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Response to Champion's Letter on Global Climate Action

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Thank you for this opportunity to reflect on the experience of the Marrakech Partnership and related activities, and to examine how to strengthen them.

At the outset, it is important to note how the “groundswell” of climate action from cities, businesses, states/regions, investors, and others has exploded since COP21. As the most recent Yearbook noted, one in five people on Earth now live in a city, state, or region taking climate action. Businesses with a total annual revenue greater than the GDPs of China and the United States combined are similarly committed. The emissions reduction potential of this activity is vast; if these efforts continue to scale up, working in partnership with national governments, they could help close the emissions gap by 2030.¹ Recognizing this potential, the UNFCCC process now strongly emphasizes the value of this groundswell of climate action.²

Despite this tremendous surge, we know 1) our current ambition is not enough, and 2) implementation is not guaranteed. The time is therefore ripe to reflect on how the UNFCCC best engages with the groundswell of climate action going forward. How can it best catalyze further action and ambition from Parties and non-Parties alike?

The Champions should be applauded for creating this opportunity for collective reflection. We must not forget that the growing role of cities, business, states/regions, investors, and other non-party stakeholders in the global climate regime is, in many ways, unprecedented in multilateralism. While there are some relevant experiences to draw from, e.g., the Rio+10 and Rio+20 summits, there is no roadmap for how to build productive links between the groundswell of climate action and the intergovernmental regime, particularly given the innovative architecture of the Paris Agreement itself.³ Realizing the potential of this innovative system to advance the aims of the Paris Agreement therefore requires careful evaluation of what works and what does not. The urgency of climate action requires us to not be afraid to adjust our approach as we advance.

This contribution addresses the specific questions mentioned in the Champions' letter in three sections:

¹ UNFCCC, Yearbook of Climate Action 2018. Available:

https://unfccc.int/sites/default/files/resource/GCA_Yearbook2018.pdf

² For an overview, see Thomas Hale, “[The Role of Sub-state and Nonstate Actors in International Climate Processes](#),” Chatham House Research Paper, November 2018.

³ Sander Chan et al., “[Reinvigorating International Climate Policy: A Comprehensive Framework for Effective Nonstate Action](#),” *Global Policy*, Vol 6., Issue 4, pp. 466-473.

1. What functions are needed in the climate action ecosystem, and which of these functions are best located in or around the UNFCCC process?
2. How well have current arrangements met those functions? What can we learn from this experience?
3. What are the most important considerations for climate action going forward?

What functions are needed in the climate action ecosystem? Who should perform them?

In order to evaluate the Marrakech Partnership, it is important first to understand its role in the broader "ecosystem" of climate action, which includes activities both in and around the UNFCCC process, and those beyond it.

The ecosystem of climate action encompasses a wide range of activities:

1. **Individual climate action** by cities, businesses, states/regions, investors, etc. around the world
2. Domestic, regional, and global **networks of cities, businesses, states/regions, investors, and other actors** that work together to address climate change
3. **Cooperative initiatives** in which non-party stakeholders often work together with states or international organizations to address common objectives
4. Efforts by **governments, international organizations, or civil society groups to support, shape, galvanize, and orchestrate** action by cities, businesses, states/regions, investors, and other actors.

Within this ecosystem, several functions are crucial for maximizing the potential of climate action. Some of the most important of which are:

1. Seed new initiatives and support existing ones
2. Recruit new actors/constituencies
3. Distil and diffuse best practices between actors
4. Showcase ambitious climate action and evidence of progress
5. Build catalytic linkages between national policies and non-Party stakeholders
6. Reporting and tracking

Global climate action is a complex system. No one actor or group of actors can perform all these functions. Moreover, most are best executed jointly, with different actors working together in distinct but complementary ways. Table 1 below highlights one way to think about this division of labor.

From this perspective, two things are clear. One, the UNFCCC process has a critical role in the broader ecosystem of climate action. Two, the UNFCCC cannot fulfill all the tasks needed. This implies that the Marrakech Partnership should focus its activities on its critical niche in the larger ecosystem, while the broader climate action community also strengthens its various roles.

Table 1: Key functions and actors in the global climate “ecosystem”

Function	Non-party stakeholders Local governments, private sector, etc	National governments	Civil society	UNFCCC process (Marrakech Partnership)
Catalyze new actions and initiatives and support implementation of existing ones	Generate bold new actions and initiatives to raise ambition and deliver on existing pledges	Orchestrate and support non-Party stakeholders to take climate action	Advocate for greater and more ambitious action, support implementation	Focus attention on key gaps (thematic, geographic, etc), link climate action to resources for implementation
Recruit new actors/constituencies	Influence peers	Support domestic actors and help link them to global networks	Advocate for and support more actors to take action	Showcase climate action to new constituencies
Distil and diffuse best practices	Peer-to-peer exchange; exchange with national governments	Consult with non-party stakeholders, build platforms for linkage and exchange	Evaluate lessons learned and diffuse best practices	Support information exchange across constituencies and thematic areas, and between Parties and non-Parties
Showcase ambitious climate action and evidence of progress	Communicate ambition and achievements	Recognize contributions of non-Party stakeholders	Communicate ambition and achievements	High-level events at COP; Yearbook; NAZCA
Link Parties and non-Parties	Engage with national governments on NDCs, LTSs, etc.	Engage sub/non-state actors in policy development	Build advocacy coalitions with sub/non-state actors	Regional climate weeks; Technical Examination Process; High-level dialogues at COPs
Reporting and tracking	Track and report their own progress	Include non-Party stakeholder contributions in national reporting	Hold actors accountable for their commitments	High-level events at COP; Yearbook; NAZCA

How well have current arrangements met these functions?

Since before COP21, efforts to build catalytic linkages between the UNFCCC process and the groundswell of climate action have delivered many successes. While it is difficult to know the counterfactual—what the outcome would have been had these linkages not formed—most observers believe that sub- and non-state action has made important contributions to the UNFCCC process. By the same token, most observers think that recognition of the groundswell of climate action in the UNFCCC process helps sub- and non-state actors expand their work.

At the same time, observers have frequently cited missed opportunities and challenges that have arisen over the last few years. *The reflections below are offered in a spirit of constructive reflection, with deep gratitude for the hard work of the individuals involved.*⁴

High-level Champions

In theory, the High-Level Champions should play a central role in catalyzing new actions and initiatives and recruiting new actors/constituencies, as the parties to the UNFCCC gave them an explicit mandate to do so at COP 21. In practice, this has proven difficult for several reasons. First, many envisaged the Champions as high-profile CEOs, mayors or similar individuals, with the global stature and real-world connections to mobilize climate action. Since Paris, however, COP presidencies have instead nominated ministers or lower-ranking government officials to play this role. Second, though the Champions are appointed for two-year terms, in practice they have required significant start-up time to figure out how to be most effective in their role, meaning that important momentum is lost with each transition. Each presidency has also naturally brought its own priorities to the role, raising a question of consistency across time. Third, the Champions have had very few resources to support them in their mandate. While the French COP presidency invested heavily in the Lima–Paris Action Agenda before Paris, subsequent presidencies have not provided their Champions with comparable personnel or budgets. Nor have other parties or foundations provided resources to the Champions commensurate with their mandate. In practice, much of the mobilization role envisioned for the Champions has migrated outside the UNFCCC process, for example to the California Global Climate Action Summit in 2018 or the One Planet Summits in 2017 and 2018. This is not necessarily a negative development, but offers insights into how the Champions' role may evolve going forward.

Champions have often been strong advocates for non-state action within the UNFCCC process, highlight the value of these actors to Parties. Many of these

⁴ This section draws from Thomas Hale, "[The Role of Sub-state and Nonstate Actors in International Climate Processes](#)," Chatham House Research Paper, November 2018.

linkages have been relatively high-level, however, creating a need to find ways to build more substantive and operational linkages between Parties and non-Parties.

Secretariat Support Unit – Global Climate Action team

With the potential of the Champions underutilized by Parties, the UNFCCC secretariat has played a larger de facto role in facilitating sub-state and non-state actor engagement with the UNFCCC process. However, the secretariat has only within the last year been able to staff its support unit, the Global Climate Action team, at an adequate level, and many processes remain in development, such as updating and improving the online Climate Action Portal. Given these constraints, most of the secretariat's engagement with climate action has inevitably focused on preparing the mandatory events and reports, as opposed to mobilizing and furthering concrete actions from a growing range of actors. The tendency has often been 'centripetal', in effect pulling the Marrakech Partnership closer into the UN process, as opposed to 'centrifugal', which would imply pushing the UN process outward to connect with sub-state and non-state action on the ground. Regularizing the administrative and budgetary arrangements around the Support Unit would enhance long-term planning and cohesion. Another idea would be to co-locate staff members from non-Party stakeholder organizations with the Support Unit in order to promote a more outward-facing orientation and facilitate information exchange.

NAZCA and the Yearbook of Climate Action

A global portal for tracking commitments and progress for climate action is a critical element of the climate action ecosystem, necessary for showcasing, information exchange, and tracking and reporting. The UNFCCC is uniquely positioned to play this role because the multilateral process has the strongest potential to build a truly universal overview of climate action. However, the coordination challenge of gathering this information and maintaining and updating it should not be underestimated. Climate action is extraordinarily diverse. No organizations or networks have a comprehensive overview of action in a given sector, much less across sectors, though many are improving their tracking efforts. NAZCA has rightly positioned itself as an aggregator of existing information sources, but this means it must rely on the existing landscape of data provider. These groups are doing excellent work, and generously contributing to NAZCA pro-bono, but their perspective is necessarily incomplete. A particularly difficult problem is that the high-credibility data providers on which NAZCA relies tend to only record climate action that is a) explicitly labeled as climate; b) is linked to transnational networks in some way. This means it misses huge portions of climate action, particularly from the global South (more on this below). On top of these intrinsic challenges, the slow progress in setting up and staffing the UNFCCC Support Unit has meant that NAZCA has evolved more slowly than the groundswell of climate action. Over the last year

there has been a notable advance, however, as the more resources have been dedicated to NAZCA.

Similarly, the Yearbook of Climate Action performs a critical role relating to showcasing, tracking, accountability, and information exchange. While NAZCA provides a total record updated in real time, the Yearbook highlights trends and changes, providing a narrative for the groundswell of climate action. Like NAZCA, the Yearbook has suffered from a lack of resources and attention, with the first two versions unfolding without sufficient planning and budget, meaning they relied on ad hoc, pro-bono contributions from the global climate action community. Despite these challenges, the documents provide a strong overview of climate action. Their impact, however, was muted, being slightly lost in the shuffle of the COPs. For example, the launch of the first yearbook saw very few parties in the room, despite being launched by the COP22 president and the UN Secretary General.

Climate action events at COPs

Creating a special sequence of events for climate action at COPs has allowed a useful broadening of the UNFCCC process, giving more stakeholders a “seat at the table” and injecting subject area dynamism into the negotiations. Such events can serve to showcase climate action, diffuse best practices, create links between Parties and non-Parties, and facilitate reporting and tracking. In practice, these events have served best the showcasing function, and have been weaker in the other dimensions. For example, even events billed as “roundtables” or “dialogues” have often failed to move beyond different actors giving broad statements on their activities. Better use of smaller, more focused events, which targeted the right participants in advance, could help to deepen the substance of these exchanges.

What are the most important considerations for climate action going forward?

The experience of the Marrakech Partnership and related tools shows the value of linking the groundswell of climate action to the UNFCCC process. The form this linkage takes has changed over the past years, and will likely need to continue to evolve as lessons are learned, and as we shift to implementing the Paris Agreement. Following the adoption of the Katowice Rulebook at COP24, the focus of both Parties and non-Parties shifts to the ongoing cycle of implementation and ambition. The question thus becomes, *how can non-Party stakeholders raise their ambition to align with the goals of the Paris Agreement, and how can they deliver on this ambition? Moreover, how does this action from help national governments go further, faster toward the Paris goals?* The Marrakech Partnership and its successor will play a critical role in making this exchange work. This section highlights several crucial considerations for global climate action going forward.

Deepen engagement with Parties

One of the most important reasons to link climate action to the UNFCCC process is to help Parties draw from the experiences and contributions of non-Party stakeholders. These experiences can be particularly helpful for developing NDCs, National Adaptation Plans, and Long-term Strategies. As countries decide what level of ambition to seek, and what policies and measures can get them there, the wealth of experience emerging from the groundswell of climate action can be a powerful enabler. Moreover, as countries implement NDCs, relationships with non-Party stakeholders can help mobilize and deploy expertise, finance, capacity building, and other facilitating conditions. We could imagine using the Yearbook and future Climate Action events at COPs to highlight these issues.

Similarly, the groundswell of climate action has an important role to play in the Global Stock Take (GST). The existing contributions of non-Party stakeholders are an important determinant of the remaining emissions gap, and so must be taken into account in determining overall progress toward the Paris goals. Even more importantly, the potential contributions of non-Party stakeholders, both individually and in partnership with national governments, can help to close the remaining emissions gap, so are needed to understand options for increasing ambition. Similarly, global efforts to assess progress on adaptation, capacity, finance, and other measures will need to consider the roles of non-Party stakeholders in order to generate a comprehensive picture of, to borrow from the Talanoa Dialogue, “where we are” and “how we get there.” The modalities for the GST agreed at COP24 envision contributions from non-Party stakeholders but do not specify what these will consist of. A future version of the Marrakech Partnership will likely provide a strong platform for delivering on this critical element of the Paris architecture.

Realizing this potential will also require Parties to engage more deeply with non-Party stakeholders in general and the Marrakech Partnership (and its potential successor) in particular. Over the last few years, we can see numerous instances in which stronger Party participation would have led to better results in the Marrakech Partnership. For example, Parties could have encouraged their non-state actors to report on climate action to NAZCA-linked data providers, helping to overcome imbalances in the current reporting framework. Or parties could send more government officials with substantive areas of responsibility (not just diplomats engaged in negotiation) to climate action events at COPs to engage with non-Party stakeholders on thematic topics.

Strengthen climate action at the regional and national level

While it is important for the multilateral climate process to engage with the groundswell of climate action at the global level, as we turn to implementation we must also ensure that climate action is strong at the regional and national levels. Indeed, it is at these levels that the key decisions needed to achieve the goals of the Paris Agreement will be taken. Interestingly, we have seen a number of new

regional and national platforms for climate action begin to emerge recently. These include ActionLAC in Latin America, America's Pledge and We Are Still In in the US, the Japan Climate Initiative, China Business Climate Action, the African Non-state Climate Action Platform, Russia Climate Partnership, and the various national alliance that are part of the Alliances for Climate Action network. Strengthening these platforms and building others like them will be critical going forward.

The Marrakech Partnership's growing emphasis on regional climate weeks is a welcome complement to these efforts. This line of work should be built upon, and increasingly linked to regional and domestic climate platforms. For example, NAZCA could seek to work with more local and regional platforms to provide global visibility to climate action at various levels.

Again, national governments have an important role here as well. While global networks are one important way to transmit information and expertise, national and regional information sharing is an important complement because climate action invariably involves national and regional particularities. National governments can create exchange between local governments, business, and others as part of consultation processes (e.g. around NDCs), while also inviting linkages to transnational and global networks. A number of countries have done this well, and could share their experiences with other Parties via the Marrakech Partnership.⁵

Strengthen non-Party Climate Action in the global South

For the past few years, the Marrakech Partnership has focused on expanding climate action in the global South. However, despite progress to expand inclusion over the past years, a North-South gap remains. According to a recent study, only 31% of participation in NAZCA-registered initiatives and only 24% of lead partners come from non-OECD countries.⁶ The Marrakech Partnership must therefore continue working with Parties and stakeholders in the global South to strengthen climate action. At the same time, we must distinguish the “action gap” from the “visibility gap.” Because we tend to only observe those actions linked to

⁵ For details of national experiences, see Galvanizing the Groundswell of Climate Actions, “Stepping up climate action at home,” September 2018. Available: <http://www.climategroundswell.org/blog-test/2018/9/10/report-stepping-up-climate-action-at-home>

⁶ ClimateSouth, 2018. Cooperative climate action 2013 – 2018: Global performance and geographic scope. Research report published by the the German Development Institute/Deutsches Institut für Entwicklungspolitik (DIE), the Blavatnik School of Government at the University of Oxford, the African Centre for Technology Studies (ACTS), and The Energy and Resources Institute, prepared by the ClimateSouth Project team of Sander Chan, Thomas Hale, Kennedy Mbeva, Manish Kumar Shrivastava, Jacopo Bencini, Victoria Chengo, Ganesh Gorti, Lukas Edbauer, Imogen Jacques, Arturo Salazar, Tim Cholibois, Debora Leao Andrade Gouveia, Jose Maria Valenzuela, Alexa Waud, Abhishek Kaushik, Kavya Michael, Mekhala Sastri, Rhea Puri, Ria Rahiman, Victor Onyango. Available: <https://www.geg.ox.ac.uk/research/climate-south>

transnational networks, we are likely systematically missing many actions in the global South. This is an important area for further research.

Shift from recording ambition and potential to tracking progress and results

NAZCA began as an effort to record the scale and scope of climate action by cities, states/regions, businesses, and other actors, in order to give Parties increased confidence that they too could take ambitious actions. Over the past years, the research community has become much better at tracking actions and has developed methodologies to estimate their potential contributions.⁷ However, as we switch to implementation, we need to also understand what contributions non-Party stakeholders have made, and what additional scope these achievements give us all to move further, faster. This will require further methodological development and better data availability, but is necessary for tracking progress toward the Paris goals. NAZCA and the Yearbook should aim to include much more information on these topics going forward.

⁷ Angel Hsu et al., "[A Research Roadmap for Quantifying Non-State and Subnational Climate Action](#)," *Nature: Climate Change*. 9, pp. 11–17 (2019)