United Kingdom, Great British Energy, headquartered in Scotland, is a new publicly owned clean energy company that includes and works collaboratively with local authorities. It will introduce a Local Power plan that will invest in Local and Combined Authorities and Community Energy Groups to roll out small and medium-scale renewable energy projects, with shared community ownership. This will support a more decentralized and resilient energy system, with more local generation and ownership.
- **Monitoring, Reporting and Verification (MRV) of climate action:** Case study of Rio Grande do Sul, Brazil, introducing an MRV system to track climate action, impacts and progress across nearly 450 municipalities within their jurisdiction, demonstrating the ability of states to work with municipalities and local governments at scale.
- **Connecting climate action at all levels for multilevel NDCs:** In South Africa, the national government endorsed Town Hall COPs as a platform for creating inclusive national climate plans. The national

ministry responsible for the NDC is collaborating with local governments to host a series of Town Hall COPs across the country, which will serve as critical entry points for multilevel collaboration, shaping the implementation of South Africa's climate change actions, the country's upcoming NDC 3.0 and national discussion points for COP30.

- **Scaling best practices for impact:** Denmark is 99% of the way to becoming the first country in the world where every municipality has a climate action plan aiming to reduce emissions and increase local resilience. The municipalities expect to help cut Denmark's total emissions by 73% by 2030 (exceeding the national target of 70%) with the more than 6,500 planned actions across sectors such as energy, transport and agriculture.

Delivering on the LGMA's key asks can bolster this multilevel action and provide additional opportunities to deliver on the Paris Agreement through multilevel partnerships.

Key asks

1. Embed

Local and subnational governments around the world have achieved major emissions cuts in the past decade and supported the delivery of more ambitious and inclusive national climate policies. Embedding recognition of this contribution, and a process to strengthen it in the Antalya outcome, will be critical to ensuring that Parties maintain momentum on prioritizing multilevel action. Ensuring multilevel governance is embedded in negotiated outcomes from COP31 will ensure subnational contributions are appropriately recognized and leveraged.

A. **Recognition:** acknowledge the distinct and complementary roles of subnational governments in designing and delivering climate action as an integral part of Parties' efforts to implement the Paris Agreement in the Antalya decision,

B. **Just Transition:** recognize multilevel approaches as critical to advancing just transitions and position subnational governments as key implementers under the new Just Transition Mechanism. Include subnational representation in the Mechanism's governance body, and provide direct access to matchmaking, technical assistance and capacity-building resources. See the LGMA COP31 Guidance for Negotiators on the Just Transition Work Programme and Mechanism.

C. **Finance:** recognizing and embedding multilevel climate finance and subnational access as core implementation mechanisms across key finance processes, including through direct access modalities for local and subnational governments, for example through the Climate Finance Work Programme, Country Platforms, the Fund for Responding to Loss and Damage (FRLD) and the Global Goal for Adaptation. See the LGMA COP31 Guidance for Negotiators on Climate Finance.

D. **GST 2.0:** ensuring that the 'Matters relating to the global stocktake' decision at COP31 is inclusive of both the contributions of subnational governments and the opportunities increased action and collaboration between all levels of government can unlock.

2. Deliver

Furthering multilevel implementation through non-negotiated outcomes and initiatives outside the formal process at COP31 can unlock ambitious action.

A. **Global Implementation Accelerator (GIA):** as endorsed in the CHAMP Coalition's Implementation Roadmap, we urge Parties to secure strong recognition of multilevel partnerships as integral to effective climate action in the Global Implementation Accelerator report.

B. **Belém Mission 1.5:** as set out in the LGMA's consultation submission, we urge Parties to feature and strongly recommend engagement with local and subnational governments in the 2026 report, since 70% to 80% of the actions needed to deliver 1.5°C are implemented at the subnational level.

C. **Coalition for High Ambition Multilevel Partnerships (CHAMP):** we encourage the 79 endorsers of CHAMP to support the LGMA's positions for COP31, engage in the Fifth Urban Ministerial Meeting on Urbanization and Climate Change, and continue to deliver on their pledge to enhance cooperation with subnational governments across all phases of national climate strategies to limit temperature increases to 1.5°C and boost climate adaptation.

3. Establish

Mandating a formal space for a Multilevel Cooperative Dialogue in the COP process will align the international support architecture with subnational needs, with a defined timeline and agreed modalities, ensuring that the global climate system effectively resources and scales place-based, lived climate action to deliver the Paris Agreement. The timeframe for a Dialogue could be in response to the upcoming release of the IPCC Special Report on Climate Change and Cities and as part of the Second Global Stocktake.

The gain from such enhanced participation is two-fold:

1. Parties will gain a coordinated entry point in the COP process to increase their understanding of, and engage on, subnational climate action realities; better ability to connect the multilateral process more closely to people's lives; ability to deliver on the Paris Agreement by looking at issues holistically in terms of domestic governance.
2. Subnational governments will gain a meaningful space in the international climate process to support national climate target delivery and their own subnational target delivery; a platform to raise the profile on the blockers that they face at the local, regional, subnational and national level; a platform to better highlight comparisons between themselves and a means to jointly develop solutions that scale multilevel action, in service of delivering the Paris Agreement.

Expected outcomes from a Multilevel Cooperative Dialogue include:

- **Accelerated delivery of national climate targets:** knowledge and best-practice sharing between Parties and subnational governments on collaborative multilevel action means Parties explicitly include more multilevel mitigation and adaptation actions in their NDCs and National Adaptation Plans (NAPs), unlocking greater action to accelerate delivery.

- **More effective climate policies and increased accountability:** taking a multilevel approach can strengthen policies to better align and be more effective, and also boost accountability for delivery across all levels of government.
- **De-risking and unlocking of additional finance:** subnational governments account for roughly 63-69% of climate-significant public expenditure and investment in Organisation for Economic Co-operation and Development (OECD) countries, but represent a disproportionately small share of climate-aligned bond issuance; unblocking subnational finance access directly serves Parties' NDC finance gaps.
- **Better data for reporting and project preparation:** engaging subnational governments ensures local and subnational data, trends, targets, risks, policies and actions are integrated into NDC design and can inform subsequent tracking in Biennial Transparency Reports (BTRs). However, the LGMA does not recommend that this space be used for matchmaking between stakeholders for specific projects, as this should be a key function of the Implementation Labs or other voluntary mechanisms under the Action Agenda or by coalitions of the willing such as CHAMP.
- **Clearer identification of barriers to action:** discussing the challenges to unlocking multilevel action across means of implementation (climate finance, technology development and transfer, and capacity-building) can create a shared understanding of how to boost action and reflect these back into the formal negotiations.

In summary, the LGMA recommends the formation of a Multilevel Cooperative Dialogue to facilitate implementation of the Paris Agreement at all levels of government. The LGMA Constituency will additionally continue to advocate for multilevel action to be embedded in existing negotiating tracks alongside this new Dialogue proposal.

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Annex 1: Dialogue Case Studies - how they support ambition and implementation

A. Dialogue on Mountains and Climate Change

- **Summary:** Formalized at COP30 as an annual Dialogue. Previous outcomes from a one-off expert Dialogue in 2024 resulted in technical recommendations for implementation and also recommendations for the COP process itself.
- **Process:** Decision to mandate stemmed from a one-off mandated expert dialogue in GST 1.0, followed by an aligned but outside-the-process event by the Kazakh government co-chaired by Simon Stiell and the creation of 'Mountains Negotiating Group'.
- **Outcomes:** As a new Dialogue, there are only early outcomes. Raised political profile for mountains, breaking of national siloing of the issue, formal integration of IPCC findings on mountains linked to dialogue establishment means countries have specific textual backing they need to apply for funding (for example, from the Fund for Responding to Loss and Damage).

B. Dialogue on Oceans and Climate Change

- **Summary:** Mandated as an annual recurring Dialogue in 2021, this meeting produces technical outcomes and recommendations to the COP (on Global Goal on Adaptation, NDCs, biodiversity and finance in 2025). The UN official media in the Dialogue is focused and more political. The Dialogue features Parties (negotiators not other ministries), UN speakers and technical experts. 16 governments contributed to the 2025 Dialogue.
- **Process:** Strong national government champions Chile and Canada helped to sponsor and push for this. When Chile hosted COP in 2019, they framed it as the "Blue COP" and the Dialogue was a key outcome. Just months before the "Blue COP," the IPCC released the Special Report on the Ocean and Cryosphere in a Changing Climate (SROCC). Upon the launch of the technical phase of the first Global Stocktake in 2021, the Dialogue was made permanent and annual.
- **Outcomes:** Sustained political drumbeat from the dialogue has led to increase in countries explicitly including ocean-based mitigation and adaptation in their NDCs; formally validating blue carbon and coastal resilience within the UNFCCC, Dialogue gave justification for major financial mechanisms (like the Green Climate Fund and the Global Environment Facility) to direct hundreds of millions of dollars toward ocean-based climate projects; created a more inclusive space in the process (for example, elevating Indigenous coastal community voice); and, ensure ocean language was deeply integrated into the GST recognizing marine ecosystems as vital carbon sinks that must be protected to achieve the 1.5°C goal.

Annex 2: Complementary processes to a Multilevel Cooperative Dialogue

- The newly adopted **5-year plan for the Global Climate Action Agenda** is a key voluntary delivery tool. This is the best space for the matchmaking of partnerships to secure project financing and technical assistance, distinguishing its role from formal UNFCCC spaces.
- The annual **Urban Ministerial Meeting** is a key platform to bring national, subnational and local housing and urban political leaders into the climate agenda, to deliver the urban elements of NDCs. The Ministerial's outcomes can complement and feed into a multilevel Dialogue - which would be broader than urbanization and seek to connect to the negotiations more.
- **High ambition voluntary spaces**, such as CHAMP - where 78 countries and the EU aim to boost ambition by integrating subnational priorities into national plans - are able to foster innovation outside the process. This model shows the effectiveness of multilevel collaboration spaces, and a Dialogue seeks to extend and incentivize this collaboration among all Parties.