

To
COP31, COP30 and COP29 Presidencies

15 July 2026

Email: presidencies@unfccc.int

Dear Presidencies,

Subject: Submission to the Belém Mission to 1.5 Call for Inputs

The Business Council for Sustainable Development Australia (BCSDA or BCSD Australia) welcomes the opportunity to contribute to the Belém Mission to 1.5.

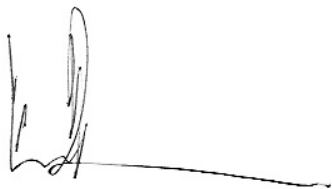
BCSDA is the Australian Network Partner of the World Business Council for Sustainable Development. It works with Australian businesses and partners across multiple sectors of the economy to advance sustainable development by aligning business performance with long-term economic, environmental and social outcomes.

BCSDA contributes to international processes because Australia's sustainable development is connected to international cooperation, markets, investment and the actions of the wider community of nations. This submission provides an Australian business-informed contribution focused on the conditions needed to turn climate plans into practical delivery.

BCSDA has not included commercially sensitive information in this submission. Any member input used in finalising the submission will be treated on an aggregated and non-attributed basis unless attribution has been expressly approved.

This submission draws on BCSDA's policy work, public evidence and relevant international business council materials. It is also consistent with WBCSD's 2026 focus on moving from ambition to execution through corporate performance and accountability, emissions reduction, value chains, and education and capacity building.

Yours faithfully



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Executive summary

The Mission is focused on implementation: identifying high-impact opportunities, barriers and actionable solutions to accelerate Nationally Determined Contributions and National Adaptation Plans, with a report to be released ahead of COP31 for decision-makers, including policymakers, business, technology innovators and investors.

BCSDA's core proposition is this: **NDCs and NAPs are more likely to mobilise delivery at scale when they are supported by investable project pipelines, clearly allocated responsibilities, credible revenue models, enabling public action and practical measures that sustain community legitimacy.**

BCSDA recommends that the Belém Mission focus on five implementation priorities:

- **Recommendation 1:** Encourage Parties to establish the framework conditions for costed, accountable and investable NDC and NAP implementation including through voluntary delivery compacts of the kind proposed in this submission, where useful.
- **Recommendation 2:** Prioritise the delivery bottlenecks most likely to slow emissions reduction and resilience: grids, storage, permitting, skills, clean product demand, adaptation finance and project preparation.
- **Recommendation 3:** Build country-led investment platforms that combine public finance, concessional capital, guarantees, private investment and project preparation around nationally determined priorities.
- **Recommendation 4:** Strengthen reciprocal public and business accountability, including durable policy settings, accountable public enabling actions, credible business transition planning, value-chain data, procurement alignment, physical-risk management and community engagement.
- **Recommendation 5:** Make adaptation a mainstream investment and competitiveness issue, not a residual public cost.

These priorities are directly relevant to Australian business and Australia's international climate engagement. Australia's experience with transmission and grid development, storage and firming, responsible critical-minerals development, industrial transformation, workforce capability and exposure to physical climate risks illustrates the importance of moving from broad commitments to practical implementation. Australian exporters in emissions-intensive and low-emissions product markets can also be affected by differences in emissions accounting, product standards and trade-related climate requirements.

Central proposition: NDCs and NAPs should become delivery compacts

The next phase of climate action should place greater emphasis on the conditions required for implementation. BCSDA recommends that the Belém Mission encourage Parties to establish nationally appropriate arrangements that make NDC and NAP implementation costed, accountable and investable.

BCSDA does not propose a uniform institutional model. Governance, legal, fiscal and administrative arrangements differ between countries. A voluntary Delivery Compact is one possible way of bringing relevant implementation information together. Illustrative elements could include:

1. **A short list of priority sector actions**, not a broad catalogue.
2. **Costed investment needs**, including public, private and concessional finance requirements.
3. **A bankable project pipeline**, including project preparation needs.
4. **Clear responsibility** within the relevant national institutional arrangements, including coordination across levels of government where necessary.
5. **A finance strategy** identifying investment needs, revenue arrangements, material risks and possible public or private financing responses appropriate to national circumstances.
6. **A business delivery role**, including transition planning, investment, procurement, data and workforce contribution.
7. **An approach to affected communities and Indigenous Peoples** that is consistent with applicable law, existing obligations, local circumstances and negotiated arrangements.

8. **Proportionate and accessible implementation reporting** covering relevant policy milestones, finance mobilisation, project delivery and adaptation outcomes.

These elements are illustrative rather than prescriptive. A Delivery Compact should not replace an NDC, NAP or domestic planning process, and its content, institutional form and reporting arrangements should remain nationally determined.

Priority action areas

BCSDA recommends that the Belém Mission focus on **five priority** action areas.

Priority 1: Grid, storage and clean electricity delivery Low-emissions electricity and electrification are central to many credible decarbonisation pathways. Electrification at the necessary pace will depend on timely grid expansion, storage, demand flexibility, reliable connection processes, capable institutions and skilled workforces. The most important implementation actions are:

- faster transmission and distribution planning;
- coordinated renewable energy zones;
- storage and demand-response markets;
- streamlined connection processes;
- early community engagement and benefit-sharing;
- procurement and planning signals for clean electricity demand.

This is not simply an energy-sector issue. It is a whole-economy productivity, competitiveness and investment issue.

Priority 2: Industrial decarbonisation and clean product demand Heavy industry requires more than general emissions targets. It needs credible demand for lower-emissions products and infrastructure coordination across energy, transport, water, ports, industrial land and workforce planning. Governments should prioritise:

- sector transition plans;
- clean product standards and procurement;
- appropriately designed demand-support or risk-sharing mechanisms where there is a demonstrated market failure, subject to value-for-money, competition and fiscal-sustainability safeguards;
- industrial precinct planning;
- support for first-of-a-kind projects;
- infrastructure for electrification, renewable hydrogen where viable, low-carbon fuels and circular materials.

Business also has responsibilities. Companies seeking public support or policy certainty should be expected to demonstrate credible transition planning, transparent emissions data, supplier engagement and alignment between public commitments and capital allocation.

Priority 3: Adaptation and resilient infrastructure Adaptation should be treated as an economic and investment priority. Climate impacts affect assets, insurance, supply chains, productivity, workforce safety, health systems, food systems and regional communities. NAPs should therefore include:

- national and regional physical climate-risk diagnostics;
- resilience standards for infrastructure and buildings;
- early warning systems and anticipatory action;
- water, heat, flood and fire resilience programs;
- public-private resilience investment pipelines;
- insurance and risk-sharing mechanisms;
- locally led adaptation, including meaningful engagement with First Nations peoples and affected communities.

Adaptation is now a balance-sheet, insurance, infrastructure and workforce issue for governments and business.

Priority 4: Value-chain data, standards and accountability Implementation depends on data that governments, investors and companies can use. The Belém Mission should encourage practical and interoperable systems for:

- emissions measurement and reporting;
- product-level carbon data;
- Scope 3 and supplier data;
- transition-plan credibility;
- physical-risk disclosure;
- adaptation and resilience indicators;
- project-level implementation tracking.

Better data should not become a reporting burden detached from delivery. The test is whether data improves investment decisions, procurement, risk management, accountability and emissions reduction.

Priority 5: Skills, capability and delivery institutions Climate plans can stall at implementation where institutions and workforces lack the capacity to deliver. Priority capability gaps include:

- energy system planning;
- project preparation;
- procurement;
- permitting;
- climate finance;
- engineering;
- transition planning;
- emissions accounting;
- adaptation planning;
- community engagement;
- regulatory implementation.

The Belém Mission should recommend that countries and international partners invest in practical delivery capability, not only high-level policy dialogue.

Finance and investment: move from priorities to pipelines

A recurring finance barrier is not only the availability of capital, but also the shortage of financeable projects, clear risk allocation, credible revenue models and capable delivery institutions. Country-led investment platforms may be useful for aligning:

- public finance;
- concessional capital;
- multilateral development bank support;
- guarantees and risk-sharing instruments;
- project preparation facilities;
- private capital;
- technical assistance;
- adaptation finance.

The appropriate mix of finance and risk-sharing tools should be determined by national circumstances. Public support should be targeted, additional, transparent and subject to value-for-money, competition and fiscal-sustainability disciplines.

Any platform should be organised around nationally determined priorities rather than donor or investor preferences. For business and investors, the key question is whether a climate plan can be translated into projects capable of reaching financial close. For governments, the key question is whether public finance is being used to unlock delivery that would not otherwise occur.

Reciprocal public and business commitments

Business delivery depends on credible public policy. But business credibility also depends on what companies do themselves. BCSDA recommends that the Belém Mission recognise reciprocal responsibilities. Governments should provide clear and durable policy settings, coordinated infrastructure and workforce planning, timely and

properly resourced approvals, transparent procurement and funding rules, interoperable standards, proportionate data requirements and accountable implementation of the enabling actions for which public institutions are responsible. Businesses should strengthen:

- transition planning;
- capital allocation alignment where feasible;
- emissions measurement and value-chain transparency;
- procurement of lower-emissions goods and services;
- physical climate-risk management;
- supplier capability building;
- workforce planning;
- community engagement;
- disclosure of implementation barriers and lessons.

This matters because climate delivery cannot be framed only as governments de-risking private investment. Public support and policy certainty are most defensible where business also improves transparency, accountability and implementation quality.

Technology and sector pathways

Technology choices should reflect national circumstances. The submission of CEBDS, the Brazilian Business Council for Sustainable Development, provides a useful example of business coalitions identifying electrification and biofuels as complementary decarbonisation levers across transport, energy, agriculture and minerals. The broader lesson is that countries should not be pushed into generic technology lists. They need sector pathways that reflect:

- energy resources;
- industrial structure;
- infrastructure readiness;
- land and water constraints;
- workforce capability;
- supply-chain access;
- community impacts;
- financeability.

Technology deployment should be supported by standards, certification, skills, maintenance capability and supply-chain development. Without these conditions, technology announcements may not translate into durable emissions-reduction or adaptation outcomes.

Nature, land use and water

NDC and NAP implementation also depends on land availability, water security, ecosystem condition and effective land-use planning.

Parties should identify material nature-related dependencies, impacts and trade-offs; strengthen landscape and water planning; support ecosystem resilience and restoration where appropriate; and provide for long-term stewardship and monitoring. Nature-based solutions should complement, not substitute for, necessary emissions reductions.

Implementation approaches should also recognise that energy, mining, agriculture, infrastructure, conservation and adaptation objectives may compete for land and water. These trade-offs should be addressed transparently through nationally appropriate planning and decision-making processes.

Indigenous Peoples and community legitimacy

Climate implementation often involves major projects affecting land, water, cultural heritage, livelihoods and local communities. Delivery is more durable where affected people are engaged early, impacts and benefits are addressed transparently, and project arrangements reflect applicable law and local circumstances.

The Belém Mission should recognise the importance of:

- early and sustained engagement before key decisions are finalised;
- respect for the rights and interests of Indigenous Peoples and affected communities, consistent with applicable law;
- appropriate protection and treatment of Indigenous knowledge and cultural heritage;
- transparent approaches to impacts and benefits;
- credible environmental safeguards;
- local employment and procurement opportunities where appropriate;
- accessible grievance and remedy mechanisms; and
- long-term relationship management.

International frameworks can support good practice, but they should complement rather than replace domestic legal obligations, place-based relationships and negotiated agreements. In the Australian context, durable delivery depends on locally appropriate engagement and agreement-making with First Nations peoples affected by a project or policy.

International cooperation

BCSDA recommends that international cooperation under the Belém Mission focus on practical implementation support. The most useful areas are:

1. **Project preparation:** helping countries convert priorities into investment-ready pipelines.
2. **Finance mobilisation:** using concessional finance and guarantees to reduce risks that private capital cannot reasonably carry alone.
3. **Technology deployment:** supporting operation, maintenance, standards and supply chains, not just technology transfer announcements.
4. **Capability building:** training regulators, planners, procurement teams, financiers and technical workforces.
5. **Data interoperability:** aligning emissions, product, transition-plan and adaptation data.
6. **Trade and standards interoperability:** improving consistency and mutual understanding across emissions-accounting methods, product standards, certification, verification and trade-related climate requirements, while maintaining environmental integrity and avoiding duplicative or unnecessarily burdensome compliance.
7. **Regional partnerships:** supporting clean energy, critical minerals, low-carbon fuels, resilient infrastructure and responsible supply chains.
8. **Adaptation finance:** building investable resilience pipelines, especially where benefits are public, distributed or difficult to monetise.

As jurisdictions introduce or expand carbon-related border measures and low-emissions product requirements, methodological inconsistency can create cost and uncertainty for affected exporters and supply-chain businesses.

International cooperation should be judged by whether it improves implementation, not by the number of initiatives created.

Proposed Belém Mission recommendation

BCSDA recommends that the Belém Mission report include the following recommendation:

The COP31, COP30 and COP29 Presidencies should encourage Parties and partners to establish nationally appropriate framework conditions for costed, accountable and investable NDC and NAP implementation. Voluntary Delivery Compacts may provide one practical approach by bringing together priority actions, indicative investment requirements, relevant public and private responsibilities, project pipelines, community-engagement arrangements and proportionate implementation reporting. Their content and institutional design should remain nationally determined.

This approach is consistent with the Mission's implementation focus while recognising differences in national institutions, legal arrangements, fiscal capacity and development circumstances.

Conclusion

The Belém Mission to 1.5 can make its strongest contribution by improving the quality of implementation.

BCSDA supports nationally determined approaches that establish the conditions for climate plans to guide investment and delivery. This requires clear and durable public-policy settings, credible business accountability, financeable project pipelines, capable institutions, reliable data, skilled workforces, respect for applicable rights and obligations, and locally legitimate engagement.

The test is not whether NDCs and NAPs contain enough ambition on paper. The test is whether they can guide real decisions by governments, investors, businesses and communities.

BCSDA would welcome further engagement with the Presidencies and stakeholders as the Belém Mission develops its report ahead of COP31.