



LGMA ZERO DRAFT POSITION FOR CONSULTATION

LOCAL AND OTHER SUBNATIONAL GOVERNMENTS ARE AT THE HEART OF MOVING THE CLIMATE AGENDA FROM NEGOTIATIONS TO IMPLEMENTATION

As the LGMA Constituency, we believe success for the global climate agenda means harnessing the vital role local and other subnational governments play in driving more ambitious and inclusive climate action.

We celebrate recent milestones of multilateral climate cooperation: the historic COP28 agreement to transition away from fossil fuels and UAE Framework for Global Climate Resilience, the COP27 Loss and Damage Fund, the COP29 pledge to mobilize \$1.3 trillion annually by 2035, and the COP30 Global Mutirão decision with a commitment to develop a just transition mechanism. These breakthroughs prove that ambitious, inclusive action can deliver real progress. These are positive policy signals that need to be translated into concrete actions - local and other subnational governments are ready to help deliver them.

Complementing these formal milestones, voluntary processes like the Brazil COP30 Presidency's Roadmaps to Transition Away from Fossil Fuels and End Deforestation, the Coalition for High Ambition Multilevel Partnerships (CHAMP), the Global Climate Action Agenda, and the First Conference on Transitioning Away from Fossil Fuels, are also shaping the global climate response, showing how multilevel coalitions of the willing driven by both national and subnational governments, focused on the clean energy and fair transition are helping drive this momentum forward.

Across the globe, subnational governments are already showing what's possible. In countries that have endorsed CHAMP for climate action, city climate commitments could close 37% of the gap between current NDCs and a Paris-aligned trajectory. Subnational governments in the Global South in particular are advancing vital adaptation and mitigation solutions, strengthening NDCs and National Adaptation Plans (NAPs), and bridging local priorities to global goals. Translating these global commitments into tangible results requires close coordination between national, regional, and local governments. What we need now are international processes that can further enable and accelerate this progress.

The forthcoming IPCC Special Report on Climate Change and Cities is expected to provide an important scientific foundation for strengthening the role of urban and subnational territories in global climate action. By assessing and synthesizing the latest evidence on urban climate science, the report can help inform Parties' consideration of how climate policies, plans, and implementation frameworks can better engage local and other subnational governments as essential partners.

More systemic and intentional inclusion and collaboration with subnational governments can lead to mitigation and adaptation plans (eg. NDCs and NAPs) more grounded in the reality of communities, help countries achieve their climate pledges in line with the objectives of the Paris Agreement faster and build the foundation to shift climate finance from aggregate pledges toward the financial systems needed to deliver the Paris Agreement in every territory.



SB64, at the mid-point between COP30 and COP31, is the moment to move local and other subnational governments from recognition to resourcing. The operationalization of the Global Implementation Accelerator, the Belem Mission to 1.5, the Action Agenda, the Just Transition Mechanism, the Climate Finance Work Program, the Veredas Dialogue on Article 2.1(c), the Fund Responding to Loss & Damage, the Annual GST-NDC Dialogue, and the Global Goal on Adaptation indicators all offer concrete opportunities to close the gap between global commitments and on-the-ground implementation - the road to COP31 needs to ensure this operationalization is inclusive of subnational governments.

Key asks

This is how the Parties to the Paris Agreement, current and future UNFCCC COP Presidencies, Coalition for High-Ambition Multilevel Partnerships (CHAMP) endorsers, the UNFCCC Secretariat, other UNFCCC Observer Constituencies, and the 193 signatories to the 2030 Agenda for Sustainable Development – can operationalize key solutions with the help of subnational governments:

- **Climate Finance** - At SB64, Parties should use the Climate Finance Work Programme, Article 9.1 implementation, NCQG follow-up and the Veredas Dialogue to **recognize multilevel climate finance as a core implementation architecture**, enabling local and other subnational governments, as critical delivery partners of national governments, to co-lead climate action through accessible and high impact mechanisms and instruments listed in our Climate Finance Annex.
 - SB64 should also prepare the ground for Parties to define and launch at COP31 two institutional instruments that add a new layer of efficiency, effectiveness and accountability to climate finance delivery: voluntary Subnational Investment Annexes in NDCs and NAPs, and a recurring *Global Synthesis Report on Multilevel Climate Finance and Subnational Investment Needs and Opportunities*. Together, they would help Parties deliver better on existing commitments by mapping territorial investment needs, structuring quality portfolios, clarifying delivery channels, tracking whether finance reaches local and regional implementation, identifying access gaps, documenting models that work, and enabling peer-to-peer cooperation to replicate, scale up and scale out solutions for mitigation, adaptation, resilience and just transition.
 - Additionally, the commitment to triple adaptation finance by 2035 must now be matched by a credible subnational delivery pathway, so that finance reaches the cities, regions and communities managing climate risks on the ground.
- **Just Transition Mechanism** - Formally include representatives of subnational governments and other constituencies in the governance of the future Just Transition Mechanism, recognizing them as essential to the delivery of a whole-of-society approach to a just transition. Furthermore, the Mechanism should acknowledge the critical role subnational governments play as just transition implementers and embed a whole-of-government approach to effectively translate high-level national commitments into tangible results for local communities and workers. The Mechanism should also include knowledge, capacity-building, technical assistance opportunities for subnational governments.
- **Formalized Multilevel Cooperative Dialogue** - Create, within an appropriate timeframe, a systematic, joint space for national and subnational governments to address implementation barriers — including climate finance, technology transfer, and capacity-building — in response to the upcoming release of the Special Report on Climate Change and Cities and as part of the Second Global Stocktake.

