

IISD Submission to the Belém Mission to 1.5

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This submission is made in response to the invitation from the COP 29, COP 30 and COP 31 Presidencies, on the Belém Mission to 1.5. IISD welcomes the opportunity to provide a submission.

Contact: Natalie Jones (njones@iisd.org), Jeffrey Qi (jqi@iisd.ca).

1. What action areas and solutions have the highest impact potential to support the submission, ambition and implementation of NDCs and NAPs?

A. Reform fossil fuel subsidies

Fossil fuel subsidy reform offers a powerful mechanism to implement and raise ambition of NDCs. In the first global stocktake outcome phasing out fossil fuel subsidies was highlighted as a priority action (CMA, 2023). Global fossil fuel subsidies were approximately USD 921 billion in 2024, down from the post-Ukraine invasion peak of USD 1.7 trillion in 2022 (Do et al., 2026). However, with crude oil prices surging above USD 100 per barrel in April 2026, subsidies are projected to spike again as governments implement short-term consumer cushions. This reactive cycle exposes public finances to volatile international markets, locks in emissions, and severely drains the fiscal space required to scale up clean energy alternatives.

The removal of fossil fuel subsidies could cut global emissions by 6 to 12% by 2030, yet most nationally determined contributions (NDCs) neglect this critical area (Kuehl et al., 2021). Only 10 NDCs 3.0 mentioned fossil fuel reform (Yanguas Parra et al., 2025), whereas in the previous version of the NDCs, 29 of 198 parties referenced fossil fuel subsidies with 16 making actual commitment to reform (Van Asselt et al., 2023). To significantly enhance



ambition and implementation of the NDCs and NAPs, priority should be placed on increasing the level of transparency and accountability in identifying fossil fuel subsidy measures as well as developing and implementing fossil fuel subsidy phase-out plans.

1. **Conducting comprehensive fossil fuel subsidy inventories:** Developing transparent and comprehensive inventories of fossil fuel subsidies is a critical first step toward reform. These inventories can help governments identify existing support measures and create a stronger basis for integrating fossil fuel subsidy reform into more ambitious NDCs.
2. **Developing and implementing fossil fuel subsidy phase-out plans:** Phasing out fossil fuel subsidies is a cost-effective and high-impact way to align public finance with sustainable development objectives and climate commitments. A phase-out plan should adopt a whole-of-government approach and include a clear timeline, enabling it to be integrated into both NDCs and NAPs.

Together, stronger subsidy identification and well-designed phase-out plans can help countries raise ambition and improve implementation.

B. Develop national roadmaps for the just, orderly and equitable transition away from fossil fuels

Transforming energy systems and transitioning away from fossil fuels are critical steps for countries to meet their NDCs on time. Calls from the COP 30 Mutirão Decision for countries to develop NDC implementation and investment plans show international support for domestic energy transition planning (CMA, 2025). As countries consider strategies to meet their climate plans in a just, orderly, and equitable manner, **national TAFF roadmaps can be used as implementation tools to construct or coordinate and streamline existing domestic plans for meeting NDC and LT-LEDS goals** in a manner that complements international coordination while raising ambition. We have the following recommendations to assist countries in developing strong national roadmaps that best support NDC implementation (Picciariello et al., 2026).

1. **TAFF roadmaps should address both fossil fuel production and fossil fuel consumption** (where applicable), for maximum effectiveness. This includes directly reducing the production of fossil fuels, as well as reducing demand through whole-economy electrification and power sector decarbonization, while simultaneously scaling clean energy systems to meet demand. Whether the national roadmap more heavily emphasizes fossil fuel production or consumption, and how the roadmap addresses these factors, will depend on how fossil fuels are incorporated into each country's economy (i.e., if they are a net importer or exporter of fossil fuels), the extent to which a country is reliant on fossil fuel revenues, the amount of fossil fuel reserves in a country, and other country-specific factors.
2. **Roadmaps should include just transition as a clear TAFF strategy.** Just transition measures are essential to ensuring a timely, efficient and inclusive transition process. The strategy should emphasize strong participatory governance structures which allow and encourage participation by a wide range of potentially



marginalized groups in the decision-making process. This strategy should also feature measures that support workers, communities, and regions currently dependent on fossil fuel industries.

- 3. To achieve an orderly and just transition, TAFF roadmaps should include strong, targeted investment planning.** Financing infrastructure for grid management and electrification as well as renewables is important to ensure a smooth national transition. For fossil-fuel dependent economies especially, planning should also emphasize public revenue replacement, managing stranded asset risks, and financial system stability. To minimize the economic burden of transition, non-debt-creating public finance and blended finance strategies should be explored.

Finally, a national TAFF roadmap must contain clear time horizons and robust monitoring, reporting, and verification (MRV) systems. A transparent roadmap with plans for structured follow-up ensures accountability and compliance and helps to build institutional capacity through data systems, regulatory oversight, and enforcement mechanisms. Relatedly, internal policy coherence through a whole-of-government approach and long-term clarity are important to ensure on-time implementation of NDCs.

C. Develop Paris-aligned transition plans for energy state-owned enterprises

Globally, energy state-owned enterprises (SOEs) are the dominant force in the fossil fuel industry, responsible for over 50% of oil and gas production, and 60% of coal production and coal power generation (Nelson et al., 2014; Heller and Mihalyi, 2019). They consistently invest around \$350 billion in capital expenditure on fossil fuels every year in G20 countries alone (Do et al., 2026). The investment decisions they make therefore have far-reaching implications for energy markets, communities, jobs, public revenues, and pollution. There is strong evidence that SOEs can be (and have been) used to accelerate transition in the energy sector (Halsey et al., 2025; Laan et al., 2023; PLN, 2021; Viswanathan et al., 2022). National governments can take several actions, which will support implementation of NDCs:

1. Develop Paris-aligned SOE transition plans with concrete timelines encompassing decarbonisation, investment and diversification, alignment with national energy security and climate goals, and transition-related risks and opportunities.
2. Revise government mandates for energy SOEs from purely fossil fuel companies to technology-agnostic providers of energy security, allowing them to diversify where possible.
3. Introduce targeted incentives (tax rebates, dividend flexibility, or concessional finance) for SOEs investing in clean energy, green hydrogen, storage, or efficiency.
4. Increase transparency about investments, ambitions, and progress, including periodic progress reporting on renewable deployment, emission management, energy efficiency and just transitions.



5. Contribute to comprehensive just transition plans led by state and national governments.

D. Accelerate and sustain adaptation planning and implementation

Adaptation planning and implementation are essential for safeguarding lives and livelihoods and protecting vulnerable ecosystems. The National Adaptation Plan (NAP) process remains the main vehicle for countries to identify and address their medium- and long-term priorities for adapting to climate change and establish the systems and capacities needed to make adaptation an integral part of their development planning, decision making, and budgeting.

Adaptation efforts so far have typically been incremental, fragmented, and ad hoc. Delivering on the Global Goal on Adaptation requires a shift towards long-term, systemic change, and this depends on effective adaptation planning. Good planning brings different actors together, improves coordination, and creates collective ownership of a shared problem. It ensures interventions are informed by science and Indigenous knowledge, and that they are directed where they are needed most. It makes implementation easier, more effective, and more durable over time.

The priority is to accelerate the transition from planning to implementation, and to sustain it. Many countries have made significant progress in formulating their NAPs, but translating these plans into financed, delivered, and monitored action remains the central challenge. Accelerating and sustaining this work depends on robust systems to track progress and manage adaptively. Comprehensive, gender-responsive and socially inclusive monitoring, evaluation, and learning systems allow countries to understand what is working, for whom, and under what conditions, to course-correct over time, and to meet their transparency reporting obligations. These systems will also be central to operationalising the Belém Adaptation Indicators in a way that reflects national circumstances.

The International Institute for Sustainable Development hosts the NAP Global Network, which supports developing countries in advancing their NAP processes and fosters sustained, country-led adaptation. The NAP Global Network has made a separate submission to the Belém Mission to 1.5 that addresses adaptation planning and implementation in greater depth, including the enabling conditions, finance, and practical approaches needed to accelerate and sustain progress. We encourage the Presidencies to consider that submission alongside this one.

E. Strengthen coherence and synergies between the implementation of climate, biodiversity and land actions

Creating synergies involves the intentional coordination of planning and implementation of national climate, biodiversity and land commitments and strategies—NDCs, NAPs, national biodiversity strategies and action plans (NBSAPs) and land degradation neutrality targets—



at the national level to achieve enhanced results greater than if each policy instrument were implemented by itself. Creating synergies creates multiple co-benefits, seeks more effective outcomes, and ensures efforts in one area do not undermine progress in another.

Synergies require intentional coordination, involving establishing dedicated mechanisms for cross-ministerial dialogue and collaboration, mapping shared objectives and stakeholders, aligning monitoring and reporting frameworks, and ensuring that climate, biodiversity, and land stakeholders are actively involved in one another's planning and update processes. Several countries have demonstrated promising institutional approaches, including interministerial committees and whole-of-government coordination arrangements that bring these communities together around shared priorities.

Nature-based solutions and ecosystem-based approaches offer a practical bridge for the synergistic national implementation of the Rio Conventions. They provide a concrete mechanism for translating national climate, biodiversity, and land commitments into integrated, locally relevant action. Applied across forestry, agriculture, water management, and coastal protection, they are adaptable to diverse national contexts and scalable from the local to the national level.

Coherence across instruments also strengthens the case for international finance. A coherent set of priorities and needs across NDCs, NAPs, NBSAPs, and land degradation neutrality targets presents a unified national vision, which donors and multilateral funds increasingly look for as evidence that climate, biodiversity, and land investments are coordinated rather than duplicative. Alignment supports more streamlined use of limited financial and human resources, reduces transaction costs, and strengthens accountability for results. Practical tools, such as the checklist for NDC-NAP-NBSAP synergies developed by IISD, GIZ, and WWF (Qi et al., 2024), can support national policymakers in identifying and acting on these opportunities throughout the planning and implementation phases.

2. What is required to further strengthen international cooperation to enhance ambition and enable the effective implementation of NDCs and NAPs?

A. Strengthening international cooperation for the transition away from fossil fuels

The challenges countries face in planning and implementing transitions away from fossil fuels (TAFF) are inherently systemic, interconnected, and linked to global markets (Meckling & Hughes, 2018). Acting in isolation can expose countries to political, economic, social, and fiscal risks that cannot be managed unilaterally (Bradley & Lahn, 2018). International cooperation, coordination, and support are therefore essential (Newell, 2026).



Strengthening international cooperation for climate plans implementation requires moving beyond ambition-setting toward coherent, coordinated delivery. As TAFF enters its implementation phase, the central challenge is ensuring that national plans, international coalitions, and sectoral initiatives align in the same direction of travel, create synergies among each other, and add to more than the sum of their parts.

Below, we list some strategies that could contribute to this international cooperation and alignment which have been discussed in more detail in Picciariello et al (2026):

1. Structured fossil fuel producer-consumer (importer-exporter) coordination to manage systemic risks

Countries cannot manage the social, economic, and fiscal risks of energy transition in isolation. International cooperation should create dedicated spaces for importer–exporter dialogue to align the pace of fossil fuel production decline with demand reduction, reducing the risk of price volatility, stranded assets, and disorderly economic shocks. The Brazilian COP 30 Presidency's global TAFF roadmap initiative and the Santa Marta process offer live opportunities to operationalize such coordination, which is currently absent from multilateral forums. Coordinated political signals from these processes can provide the predictability that markets, investors, and governments need to advance on the TAFF.

2. Common standards, MRV, and transparency for accountability

Enhanced transparency is a prerequisite for meaningful international cooperation. Common monitoring, reporting, and verification frameworks for TAFF and just transition outcomes can build trust, enable progress tracking, and strengthen accountability between and within nations. The Paris Agreement's Enhanced Transparency Framework provides a foundation to build on, and processes such as the Belém Mission to 1.5 and the Global Implementation Accelerator can serve as structured follow-up mechanisms that maintain momentum beyond individual COP cycles.

3. Inclusive, country-driven process design

For international cooperation to enhance rather than undermine national ownership, processes must be country-driven, incorporate expert and multistakeholder inputs including civil society, workers, Indigenous Peoples, and the private sector, and complement rather than duplicate existing initiatives. Effective coordination requires clearly specified scopes and modalities, with structured follow-up anchored in the UNFCCC and Paris Agreement architecture. The lessons from first-mover alliances such as the PPCA, BOGA, COFFIS, CETP as well as the Fossil Fuel Fuel Treaty Initiative demonstrate that credible coordination spaces can reduce first-mover risks and support knowledge sharing.

Acting in coordination reduces volatility, distributes the burdens of transition more equitably, and enables developing countries to access the security, economic, and industrial benefits of the global energy transition.



4. Follow-up processes and proactive alignment

Effective international coordination requires structured follow-up processes to maintain momentum and translate dialogue into action. Regular check-ins, reporting mechanisms, and opportunities for iteration can help track progress, share lessons, and adapt coordination efforts as transition needs evolve.

Anchoring within the multilateral climate frameworks of the UNFCCC and Paris Agreement is crucial. Proactive alignment across the processes convening in 2026 — from the Brazilian Presidency's roadmap to the Global Implementation Accelerator and COP 31 preparations — represents a pivotal opportunity to build the international architecture needed for delivery.

B. Delivering on the tripling of adaptation finance goal through predictable, long-term, grant-based finance

Insufficient finance remains one of the main barriers to adaptation, and strengthened international cooperation must close this gap. The UN Environment Programme's Adaptation Gap Report 2025 estimated the adaptation finance gap at between USD 284 billion and USD 339 billion per year for developing countries, while only around 5% of total climate finance flows are currently directed toward adaptation. The COP 30 commitment to triple adaptation finance by 2035 is an important political signal, but even if it is met, a substantial annual shortfall will remain. Cooperation under the Mission should therefore focus not only on the headline figure, but on ensuring that finance is delivered at the scale, pace, and quality that adaptation planning and implementation require.

The quality and predictability of adaptation finance matter as much as the volume. To support effective NAP processes, finance needs to be predictable and long-term, so that countries can plan and sustain adaptation action across multiple cycles rather than depending on short-term, project-by-project support. It should be delivered in forms that do not deepen developing countries' debt burdens, principally through grants and other concessional instruments, to avoid exacerbating the very vulnerability that adaptation finance is meant to reduce. The share of climate finance dedicated to adaptation should move toward parity with mitigation to reflect the growing needs of the most vulnerable countries, and pledges should include specific allocations for adaptation as a matter of good practice.

Finance must also reach those who need it most, particularly the least developed countries and Small Island Developing States, and delivery mechanisms should enable inclusive, gender-responsive, and effective adaptation. Streamlining and simplifying access, and improving the predictability of disbursement, would allow countries to move from planning to delivery far more quickly.



C. Avoiding duplication and building on existing initiatives and mechanisms for adaptation support

The Mission should add value by avoiding duplication of efforts and maximising effectiveness through clear linkages with existing mechanisms, including initiatives under the Action Agenda and non-Party stakeholder efforts. Connecting the Mission's adaptation work to established platforms and partnerships will help ensure coherence and reduce fragmentation across the wider adaptation landscape.

D. Linkages to the formal negotiations

The Mission's work should reinforce, and draw coherence from, the formal process under the UNFCCC and the Paris Agreement. In particular, we see value in linkages to:

- the operationalisation of the Belém Adaptation Indicators, including guidance on applying them at national and subnational levels through the NAP process;
- improving the coherence of the adaptation architecture under the UNFCCC and the Paris Agreement, so that the NAP process, the Global Goal on Adaptation, and related workstreams reinforce rather than duplicate one another; and
- the implementation of the Gender Action Plan, ensuring adaptation ambition is delivered through gender-responsive and socially inclusive action.

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Head Office

111 Lombard Avenue, Suite 325
Winnipeg, Manitoba
Canada R3B 0T4

Tel: +1 (204) 958-7700

Website: www.iisd.org

Twitter: @IISD_news



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