Submission to the UNFCCC from observer members of Galvanizing the Groundswell of Climate Actions¹ regarding our "views on opportunities to further enhance the effective engagement of non-Party stakeholders with a view to strengthening the implementation of the provisions of decision 1/CP.21"

Galvanizing the Groundswell of Climate Actions² welcomes the opportunity to share our views on opportunities to further enhance the effective engagement of non-Party stakeholders. The wide spectrum of non-Party stakeholders play a number of important roles in the UNFCCC process and addressing climate change more broadly. Encouraging effective participation by non-Party stakeholders will support implementation of the Paris Agreement. This submission has two sections. The first is a brief overview of the importance of non-Party stakeholder engagement. The second will look at specific opportunities for enhanced engagement to strengthen the implementation of the provisions of decision 1/CP.21.

Overview of non-Party stakeholder engagement

While numerous non-Party stakeholders are directly taking climate actions of their own, many provide direct and enduring support for the UNFCCC process. They directly engage in and support the negotiations throughout the year contributing technical and analytical expertise to Parties and the Secretariat, participate in working groups, and facilitate dialogues to help advance conversations on complex and intricate issues. They also represent diverse constituencies and provide a voice for communities that are impacted by climate change, but may otherwise be left out of the decision making process.

Non-Party stakeholders are important messengers, translating information for lay audiences and connecting the UNFCCC process to real people. They also play an important role in holding countries accountable both domestically and at the global level.

The actions of non-Party stakeholders are ambitious and are already helping countries deliver and overachieve their NDCs. They are taking action to reduce emissions, build resilience, and mobilize the finance capacity and technical expertise needed to achieve the goals of the Paris Agreement. They are also contributing to Parties' knowledge and capacity to increase their ambition in the future.

¹ Galvanizing the Groundswell of Climate Actions (GGCA) is an informal group of non-governmental organizations and academic and research institutions including: Cambridge Institute for Sustainability Leadership, CDP, Ecofys, German Development Institute, Mission 2020, Natural Resources Defense Council, The Stanley Foundation, World Resources Institute, World Wildlife Fund, University of Oxford and Yale University.

² http://www.climategroundswell.org/

It is important to continuously encourage and enable broad non-Party stakeholder participation to ensure their ability to contribute constructively to the UNFCCC process is maintained. Addressing climate change is not just the responsibility of national governments. If we are to achieve the goals set out in the Paris Agreement, Parties and non-Parties alike will need to double down efforts in its implementation.

Opportunities for enhanced engagement

Non-Party stakeholders already assist in the implementation the Paris Agreement and enhanced engagement can further accelerate its delivery. This section outlines three key areas where enhanced engagement can lead to specific advancements toward achieving the goals of the Paris Agreement.

1. Accelerating Pre-2020 Action and Ambition

a. Technical Examination Processes

Some of the existing arrangements related to pre-2020 action and the results of Workstream II already encourage interaction with non-Party stakeholders. For example, the technical examination processes for mitigation and adaptation already engage non-Party stakeholders in presenting practical cases of climate action and also engage them in planning such as by observer groups participating in the TEP-A working group established by the Adaptation Committee to help plan and implement the technical expert meetings (TEMs) on adaptation.³

The Paris decision calls for cooperation with relevant non-Party stakeholders and particularly improved participation of developing country Party and non-Party experts as appropriate in strengthening the technical examination process for mitigation. One way to improve participation among developing countries is to expand climate action among non-state and subnational actors in developing countries and promote a regional focus for engagement.⁴ Holding regional technical expert meetings could help engage broader participation from developing country experts.

Not only can non-Party stakeholders from developed and developing countries present valuable expertise and knowledge during the technical examination meetings, they can also play a significant role in applying the results of the TEMs and scaling up and replicating key practices in new locations. The TEMs provide a rare space for Parties and non-Party stakeholders to directly interact, share experiences and build good implementation practices. Another way to enhance engagement with non-Party stakeholders would be through targeted sectoral integration. Technical expert meetings could be aligned with sectoral meetings such as the Clean Energy Ministerial or other sector-specific international convenings to draw on the broader experience of non-Party stakeholders directly engaged in climate action.⁵

³ http://unfccc.int/adaptation/workstreams/technical_examination_process_on_adaptation/items/9542.php

⁴ GGCA Accelerating Non-Party Climate Action at the Regional Level: Strategies to Reduce Geographic Imbalances Discussion

⁵ GGCA Long-Term Strategy 2018 Discussion

Regional or sectoral expansion of the TEMs could also help realize the vision of the Marrakech Partnership for a phased, year-long approach to catalysing and showcasing action.⁶ Non-Party stakeholders are the key channel for the UNFCCC process to connect to action on the ground and help to bring climate priorities to different pillars of action such as energy, transport and land use. For more on these linkages, see also Global Climate Action below.

2. Driving Ambition

a. 2018 Facilitative Dialogue

Non-Party stakeholders can play a significant role in helping to realize an effective facilitative dialogue in 2018.⁷ The Presidencies of the twenty-second and twenty-third Conferences of the Parties have been tasked with undertaking consultations on the organization of the facilitative dialogue⁸ and would greatly benefit from rich engagement with non-Party stakeholders. Non-Party stakeholders can help identify opportunities to enhance the provision and mobilization of support, the ambition of mitigation efforts and ways to increase resilience for all Parties, which are often supported directly and indirectly by non-Party stakeholder efforts.

Parties and non-Party stakeholders should work together to secure a coherent flow of events in 2018 to drive ambition.9 In this regard, non-Party stakeholders could play three core roles. First, they can help bridge climate action across numerous thematic areas. Non-Party stakeholders are active across all thematic areas that contribute to mitigation and adaptation and often address issues such as transport and land use planning simultaneously. Their experience and connections could help build stronger linkages between thematic areas for national governments. Second, non-Party stakeholders can provide key evidence and analysis for the facilitative dialogue. Non-Party stakeholders regularly conduct research, collect data and facilitate the flow of information on how Parties and non-Party stakeholders are progressing, what actions have been successful and how to overcome barriers. Such information could serve as input to the facilitative dialogue. Third, many non-Party stakeholders are grounded in real-world action and have deep understanding of where gaps and opportunities lie and could share their insight through the facilitative dialogue. Greater climate ambition requires a recognition of overlaps and interlinkages between thematic action areas, evidence of national and subnational progress, and a clear understanding of opportunities to ground state decisionmaking. By showcasing growing results and highlighting the rising ambition of state and nonstate actors, 2018 can demonstrate successes that support existing NDCs and jumpstart opportunities for non-state and subnational actors to become more involved in the NDC design and implementation process.

Building space for the participation of non-Party stakeholders in planning the facilitative dialogue will strengthen their value to the process itself. As the Presidencies undertake planning for the

⁶ http://unfccc.int/files/paris agreement/application/pdf/champions outcome draft v4.pdf

⁷ Paragraph 115 of Decision 1/CP.21

⁸ Paragraph 16 of Decision 1/CP.22

⁹ GGCA Long-Term Strategy 2018 Discussion

facilitative dialogue, they can engage non-Party stakeholders in a number of ways. The Presidencies are required to undertake inclusive and transparent consultations with Parties, however any planning sessions or workshops could also include non-Party stakeholder presence. Parties and non-Party stakeholders could be consulted together, or could be consulted separately through parallel workshops or dialogues. The Presidencies could also solicit views or analysis from non-Party stakeholders to serve as input to consultations with Parties. Additionally, the Presidencies could circulate any summary documents from consultations in a public format to provide transparency and allow stakeholders to reflect and plan their support. In addition to these inputs and interactions, the Yearbook of Climate Action called for under the Marrakech Partnership can serve as a high profile contribution to the 2018 Facilitative Dialogue.

It is important that Parties and non-Party stakeholders take into account a more long-term and holistic perspective of climate action. Events in 2018 including the release of the IPCC Special Report of the 1.5° C, a summit of non-state actors, events of the Marrakech Partnership and the 2018 facilitative dialogue must be seen in an integrated manner rather than as discrete events, and provide critical platforms to better unpack and understand the contributions of non-state and subnational actors. The Presidencies should seek to elaborate how an assessment of progress under the facilitative dialogue can cover an aggregate state of collective ambition by Parties and non-Party stakeholders.

b. Global Stocktake

Many of the above suggestions regarding the 2018 facilitative dialogue could also be applied to the global stocktake. The periodic stock taking of the implementation of the Paris Agreement to assess the collective progress towards achieving the purpose of this Agreement and its long-term goals should take into consideration the actions and impacts of non-state and subnational actors. Additionally, successful and effective participation and support from non-Party stakeholders regarding the 2018 facilitative dialogue could set a precedent for the global stocktake.

At a minimum, the APA and SBSTA could take into consideration any views or submissions shared by non-Party stakeholders regarding the modalities or inputs of the global stocktake. However, a thoughtful consideration of the potential value of non-Party stakeholders to the global stocktake should be undertaken. Non-Party stakeholders can provide valuable input and could also participate in the modalities of the global stocktake. Many non-governmental organizations undertake peer-reviewed analysis of the impact of national policies and targets and these could contribute to an understanding of the overall effect of Parties' nationally determined contributions. They may have information of the state and potential of mitigation and adaptation efforts and the mobilization and provision of support. Additionally, information on the current impact and potential of climate action by non-state and subnational actors could serve as input during the stocktaking process to help inform Parties about efforts and opportunities that may be relevant when revising their NDCs. Such information could either be collected and

¹⁰ GGCA Tracking and Aggregating Non-State and Sub-National Climate Action Toward 2018 Dialogue

compiled by the Secretariat, or Parties could be invited to collect information from non-state and subnational actors domestically to share during the global stocktake process. The NAZCA portal could also be enhanced to provide space and structure to capture more detailed information on global progress among non-Party stakeholders.

c. Long-term strategies

Parties were invited to communicate "mid-century long-term low greenhouse gas emission development strategies" or "long-term strategies" by 2020.¹¹ Long-term strategies are central to achieving the goals of Paris Agreement and outline how a country could pursue its development trajectory while phasing out net emissions over time.¹² Many non-Party stakeholders have extensive experience with long-term climate planning¹³ and can offer advice and support for countries to develop long-term strategies. In addition, a growing number of non-party stakeholders are themselves adopting long-term strategies, and so may provide helpful examples and inputs for national governments. It may be useful to consider developing mechanisms or pathways for non-Party stakeholders to support Parties in developing their long-term strategies such as through collaborative workshops, a voluntary review or input process, or developing guidance for how to engage and collect feedback from non-Party stakeholders.

3. Global Climate Action and Marrakech Partnership

a. NAZCA

The Non-State Action Zone for Climate Action (NAZCA) portal is now recognized as a central platform for showcasing non-state and sub-national climate action.¹⁴ NAZCA also provides the official platform for tracking climate action by non-Party stakeholders and voluntary initiatives.¹⁵ Decision 1/CP.21 invites non-Party stakeholders to scale up their mitigation, adaptation and support efforts and demonstrate these efforts via NAZCA.¹⁶ And the Marrakech Partnership for Global Climate Action highlights the role NAZCA can play in tracking progress to support Parties and non-Party stakeholders in identifying gaps and opportunities for additional action.¹⁷ However, the NAZCA portal still has significant gaps in data and faces other challenges that limit its potential and deeper engagement with non-Party stakeholders could help address these issues. Galvanizing the Groundswell of Climate Actions has identified challenges and priority areas for improving the data processes that support NAZCA:

Data aggregation: Data collection and sharing are still fundamental challenges that stem
from restrictions on data use and disclosure, staffing and funding challenges. This
inhibits the ability to build a comprehensive understanding of the aggregate impact of
global climate action. Non-Party stakeholders are currently advancing efforts to improve
the understanding and aggregation of data on non-state and subnational actions.

¹¹ Paragraph 35 Decision 1/CP.21

¹² http://www.wri.org/blog/2016/08/whats-paris-agreements-long-term-climate-change-strategy

¹³ http://deepdecarbonization.org/

¹⁴ GGCA Tracking and Aggregating Non-State and Sub-National Climate Action Toward 2018 Dialogue

¹⁵ http://unfccc.int/files/paris_agreement/application/pdf/champions_outcome_draft_v4.pdf

¹⁶ Paragraphs 117 and 134, Decision 1/CP.21

¹⁷ http://unfccc.int/files/paris agreement/application/pdf/champions outcome draft v4.pdf

Harmonizing methodologies: Harmonization and alignment of methodologies to assess
the impact of subnational and non-state climate actions could help streamline reporting
and facilitate efforts to track global impact and progress. A number of efforts by different
non-party stakeholders are already underway¹⁸ and could support data aggregation
efforts and development of interactive data presentation to showcase the scale of
climate action that could be used in the 2018 facilitative dialogue and global stocktake.

The Climate Champions, Secretariat and Parties could engage in dialogues with non-Party stakeholders to ensure these efforts are complementary to UNFCCC activities. Party and non-Party stakeholders could also discuss ways the information provided on NAZCA can be used to enhance understanding of the global landscape of climate actions and provide input to the 2018 facilitative dialogue and global stocktake.

b. Enhancing linkages between Parties and non-Party stakeholders

The conference of the Parties agreed in Paris to "uphold and promote regional and international cooperation in order to mobilize stronger and more ambitious climate action by all Parties and non-Party stakeholders." Decision 1/CP.21 specifically encourages Parties to work closely with non-Party stakeholders to enhance mitigation and adaptation actions. 19 Strong and tangible linkages between Party and non-Party stakeholders are crucial to implementing Parties' climate commitments and also the Marrakech Partnership.²⁰ The Marrakesh Partnership for Global Climate Action provides a structural framework for the agreed outcomes in Paris and facilitates collaboration between Party and non-Party stakeholders to scale up efforts to enhance implementation. However, its implementation is not automatic and requires care and attention to bring it to life. The Marrakech Partnership depends on robust interactions between the Presidencies, Secretariat, Parties and non-Party stakeholder to plan and undertake its directive. The Climate Champions and the Secretariat have already begun the process of engagement and we thank them for their efforts. This engagement should continue to be deepened to help integrated climate change into other relevant fora outside the UNFCCC to carry climate messages and spur additional activity. The Climate Champions could select leaders from subnational and non-state communities as "Ambassadors" to carry key messages and broaden legitimacy and authority into non-UNFCCC fora. Non-Party stakeholders could also be solicited to help deepen sectoral integration and engagement among key ministries during the annual high-level event.

c. Annual high level event

The high-level event called for in paragraph 120 of Decision 1/CP.21 will rely heavily on active participation from non-Party stakeholders. They will contribute substantively to drive the acceleration of climate action in all of the key themes of the Marrakech Partnership and can build bridges to sectoral ministries, high-level policy makers and the activities and events in forums operating outside the UNFCCC.

¹⁸ http://www.climateactiontransparency.org/methodological-framework/non-state-action/

¹⁹ Paragraph 118 Decision 1/CP.21

²⁰ GGCA Long-Term Strategy 2018 Discussion

The Climate Champions and the Secretariat are making strides to involve non-Party stakeholders in the planning and development of the high-level event, and it is critical for the process to be driven by the non-state and subnational actors taking concrete climate action. However, the resources available to support this process are inadequate and need to be strengthened to ensure engagement and participation are at a level necessary to provide good results. The current breadth of climate actors engaged in the process is still quite small as are the number of staff supporting the Champions within the secretariat and the Presidencies.

There is also a need to ensure a positive and mutually beneficial connection between Parties and non-Party stakeholders is maintained. The high-level event should engage participation from all actors with strong representation from national governments including climate negotiators as well as national policy makers and ministry officials. In addition to highlighting the actions and efforts of non-Party stakeholders during the high-level event, the Champions should also seek to showcase positive examples and best practices for interaction between Party and non-Party stakeholders and among different thematic areas, such as policy making, actions or targets that involves joint consideration of multiple themes including energy, transport, land use (including agriculture and forests), water and resilience.

²¹ GGCA Roadmap and framework for delivery of the Action Agenda to 2020

²² GGCA Memo: How can Funders Accelerate Action 2018 – 2020?