



30 October 2025 - Version 3

# LGMA GUIDANCE FOR COP30 NEGOTIATORS

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# LGMA GUIDANCE ON MULTILEVEL GOVERNANCE AND URBANIZATION

*Prepared by the LGMA Working Group on Multi-level Action & CHAMP*

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## OVERVIEW - GUIDANCE FOR NEGOTIATORS

Parties must strengthen partnerships with subnational actors to accelerate delivery of the Paris Agreement. Unlocking the full potential of multilevel collaboration means advancing “inclusive, multilevel, gender-responsive, and cooperative action”, and embedding this into the COP process. This includes creating dedicated spaces to leverage the capabilities of local and other subnational governments in implementing negotiated outcomes, while strengthening how mandates, competencies, and contributions are tracked and recognized.

UNFCCC processes have yielded multiple outcomes on multilevel action and urbanization. It is time to capitalize on these to create a clear entry point within the negotiations.

Therefore, we call on Parties to agree the below as part of the outcomes from COP30 in Belém:

- **Recognize** the role of subnational governments in designing and delivering climate action as an integral part of Parties’ efforts to implement the Paris Agreement, and reflect this in the Belém outcome document (section 1).
- **Establish** a formal UNFCCC work program that is dedicated to furthering multi-level climate action in collaboration with local and other subnational governments in the lead up to the Global Stocktake in 2028, as well as to accelerate and strengthen synergies between the New Urban Agenda and climate action, building on previous relevant UNFCCC outcomes, progress in Nationally Determined Contributions (NDCs) 3.0 and cognizant of the outcomes of the IPCC Special Report on Cities expected in 2027 (section 1).
- **Embed** and mainstream multilevel action across key negotiating streams - including Just Transition Work Programme and Global Goal on Adaptation Indicators. This includes ensuring the modalities of the United Arab Emirates dialogue on implementing the outcomes of the Global Stocktake provides inclusive engagement for subnational governments, in order to strengthen implementation (section 2).



To support the achievement of these negotiated outcomes, we urge Parties to proactively engage in the Action Agenda and request that it helps consolidate existing spaces to introduce an implementation forum that can broker multi-level partnerships and unlock barriers to more ambitious climate action (section 3).

Together, these outcomes can build a new era for multi-level cooperation in the global climate and sustainability agenda.

## “ **Proposed text to negotiators**

### **Recognise (Preambulatory clause):**

“Recalls the Paris agreement and Glasgow climate pact preambles recognising local, subnational and multi-level action, the UAE decision 1/CMA.5, paragraph 161 urging multilevel, gender-responsive and cooperative action and notes the positive contributions made since by Parties and non-Party stakeholders, including cities, towns, states, provinces and regions as summarized 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.’”

### **Establish (Operational clause):**

“Decides to launch a time-bound work programme on multilevel action between Parties and subnational governments with a view to consolidating data inputs from subnational governments, identifying implementation opportunities and challenges to achieve the goals of the Paris Agreement across mitigation, adaptation, just transition, means of implementation, including findings from the IPCC Special Report on Cities, due in 2027, and, as needed, developing quantified elements and inputs to support the Global Stocktake.”

### **Embed (Operational clause):**

In the modalities of the United Arab Emirates dialogue on implementing the outcomes of the Global Stocktake: “Decides that inputs to the United Arab Emirates dialogue include: (a) Reports and national communications of Parties, as well as relevant input from non-Party stakeholders, including international, regional and subregional organizations;”

“Decides that each United Arab Emirates dialogue will be held over [two][three] half-day sessions and organized in a manner that facilitates a focused exchange of views, information and ideas, considering regional and subregional perspectives, [and arranged in a variety of formats, such as expert presentations, thematic round tables, breakout group discussions and world café discussions,] to promote the active participation of and interaction among Parties and non-Party stakeholders, including options for virtual participation with a view to supporting the equitable and effective engagement of participants.”

## **BACKGROUND**

Subnational governments play a decisive role in implementation, delivering an estimated 70-80% of mitigation and adaptation measures worldwide. Local and other subnational governments already demonstrate how they can support international climate progress by focusing on practical delivery. As a result, LGMA has repeatedly referenced the need to strengthen multilevel action, with clear signals in the first Mayors and Parliamentary Dialogue (2010), [Paris Agreement](#) (2015), [Glasgow Climate Pact](#) (2021) and [First Global Stocktake Outcome](#) (2023).

National climate plans are enhanced in both ambition and implementability when developed in partnership with subnational governments as essential actors in delivery. Recognizing this, 77 countries have joined the



[Coalition for High Ambition Multi-level Partnerships \(CHAMP\)](#) - a coalition committed to collaborating with subnational actors and integrating their priorities into national plans. [Town Hall COPs](#) have also been a key mechanism for delivering joined up action in 2025 - including in countries outside of the CHAMP coalition, like [South Africa](#).

The urgency to take multilevel action is not new. Research from 2019, showed that a bundle of technically feasible low-carbon measures could cut emissions from key urban sectors by [almost 90% by 2050](#). In absolute terms, these savings are greater than the combined 2014 energy-related emissions of the two largest emitters, China and the US. Despite this, [analysis by UN Habitat](#) finds that less than a third of current NDCs have strong urban content.

This year has brought growing calls from non-Party stakeholders to unlock faster, more effective implementation. Dedicated dialogue in the COP process on advancing local climate action could directly connect multilateral outcomes to communities and livelihoods, building trust and credibility.

**To do so, we must elevate the role of subnationals beyond city-to-city or region-to-region exchanges, bringing Parties, financiers, development banks, and the private sector into the conversation.** This is already being tested through high-level engagements at UNFCCC Regional Climate Weeks and UN Habitat Ministerial, leading towards the COP30 Local Leaders Forum in Rio.

At the same time, the urbanization agenda is also gaining momentum. We must empower each level of government to take the right climate actions. The COP30 Presidency's Action Agenda includes a dedicated focus on multilevel governance and city resilience, while UN-Habitat has adopted a new climate strategy. By 2027, the IPCC's Special Report on Cities will trigger further political responses at COP32. COP30 offers a crucial moment to build on these initiatives and secure a permanent place for multilevel action.

## SUPPORTING INFORMATION

### 1. CALL ON PARTIES TO INTRODUCE A FORMAL WORK PROGRAMME TO CATALYSE MULTILEVEL ACTION AND IMPLEMENTATION AT THE SUBNATIONAL LEVEL IN THE BELÉM OUTCOME DOCUMENT.

Local and other 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 Belém outcome document, will be critical to ensuring that Parties maintain momentum on prioritizing multilevel action. In 2024, 94% of Race to Zero Cities and 100% of states and regions reported having a subnational transition plan or strategy to address mitigation or adaptation. Subnational plans and national commitments must now better align and reinforce each other to ensure effective multilevel action.

Beyond recognition, introducing a formal UNFCCC work programme that is inclusive of subnational governments can ensure a more action-oriented, multilevel and multilateral process. Advancing climate action by providing a constructive space for national and subnational governments to collaborate - to facilitate a technical conversation on how to overcome barriers to implementation in the run up to the second Global Stocktake negotiation (in 2028).

A timebound work program on multilevel action could:

- Establish a dedicated entry point within the UNFCCC process to systematically capture and reflect the contributions of subnational governments. Such a space would provide an opportunity to identify



and address barriers to action in a holistic manner, with a view to unlocking greater support from subnational actors towards achieving the goals of the Paris Agreement.

- This entry point can serve as a platform to integrate and follow up on the findings of the forthcoming IPCC AR7 Special Report on Cities (2027), thereby creating a sustained home for subnational engagement within the process.
- Focus on addressing implementation barriers, in sync with the implementation forum and Action Agenda framing outlined below (section 2).
- Create a roadmap to address barriers and support Party-level action - including through strengthened UNFCCC processes, lessons learnt on the NDC design process, and negotiation tracks. Ensuring that insights are translated into actionable guidance that accelerate implementation.
- Develop a special reporting element for parties, where each party is encouraged to report on their multilevel partnerships with local subnational governments, potentially in alignment with the Biennial Transparency Reporting process, which will culminate in a special report to inform the Global Stocktake in 2028.
- Test a new model, shifting from negotiations to implementation orientated conversations. Cities, subnational governments, regions and Parties discussing through a work program on multilevel action could be a testbed for a broader shift.

In-session workshops could be convened at SB64 and SB66 on multilevel collaboration, the role of subnational governments, and sustainable urbanization. The outcomes of these workshops can be reported at COP32, building on the outcomes of IPCC AR7 Special Report and elevating the MPGCA Human Settlements Thematic Action Pathway. The workshops could support integrating multilevel action, including subnational and urban contributions into NDCs 3.0. It could also consider how existing multilateral frameworks, such as the New Urban Agenda from UN Habitat, could integrate into the COP process for increased implementation.

## **2. TO SUPPORT THE ACHIEVEMENT OF THESE NEGOTIATED OUTCOMES, WE URGE PARTIES TO PROACTIVELY ENGAGE IN THE ACTION AGENDA AND REQUEST THAT IN THE LONG-TERM IT BROKERS MULTI-LEVEL PARTNERSHIPS TO PROVIDE A ROUTE FOR MORE AMBITIOUS CLIMATE ACTION.**

The Action Agenda (AA) as set out by Brazil is welcome and demonstrates an unprecedented focus on the urban and cities agenda. While recognizing the role of subnationals in biodiversity preservation. This, along with the specific focus on multilevel action in Activation Group (11), is a step forward. Following the September 2025 NDC Synthesis Report, we are likely to see a global ambition gap of over 0.7°C. Local and other subnational government contributions will be a key tool for narrowing this gap. Recent [research](#) for example finds that cities globally have the potential to reduce the emissions gap between current NDCs and a 1.5C pathway by 40%. NDCs are a floor - not a ceiling - for subnationals, we must ensure the new AA helps catalyze their contributions.

The AA has delivered major successes in the past, including showcasing action already underway in support of the Paris Agreement. It must now evolve into an effective enabling tool for implementation. A key suggestion is to build upon the COP30 Local Leaders Forum to create a dedicated space for brokering relationships and supporting subnational action to overcome implementation barriers - matching the challenges faced by governments with solutions gathered through the revised Action Agenda and Non-State Actor Zone for Climate Action (NAZCA) portal, whether those be policy recommendations, private finance, public funding, or other support.



A dedicated and institutionalized implementation platform to unlock subnational government action and multilevel action should:

- Convene annually by each COP Presidency and operate alongside the formal negotiation process. Targeted towards unlocking non-party stakeholders barriers to implement already agreed negotiation outcomes.
- Develop best practice principles, on virtual participation, duration, and thematic focus.
- Operate under a central focus of trying to consolidate and synthesize existing efforts, as opposed to developing a new initiative or space.
- Support a full-cycle approach to finance and implementation:
  - Before the COP - map local finance (including adaptation, mitigation, and loss & damage), technical, capacity building, regulatory, and access barriers;
  - During the COP - facilitate matchmaking between subnational actors, national governments, and broader private sector players;
  - After the COP - track progress transparently, aligned with the Global Stocktake (GST) via the NAZCA platform.
- Ensure capacity building reaches those most in need. Finance without capacity-building risks bypassing the communities and governments with the greatest implementation gaps.
- Enable local and other subnational governments to present what they've delivered and what they intend to deliver each year, reinforcing their contributions to national climate plans and wider COP process. In sync with the Granary of Solutions.
- Deliver outcomes that inform the formal negotiations. A subnational-led statement should synthesize insights and priorities, creating a structured link between an implementation forum and the UNFCCC negotiation process.

### **3. ENSURE MULTILEVEL ACTION IS EMBEDDED IN EXISTING NEGOTIATING TRACKS AND DIALOGUES TO ENSURE IMPACTFUL CLIMATE ACTION THROUGH COLLABORATION ACROSS LEVELS OF GOVERNMENT.**

Across existing negotiations, we urge negotiators to consider where multilevel action can unlock greater ambition and implementation of agreed outcomes.

- As an essential element of effective implementation, it is a priority to **integrate multilevel action into the modalities of the United Arab Emirates Dialogue** on implementing the outcomes of the Global Stocktake, to ensure those outcomes are fully realized.
- Within the **Just Transition Work Programme**, **vertical integration across all levels of government** should be encouraged to foster coherent just transition implementation and alignment.
- Global **adaptation progress must measure the quality of collaboration with subnational governments**, not only outcomes. Ninety percent of adaptation measures occur at the local level, making subnational governments central to climate resilience.
- **Institutionalize multilevel climate finance** as a structural pillar of the new financial architecture. By 2030, at least **30% of climate finance shall be channelled to local and regional governments**. To achieve this, Parties will operationalize internationally agreed mechanisms with **simplified access windows** that empower local actors to ensure equitable, and effective delivery of resources.



## MULTILEVEL GOVERNANCE AND URBANIZATION ANNEX 1 - HOW DOES MULTILEVEL ACTION SUPPORT DELIVERY OF THE PARIS AGREEMENT?

- **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.
- **Developing integrated climate aware spatial development strategies:** By aligning local and subnational spatial development processes with climate outcomes, including mitigation, adaptation and just transition, to reach and retain long term climate objectives while informing a desirable economic infrastructure and development framework.
- **Monitoring, Reporting, and Verification of climate action:** Case study of Rio Grande do Sul 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 Communities at scale.
- **Connecting climate action at all levels for multilevel NDCs:** In South Africa, the federal 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.



## MULTILEVEL GOVERNANCE AND URBANIZATION ANNEX 2: MULTILEVEL ACTION AND URBANIZATION UNDER THE UNFCCC

Complementing forums, summits, campaigns, initiatives, pavilions led by [LGMA Constituency at COPs](#).

<b>1. MULTILEVEL</b>	2023 - COP28 Global Stocktake - <a href="#">Decision – para.161 – urging for multilevel action</a>
	2021 - COP26 Glasgow Climate Pact - <a href="#">Decision – preamble – need for multilevel action</a>
	2015 - COP21 Paris Agreement - <a href="#">Decision – preamble – recognizing importance of engaging all levels of governments</a>
	2014 - <a href="#">SB40 Forum on experiences and best practices of cities and subnational authorities in relation to adaptation and mitigation</a>
	2010 - COP16 Cancun Agreements - <a href="#">Decision – para.7 governmental stakeholders</a>
<b>2. MITIGATION</b>	2024 - COP29 - <a href="#">Mitigation Work Programme on cities, buildings and urban systems</a>
	2014 - <a href="#">SB40</a> and <a href="#">ADP Technical Expert Meetings on urban environment</a>
	2013 - <a href="#">ADP2.3 Workshop on pre-2020 ambition: urbanization and the role of governments in facilitating climate action in cities</a>
<b>3. ADAPTATION</b>	2023 - COP28 - Global Stocktake - <a href="#">Decision – para.63</a>
	2015 - COP21 Paris Agreement - <a href="#">Decision – Art.7.2</a>
<b>4. LOSS AND DAMAGE</b>	2023 - COP28 - <a href="#">Decision - Direct subnational access para.20e, 44, 48</a>
<b>5. FINANCE</b>	2019 - COP25 <a href="#">Standing Committee of Finance – Report</a>
<b>6. ACTION FOR CLIMATE EMPOWERMENT (ACE)</b>	2021 - Glasgow Work Program - <a href="#">Preamble – para.12, 19, 26c, 29e</a>
<b>7. COP PRESIDENCY - ACTION AGENDA</b>	2025 - COP30 <a href="#">Axis4 - Building Resilience for Cities, Infrastructure and Water</a>
	2024 - COP29 - <a href="#">MAP - 3rd Urban and Climate Ministerial</a>
	2023 - COP28 - <a href="#">Stocktake - CHAMP - 2nd Urban and Climate Ministerial, Urban Nature</a>
	2022 - COP27 - <a href="#">SURGe, Sharm El Sheikh Adaptation Agenda, 1st Urban Climate Ministerial</a>
	2021 - COP26 - <a href="#">Race-to-Zero, Race-to-Resilience</a>
	2019 - COP25 - <a href="#">Climate Ambition coalition</a>
	2018 - COP24 - <a href="#">Multilevel Action Dialogue</a>
	2017 - COP23 - <a href="#">Talanoa Dialogue</a>
	2016 - COP22 - <a href="#">Marrakech Partnership for Global Climate Action Human Settlements Thematic Action Pathway</a>
	2014 - COP20 - <a href="#">Lima-Paris Action Agenda</a> and NAZCA
	2013 - COP19 - <a href="#">Cities Day</a>
2010 - COP16 - <a href="#">Mayors and Parliamentarians Dialogue</a>	





Highlights in reverse chronological order:

- **2024 Mitigation Work Programme** focused on cities, buildings and urban systems
- **2023 UAE Consensus** para.161 urged Parties for multilevel action and para.63 on resilient cities
- **2021 Glasgow Climate Pact** underlined urgent need for multilevel collaboration
- **2019 Standing Committee on Finance** focused on sustainable cities
- **2015 Paris Agreement** preamble recognized the importance of engagement of all levels of governments and Art7.2 local and subnational dimensions of adaptation
- **2010-2015;** workshops and forums paving the way for the Paris Agreement
- **2007-2009;** Bali Roadmap for a post2012 climate regime, mirrored by Local Government Climate Roadmap for *recognition, engagement and empowerment* of local and other subnational governments
- **1995-2006;** little progress due to lack of any substantial provisions in the UNFCCC and Kyoto Protocol.



# LGMA GUIDANCE ON ADAPTATION

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## BACKGROUND

Nearly half of the world's population - 3.6 billion people - is already highly vulnerable to climate change, and no one is immune to its impacts. Climate change is a lived reality, claiming lives, damaging ecosystems, and disrupting local economies. Without urgent action to cut emissions and strengthen resilience, these impacts will intensify, hitting the most vulnerable communities hardest. Local and other subnational governments are on the frontline of this crisis, driving locally led solutions that foster ownership, social cohesion, and agile, nature-positive responses. Investing in adaptation now will help avoid far greater costs in the future.

In this context, the constituency of Local Governments and Municipal Authorities (LGMA) to the UNFCCC calls for adaptation to be treated with the same urgency and provided with the same appropriate and adequate resources as mitigation, and to be embedded across all levels of governance. Both transformational and incremental approaches to adaptation are needed to rethink how we plan territories, allocate funding, measure progress, and strengthen social resilience.

To be effective, adaptation must be pursued in coherence with the Sendai Framework for Disaster Risk Reduction and in alignment with the Convention on Biological Diversity (CBD). This coherence reinforces the leadership of local and subnational governments in shaping climate-resilient futures.

The rising incidence of maladaptation must also be urgently addressed. As noted by the IPCC WGII, "inclusive planning initiatives informed by cultural values, Indigenous knowledge, local knowledge, and scientific knowledge can help prevent maladaptation." Only by aligning subnational strategies with national priorities and global frameworks, and by working in an inclusive and structured manner, can climate action be effective, equitable, and future proof.

At the same time, it must be recognized that adaptation has limits. The unavoidable impacts of a post-1.5°C world already demand responses that go beyond resilience-building. Loss and Damage (L&D) transcends the scope of adaptation, requiring urgent measures to minimize irreversible losses, reverse damages where possible, and ensure justice for affected communities.

## RECOGNIZING SUBNATIONAL GOVERNMENTS' CONTRIBUTION TO THE GLOBAL GOAL ON ADAPTATION

Ninety percent of adaptation measures occur at the local level, making subnational governments central to climate resilience. They lead in planning, implementing, and monitoring adaptation, yet their contributions



often remain underrecognized in global frameworks. Achieving the Global Goal on Adaptation (GGA) requires multi-level collaboration, with indicators that reflect local action and ensure support for subnational actors. In 2023, [70% of states and regions had climate strategies](#), with nearly half being integrated action plans, demonstrating growing local leadership.

The GGA Decision 2/CMA.5 affirms that adaptation is a multi-level challenge, spanning local to international scales, and calls for gender-responsive, participatory, nature-based, and inclusive solutions. It stresses the importance of addressing the needs of vulnerable ecosystems and groups, including youth, women, Indigenous Peoples, and persons with disabilities. Decision 2/CMA.5 also highlights the vital role of diverse stakeholders - from subnational governments and civil society to the private sector, multilateral banks, and academia - in implementing the UAE Framework for Global Climate Resilience.

To be effective, global adaptation progress must measure not only outcomes but also the quality of collaboration with subnational governments. Recognizing and adequately resourcing their efforts is essential to closing the gap between global ambition and locally led adaptation.

## 1. UAE-BELÉM WORK PROGRAMME ON INDICATORS

The UAE-Belém work programme is a key opportunity to ensure that subnational adaptation efforts are visible, measurable, and valued. The LGMA constituency welcomes the inclusive approach taken by the expert group in developing the indicators and the strong recognition of subnational governments across the [final list of potential indicators](#).

The LGMA constituency supports the adoption of clear, measurable headline indicators that reflect the full adaptation cycle, particularly those that capture the role and collaboration with subnational governments, ensuring that reporting remains a national responsibility that does not place additional burden on local communities. Tracking and aggregating local progress will strengthen national adaptation planning and enable more effective reporting, ensuring that no local contribution remains invisible.

In addition, to maximize efficiency and coherence, the LGMA calls for alignment with Sendai Framework targets and reporting systems. This will ensure comparability across global processes and elevate the visibility of local adaptation efforts within both climate and disaster risk reduction agendas.

Priority indicators to be kept within the final list of indicators - with relevant additions highlighted in italic - include:

### 10 (a) IMPACT, VULNERABILITY and RISK ASSESSMENTS (IVRAS)

- (10a04) Number of people per 100,000 that are covered by early warning information through local governments or through national dissemination mechanisms.
- (10a06) Percentage of local governments in a country having a plan to act on early warnings.

### 10 (b) PLANNING

- (10b05) Proportion of National Adaptation Plans, policy instruments, and planning processes that have been informed by traditional knowledge, knowledge of Indigenous Peoples, and local knowledge systems.
- (10b06) Proportion of local governments that have integrated climate change adaptation into policies, legal frameworks, budgets, plans and processes.
- (10b10) Proportion of government budget allocated to climate adaptation and resilience.
  - *Note: Disaggregation should also include proportion of budget allocated to action at the local level.*



## 10 (c) IMPLEMENTATION

- (10c07) Annual adaptation finance expenditure.
  - *Note: Disaggregation should include proportion of adaptation finance allocated to sub-national and local institutions as per former indicator 10c08.*
- (10c10) Number of Parties with institutional arrangements for the provision of regular training on climate change adaptation at the national and local level for governments and non-government organisations including community-based organisations.
- (10c11) Extent of capacity-building interventions enhancing adaptive capacity of vulnerable communities/people.

## 10 (d) MONITORING, EVALUATION, LEARNING

- (10d01) Number of Parties that have designed a system for monitoring, evaluation and learning for their national adaptation efforts.
- (10d05) Number of Parties with sufficient institutional capacity, including adequate financial resources, to fully operate the national adaptation Monitoring, Evaluation, and Learning system.

## 2. NATIONAL ADAPTATION PLANS

For adaptation initiatives to be effective and sustainable, they must be rooted in local contexts, with leadership from local and subnational actors and institutions. Parties should therefore prepare multilevel, participatory, and gender-responsive National Adaptation Plans (NAPs), with support as needed, while enhancing the coherence of policy and institutional frameworks.

Locally led adaptation is essential for delivering real and lasting impact. NAPs must be co-developed with subnational governments and key stakeholders, leveraging local knowledge and meaningful community engagement. This inclusive approach is vital for accurately identifying vulnerabilities and designing tailored, effective solutions that strengthen resilience where it matters most.

Embedding NAPs within the broader governance principles of the Sendai Framework will ensure effective vertical integration and recognize local governments as essential partners in climate adaptation, resilience building, and risk reduction.

### “ *Proposed text to negotiators* ”

Urges Parties to reinforce vertical integration in NAP processes to ensure coherence and alignment between national, subnational, and local adaptation plans, enabling locally led adaptation through meaningful engagement and support of subnational actors, and to include clear actions in NAPs that promote capacity-building, inclusive participation, and direct access to finance for subnational governments and local communities.

## 3. ADAPTATION FINANCE

Ambitious finance targets are crucial to enable effective adaptation, particularly for climate-vulnerable countries and communities. International climate finance for adaptation must be scaled up to match mitigation ambition, and direct access to finance at the local level needs to improve, as only about 17% of adaptation finance currently reaches local actors, limiting its impact on the ground. Scaling up adaptation



finance should support the GGA and its targets, aligning financing with the UAE Framework for Global Climate Resilience. It should also be reported against Sendai and CBD targets, reinforcing the obligation to provide local and subnational governments with adequate, predictable, and direct funding for risk reduction and resilience building.

Robust adaptation methodologies and metrics must be established to track not only the volume but also the quality of climate finance, ensuring funds are sufficient and effectively deployed. Strengthening the administrative capacity of local and subnational governments is imperative, as many currently lack the resources to meet growing adaptation challenges.



#### ***Proposed text to negotiators***

Calls on Parties to dramatically increase the quantity, quality, and predictability of climate finance for adaptation, ensuring targeted and direct support for local and subnational adaptation actions, in line with the targets of the Global Goal on Adaptation, while stepping up efforts to triple adaptation finance. Emphasizes the need to accelerate capacity-building to improve access, and to harmonize and simplify procedures to facilitate direct funding.

## **4. BAKU ADAPTATION ROADMAP**

The Baku Adaptation Roadmap (BAR) represents a critical opportunity to advance the GGA, yet its objectives, implementation pathways, and tracking mechanisms remain undefined. As the roadmap takes shape, the LGMA constituency emphasizes the importance of avoiding duplication, ensuring coherence with existing processes, and securing the formal inclusion of subnational governments. As frontline actors, subnational governments must be recognized as integral partners in shaping and delivering the roadmap.

A key gap that requires attention is the operationalization of data collection and reporting for the UAE-Belém indicators. This function currently lacks a clear institutional anchor and could be effectively embedded within the BAR. The roadmap should also remain consistent with broader frameworks, including the Sustainable Development Goals, the Sendai Framework, the Kunming-Montreal Global Biodiversity Framework, and the UN Convention to Combat Desertification.

Importantly, the BAR should articulate how adaptation efforts intersect with L&D pathways, acknowledging that the roadmap must prepare for escalating climate impacts that cannot be fully addressed through adaptation alone. Establishing coherence at this stage will help ensure that prevention, resilience, and recovery measures are aligned within a single, multilevel governance framework.





# LGMA GUIDANCE ON JUST TRANSITION

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## BACKGROUND

Cities and local and other subnational governments are vital social and economic hubs with close ties to communities and their powers in key climate sectors like energy, industry, transport, waste management, construction, green job creation, and workforce development, making them essential partners for national governments.

Local and other subnational leaders are in a unique position and have a strong track record of involving and collaborating with diverse stakeholders, including formal and informal workers, unions, businesses and disadvantaged and marginalized communities - all crucial for achieving local just transitions. Their deep understanding of local dynamics and vulnerabilities allows them to implement tailored solutions that underpin national and global just transition efforts. Best practices at the subnational level can significantly inform national government strategies, fostering multi-scalar governance and collaboration. Conversely, neglecting local contexts risks exacerbating inequalities at regional, city, or community levels, triggering social backlash or undermining political continuity.

The Just Transition Work Programme (JTWP) and its outcomes offer a strategic opportunity to accelerate just transition pathways globally, nationally, and locally - spurring local economic development, ensuring policies meet the needs of local communities and workers to leave no one behind while securing social acceptance. As highlighted in the first [JTWP annual summary report](#), aligning national policies with local needs, clearly defining local government roles, engaging local governments to meet national targets, and considering local contexts are paramount for ensuring equitable outcomes for workers and communities.

## PROPOSED TEXT TO NEGOTIATORS

In recognition of the role local and subnational governments play in implementing just transitions, we urge Parties at COP30 to **formally acknowledge local actors as key partners and implementers of just transition policies and programs**.

This will strengthen multilevel partnerships for just transitions, including in the implementation of NDCS 3.0, aligning with the commitment of over 70 countries to embed multilevel governance in climate action under the Coalition for High Ambition Multilevel Partnerships ([CHAMP](#)) initiative. More specifically the constituency of Local Governments and Municipal Authorities (LGMA) to the UNFCCC suggests that the Parties consider incorporating the following text into the COP30 JTWP decision:



***Proposed text to negotiators***

Recognise that local and other subnational governments have a critical role in the design, implementation and monitoring of just transition pathways and encourage vertical integration across all levels of government to foster coherent just transition implementation and alignment.

## **ADDITIONAL CALLS TO ACTION**

This section proposes three additional calls to action to accelerate a just transition at the subnational level, complementing the key ask:

### **1. MULTILEVEL GOVERNANCE MECHANISMS**

Create national multi-level and multi-stakeholder governance frameworks and mechanisms, such as national just transition commissions, to collaborate with subnationals in the design and implementation of national climate strategies and programmes for improved policy coherence, localized and equitable outcomes.

### **2. SUBNATIONAL GOVERNMENTS AT THE CENTRE OF NEW JUST TRANSITION WORK PROGRAMME ARRANGEMENT/ MECHANISM**

Establish new institutional arrangements/mechanisms to help further implement and monitor progress of the work under the Just Transition Work Programme. Any new modalities should be inclusive of cities and other subnational governments from the outset.

### **3. INCREASED FUNDING FOR SUBNATIONAL JUST TRANSITION & LOCALISATION CRITERIA**

Enable direct subnational access to climate and just transition finance with clear principles and metrics that prioritize localization, subnational engagement, social dialogue, rights-based approaches, and equity assessments that examine potential or existing positive and negative impacts of climate action on specific groups. Target key sectors - energy, buildings, transport, waste - while ensuring upfront finance for workforce development and social protection, in particular for marginalized and disadvantaged groups and workers, including those in informal employment.





# LGMA GUIDANCE ON CLIMATE FINANCE

## Localizing climate finance to close the ambition gap

*Prepared by the LGMA Working Group on Climate Finance*

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## OVERVIEW - GUIDANCE FOR NEGOTIATORS

As the constituency of Local Governments and Municipal Authorities (LGMA) to the UNFCCC, we ask that Parties agree to institutionalize multilevel climate finance as a structural pillar of the new financial architecture. By 2030, at least 30% of climate finance shall be channeled to local and regional governments. To achieve this, Parties will operationalize internationally agreed mechanisms - including urban-inclusive country platforms, public development banks working as one system, Local Project Preparation ecosystems, and regulatory innovation - with simplified access windows that empower local actors to ensure equitable, and effective delivery of resources.

Localizing finance is a pivotal mechanism for translating ambition into tangible outcomes. It enables more effective utilization of available resources for the benefit of both parties and non-party stakeholders. To realize this potential, our community advances two long-term goals:

1. Strengthen and reform the international financial architecture, with a view to establishing and integrating a high-impact financing framework that effectively supports the climate action of local and regional governments.
2. Provide a menu of access options that enables local and regional governments, North and South, states and rural communities, to mobilize climate finance in line with their mandate, needs, vision, institutions, and capacities.

Therefore, at COP30, we call upon Parties to acknowledge the localization of climate finance as a fundamental pillar of the evolving global financial architecture. Below is text for the negotiators and a four pillar strategy to turn negotiated outcomes into an implementing ecosystem.



## “ Proposed text to negotiators

### **New Collective Quantified Goal on Climate Finance (NCQG): Making the goal deliver locally**

“Define structural allocation targets. By 2030, ensure at least 30% of climate finance flows reach local and regional governments and the communities they serve, as key leverage players that can enhance National ambitions through effective implementation.”

### **Article 2.1(c): Localizing finance to align all flows**

“Mandate subnational financing windows, strengthen the capacity of national and subnational development banks, and pilot regulatory innovation. COP30 should illustrate that the alignment of climate finance occurs not only at the sovereign and corporate levels, but also across the institutions and territories responsible for delivering public services and infrastructure.”

*Note: Sharm el-Sheikh Dialogue offers a direct opportunity to showcase these models as test cases.*

### **Articles 6.2 and 6.4: Cooperative approaches and Paris Agreement Crediting Mechanism**

“Parties are invited to involve, as applicable, their subnational governments in the design and implementation of national GHG emission reduction and removal projects whose mitigation outcomes could be used for the purpose of international transfers, and to encourage subnational governments to propose, develop and implement their own projects.”

### **Article 6.8 Work programme: Country platforms as non-market solutions**

“Recognise urban and inclusive country platforms that effectively localise climate finance by supporting decentralised cooperation and subnational project preparation ecosystems. Recognise these country platforms as scalable non-market approaches that foster integrated and holistic solutions for both mitigation and adaptation. Acknowledge that multilevel governance in country platforms can mobilise finance, technology, and capacity across multiple levels of government and stakeholders.”

### **On transparency: Tracking finance where it matters**

“Parties are invited to disaggregate climate finance flows to the subnational level within their Biennial Transparency Reports (BTRs). This would allow the international community to track not only national commitments, but also how much finance actually reaches local and regional governments, and how much these governments themselves contribute through domestic revenues, bonds, and solidarity levies. Data should feed into the Global Stocktake, so that the role of subnational actors is visible not only in reporting but in the collective political assessment of progress under the Paris Agreement.”

### **On adaptation & Loss & Damage: Direct access for resilience**

“Recognise local and regional governments as first responders to climate impacts and essential implementers of adaptation strategies.”

“Ensure the operationalisation of the Global Goal on Adaptation (GGA) explicitly recognises subnational access to adaptation finance, and that the Fund for Responding to Loss and Damage (FRLD) establishes direct access modalities, including through national and subnational development banks and/ or regional development finance institutions and facilities.”

“Grant local and regional governments a formal role in governance (active observer or board seats).”

“A dedicated small grants facility should be created within the FRLD to channel resources rapidly to cities, regions and communities, addressing both economic and non-economic losses, such as cultural heritage and community identity.”



### ***Proposed text to negotiators***

#### **Just Transition Work Programme (JWTP): Territorial implementation**

“Explicitly recognise the territorial dimension to a just transition. Financing mechanisms must include direct access for local and regional governments, guided by localisation criteria, social dialogue, and rights-based approaches. Dedicated resources are needed for upfront workforce development and social protection, with particular attention to marginalised groups and informal workers.”

“Modalities should include multilevel governance frameworks, such as national just transition commissions with local and regional government participation.”

#### **On the Standing Committee on Finance (SCF): Subnational chapter**

“Introduce a dedicated subnational chapter in the SCF Biennial Assessment and in NCQG deliberations. This would consolidate data, track flows, and highlight innovative instruments targeted to local and regional governments. By anchoring subnational finance in SCF outputs, negotiators can guarantee that localisation remains visible in the official architecture of the Paris Agreement finance regime.”

#### **On the Global Goal on Adaptation (GGA): Subnational indicators**

“Develop indicators on direct subnational access to adaptation finance and delivery capacity under the GGA framework, to strengthen accountability for closing the adaptation gap and ensure local and regional governments can sustain and scale frontline resilience services.”

## **BACKGROUND**

The global climate finance landscape is shifting. At COP29, Parties established a new climate finance goal, whereby developed countries will mobilize \$300 billion annually for developing countries by 2035, contributing to a collective “all actors” target of at least \$1.3 trillion per year. Yet inflationary and debt pressures, backtracking on national climate commitments, cuts to Official Development Assistance, and slow reform of the international financial system cast doubt on whether these resources will be effectively mobilized and distributed.

Exacerbating the challenge, the announced amounts fall significantly short of the financial resources required to meet global mitigation and adaptation needs. Annual urban investment needs alone are estimated between \$4.5-5.4 trillion (USD) through 2030 [by the World Bank](#), far beyond what current channels deliver. Limited international progress in fiscal decentralization has constrained global efforts to enhance climate ambition, preventing full realization of the transformative potential and emission reductions achievable at the local level.

Local and regional governments are on the frontlines of climate action and public service delivery, managing critical sectors from energy to infrastructure to waste. They generate more than 80% of global GDP, and concentrate the infrastructure, jobs, and innovation that will determine whether national climate and development goals succeed or stall. However, [in the Global South](#), fewer than 5% of the 500 largest cities can access international capital markets, with only 20% of those cities having a credit rating in local markets. Not only that, but fewer than [11%](#) of global urban finance went to Emerging Market and Developing Economies (EMDEs) Cities in 2022, and [1%](#) to Least Developed Countries (LDCs) Cities. It isn’t just a quantity issue but a finance flow issue at the local level.





Localizing finance has geographic nuance. High-income countries must source and channel resources more systematically to local actors, to transition economies and increase the resilience of infrastructure at the pace needed. Middle and low income countries require new pathways and innovative financial engineering to overcome systemic access barriers, while adapting to a disaster-based climate and combating shrinking debt margins. Bridging these priorities requires a “localized” financial architecture and a renewed ecosystem of players that work from global to local - empowering subnational climate action at the core.

The diverse set of capabilities in public finance management and capital-raising capacity existing across the diversity of subnational governments (regions, capital cities, economic hubs, intermediary cities and villages/rural areas) also calls for a nuanced and bespoke approach to ensure no one is left behind and just transitions are effectively applied.

We therefore welcome the Baku-Belém Roadmap as a call for structural transformation. But this transformation can not be delivered without fully leveraging the financial and implementation capacity of local and regional governments. Localizing finance must be elevated as a structural pillar - a core delivery system to ensure subnational governments can implement climate plans and projects at scale, as highlighted in COP28 Para.161 where Parties themselves urged for multilevel action.

Evidence shows the payoff will be substantial: [research by the Coalition for Urban Transitions](#) estimates that low-carbon urban investments could yield \$23.9 trillion in returns by 2050, while strengthening competitiveness and resilience. Unlocking the financial capacity of local and regional governments is not an afterthought - it is one of the strongest levers we have to deliver on global climate goals.

## **FOUR TANGIBLE, HIGH-IMPACT PILLARS TO LOCALIZE CLIMATE FINANCE**

Building from the fourth Financing for Development (FfD4) Summit outcome document, the *Compromiso de Sevilla*, which calls for significant reforms to the international financial architecture, the LGMA Constituency proposes:

### **1. INSTITUTIONALIZE MULTILEVEL CLIMATE FINANCE WITHIN COUNTRY PLATFORMS**

Institutionalizing multilevel climate finance within country platforms is essential to close the gap between national pledges and on-the-ground delivery. Today’s country platforms are largely national in design, overlooking the frontline role of local and regional governments. Embedding subnational windows with dedicated governance, pipelines, and access rules would transform country platforms into truly inclusive and locally driven systems, delivering significant impact.

By setting a target that at least 30% of climate finance flows reach local and regional governments and the communities they serve, by 2030, tracked transparently under the NCQG and parallel channels, negotiators can guarantee that finance empowers the actors who deliver adaptation, resilience and the just transition, daily.

[Early pilots](#) in Cameroon, Madagascar and South Africa show that country platforms which aim to localize finance can align ministries, development banks, and local and regional government associations around shared pipelines and simple, tailored access options.

COP30 can enable this shift through the following:

- Recognize inclusive and locally driven country platforms as core delivery mechanisms.





- Require subnational financing windows with local and regional government representation in governance.
- Promote country platforms with a localizing finance framework within the NCQG and GGA, ensuring localization is a measurable criterion for ambition.
- Task the Standing Committee on Finance to track and report subnational flows.

## **2. EMPOWER NATIONAL AND SUBNATIONAL PUBLIC DEVELOPMENT BANKS FOR CLIMATE FINANCE INTERMEDIATION**

National and subnational development banks are the backbone of localization. They can lend in local currency, de-risk portfolios, blend public and private capital, and remain close to the realities of local project pipelines. Yet many lack accreditation to international climate funds, adequate capitalization, or enabling frameworks to support sub-sovereign lending - leaving frontline actors locked out of finance.

Empowering these domestically anchored banks unlocks a scalable channel for climate finance delivery. Empowering local intermediaries is more important than establishing new funds managed elsewhere, as they can better channel existing international and regional funds directly to local climate action. Additionally, they can aggregate demand, standardize documentation, and manage special purpose vehicles, pooled portfolios, and blended facilities that bring adaptation and mitigation projects to market - even in situations where local and regional governments cannot achieve conventional creditworthiness in time.

COP30 can enable this shift through the following:

- Request the Green Climate Fund (GCF), the Global Environment Facility (GEF), the Adaptation Fund, and multilateral development banks to prioritize accreditation and partnerships with national and subnational development banks. For example, the GEF could establish an Advisory Committee where subnational governments can be members and the GCF deploy the Locally Led Climate Action (LLCA) guidelines through tailored support to voluntary parties.
- Push for more Subnational Development Banks in developing and emerging economies.
- Establish local currency and guarantee windows dedicated to subnational portfolios.
- Recognize off-balance sheet mechanisms as legitimate pathways for local climate project finance.
- Mandate annual reporting on volumes channeled via national and subnational development banks to local and regional governments, including private capital.

## **3. STRENGTHEN LOCAL PROJECT PREPARATION ECOSYSTEMS AND FINANCIAL MANAGEMENT**

The main reason subnational climate projects fail to secure finance is upstream: weak pre-feasibility studies, fragmented data, unclear mandates, and no budget for early-stage preparation.

Building financeable, investment-ready pipelines requires permanent local capacity, predictable funding for early-stage work, and standardized toolkits aligned to international standards. Quality over quantity must guide pipeline development, with clear pathways into special purpose vehicles, pooled portfolios, or program loans that investors can underwrite.

Dedicated Local Project Preparation windows should be established under the UNFCCC's financial mechanism, Nationally Determined Contribution (NDC) Partnership, and with multilateral development bank support.



These should provide multi-year grant envelopes for early-stage work and be complemented by Financial Engineering Excellence Hubs (“FinHubs”), hosted by national or subnational development banks or ministries. FinHubs would embed technical experts, funded through decentralized cooperation, to prepare feasibility studies, structure projects, and assemble pipelines of bankable subnational investments across key sectors.

Decentralized Development Cooperation (DDC) has already proven to be a cost-effective way to bring in expertise and align projects with international standards. To be effective, the project preparation ecosystem must operate across all levels: At the international level, this means predictable grants for early-stage work, template term sheets, and open data standards; at the national level, clear rules for sub-sovereign borrowing, climate-aligned procurement, and predictable budget transfers; at the regional and state level, clearer roles stipulated in project aggregation, powers in solidarity levies mechanisms recognized, and shared financial public management services with national governments; and at the city and local level, responsibility for pipeline ownership, permitting, revenue measures, and asset management.

COP30 can enable this shift through the following:

- Mandate operating entities and multilateral development banks to fund streamlined and dedicated Local Project Preparation windows, including through aligning their frameworks with the LLCA guidelines of the GCF.
- Recognize decentralized development cooperation as an eligible channel for pre-feasibility and capacity-building within country platforms.
- Ensure the FRLD provides direct access modalities for local and regional governments, either directly or via their development banks and associations, so that frontline communities can swiftly secure resources for recovery, resilience, and adaptation.
- Include indicators for subnational access to finance and delivery capacity, tied to project preparation ecosystems, in the GGA framework.

#### **4. ENABLE REGULATORY INNOVATION AND FISCAL FLEXIBILITY**

Even the strongest pipelines stall without rules that allow them to close. Regulatory innovation is the bridge.

Subnational governments that have the powers to introduce carbon pricing, either through a tax or a cap-and-trade system, should be encouraged to use these instruments to raise their own funds. Those that are already using these climate financial tools should also consider raising the price of carbon to effect behavioral change, further reduce emissions, and raise revenues. In addition, governments that adopt carbon pricing should consider exclusively dedicating all these revenues to the fight against climate change, through the implementation of mitigation, adaptation and just transition actions, and avoid as much as possible using that money to finance non-climate related programs.

Pragmatic adjustments to debt treatment, fiscal rules, collateral and intercept mechanisms, climate budget tagging, and prudential guidance for green assets can unlock investment that is otherwise stranded. These measures reduce transaction costs, increase investor confidence, and keep debt sustainable - especially critical for adaptation and just transition projects where cash flows are indirect.

Governments should pilot flexible regulatory frameworks that allow new types of local climate finance instruments to be tested. These could include pooled municipal green bonds with partial guarantees, sub-sovereign lending with escrow or intercept features, resilience-linked debt clauses and debt-for-adaptation swaps, and climate-aligned screening of public-private partnerships. Alongside this, guidance on subnational credit ratings, first-loss facilities to de-risk portfolios, and clear rules on how carbon pricing revenues or solidarity levies can flow to local programmes are key to expanding fiscal space.





Private capital must be treated as a partner, not a panacea. Public institutions - national and subnational development banks, guarantees, and grants - should prepare, de-risk, and scale, while private investors finance replicable, service-linked assets. Guardrails on affordability, equity, and transparency are essential to ensure innovations do not create hidden liabilities or widen inequalities.

COP30 can enable this shift through the following:

- Invite governments, multilateral development banks, and climate funds to pilot regulatory reforms that enable subnational climate finance.
- Encourage governments, including subnational governments, to put a price on carbon emissions to mitigate them.
- Recognize resilience-linked debt instruments and debt-for-adaptation swaps as part of the global adaptation and just transition finance toolkit.
- Request the Standing Committee on Finance to catalogue and disseminate effective regulatory innovations and to track their uptake.

## **CLIMATE FINANCE ANNEX - BACKGROUND NOTES**

### **THE FOUNDATION FOR A “30 BY 30 LOCALIZATION GOAL”**

Subnational governments manage 70-80% of emissions and deliver most adaptation-critical services, making them essential actors in achieving climate goals.

Yet, less than 11% of climate finance reaches urban areas in emerging markets and developing economies, and only ~1% flows to LDC cities.<sup>1</sup>

The 30% by 2030 target is a corrective measure: while still below subnationals’ share of responsibility, it helps close the gap between climate exposure and access to finance.

It also reflects the broader trend of tripling climate finance commitments from Annex I countries, setting a realistic and politically grounded benchmark.

#### **How we define “reaching Local and Regional Governments (LRGs)” for the 30%**

Counting rule (for tracking): Finance disbursed to or through (i) LRG treasuries, (ii) LRG-controlled entities/utility SPVs, (iii) accredited domestic intermediaries (national and subnational development banks, municipal funds) with a dedicated subnational window.

Includes grants, loans, guarantees and equity when the ultimate beneficiary and decision rights are subnational.

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<sup>1</sup> Climate Policy Initiative (CPI), Cities Climate Finance Leadership Alliance (CCFLA), Organisation for Economic Co-operation and Development (OECD), United Cities and Local Governments (UCLG).





# LGMA GUIDANCE ON LOSS & DAMAGE

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## OVERVIEW - GUIDANCE FOR NEGOTIATORS

The establishment of the Fund for responding to Loss and Damage (FRLD) is a historic step forward. The FRLD has the potential to not only directly avert, minimize, and address Loss and Damage (L&D) across some of the world's most vulnerable regions and communities, as direct access is a key avenue for frontline communities to address losses and damages, but to set a new standard and precedent for localization across the climate finance infrastructure globally.

At COP30, Parties must consolidate Loss and Damage as the **third pillar of climate action**, alongside mitigation and adaptation, and strengthen the Warsaw International Mechanism and Santiago Network on Loss and Damage as core mechanisms for knowledge, governance, and technical assistance. We call on Parties to:

### ACCESS TO FUNDING FOR LOCAL GOVERNMENTS

- Establish project selection criteria that mandates local and regional government engagement in the Fund's selected projects throughout the duration of the Fund's Start-Up Phase (2026-2028), whilst also,
- Securing **direct and simplified access** for local and regional governments to the FRLD, with dedicated allocations for subnational and community-led projects.
- Ensuring that the FRLD establishes a **small grants facility** for rapid, flexible, grant-based support at the local level, prioritizing communities and vulnerable groups.

### LOSS & DAMAGE GOVERNANCE

- Strengthen the **Warsaw International Mechanism** and **Santiago Network** to ensure local governments are recognized as contributors and beneficiaries of knowledge, technical assistance, and coordination.
- Align the **COP30 Action Agenda Mutirão** with the Warsaw International Mechanism and Santiago Network, and integrate LGMA contributions under **Axis IV, V and VI** as solution-providers.
- Advance the **strategic recognition of L&D as the third pillar of climate action**, equal to mitigation and adaptation, embedded in the Global Stocktake and across the UNFCCC agenda.



- Guarantee **inclusive approaches** that respect the rights of women, Indigenous Peoples, youth, persons with disabilities, and address both economic and non-economic losses.

## BACKGROUND

As the constituency of Local Governments and Municipal Authorities (LGMA) to the UNFCCC, we bring the collective voice of local and other subnational governments, and their associations from every continent. For more than three decades, our communities have been at the frontline of climate impacts; responding to floods, droughts, storms, fires, and displacement while striving to uphold the dignity and wellbeing of our people.

At COP30 in Belém, we reaffirm our conviction that no territory and no community should be left alone in the face of Loss and Damage. The recognition and operationalization of the Loss and Damage Fund was a historic step, but the journey is far from complete. To fulfill its mission of assisting developing countries that are particularly vulnerable to L&D, the Fund must reach the local level rapidly and fairly, and it must be embedded in a broader vision: L&D as the third pillar of climate action, alongside mitigation and adaptation.

The COP30 Presidency has called for a *mutirão* of solutions, a collective endeavor that brings together every level of government and society. Local and other subnational governments stand ready to contribute to this effort, offering concrete practices, technical knowledge, and solidarity across territories. Our message is simple yet urgent: we are not only first responders, but also solution-providers, innovators, and partners in solidarity. Through multilevel action and shared responsibility, we can turn L&D from a story of despair into a foundation for resilience, justice, and hope.

L&D refers to the unavoidable impacts of climate change that exceed the limits of adaptation. For local and other subnational governments, this is not a distant concern but a lived reality. Every day, cities and territories face the consequences of destroyed infrastructure, displaced populations, disrupted services, and rising inequalities. These impacts cut across borders and communities, with the most vulnerable bearing the heaviest burdens.

Building on earlier milestones, including the Future Envisioning Exercise on Loss and Damage convened through the UCLG Policy Council on “Resilient and Regenerative Territories: Renaturing”, the resulting LGMA statement “Local Voices Organized through the Global Task Force and LGMA Local and regional governments constituency: A summary of the Future Envisioning Exercise on Loss and Damage”, and the launch of the LGMA Call to Action on Loss and Damage ahead of COP29, as well as participation in several meetings of the Board of the Fund for Responding to Loss and Damage, the constituency entered the post-COP29 phase with a consolidated vision: Framing L&D as a matter of climate justice, securing subnational access to finance, and embedding informality, care, and migration into the global debate. From this basis, the LGMA has steadily advanced its role in the FRLD, moving from visibility to concrete influence.

## ADVOCACY ROADMAP

### THE ISSUE OF “ACTIVE OBSERVERS” TO THE FRLD BOARD

“Active observers” are a formal channel for stakeholder participation in the FRLD Board, created under the Governing Instrument and detailed in a draft policy considered at B4. They are seven non-voting seats in the Board room whose role is to bring perspectives of climate-vulnerable groups into deliberations through structured, accountable engagement before, during, and after meetings; consulting their constituencies, submitting inputs in advance, intervening when invited by the Co-Chairs, providing post-meeting reports, and





coordinating among themselves (with alternates) under clear rules on conduct, confidentiality, conflicts of interest, and access to information; they are present for open sessions and exit for executive sessions, benefit from Secretariat facilitation (including travel support prioritizing developing-country reps), serve two-year terms (max two consecutive), and the policy is to be reviewed after two years. The composition is meant to balance inclusivity and rotation: One representative each for Indigenous Peoples, women, youth, environmental NGOs, and the private sector, plus two rotating seats for climate-vulnerable communities drawn among farmers, workers/trade unions, migrants, and local communities, with the two community seats rotating by agenda relevance and observer coordination. In this scheme, there is no dedicated seat for the constituency of local and other subnational governments.

## **B4 - MANILA, DEC 2024**

Governor Dakila Carlo “Dax” Cua, Governor of Quirino Province, President of UCLG ASPAC and President of the Union of Local Authorities of the Philippines (ULAP), delivered the first LGMA intervention at the FRLD Board. He stressed that local governments are frontline responders, calling for our recognition as Active Observers, direct access, small grants, and a Civil Protection Window. His remarks, alongside previous LGMA participation in the Fund’s Board meetings from 2023 onwards, established LGMA as a recognized voice in the Fund’s governance. The decision on Active Observers was postponed until B5.

## **B5 - BRIDGETOWN, APR 2025**

The LGMA put forward a formal [submission](#) to the Board to support the Board's development of the FRLD start-up phase by highlighting existing mechanisms which provide funding to subnational entities through different access modalities. At the Fund’s High-Level Dialogue later that month, discussions made clear that a direct access window to the Fund, during its 2026-2028 start-up phase, was highly unlikely. However, Co-Chairs indicated openness to including local government engagement as a project selection criterion, opening a new entry point. The decision on Active Observers was postponed until B6.

## **B6 - CEBU, JUL 2025**

Ahead of the meeting, the LGMA submitted recommendations to counter the Secretariat’s national-centric design, urging subnational access, broader implementing partners, and inclusion of non-economic losses. In plenary, UCLG delegate, Councilor Elmer Datuin, Councilor of Baguio City (Philippines), spoke on behalf of LGMA and reiterated calls for direct access, small grants, and local engagement. Debates resulted in agreement to simplify criteria (dropping leverage and replicability) and to create consultative forums for stakeholder participation, anchoring LGMA’s institutional presence. The decision on Active Observers was postponed until B9 in 2026.

## **B7 - MANILA, OCT 2025**

Manila will be a key milestone before COP30 as the Board expects to fully outline the proposal for the operationalization of the Fund’s Start-Up Phase which will be presented for endorsement by the UNFCCC Parties at COP30. At the Board meeting, the LGMA’s priorities are to:

- Ensure an Active Observer status for the LGMA constituency.
- Secure alternate avenues for local governments to access funding from the Fund for Responding to Loss & Damage; the most likely option seems to be ensuring that the Fund adopts project selection criteria that mandates local and regional government engagement. In implementing this, this solution can be a steppingstone towards more formal local access windows, to be adopted beyond the Fund’s startup phase. Achieving this will demonstrate that local governments are not only implementers but essential partners in shaping and governing loss and damage responses.



As the constituency representing local and regional governments at the UNFCCC, the Local Governments and Municipal Authorities (LGMA) call for COP30 in Belém to be a turning point. The operationalization of the FRLD must be accompanied by a stronger vision at the UNFCCC: Loss and Damage must be recognized as the third pillar of climate action, alongside mitigation and adaptation.

## WHAT'S AT STAKE?

Local and other subnational governments are at the frontline of climate impacts. They are the first to respond when storms, floods, and wildfires strike, and they are equally at the center of slow-onset processes such as sea level rise, desertification, and ecosystem degradation. Informal settlements, Indigenous Peoples, women, youth, and marginalized groups are disproportionately exposed to these risks.

For local governments, the stakes are also financial and political. Municipal budgets are increasingly redirected from long-term development to emergency responses, often without the necessary support or recognition. Unless global governance secures direct and timely support to local levels of government, it risks losing the trust of the very communities it is intended to serve.

As a constituency, there is a direct governance risk regarding the Fund for Responding to Loss and Damage during the Fund's upcoming Start-Up Phase (2026-2028). If the constituency of local and regional governments does not secure a formal [active observer role](#) in the Fund's Board, it risks being sidelined into generic "community" categories where its unique political mandate and ability to convene are diluted. This would limit the organized constituency of local and other subnational governments' ability to shape Board decisions, reduce visibility, and undermine the credibility of multilevel governance already recognized in the Paris Agreement.

Similarly, if no dedicated local and regional governments funding window or positive marker for local and regional governments engagement is embedded in the Fund's project selection criteria, cities and regions may find themselves locked out of the Fund. That would not only perpetuate the structural exclusion of local governments from climate finance, but also weaken the effectiveness of the Fund itself, as the actors most capable of delivering locally efficient and socially just responses would be left without resources. Should LGMA efforts succeed, however, the FRLD has the potential to not only directly avert, minimize, and address L&D across some of the world's most vulnerable regions and communities, as direct access is a key avenue for frontline communities to address losses and damages, but to set a new standard and precedent for localization across the climate finance infrastructure globally.

Weak fiscal decentralization in countries, inadequate risk protection mechanisms, and misalignment between national strategies and local budgets show that, without structural reform, subnational governments remain under-resourced. Embedding fiscal decentralization in Nationally Determined Contributions and National Adaptation Plans, and co-designing climate financing frameworks with local governments, will be critical to ensure that L&D finance delivers effectively at the local level.

In short, what is at stake is the difference between a Fund that truly embodies multilevel, locally efficient climate justice, and one that repeats the limitations of past climate finance mechanisms by overlooking the role of local and other subnational governments.

## LOSS & DAMAGE AND THE COP30 ACTION AGENDA

With the FRLD now under its own governance, the UNFCCC retains a decisive role in providing the political and institutional architecture for L&D.





This year, the COP30 Action Agenda, launched by the Brazilian Presidency, offers an additional political opportunity to root L&D in implementation. As a collective of solutions across six thematic axes, it creates space for multilevel governance and inclusive participation. For local and regional governments, three axes are particularly relevant:

- **Axis IV** (Building resilience for cities, infrastructure and water) connects directly to L&D in urban areas, where floods, storms, and heatwaves undermine infrastructure and services. The LGMA can contribute to nature-based infrastructure, social protection schemes, and community resilience practices.
- **Axis V** (Fostering human and social development) reflects the social and human dimensions of L&D, such as displacement, health, and cultural heritage. The LGMA can bring forward good practices on climate migration, care systems, and safeguarding of livelihoods.
- **Axis VI** (Unleashing enablers and accelerators) provides space for innovation in finance and governance. The LGMA can demonstrate subnational access models for the FRLD, peer-to-peer learning through the Santiago Network for Loss and Damage, and accountability frameworks for equitable resource distribution.

The COP30 Action Agenda provides a promise of a fertile ecosystem of solutions. But they will only succeed if L&D is recognized as the third pillar of climate action under the UNFCCC. This requires embedding it into the Global Stocktake, clarifying its relationship with adaptation, and ensuring inclusivity in responses to both economic and non-economic losses.

## **HOW CAN LGMA CONTRIBUTE TO THE LOSS & DAMAGE AGENDA?**

Local and other subnational governments bring a unique added value to the L&D agenda. They are closest to communities and services, able to provide timely diagnosis and deliver practical solutions. They also hold knowledge and data about their territories that can make national and global responses more effective.

To make global mechanisms truly operational, COP30's negotiations on the operationalization of the FRLD must secure a pathway for local governments to access the Fund's funding and be included in its governance. This means establishing direct and simplified windows for municipalities and regions within the Fund, alongside allocations that guarantee support for subnational and community-led projects. It requires a governance model that embeds multilevel collaboration, ensuring transparent and reciprocal coordination between national focal points and local authorities.

Finance must also be rapid and equitable. A dedicated small grants facility should be created to empower communities and local governments to respond quickly to emergencies. Support must be provided as grants, not loans, and should prioritize readiness and flexibility rather than financial leverage or replicability. At the same time, responses must be inclusive and just, ensuring that women, Indigenous Peoples, persons with disabilities, and other vulnerable groups are meaningfully included, and that non-economic losses (such as cultural heritage and identity) are addressed alongside material damages.

The Asia-Pacific has also demonstrated local readiness to manage climate finance. Cities such as Makati and Santa Rosa are integrating loss and damage considerations into disaster risk reduction and sustainability strategies, backed by measurable targets in their Voluntary Local Reviews. Building on this leadership, we call for a dedicated pilot initiative under the Fund for Responding to Loss and Damage to directly finance city-level responses in climate-vulnerable secondary cities. Such pilots would not only empower frontline municipalities but also provide replicable models for scaling up subnational access across regions.





## THE TWO-YEAR ROADMAP ON LOSS & DAMAGE NEGOTIATIONS AFTER COP30

COP30 represents a critical milestone for the FLRD, marking the official operationalization and commencement of its start-up phase. However, the adoption of this initial framework is merely the first step towards establishing a fully functional Fund in the long term. Consequently, the engagement and contributions of the LGMA constituency will be more crucial than ever as this process unfolds.

The LGMA's work moving forward will require a dual focus. In the immediate term, we will need to concentrate on optimizing the operational modalities of the start-up phase to ensure its effectiveness through 2028, as well as the development of the long-term architecture of the Fund beyond 2028. To this end, our priority over the next few years will be to both:

- Secure meaningful representation for local governments within the Fund's governance structures.
- Ensure that the Fund tests and implements innovative mechanisms that facilitate direct access to financing for local governments.

Achieving these objectives will necessitate a continuation of our active participation in Board Meetings and sustained bilateral engagement with the Board of the Fund and its Secretariat. This engagement will extend to direct collaboration with national governments and the World Bank. The LGMA constituency is committed to working cohesively to advance these essential efforts, ensuring the Fund is structured to deliver support effectively and directly to the communities most in need.

## EXISTING LGMA RESOURCES AND GOOD PRACTICES ON LOSS & DAMAGE

- [UCLG - LGMA Positioning Paper on Loss and Damage](#)
- [UCLG - LOCAL VOICES Organized through the local and regional governments constituency](#)
- [C40 Cities - Challenges and opportunities for city leadership](#)
- [UCLG - A CALL TO DELIVER an efficient Local and Subnational Loss and Damage Response](#)

**Case study:** The Scottish Government's Loss and Damage Programmes have focused on ensuring that local communities, who are experiencing the worst impacts of climate change, are shaping the responses. Their Programmes have been community led, giving agency to the most vulnerable and marginalized.

- [Climate loss & damage as direct cash transfers: evidence from Malawi | GiveDirectly](#)
- [Communities In Charge: Lessons for the Global Fund for Responding to Loss and Damage from a locally-led project in Kenya - Oxfam Policy & Practice](#)
- [From Local to Global: Advancing Equitable Access to Climate Finance and Loss and Damage Funding](#)
- [How small and locally led grants can address loss and damage: early lessons from the Scottish government's 2021 funding commitment | SEI](#)
- [Loss and Damage Insights From Community-Led Projects — Climate Justice Resilience Fund](#)





# LGMA GUIDANCE ON FOOD

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## OVERVIEW - GUIDANCE FOR NEGOTIATORS

The Local Governments and Municipal Authorities (LGMA) Constituency urge national governments to recognize that multilevel collaboration and urban food systems transformation are key to achieving climate, agriculture and sustainable food targets. Cities are where most people live, where most food is consumed, and where a major share of emissions is generated, making them a strategic and systemic entry point for climate action and powerful levers and accelerators of change. Additionally, local governments are not only urban actors: Territorial food systems should also be promoted, connecting rural and peri-urban production with urban consumption through inclusive strategies

COP30 represents a key opportunity to position local and other subnational governments as strategic allies. We welcome that UNFCCC has begun to address the climate and sustainable food linkages through the operationalization “Sharm el-Sheikh joint work on implementation of climate action on agriculture and food security” in 2025, three years after its adoption at COP27; through the Standing Committee on Finance focusing on sustainable food systems and agriculture in its 2025 Forum; and through a more specific focus on food in the COP30 Action Agenda.

By integrating urban-rural food systems into Nationally Determined Contributions (NDCs), national governments achieve a win-win: a more aligned and bolder impact on decarbonization and a greater impact on food systems transformation. This should be accompanied by the recognition of local and regional governments as co-decision makers, not only implementers.

We call on national governments to:

- **Integrate urban-rural territorial food systems into NDCs and national climate strategies** to maximize the combined impact on climate action and food systems transformation.
- **Recognize and support the mandate of local and other subnational governments to act on food**, helping governmental departments understand their role in addressing food challenges at the urban level and enabling them to contribute effectively to national efforts on hunger, health, and environmental sustainability. This requires both institutional and financial empowerment, adapted to national decentralization frameworks.
- **Include local and other subnational governments as equal governmental - not civil society - partners in UNFCCC, United Nations Food Systems Summit (UNFSS), Committee on World Food Security (CFS) and other international processes**, and ensure direct access to climate finance for subnational actors to accelerate systemic implementation.
- **Invest in urban capacity and financing**, empowering local and other subnational governments to scale solutions in public food procurement, food markets, food waste reduction, urban planning and





farmer-city linkages to close the urban-rural gap, unlocking opportunities for inclusive economic growth, greater social equity, and environmental sustainability.

- **Foster multilevel, multisectoral governance** that coordinates health, agriculture, climate, biodiversity, and urban planning to deliver resilient, equitable food systems. Institutionalizing these mechanisms will allow sustained transformation.

With strong national support, cities and regions can deliver local solutions that reduce emissions, enhance food security, improve health outcomes, and build inclusive, climate-resilient economies. But this requires that their voices are not only heard but reflected in national targets and budget allocations.

## BACKGROUND

**The fight against climate change and unsustainable food systems will be won or lost in cities.**

- 70% of all food produced is consumed in cities, and this share is expected to increase to 80% as urban populations are expected to grow by 2.5 billion people by 2050.
- 70% of GHG emissions are emitted by cities.
- 76% of food insecure people live in urban or periurban areas.

Food systems are responsible for approximately one-third of global greenhouse gas emissions, with impacts on biodiversity, land use, and human health. With their proximity to citizens and portfolios including but not limited to managing food markets, food waste, public procurement and urban planning, cities are uniquely positioned to connect people, policies, and resources for food systems change. They are also well-positioned to act as facilitators, enablers, and coordinators among food system stakeholders and across different levels of local and regional government. Territorial governance approaches, involving rural-urban linkages and decentralized actors, are essential for creating lasting solutions. By addressing food challenges where they intersect with urban systems (water, energy, nature, mobility), cities have the potential to overcome the rural-urban gap and to support national efforts on hunger, health and nature.

Food security is also becoming an increasingly urgent urban issue. With an increasing number of extreme weather events and conflict threats, cities face unprecedented challenges in ensuring that all residents have access to affordable and nutritious food. The recent High-Level Panel of Experts (HLPE) report on urban and peri-urban food systems showed that of the over 2.2 billion people who are food insecure, three-fourths of them reside in urban and peri-urban regions. Despite these pressures, local governments often lack clear policy mandates and resources to meaningfully address urban food insecurity and build resilient food systems. This highlights the urgent need to revise legal frameworks and enable coordinated territorial responses.

Currently, relevant international processes on climate change (UNFCCC) and food (UNFSS), as well as related support mechanisms (e.g. Climate Finance), do not yet fully leverage the potential of local and other subnational governments to deliver greater impact. Although national governments and UN agencies call for systemic solutions, their approaches often remain siloed, with relevant ministries (including climate, agriculture, urban) and UN departments not sufficiently engaging with each other. This makes it difficult to “connect the dots” - to view cities as the levers and accelerators they are and recognize them as systemic governmental stakeholders across sectoral matters and priorities.

Countries like COP30 host Brazil, who successfully link climate and food in a multilevel governance framing, showcase the potential of such an integrated approach. The CFS provides another important entry point. During the plenary session of CFS 53, held on 20 and 24 October 2025, the Committee endorsed the document CFS 2025/53/5 “CFS Policy Recommendations on Strengthening Urban and Peri-urban Food





Systems to Achieve Food Security and Nutrition in the context of Urbanization and Rural Transformation” as an action-oriented, inter-governmentally agreed, voluntary and non-binding, global policy framework in support of country-led efforts towards improving food security and nutrition policies and actions. For the most up-to-date information, please refer to the [CFS website](#).

To be effective in localizing national efforts on food, health and the environment, cities need greater devolution of financial resources, clear mandates and institutional capacities. It is projected that urbanization, the gradual migration of people from rural to urban areas, along with global population growth, could add an estimated 2.5 billion people to urban areas by 2050, increasing the urban population share to around 68%. What cities build over the next decade will directly influence how food is produced, processed, accessed, governed, consumed - determining dietary outcomes, greenhouse gas reduction, and resilience for generations to come.

## HOW FOOD IS ADDRESSED IN THE UNFCCC PROCESS

Food and agriculture have gained growing attention under the UNFCCC COP process, reflecting their dual role as both contributors to climate change and key areas for climate solutions.

### 1. SHARM EL-SHEIKH JOINT WORK ON IMPLEMENTATION OF CLIMATE ACTION ON AGRICULTURE AND FOOD SECURITY WAS ADOPTED AT COP27 IN 2022

This four-year joint work includes implementation of the outcomes of the [Koronivia joint work on agriculture](#) and [previous activities addressing issues related to agriculture](#), as well as future topics, recognizing that solutions are context-specific and take into account national circumstances. The first workshop was held in June 2025 at the UN Bonn Climate Conference (SB62).

### 2. THE 2025 FORUM OF THE STANDING COMMITTEE ON FINANCE

On 8-9 September at FAO Headquarters in Rome, the Forum of the Standing Committee on Finance convened on the topic of “Accelerating climate action and resilience through financing for sustainable food systems and agriculture”. The presentations clearly showed that Climate Finance, which addresses both climate mitigation and adaptation, is key for food and agriculture. However, agrifood systems remain significantly underfunded, receiving only 4.3% of global climate finance flow in 2019-2020. Furthermore, the role of cities and urban food systems had not been adequately addressed.

Following active participation of the LGMA constituency, local food systems, in particular resilient urban-rural food systems, were increasingly mentioned as important drivers of change. They were highlighted for their potential to address challenges such as food waste, transport emissions, biodiversity loss, resilience building, and participatory governance. Urban food systems were also presented as a means to empower small-scale farmers who are often marginalized due to limited market access, by connecting them to cities where most food-consuming citizens live. Particularly, mechanisms such as local markets, public food procurement, and circular food systems resonated well with the Standing Committee on Finance (SCF) audience. From an LGMA perspective, this highlights the challenge of siloed processes. While there has been long-standing collaboration with FAO on urban food systems, greater cross-departmental coordination, including with FAO teams working on climate change and emergencies, would help ensure these valuable urban perspectives are fully reflected in discussions such as those of the Standing Committee on Finance.



### 3. “AGRICULTURE & FOOD SYSTEMS” IS ONE OF THE SIX ACTION AGENDAS OF THE COP30 PRESIDENCY

This signals a major step forward in placing food systems at the heart of climate action. Momentum has been building: **The Glasgow Food and Climate Declaration** first recognized the critical role of local and regional governments in tackling the climate emergency through integrated food policies and called national governments to act, and at **COP28**, the **UAE Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action** brought over 160 countries together to commit to aligning food and agriculture with national climate strategies by stating clearly that “any path to fully achieving the long-term goals of the Paris Agreement must include agriculture and food systems”.

COP30 represents a key opportunity to position local and other subnational governments as strategic allies. By integrating urban-rural food systems in NDCs, national governments achieve a win-win: a more aligned and bolder impact on decarbonization and a greater impact on food system transformation, supported by clear mandates, long-term funding and robust capacity-building mechanisms.

## HOW CAN LGMA CONTRIBUTE?

Food systems transformation holds the solutions to major interlinked challenges: climate change, biodiversity loss, land degradation, food insecurity and all forms of malnutrition, diet-related diseases, inequality and poverty. According to the One Planet Network’s Sustainable Food Systems Programme (2025), moving towards sustainable, resilient and equitable food systems requires<sup>2</sup>:

- **Fostering convergence and coherence across all public policy areas** that are related to food security and nutrition as well as other food systems outcomes.
- **Tackling political economy dynamics**, in particular power asymmetries and structural inequalities, including through transparent rules of engagement and by actively managing trade-offs and co-benefits in policy processes related to food systems.
- **Putting people at the center** through the application of a human-rights based approach to food systems transformation.
- **The effective and meaningful participation of all relevant stakeholders** in policy processes related to food systems, where groups that are often underrepresented, marginalized and disadvantaged such as smallholders, women, youth, Indigenous Peoples and local communities, and people of African Descent, are empowered to play a leading role.
- **Promoting equity-sensitive measures** that link environmental, economic and social dimensions, such as facilitating access to land and finance, promoting approaches such as agroecology and regenerative agriculture, and public policies such as sustainable public food procurement and school meal programs.

We encourage all levels of government and partners to foster policy coordination and cooperation across local, subnational, and national levels to ensure urban food systems are given the attention they need.

**Cities and other subnational governments need much more support and recognition for their work**, which is overlooked by national governments and in international climate negotiations.

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<sup>2</sup> Source: One Planet Network Sustainable Food Systems Programme, 2025 - Outcome Document of the 5th Global Conference, Brasília, Brazil.





Ambitious initiatives at the local level contrast dramatically with the weak and fragmented actions of national governments on food and climate change - as shown by their inadequate national climate plans submitted under the Paris Agreement (NDCs) where food systems are routinely overlooked. The plans that do exist lack joined-up approaches that span the whole food system, coordination between local, regional, and national levels of government, and measurable commitments.

Local and other subnational governments possess the competencies and responsibilities - ranging from land planning, waste management, and public procurement to urban planning, food markets, and community-led initiatives - to foster resilient food systems and ensure access to healthy, nutritious food for their citizens. They can support food systems' relocalization, bridging the urban-rural divide, sustainable food production, and improve access to healthy and more nutritious food.

With strong national support, local solutions become possible. To be effective in localizing national efforts on hunger, health and the environment, cities need greater devolution of financing, authority and accountability.

## EXISTING LGMA RESOURCES AND GOOD PRACTICES ON FOOD

- Important conversations around urban food system integration into national plans and their cross cutting role were held during the co-convened **FAO-ICLEI workshop in September 2024**, where participants gathered to **discuss strategies for transforming urban agrifood systems and to agree on a course of action**, laying the groundwork for the co-creation of a five-year Roadmap with concrete modalities, roles, and actions across different groups and regions. One of the key outcomes of the workshop is the recognition that **local governments often lack clear policy mandates, adequate resources, and practical guidance to address urban food insecurity, build resilient food systems, and collaborate effectively to drive food systems transformation within cities and beyond**.
- Another key global moment was the **UN Food Systems Summit +4 Stocktake** in Addis Ababa in July 2025, which brought together national conveners and diverse organizations including the private sector, CSOs and NGOs to speak about their work in transforming food systems. The overall summit demonstrated clear political commitment, leadership and affirmation of the role of national governments in shaping the food systems agenda, but the **role of the urban sphere and the importance of local and other subnational governments is still seen as marginal**. The contributions from local and regional governments, as well as city networks, at the Summit, were, in fact, largely absent. The Summit therefore served as an important reminder of the need to more deliberately integrate the experiences, insights, and innovations emerging from cities into this process, ensuring that national-level discussions are informed by and connected to the realities on the ground in urban contexts.
- Since 2020, the **Urban Food Systems Coalition** has actively advanced the visibility, voice, and influence of cities and urban food systems stakeholders in global fora and has helped integrate urban perspectives in global dialogues such as UNFSS+2, CFS49 to 52 sessions, the One Planet Network SFS 4th and 5th Global Conference, COP28, and the World Urban Forum 12 in Cairo.
- During the plenary session of the **CFS 53** on 22 October, the Committee endorsed the Policy Recommendations on Strengthening Urban and Peri-Urban Food Systems to Achieve Food Security and Nutrition in the Context of Urbanization and Rural Transformation. These action-oriented recommendations have prominently put urban and peri-urban food systems on the global agenda as active sites of food systems transformation. These recommendations are based on the



groundbreaking 2024 HLPE report, which highlighted the need for recognizing the central role of cities and their surrounding regions.

- UCLG has published a global report on food insecurity and a [MOOC \(2025\)](#) to scale up territorial approaches titled “[Rising to the challenge of food insecurity : initiatives by local and regional governments](#)”.
- The recently published Position Paper of ICLEI European Secretariat on [Urban Food Security and Resilience in Europe](#) argues that by promoting relocalized food systems, fair and sustainable production methods, and healthy food environments, LGMAs can reduce the inherent vulnerabilities of global food chains, support local economies and provide dignified livelihoods for farmers, and enhance public health. Particularly through typical urban portfolios, such as public food procurement, food markets, and circular food systems, and by overcoming the urban-rural gap through nexus action (water, health, energy, mobility etc) and linking farmers (production) with cities (demand), local and regional governments can be gamechangers and accelerators.
- [AfriFOODlinks](#) envisions a thriving network of cities in Africa and beyond, in which food systems and nutrition are firmly established on the local governance agenda. Citizen-led multi-stakeholder governance platforms welcome diverse voices to inform policy and urban planning processes that promote food and nutrition security and environmentally regenerative practices.



# LGMA GUIDANCE ON THE 2025 ACTION AGENDA

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## BACKGROUND

The constituency of Local Governments and Municipal Authorities (LGMA) to the UNFCCC welcomes the new COP30 Action Agenda vision, including the Work Programme for the Climate High-Level Champions and the Marrakech Partnership for Global Climate Action (MPGCA) for 2025. While celebrating enormous momentum for collective climate action through the work of MPGCA and High Level Champions, through this submission, LGMA takes this opportunity to provide a background and a frank assessment on the experience in the past 10 years, supported with 3 main perspectives on the way forward.

The idea of creating an action agenda within the UNFCCC process originated from the initial efforts of raising the pre-2020 mitigation ambition globally through a diversity of actors in the transition period that followed the failure to reach a global agreement at COP15 in Copenhagen in 2009.

With the whole-of-government, whole-of-society approach under the 2015 Paris Climate Agreement, the Party-driven UNFCCC negotiation-based processes are aimed to be followed under the mandate of the high-level champions, while the initiatives of non-Party stakeholders captured under the Lima-Paris Action Agenda are aimed to be followed under the Marrakech Partnership for Global Climate Action.

In order to respond to the vision of the initial MPGCA processes that are designed around mitigation sectors, the engagement of cities, regions, and local and other subnational governments, evolved under the Human Settlements Action Pathway from constituency-based processes to sectoral approaches focusing on built environment and waste and consumption.

In parallel, the visibility and mobilization of local and other subnational governments were designed through commitment campaigns like Race To Zero, Race to Resilience, reporting on the Non-State Actor Zone for Climate Action (NAZCA) platform, and other UNFCCC-led initiatives like Momentum for Change, but not necessarily connected or coordinated with the Action Pathways.

With the evolution of the UNFCCC agenda, new concepts on adaptation and justice were introduced, often through organic ways and again not necessarily directly linked to the Action Pathways.

Meanwhile, government and stakeholder-led 2030 Breakthrough processes had limited impacts due to differing political visibility, availability of financial support and commitment goals and a disconnect to the commitment campaigns or Action Pathways.

Since 2021, while the introduction of professional teams created a certain momentum and capacity for the Climate High-Level Champions and the UNFCCC, the bulk of the workload for follow-up, monitoring, reporting remained on the shoulders of the voluntary work of networks of local, regional and other subnational governments, who in some cases even mobilized staff capacity to follow through.

At the same time, almost all COP Presidencies initiated numerous additional campaigns or programs, some independent from the work of the High Level Champions and MPGCA, which exhausted political attention, human and financial resources, and supported with very limited coordination and follow-up in between.





## LGMA PROPOSALS FOR CLIMATE HIGH-LEVEL CHAMPIONS AND MPGCA BEYOND 2025

The LGMA welcomes the effort of the COP30 Presidency to introduce a holistic approach to the Action Agenda, connect the process to the outcomes of the first Global Stocktake, and introduce a new format for coordination.

We particularly welcome the fact that the design of Axis 4 (Building Resilience for Cities, Infrastructure and Water) as well as all 30 Activation Groups of the COP30 Presidency Action Agenda takes into account all relevant outcomes of the Global Stocktake as well as of COP29.

Due to ongoing development of the Action Agenda towards and at COP30, the LGMA proposes that the experience in 2025 should be considered as a “beta version” and that the implementation in 2026-2030 be recalibrated in the first 6 months of 2026, based on the experience in 2025.

Within this scope, following priorities are presented as proposals on the way forward:

### 1. STRUCTURED, YEAR-ROUND ENGAGEMENT IN CONNECTION TO NATIONALLY DETERMINED CONTRIBUTIONS (NDCS) 3.0

It is expected that with the submission of NDCs3.0 and strategic outcomes at COP30, global climate action will be entering into a new phase, which is fully aligned with the spirit of the whole-of-society, whole-of-government approach under the Paris Agreement. This new era demands a more structured year-round engagement at the local, subnational, national, regional and global levels. At the UNFCCC level, this requires the work of the MPGCA to be carefully incorporated across Ministerial consultations in Copenhagen, Berlin, mid-year Bonn Climate Talks, Pre-COPs, and potentially Global Climate Action Summits before COPs. The work of Activation Groups should be linked with parallel processes such as Race to Resilience and Race to Zero, Sharm El Sheikh Adaptation Agenda, 2030 Breakthroughs, NAZCA platform and other existing and future UNFCCC or COP Presidency-led processes (for example the Baku Adaptation Roadmap) with clear mechanisms. Most importantly, a clear synergy should be built to support NDCs3.0.

### 2. SUBNATIONAL ENGAGEMENT FOR ALL SIX AXES OF THE ACTION AGENDA VIA LGMA

By building the connection of the Action Agenda to the Global Stocktake process, the new vision de facto builds the connection between the Action Agenda and the UNFCCC process, where the engagement of local and other subnational governments are coordinated through the LGMA Constituency. Therefore, LGMA particularly welcomes para19.f.ii of the MPGCA Work Programme and underlines that the vision and process to have active engagement of subnationals in each of the 6 Axes and all 30 Activation Groups should be developed in close collaboration of the LGMA Constituency, in order to ensure, efficiency, effectiveness and respect the legitimate constituency-based engagement practices in the UNFCCC processes.

### 3. MOBILIZATION OF TECHNICAL AND FINANCIAL SUPPORT TO ACKNOWLEDGED INITIATIVES AND ACTORS

The implementation of COP30 Action Agenda and their connection to NDCs3.0 and the Global Stocktake 2.0 process demand significant resources and more effective multilevel and multistakeholder partnership mechanisms. Such holistic and integrated vision and especially the enormous task of active facilitation and monitoring of engagement of subnationals require significantly elevated dedication and professionalism of networks of local and other subnational governments and other partners, which can not rely on their





voluntary commitments or resources. The UNFCCC Secretariat, High Level Champions and the COP Presidencies should commit to mobilize additional resources as well as technical and financial support to all partners involved as part of their vision for successful delivery of the Action Agenda beyond 2025.