



# Opportunities to further enhance the effective engagement of non-Party stakeholders in the UNFCCC process

Submission by The Climate Group | February, 2017

## Overview

---

This submission is prepared by The Climate Group in response to the invitation by the UNFCCC for submissions 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 (per FCCC/SBI/2016/8, paragraph 164).

The Climate Group brings together the world's most influential state and regional governments to accelerate the global transition to a low carbon economy. Through the [States & Regions Alliance](#) and the [Under2 Coalition](#), our members are spearheading impactful climate policy in their respective sub-national jurisdictions.

## Enhancing engagement with non-Party stakeholders

---

The Climate Group welcomes the efforts by the UNFCCC to enhance collaboration and effective engagement between Party and non-Party stakeholders as outlined in the Marrakech Partnership for Global Climate Action and have prepared a series of suggestions below.

**Importance of state and regional actors:** From state and regional government's perspective, it is important that the UNFCCC's engagement with non-Party stakeholders consider businesses, cities, states and regions in a balanced manner, so that they are all equally included in the process and the impact of their respective actions valued accordingly. Whilst the role of cities and businesses as climate actors is well understood, the world's state, regional and provincial governments should also be recognized as significant players responsible for developing and implementing key areas of climate policy such as renewable energy and energy efficiency, transport, adaptation, public planning, carbon pricing and low carbon investment. State and regional governments operate at a level where some of the most flexible, innovative and ambitious policies are developed. They are crucial to successful action as they propose their own legislative measures, develop implementation plans and oversee enforcement measures. Furthermore, some regional governments are responsible for providing oversight and expertise on climate change policy and action over local levels of government (cities and municipalities). In doing all of this, state and regional governments implement the policies that directly contribute to national governments meeting their NDCs. They have the authority and resources to act and at the same time are close to local business and communities enabling a faster response to different policy needs. It is crucial to ensure that states and regions are recognized as important stakeholders in the UNFCCC process and engaged as a key part of the non-Party stakeholder agenda.

**Endorsing a dedicated day at future COPs:** Similar to dedicated action days convened at COP21 in Paris, ensuring a permanent day at future COPs for state and regional governments would create a forum for these stakeholders to formally present their actions and views to each other and to Party



stakeholders, and would facilitate more global collaboration. Support from the High-level Co-Champions for convening such an event will add credibility and encourage wider participation.

**Extending accreditations to non-Party stakeholders:** One of the key challenges faced by non-Party stakeholders is securing accreditations to attend COP events. Sub-national governments rely on their national counterparts or admitted organizations that they partner with to secure accreditations. Providing formal accreditation mechanisms to sub-national stakeholders and increasing allocation to organizations representing sub-national stakeholders will be key to enhancing non-Party stakeholder engagement. Even within the non-Party stakeholder actors, ensuring participation of sub-national government leaders is paramount given that they are democratically elected representatives of (often large) sub-national jurisdictions.

**Encouraging cooperation around NDCs:** Prior to COP21, several national governments engaged with their state and regional and city counterparts and sought feedback while preparing their respective NDCs. In order to ensure consistency and continuity, it is vital to establish a space alongside the five-year global stocktake, where Party stakeholders consult with their sub-national counterparts prior to submitting their revised NDCs. This process will encourage vertical alignment between subnational and national jurisdictions and help demonstrate how the actions and ambitions of sub-national governments can directly contribute to the NDCs. We would therefore encourage Parties to strongly consider including the participation of non-Party actors, specifically subnational actors, in the development of modalities for the global stocktake, to be adopted by the CMA pursuant to paragraph 101 of decision 1/CP.21.

**NAZCA portal:** The UNFCCC could initiate an iterative process and issue a series of guidelines aimed at harmonizing and strengthening the commitments from non-Party stakeholders to be in line with science and their respective Monitoring, Reporting and Verification (MRV) processes. Continued support by the UNFCCC that encourages transparent disclosure by sub-national governments will enable the NAZCA portal to become the principal data/information flow tool between Party and non-Party stakeholders.

**Non-Party stakeholder representatives at TEPs/TEMs:** The UNFCCC Secretariat should encourage and facilitate active participation from non-Party stakeholders in the Technical Examination Processes (TEPs) on mitigation and adaptation, including the Technical Expert Meetings (TEMs), organized regularly as part of these processes. These instances provide important information sharing, capacity building and knowledge exchange opportunities for sub-national actors. The Climate Group would welcome the opportunity to propose representatives from state and regional governments to participate in the TEMs. A more systematic approach to subnational participation could also be implemented through the creation and maintenance of a public roster of subnational experts, which could be invited to participate and engage with Parties when appropriate.

Contact:

Libby Ferguson

States & Regions Director

The Climate Group

[lferguson@theclimategroup.org](mailto:lferguson@theclimategroup.org)

Tel: +44 20 7960 2989