International Chamber of Commerce

Submission on the Belém Mission to 1.5 – July 2026

The International Chamber of Commerce (ICC) is the institutional representative of 45 million companies in more than 170 countries, ranging from multinational corporations to small and medium-sized enterprises (SMEs), business associations and local chambers of commerce – working across all sectors around the globe. ICC supports the ambition of the Paris Agreement and through its role as principal business voice to the UNFCCC has been mobilising business to create opportunities and pathways towards limiting global warming to 1.5°C and achieving net zero emissions by 2050.

Context

The global business community applauded the creation of the Belém Mission to 1.5 at COP30 (hereafter the Mission), aimed at supporting the ambition and delivery of nationally determined contributions (NDCs) and national adaptation plans (NAPs) and accelerating implementation, strengthening international cooperation and mobilising investment. The approach from the COP31, COP30 and COP29 Presidencies to focus their work and report on the action areas and solutions with the highest impact potential to keep 1.5°C within reach and strengthening adaptation and resilience in this context is important.

As new initiatives continue to emerge across the process, it will be important to ensure that they complement and reinforce one another, avoiding proliferation and duplication of efforts. We would like to offer the following reflections on priority areas where we consider that the Mission can add the greatest value.

<u>Question 1:</u> What action areas and solutions have the highest impact potential to support the submission, ambition and implementation of NDCs and NAPs?

Credible, investable and implementable NDCs and NAPs can play a pivotal role in shifting critical financing flows by incentivising both governments and the private sector to align investments with climate mitigation and adaptation objectives. As the principal policy frameworks setting out governments' climate priorities and plans, they can provide the policy certainty, predictability and confidence needed to guide long-term investment decisions. They can also enable value-chain decarbonisation by establishing clear incentives, expanding access to renewable energy, supporting markets for low-carbon materials, and encouraging supplier engagement and credible emissions data across value chains.

Together, these signals can accelerate the development and deployment of the finance, technologies and solutions required to achieve the goals of the Paris Agreement.

While some countries are providing clearer investment signals through their recently submitted NDCs and NAPs – including by reflecting outcomes of the first Global Stocktake decision, in particular elements from paragraph 28 on accelerating the energy transition, and strengthening adaptation planning – significant gaps remain. Two key considerations are of particular importance:

- Mobilising and scaling greater private finance is essential to support NDC and NAPs implementation, and deliver resilience and development goals, particularly in developing and emerging economies.
- Capital will not flow at scale without clearer policy signals and better-aligned incentives that improve risk-return profiles and attract investment into the transition.

ICC therefore considers the following priority areas for policy action to have the greatest potential to support the ambition and implementation of NDCs and NAPs, that the Mission should take in account:

Priority action areas for NDCs

1. **Translate energy transition goals into robust, implementable NDCs:** The energy transition outcomes agreed under paragraph 28 of Decision 1/CMA.5 should be reflected in NDCs through clear and coherent domestic policies, sectoral priorities and investment frameworks. While initiatives to develop global roadmaps, including the Brazilian roadmap on transitioning away from fossil fuels, can provide useful direction, the real acceleration of the energy transition will depend on how these commitments are translated into national implementation through NDCs, strong enabling policies and regulatory frameworks.

   Recognising that there is no one-size-fits-all approach when it comes to the energy transition and no single model can apply across economies is critical in this regard. Countries have different starting positions in terms of energy mix, resource endowments, infrastructure, institutional capacity and development priorities, making nationally determined pathways central. Policies should look holistically at demand- and supply-side opportunities, enable flexible technology pathways, and avoid the premature retirement of existing assets. Such flexibility should however not delay efforts to accelerate the energy transition, weaken NDC ambition, or prolong high-

emitting assets where viable low-carbon alternatives exist.

In this context, accelerating renewable energy deployment, electrification and energy efficiency will be critical. Energy efficiency should be prioritised as a fundamental enabler of the energy transition and one of the fastest and most cost-effective ways to reduce emissions while strengthening energy security, affordability and competitiveness. NDCs should therefore include ambitious policies to accelerate both energy efficiency and clean electrification, through, *inter alia,* minimum energy performance standards and enabling frameworks for clean electricity.

2. **Scale climate finance and mobilise private capital to accelerate the energy transition, particularly in EMDEs.** Finance is the most critical enabler of climate action and essential to implementing NDCs at the pace and scale required. Yet access to affordable and scalable finance remains insufficient, particularly in Emerging Markets and Developing Economies (EMDEs), where high capital costs and perceived investment risks continue to constrain investment in energy infrastructure and industrial transformation. In this context, NDCs should be underpinned by clear financing and investment strategies and roadmaps that identify priority sectors, project pipelines, and the policy and financial instruments needed to mobilise private capital. Finance strategies should also include demand-side measures, such as strategic public procurement, and explore pathways to redirect, repurpose and reform inefficient fossil fuel subsidies that do not address energy poverty or just transition objectives and reallocate them to accelerate clean energy access, support vulnerable communities and small businesses, and enable a fair and inclusive transition.

   In addition, we see an important role for MDBs and DFIs to become greater catalysts for private investment through expanded use of guarantees, blended finance and risk-sharing instruments. Finally, it is also important to carefully assess and address macroprudential regulations that currently unintentionally constrain private investment flows to EMDEs.

3. **Expand and scale carbon pricing and high-integrity carbon markets.** A strong domestic mitigation and carbon removal framework should be the cornerstone of countries' climate action plans. Mitigation efforts should follow a hierarchy that prioritises direct emissions reductions, with high integrity carbon markets and international cooperation under Article 6 of the Paris Agreement used as effective complementary tools for residual emissions and to scale up broader climate finance for mitigation and adaptation. Robust MRV, environmental integrity and avoidance of double counting

are also essential in this regard.

Carbon pricing and high-integrity carbon markets are among the highest-impact tools for strengthening both ambition and implementation. Expanding carbon pricing can deliver emissions reductions in a cost-effective and technology-neutral manner while providing the long-term investment signals needed to scale low-carbon technologies. At the same time, accelerating the implementation of Article 6 and supporting high-integrity voluntary carbon markets can mobilise private finance, reduce mitigation costs and channel investment towards high-quality mitigation activities, particularly in EMDEs. Carbon markets should complement, rather than replace, direct emissions reductions.

4. **Advance harmonised approaches to carbon emissions accounting.** Delivering NDCs will require a significant increase in the production, trade and use of low-carbon products, yet inconsistent carbon accounting methodologies continue to increase transaction costs and limit comparability across markets. Governments should therefore support convergence towards globally harmonised product-level carbon accounting, building on existing and new international initiatives, such as the Technical Expert Panel on Carbon Accounting formed by a partnership between ICC and Carbon Measures, to improve transparency, strengthen demand for low-carbon products and provide clearer investment signals across global value chains. As entity-level reporting remains essential for corporate disclosure, risk management and regulatory compliance, product-level accounting should complement, rather than replace, scope 1, Scope 2 and Scope 3 reporting and align with GHG Protocol/ISO/SBTi integrity, while avoiding duplication with other existing accounting standards.

Priority action areas for NAPs

To strengthen the ambition, submission and implementation of NAPs, the Mission should prioritise three mutually reinforcing action areas:

1. **Strengthen pathways for private-sector participation and investment:** Governments should develop clearer pathways for business engagement in NAP design and implementation, in particular pipelines of bankable adaptation projects. Businesses are already on the front lines of climate impacts, facing operational disruptions, infrastructure damage, supply chain vulnerabilities, and productivity losses. Yet private-sector engagement remains constrained by a limited commercial case for adaptation investments, particularly where benefits materialise over long-term horizons and are distributed across multiple stakeholders. Strengthening the

investment dimension of NAPs would help create clearer signals for investors and mobilise the private capital needed to complement limited public resources.

2. **Improve climate-risk information, data and transparency:** Effective adaptation planning and investment depend on access to consistent, decision-useful climate-risk information. Businesses and financial institutions require robust data to assess vulnerabilities, identify opportunities and allocate capital effectively. Yet climate-risk information remains fragmented and difficult to access across many jurisdictions. Strengthening access to high-quality, open climate-risk information, improving physical-risk disclosures and increasing alignment around adaptation metrics and indicators would support both policymaking and investment decisions. Greater clarity on how the adaptation targets and indicators being developed to support the implementation of the GGA can inform business action and investment, would also be important.

3. **Ensure policy coherence through integrated adaptation planning:** Adaptation should be embedded across national policy frameworks – including infrastructure, agriculture, water, energy, health, industrial and investment strategies – rather than treated as a standalone climate objective. Integrating adaptation into broader economic and development priorities would strengthen the resilience of both human and natural systems, improve policy coherence and ensure that NAPs function as effective implementation and investment frameworks.

<u>Question 2:</u> What is required to further strengthen international cooperation to enhance ambition and enable the effective implementation of NDCs and NAPs?

Greater international cooperation will be particularly important in the following areas to support enhanced ambition and effective delivery of NDCs and NAPs:

Structured public-private collaboration

The Mission should help establish platforms to foster new and sustained public-private partnership models at local, national and international levels to identify implementation barriers, share practical experience, and accelerate the deployment of climate solutions.

More systemic engagement between governments, investors and industry can help develop investment-ready project pipelines and enabling policy frameworks, improve the alignment of climate priorities with private capital, and strengthen the bankability of

transition investments. It can also facilitate the exchange of best practices, enhance transparency and data sharing, and support more effective mobilisation of domestic and international finance.

Cooperation on technology deployment and diffusion at scale

Business has a key role to play in helping society meet the climate challenges but can only do so in an environment that supports innovation. The Mission provides an important opportunity to strengthen the global conversation and cooperation on scaling innovation and technology as key enablers of ambitious climate action. Rapid deployment, diffusion and adaptation of existing and emerging technologies at scale, requires stronger international cooperation to accelerate technology flows through trade, investment, value chains, licensing, standards and partnerships, while also enabling countries to build the skills, institutions and markets needed to absorb, adapt and improve technologies for local circumstances.

Work and discussions in these areas should involve the UNFCCC Technology Mechanisms and other initiatives outside the UNFCCC to ensure complementarity, leverage existing expertise and strengthen collaboration between governments, business and research institutions in building inclusive, resilient and effective innovation ecosystems.

Coherence and cooperation across climate implementation initiatives

Strengthening international cooperation also requires greater coherence across the growing landscape of implementation initiatives under the UNFCCC, including the Global Climate Implementation Accelerator, initiatives under the Action Agenda, and the New Climate Implementation Bridge. Clarifying how these initiatives complement one another, reducing fragmentation and duplication, and creating clearer entry points for governments, businesses and other stakeholders would help maximise their collective impact and support more effective implementation of NDCs and NAPs.

Continuing discussions on the interlinkages between the UNFCCC and the other Rio Conventions, and considering where greater collaboration can support the implementation of NDCs and NAPs is also important. This could include recognising the co-benefits of measures within NDCs and NAPs that contribute simultaneously to climate, biodiversity and land objectives, as well as improving interoperability and usability across climate, nature and sustainability data, thereby simplifying reporting and disclosure frameworks to reduce duplication and unnecessary burdens for businesses – while maintaining ambition and reporting and disclosure quality. Any such efforts should be guided by practical implementation needs, demonstrate clear added value for NDC and

NAP implementation, and preserve the distinct mandates and governance structures of each Convention.

Policy coherence and coordinated solutions

The Paris Agreement underscores the importance of international cooperation and coordinated solutions at all levels, driving the highest possible ambition and effective action and it provides a framework for financial, technical and capacity building support to those countries that need it.

As governments introduce measures and policies to accelerate the low-carbon transition, greater attention is needed to their interaction with trade, investment and technology cooperation, particularly for developing economies. The Mission should provide a space for strengthening dialogue among countries on how to achieve greater transparency, policy coherence and international cooperation, and ensure that climate policies reinforce – rather than fragment – global efforts to accelerate the transition.