



UNFCCC Secretariat Recognition and Accountability Framework

Draft Implementation Plan with respect to Net-Zero Pledges of non-State actors and Integrity Matters

(version 0.1 – 4 June 2023 – for stakeholder engagement)

I. Introduction

1. A global transition in multiple interrelated economic, social and natural systems is already underway both in response to the expected impacts of climate change and also to deliver a global balance of emissions and removals (global net-zero). The pace and scale at which this transition occurs will determine the extent to which we can avert the worst impacts of climate change, through limiting the increase in global temperature and adapting to the inevitable impacts of climate change. The UNFCCC is the central global convening mechanism to facilitate the radical collaboration required to make this transition both effective and equitable.
2. This transition requires the active contribution and input from all levels of society and accelerating the pace of action requires trust that all stakeholders are delivering on their commitments. Specifically with respect to net-zero commitments of non-state actors, the report of the United Nations Secretary-General's High-Level Expert Group on the Net Zero Emissions Commitments of Non-State Entities - "Integrity Matters: Net Zero Commitments by Businesses, Financial Institutions, Cities and Regions" (the Integrity Matters report) has delivered a guiding vision of what credibility means and what must be done to ensure trust that delivery of this commitments is occurring.
3. The following sections of this document outline the core elements of the implementation plan to achieve graduated progress towards translating that guiding vision into a practical reality. Through the implementation of this plan all non-state actors will have clarity that their commitments will be publicly recorded, their progress independently verified, their successes and best practice recognized and their challenges acknowledged. The data derived from this work will be used to unlock faster implementation and higher levels of ambition in the global transition required to meet the aim of the Paris Agreement and ensuring effective follow through to the outcomes of the first Global Stocktake.
4. The UNFCCC secretariat looks forward to a deep collaboration with all stakeholders in further elaborating and then delivering on this plan and its release marks the beginning of a new phase of recognizing leadership by and enhancing transparency of progress toward the delivery of net zero commitments of non-party stakeholders.
5. The plan will be implemented iteratively over the coming 18 months through COP28 and up to COP29 and further delivery beyond this will be driven by the lessons learned over this initial phase.

6. The UNFCCC secretariat will deliver this work as part of a broader exercise of upgrading the Global Climate Action Portal and ensuring that all voluntary commitments for climate action and cooperative climate initiatives by non-Party stakeholders are recognized on the Platform and are subject to greater validation and progress reporting. This broader work responds to the invitation from Parties to the Convention and the Paris Agreement
7. In using this plan for recognition and accountability for others, the UNFCCC secretariat also publicly commits to holding itself to account for delivery. A progress report on delivery will be released in advance of each UNFCCC session commencing at COP28 and a public dialogue will be held during each session for stakeholders to highlight their experiences in engaging in the implementation of this plan.

II. Background

8. The Integrity Matters report contains 10 recommendations which form the common global reference point for determining the integrity of non-state actor initiatives and commitments and the credibility of progress towards their achievement. These recommendations have been welcomed by the Parties to the Convention and the Paris Agreement.¹
9. Recommendation 8 refers to increasing transparency and accountability and provides the following recommendations for non-state actors:
 - Non-state actors must annually disclose their greenhouse gas data, net-zero targets and the plans for, and progress towards, meeting those targets, and other relevant information against their baseline along with comparable data to enable effective tracking of progress toward their net-zero targets.
 - Non-state actors must report in a standardised, open format and via public platforms that feed into the UNFCCC Global Climate Action Portal (GCAP) to address data gaps, inconsistencies and inaccessibility that slow climate action.
 - Non-state actors must have their reported emissions reductions verified by independent third parties. Special attention will be needed to build sufficient capacity in developing countries to verify emission reductions.
 - Disclosures ought to be accurate and reliable. Large financial and non-financial businesses should seek independent evaluation of their annual progress reporting and disclosures, including opinion on climate governance, as well as independent evaluation of metrics and targets, internal controls evaluation and verification on their greenhouse gas emissions reporting and reductions.
10. It also highlights, among other issues, the need for initiatives and alliances to report *“annually to the UNFCCC Global Climate Action Portal on the progress and any changes made, and provide an overall assessment of members’ performance”* and the importance of *“a global central digital repository of climate disclosures that encompasses all reporting data points”* that is *“overseen by the UNFCCC and feeds into its Global Climate Action Portal”*.
11. In response to these recommendations, the Secretary General reiterated the critical importance of reporting by voluntary initiatives of non-state actors through the UNFCCC’s

¹ Decision 1/CP.27, paragraph 64 and Decision 1/CMA.4, paragraph 92

Global Climate Action Portal (GCAP) and the need to improve GCAP as a data portal. He further emphasized that *“we must work together to fill gaps from the lack of universally recognized credible third-party authorities – and we must strengthen mechanisms positioned to conduct this verification and accountability process. It is my deep belief that the UNFCCC should play a decisive role – and I invite its Executive Secretary to present a plan early next year”*.

12. This document outlines the UNFCCC secretariat’s response to this request from the Secretary General addressing:
 - a. How the UNFCCC secretariat will ensure that there is a common accessible public record of:
 - i. Pledges;
 - ii. Transition Plans;
 - iii. Progress reports
 - b. How the UNFCCC secretariat will ensure that appropriate validation and verification is provided for each of these in order to assure the public of their integrity and credibility. This process will recognize the leadership of those delivering robust and credible contributions to net zero targets.

III. Implementation plan

A. How will UNFCCC ensure that there is a common accessible public record of Pledges Plans and Progress reports?

13. **Pledges and Plans:** Coalitions and initiatives mobilizing net-zero pledges will be invited to register on the Global Climate Action Portal and to report annually on how they are aligning their criteria and efforts with Integrity Matters.
14. Individual non-State entities who are members of coalitions/initiatives² will be able to:
 - a. Register their net-zero pledges into GCAP through a standardized format that will reflect the detailed credibility criteria established by HLEG to consider a pledge credible;
 - b. Submit their transition plans that will set the course to achieve their net-zero targets.
15. GCAP will be technically upgraded to allow for this direct submission. UNFCCC secretariat will produce a guidance to be followed by entities who are members of coalitions/initiatives to register their net zero pledges and submit their plans. The guidance will include information on which entities can submit the pledges and plans; the information that they should contain and the notification to the entities that their pledges and plans will be subject to the progress tracking and verifying system that will be put in place according to this Plan (see B. below).

² The UNFCCC secretariat will also consider the need to establish a process for non-State entities, who are not members of coalitions/initiatives, to register pledges and submit plans directly on GCAP

16. During 2023, the UNFCCC secretariat will work with relevant stakeholders to determine how information in pledges and plans can be submitted in a way that increases the robustness of the whole accountability system. The guidance of the secretariat will then be transformed into standardized templates to submit net zero pledges and transition plans for publication in GCAP. This will allow for a better system of determining the credibility of pledges and plans and of verifying the progress reported against the pledges and plans.
17. **Progress reports:** Annual disclosure of all value chain emissions and use of carbon credits will be required to analyze progress with respect to the registered plans. While GCAP will be the United Nation's data access point for all stakeholder commitments, it is not intended that GCAP will act as a reporting platform for *individual* non-State entity GHG data and progress reports. Rather it is expected that data on individual entities will be transmitted in *aggregate* format by other existing reporting platforms.
18. These platforms will be expected to provide the information in agreed formats and free of charge. The UNFCCC secretariat has already established such reporting through collaboration with CDP (formerly the Carbon Disclosure Project). The UNFCCC secretariat is also partnering with the Climate Data Steering Committee and NZDPU in the development of a public utility which will be available free of charge for entities to provide their core progress reporting on all greenhouse gas emissions and carbon credit usage. The ongoing upgrades of GCAP will account for these developments in reporting platforms and provide access to additional aggregation platforms as appropriate.
19. **Expected deliverables:** In support of this plan the UNFCCC secretariat will deliver, following appropriate stakeholder consultation:
 - a. An upgraded Global Climate Action Portal which allows individual entities who are members of coalitions/initiatives to register net zero pledges and transition plans to the GCAP and for initiatives and coalitions to submit annual collective progress reports;
 - b. Guidance and standardized reporting templates for the submission of net zero pledges and transition plans;
 - c. Guidance on how non-State entities who are not members of registered coalitions or initiatives can register their pledges and plans;
 - d. Partnerships with reporting platforms to ensure that progress data is aggregated and made publicly available through the Global Climate Action portal.
20. **Timeline:**
 - a. September 2023: individual initiatives and entities who are members of coalitions/initiatives will be able to report net zero pledges and transition plans to GCAP;
 - b. September 2023: indicative process established for individual entities who are not members of coalitions/initiatives to report pledges and plans;
 - c. March 2024: the guidance of UNFCCC will be transformed into standardized templates to submit net zero pledges and transition plans for publication in GCAP.

B. How will UNFCCC ensure that appropriate validation and verification is provided in order to enable assurance with respect to the public of their integrity and credibility?

21. While there is a universal recognition of the need to ensure that progress is tracked, that failure to implement is identified and reported and that progress is fairly reflected, there is currently a wide diversity of approaches employed to deliver this. This patchwork of approaches and reports can be counterproductive with contradictory messaging making it difficult to understand where progress has or has not been achieved. This confusion impacts policymakers, investors and businesses making choices across their supply chains.
22. A core output of this Plan must therefore be a more robust overall analysis of the net zero pledges and transition plans and the data whereby progress is reported.
23. **Pledges:** HLEG recommendation 1 (Announcing a Pledge) underscores the need for pledges to be generated using a robust methodology consistent with limiting warming to 1.5°C with no or limited overshoot verified by a third party. The report acknowledges that there is currently no existing universal and credible third-party verifier. To address this the UNFCCC secretariat will create a working group of pledge verification entities to ensure exchange of best practice, consistency in approaches and alignment of approaches with the HLEG recommendations. These pledge verifiers will be expected to confirm their assessment of the pledges registered in GCAP and the methodology employed in the verification.
24. **Transition Plans:** The pathway of graduated progress from current practice to net-zero will differ by entity, by sector, and by geography, with the challenges faced in that transition comprising a mixture of unique internal actions and culture changes, as well as broader contributions to systemic change. The heart therefore of turning a credible pledge into tangible delivery is a transition plan built on the evolving value chain of each entity. In validating the credibility of plans the UNFCCC secretariat considers it appropriate to follow a two track approach:
 - a. Convening those entities who conduct regular and publicly available assessments to identify the commonalities and divergences in their approaches and methodologies and document the benefits and most appropriate uses of these approaches so that the global community has a common understanding with which to read these independent assessments;
 - b. Convening a group of independent experts to guide the creation of appropriate analysis processes of transition plans of individual entities and recommend approaches to assure their progress towards alignment with the recommendations of the Integrity Matters report.
25. **Progress reports:** Verification of reported emissions towards a net zero pledge will require the creation of a universally accepted approach to third party verification of annual emission inventories. In the ongoing implementation of this Plan the UNFCCC secretariat will assess challenges with respect to the availability and consistency of third party verifiers for annual emissions inventories and the appropriate verification cycles and approaches required in different sectors, entity scales and geographies. The creation of a centrally accredited pool

of verifiers remains an option in addition to collaboration with existing national accreditation authorities.

26. **Expected deliverables:** In support of this plan the UNFCCC secretariat will deliver:
- a. A working group of pledge verification entities guided in their work by the Integrity Matters report and provide assurance that their work can be authorized by the UNFCCC Executive Secretary for recognition on GCAP;
 - b. An independent expert group for to develop recommendations on validation approaches for transition plans;
 - c. An assessment of approaches to ensure third party verification of emissions data and recommendations to enhance consistency of such verification;
 - d. A technical support unit to support the established groups
27. **Timeline:**
- a. July-August 2023: launch expression of interest for initial working group of pledge verifiers and through identification of verifiers by entities submitting pledges;
 - b. September 2023: criteria established by the Executive Secretary for continued inclusion of pledge verifiers in the working group and recognition of their verification on GCAP;
 - c. September 2023: establish an independent review group to establish process and systems for transition plan analysis;
 - d. November 2023/COP28: announcement of process and systems for transition plan analysis;
 - e. November 2023-ongoing: analysis of transition plans and processes for transition plan assurance in accordance with the process established by the independent review group and in coordination with relevant UN entities and the Secretary General's Climate Action team;
 - f. By November 2023: recommendations related to the consistency of third party verification of emissions data and approaches to accreditation of verifiers;
 - g. At COP28: a report on progress achieved in establishing this recognition and accountability system and results delivered to date by the system;
 - h. At COP28: A further elaboration of the implementation by the UNFCCC Executive Secretary

IV. Next steps

28. To implement the Plan UNFCCC secretariat will proceed immediately to create inclusive and consultative process to receive stakeholder inputs and feedback to deliver on the expected outcomes as per the timeline presented in II above.
29. Further consideration will be given to how the accountability framework can support the outcome of the first Global Stocktake and the implementation of its outcomes.
30. Consultation will be undertaken on creating a sustainable funding model for the ongoing delivery of this work.