

Dear COP29, COP30 and COP31 Presidencies,

I am writing on behalf of the Smart SME Platform (Akıllı KOBİ), a Türkiye-based SME digitalization platform and member of the ICC Small Business Champions Network, in response to the Call for Inputs circulated through the UNFCCC Business and Industry Constituency.

SMEs account for a material share of business-sector greenhouse gas emissions and are central to employment and supply chains, yet their capabilities and constraints are not consistently reflected in how NDCs and NAPs are actually delivered. This is a practical gap, not a conceptual one. Most of the technologies needed already exist and can reach SMEs at scale through business intermediaries that are already in place.

High-impact solutions

Digitalization supports both mitigation and adaptation. On mitigation, energy sub-metering, process monitoring and simplified digital carbon accounting help SMEs find operational savings and generate measurable data. When standardised, aggregated and quality-controlled, this data can support programme-level and sectoral NDC monitoring. On adaptation, geolocated climate-risk information, water-risk monitoring and digital business-continuity tools allow SMEs to assess exposure and prepare for disruption. The same tools can help identify and aggregate investable SME adaptation projects, supporting more effective deployment of the adaptation finance called for at COP30.

In our experience the binding constraint is not technology but the conditions for adoption: upfront cost, limited internal expertise and weak implementation support. Three mechanisms address this:

- Blended finance: Concessional loans, grants and performance-based incentives for affordable digital tools and the implementation services around them.
- Delivery through existing intermediaries: Chambers of commerce, sector associations and national SME platforms rather than new standalone structures.
- Phased adoption: Basic measurement and operational improvement first, more advanced management and reporting later. Many SMEs simply will not begin if enterprise-level compliance systems are imposed from day one.

International cooperation

Cooperation should focus on a common core of proportionate sustainability data requirements for SMEs, shared definitions, interoperable formats, reusable data fields and simplified methodologies, so that data collected once can serve multiple customers, financiers and public programmes without enterprise-level compliance costs falling on small firms.

Alongside this, open standards, data portability and interoperable digital public goods should be supported next to affordable commercial solutions. This reduces vendor lock-in while leaving room for both public and private sector innovation.

Finally, national SME digitalisation platforms should be connected to the UNFCCC Technology Mechanism through existing National Designated Entity and CTCN Network channels. Implementation experience from these platforms could also inform the work of the Technology Executive Committee, so that tools and standards that work can scale across jurisdictions instead of being rebuilt each time.

We would be glad to share implementation experience from our SME network and to take part in technical consultations ahead of the Mission's report before COP31.

Sincerely,

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