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European Committee of the Regions

GLOBAL COVENANT of MAYORS for CLIMATE & ENERGY

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GLOBAL TASKFORCE OF LOCAL AND REGIONAL GOVERNMENTS

ICLEI Local Governments for Sustainability

Regions4 Sustainable Development

UCLG United Cities and Local Governments

UNDER 2° Secretariat CLIMATE GROUP

THE LOCAL GOVERNMENTS AND MUNICIPAL AUTHORITIES (LGMA) CONSTITUENCY

THE LGMA CONSTITUENCY COP31 POSITION

The Paris Agreement will only be delivered through the engagement of all levels of government

The LGMA provides detailed recommendations, context and proposed negotiating text in our Guidance for Negotiators, which accompanies this COP31 Position and sets out how each ask can be operationalized.

cities-and-regions.org/cop31-lgma-position

As the LGMA, we believe that for the global climate agenda to succeed, the decision-making powers of all levels of government, including local, regional and subnational governments, must be championed, heard and fully mobilized to drive more ambitious, fair and inclusive climate action.

In the United Nations Framework Convention on Climate Change (UNFCCC) process, the LGMA Constituency represents the interests of governments and authorities of municipalities, towns, cities, counties, territories, provinces, regions and states, as well as devolved governments and other subnational jurisdictions (hereafter "local, regional and subnational governments"), many of which hold regulatory, fiscal and planning powers essential to implementation on the ground.

The multilateral process has built ambition through Nationally Determined Contributions (NDCs), the Global Stocktake (GST) and Conference of the Parties (COP) outcomes. With the United Nations Environment Programme (UNEP) recently concluding that exceeding 1.5°C is now unavoidable, we face greater risks of irreversible impacts, tipping points and the limits of adaptation. All levels of government will increasingly face difficult decisions under uncertainty: what to protect, what to rebuild differently and what becomes of places that may become uninhabitable.

Therefore, the next phase of this process must be implementation, with subnational governments as indispensable partners for national governments and international institutions. We need solutions that reflect delivery realities, rooted in local contexts, particularly in the Global South, where subnational governments often have plans and priorities but lack the enabling national frameworks, devolved mandates, fiscal systems, project preparation support and access to investment needed to deliver them.

We call on Parties to the Paris Agreement, current and future UNFCCC COP Presidencies, the Coalition for High Ambition Multilevel Partnerships for Climate Action (CHAMP) endorsers, the UNFCCC Secretariat and our fellow UNFCCC observer constituencies to operationalize key solutions with all levels of government by:

1. **Achieving an energy transition outcome that recognizes and accelerates subnational delivery to return to the 1.5°C pathway**. In OECD and EU countries, subnational governments were responsible for 69% of climate-significant public investment and 63% of climate-significant public expenditure in 2019, yet their delivery capacity remains largely structurally excluded from the mitigation architecture of the multilateral process. Parties should embed clean energy electrification at the local, regional and subnational level, renewable energy deployment, energy efficiency strategies, and resilient, efficient urban and regional systems and land-use planning into the Belém Mission to 1.5, the Global Implementation Accelerator (GIA) and NDC 3.0 implementation. This means granting local, regional and subnational governments the mandate, finance and regulatory authority to drive the managed transition away from fossil fuels, before the window to reverse the overshoot of 1.5°C closes.
2. **Prioritizing an ambitious outcome on just transition** and meaningfully including subnational representation in the Belém-Antalya Mechanism for Global Just Transitions (BAM) to ensure national outcomes are rooted in local needs and realities and deliver tangible benefits that reach workers and communities at the local level.

3. **Institutionalizing multilevel climate finance through multilevel-framed architectures that empower local, regional and subnational governments** to mobilize additional resources, expand fiscal space and access predictable, affordable finance, supported by inclusive country platforms, dedicated financial intermediation (such as national and subnational public development banks) and funded expert project preparation. Multilevel climate finance access should be embedded as a core implementation principle across key finance processes, such as the Climate Finance Work Programme, the Fund for Responding to Loss and Damage (FRLD), the Global Goal on Adaptation (GGA) and the Climate Implementation Bridge, alongside strengthening the institutional and technical capacity of subnational governments to develop investment-ready projects and aggregate local priorities into scalable investment pipelines.
4. **Continuing to uphold the key role of independent science in the COP process**, providing baseline evidence to support the global climate agenda and decision making. This includes drawing on data from the upcoming Intergovernmental Panel on Climate Change (IPCC) Special Report on Climate Change and Cities and ensuring that the contributions of local, regional and subnational governments are reflected in the Second Global Stocktake**.**
5. Recognizing that implementation of the Paris Agreement requires all levels of government, as explicitly acknowledged in the Paris Agreement preamble, **creating, within an appropriate timeframe, a systematic, joint space for Parties and local, regional and subnational governments to discuss barriers to multilevel action and means of overcoming them**, in response to the upcoming release of the IPCC Special Report on Climate Change and Cities and as part of the Second Global Stocktake.
6. **Accelerating the implementation of the Global Goal on Adaptation and National Adaptation Plans (NAPs) by strengthening their alignment with and support for integrated local action** that connects climate, biodiversity, water, land-use and public health considerations. This requires mobilizing predictable adaptation finance, strengthening risk assessments and expanding early warning systems, providing knowledge and technical support to local, regional and subnational governments, and ensuring that the GGA framework recognizes and measures progress at all levels of government through its indicators.

Across the globe, local, regional and subnational governments are already showing what is possible. Many are accelerating delivery through ambitious annual implementation plans and commitments, and their experience shows how much more could be achieved through multilevel cooperation. Subnational governments are advancing vital adaptation, mitigation, clean energy electrification and just transition solutions, strengthening NDCs and NAPs and bridging local priorities to global goals. In countries that have endorsed CHAMP, local government climate commitments could close 37% of the gap between current NDCs and a Paris-aligned trajectory by 2030.

While a recent UN-Habitat report shows that 80% of submitted NDCs feature well-developed urban content, these plans need to be implemented in consultation with subnational governments. What we need now are international processes that can further enable and accelerate this progress.

The successful translation of global commitments into tangible results for communities requires close coordination among all levels of government. More systematic and meaningful engagement with local, regional and subnational governments can lead to national mitigation, adaptation and just transition plans that are policy aligned, can be implemented faster and are better tailored to the reality of communities. It also provides better territorial information, earlier identification of implementation barriers, stronger delivery capacity and greater transparency on what is happening below the national level.

This multilevel engagement strengthens the Paris Agreement's own accountability architecture: systematic subnational data flows directly improve the quality of national reporting under the Enhanced Transparency Framework, while formalized coordination structures can help to close the gap between national ambition and locally delivered implementation. A systematic multilevel space also gives Parties a more efficient channel for capacity building, closing the two-way gap where national departments often lack capacity to engage subnational partners, and subnational governments lack capacity to engage in the NDC cycle. And because subnational governments are already responsible for much of the climate-significant public investment in many countries, unlocking their access to finance is not a parallel ask but a direct lever for Parties to close their own NDC financing gaps.

The forthcoming IPCC Special Report on Climate Change and Cities is expected to provide an important scientific foundation and further evidence for the key role of local, regional and subnational governments in global climate action. By assessing and synthesizing the latest evidence on urban climate science, the report can help inform Parties' consideration of how climate policies, plans and implementation frameworks can better engage all levels of government.

COP31 offers many opportunities to reinforce cooperation across all levels of government. The development of the GIA, the Belém Mission to 1.5, the COP31 Action Agenda (with its focus on electrification, waste reduction and resilient cities), the BAM, the Climate Finance Work Programme, the Veredas Dialogue on Article 2.1(c), the FRLD, the annual GST-NDC Dialogue and the GGA indicators all offer concrete processes to close the gap between global commitments and implementation on the ground. COP31 also follows the United Nations Convention to Combat Desertification (UNCCD) COP17 and the Convention on Biological Diversity (CBD) COP17 this year, and the Rio Conventions' growing work on synergies is an opportunity to align NDCs, NAPs, National Biodiversity Strategies and Action Plans (NBSAPs) and land degradation neutrality targets in the territories that local, regional and subnational governments plan and manage. With all these opportunities for subnational contributions, now, more than ever, we need a single systematic, joint space to unlock the implementation and financing of multilevel climate partnerships.

Our asks reflect the readiness of local, regional and subnational governments to serve as essential partners to national governments in implementing the Paris Agreement, ensure resilience for our communities and deliver a just transition to the green economy. With the window to limit overshoot of 1.5°C closing, the time to work together is now.

The LGMA is also providing detailed recommendations, context and proposed negotiating text in our Guidance for Negotiators, which accompanies this COP31 Position and sets out how each ask can be operationalized.

Endorsers of the LGMA Constituency COP31 Position

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FMDV Supporting local authorities to access funding

Regions4 Sustainable Development

UCLG United Cities and Local Governments

UNDER 2° SECRETARIAT THE CLIMATE GROUP

Sons and Daughters of Africa Inc (SADA)

ABM Associação Brasileira de Municípios

UITP ADVANCING PUBLIC TRANSPORT

CPAWS-OV

Upper Denkyira East Municipal Assembly

CADIRE BUSINESS COMMUNITY INTERNATIONAL

APSDHISAR

IFLA INTERNATIONAL FEDERATION OF LANDSCAPE ARCHITECTS

CITYNET THE REGIONAL NETWORK OF LOCAL AUTHORITIES FOR THE MANAGEMENT OF HUMAN SETTLEMENTS

CHD GROUP nurturing a healthy world Holding UNECOSOC Special Consultative Status

GLOBAL CITIES HUB GENEVA

Viable Cities

Mobilise YourCity

POVERTY TRANSITION INITIATIVE PTI POVERTY EQUALS VIOLENCE

SCITECH DIPLOHUB BARCELONA SCIENCE AND TECHNOLOGY DIPLOMACY HUB

ISOCARP Knowledge for Better Cities

EACLGA EAST AFRICAN COUNTY AND LOCAL GOVERNMENTS ASSOCIATION

ACR+

MARMARA MUNICIPALITIES UNION

UCLG ASPAC United Cities and Local Governments Asia-Pacific

AIPH

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RESILIENT CITIES NETWORK

GOULBURN MURRAY CLIMATE ALLIANCE

ASARA FOR HUMANITY NETWORK

DAWN OF FUTURE
dawn-of-future.cn

AMB Àrea Metropolitana de Barcelona

EAGA
EASTERN ALLIANCE FOR GREENHOUSE ACTION

CENTRE FOR ENVIRONMENT, HUMAN RIGHTS & DEVELOPMENT FORUM - CEHRDF

CNCA

AER
Assembly of European Regions

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Ethiopian Cities Association

CYUC UCCC

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HEALTHY CITIES NATIONAL NETWORK OF TÜRKİYE

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