

Research Paper

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# The Role of Sub-state and Non-state Actors in International Climate Processes



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## Summary

- Climate action from sub-state and non-state actors such as subnational governments, cities, corporations and NGOs has very significant potential to enhance national efforts to curb CO<sub>2</sub> emissions, close the so-called ‘emissions gap’ – between current commitments and the action necessary to meet climate targets – and help move the world on to a ‘1.5°C pathway’ that would limit global warming to 1.5°C above pre-industrial levels by 2100.
- In addition to their own climate action, sub-state/non-state actors can contribute to climate governance by developing new policies and business models to support emissions cuts and build resilience. Knowledge exchange and capacity-building have a role to play in helping these innovations to spread internationally.
- Politically, measures implemented by sub-state/non-state actors can help national governments to implement existing targets faster and more effectively, while helping to build political support for more ambitious climate action.
- The post-Paris climate regime of the United Nations Framework Convention on Climate Change (UNFCCC) reflects the growing importance of sub- and non-state actors, and has featured the creation of institutional structures to engage and coordinate them.
- In the current international political environment of rising populism, the role of sub- and non-state actors may become more important than ever. However, more questions about the robustness of sub- and non-state action are also likely to be raised.
- With the 2020 deadline approaching for countries to submit details of enhanced Nationally Determined Contributions (NDCs), long-term climate strategies and other means of raising policy ambition, the next two years are set to provide significant opportunity for sub- and non-state action. Many governments are already developing ways to engage with sub- and non-state actors to identify opportunities to strengthen action by 2020.
- Key questions in this respect include (a) whether sub- and non-state actors can mobilize *across* sectors; and (b) whether action can be extended beyond the ‘usual suspects’ to include contributions from less familiar sources, such as business sectors with limited opportunities for climate action or corporations in the Global South.

## 1. Introduction

Across nearly every realm of world politics, actors other than nation states – including cities, state and regional governments, businesses, the financial sector, civil society groups and others – are playing a larger role in international governance. This trend has advanced perhaps most in the realm of global climate change. The Paris Climate Conference in 2015 proved to be a major inflection point around which the growing ‘groundswell’ of climate action became both an official part of the climate regime and an important element of the political dynamics surrounding it.

Since Paris, this trend has accelerated. The September 2018 Global Climate Action Summit in San Francisco showcased the current scale and potential of climate action. A number of reports highlighted how much action by sub-state/non-state actors has been observed (at least, via global reporting platforms), and what its potential contributions might be.<sup>1</sup> At the upper end of the range of estimates, these reports identified climate action in 9,149 cities and municipalities in 128 countries, home to 16 per cent of the global population; and in 245 states and regions in 42 countries, home to 17.5 per cent of the global population. Accounting for overlaps, this means that about a fifth of the world population lives in subnational jurisdictions that have pledged action on climate change. On the corporate side, climate action was recorded in 6,225 companies headquartered in 120 countries, representing US\$36.5 trillion in revenue, larger than the combined GDP of the US and China.

Given this massive scale, it is not surprising that sub/non-state climate action has significant potential to reduce emissions. A recent study found that global emissions in 2030 would be cut by a third (15–23 GtCO<sub>2</sub>e a year) if international cooperative initiatives such as RE100, the Global Covenant of Mayors and the New York Declaration on Forests (a) meet their goals and (b) scale up to include new actors along their current growth trajectories.<sup>2</sup> These potential emissions reductions depend on support from national governments in many cases (especially for initiatives in land use, for example, where national governments are core participants). Combined with countries’ Nationally Determined Contributions (NDCs) to avoid ‘double-counting’, the potential reductions could put the world on a path to the 1.5°C temperature goal of the Paris Agreement. While it is difficult to aggregate progress across initiatives, by 2018 about 70 per cent of the international cooperative initiatives registered on the UN’s Climate Action Portal<sup>3</sup> showed high or medium-high

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<sup>1</sup> The information below draws from the following sources: Data Driven Yale, NewClimate Institute and PBL (2018), *Global climate action of regions, states and businesses*, [http://datadriven.yale.edu/wp-content/uploads/2018/08/YALE-NCI-PBL\\_Global\\_climate\\_action.pdf](http://datadriven.yale.edu/wp-content/uploads/2018/08/YALE-NCI-PBL_Global_climate_action.pdf) (accessed 26 Nov. 2018); America’s Pledge (2018), ‘Fulfilling America’s Pledge: How States, Cities and Businesses are Leading the United States to a Low-Carbon Future’, Bloomberg Philanthropies Support LLC, <https://www.americaspledgeonclimate.com/fulfilling-americas-pledge/> (accessed 26 Nov. 2018); Global Covenant of Mayors for Climate & Energy (2018), *Implementing Climate Ambition: Global Covenant of Mayors 2018 Global Aggregation Report*, [https://www.globalcovenantofmayors.org/wp-content/uploads/2018/10/2018\\_GCOM\\_report\\_web.pdf](https://www.globalcovenantofmayors.org/wp-content/uploads/2018/10/2018_GCOM_report_web.pdf) (accessed 26 Nov. 2018); Hsu, A. et al. (2018), *Bridging the emissions gap - The role of non-state and subnational actors: Pre-release version of a chapter of the forthcoming UN Environment Emissions Gap Report 2018*, [https://wedocs.unep.org/bitstream/handle/20.500.11822/26093/NonState\\_Emissions\\_Gap.pdf?isAllowed=y&sequence=1](https://wedocs.unep.org/bitstream/handle/20.500.11822/26093/NonState_Emissions_Gap.pdf?isAllowed=y&sequence=1) (accessed 26 Nov. 2018); and Hale, T. et al. (2018), ‘Cooperative Climate Action: Global Performance & Delivery in the Global South’, Global Economic Governance Programme, <https://www.geg.ox.ac.uk/publication/cooperative-climate-action-global-performance-delivery-global-south> (accessed 26 Nov. 2018).

<sup>2</sup> Data Driven Yale, NewClimate Institute and PBL (2018), *Global climate action of regions, states and businesses*.

<sup>3</sup> Global Climate Action NAZCA (2018), ‘Global Climate Action’, <http://climateaction.unfccc.int/> (accessed 26 Nov. 2018).

output performance, meaning that they were taking the kinds of steps needed to be on track towards meeting their goals.<sup>4</sup>

Sub-state and non-state climate action has become a core feature of international climate governance and has reached a large scale. But in a context of rising geopolitical tension and domestic political contestation in many countries, serious questions are emerging regarding the role of this ‘groundswell’ in the future. Perhaps most centrally, will it deliver on its potential? Can it scale up beyond the most progressive subnational jurisdictions and businesses to shift ever larger swathes of society and the economy towards higher climate ambition? Moreover, what will its impact be on national government policies and the politics that drive them? And what role will it play, both formally and informally, in the Paris Agreement’s ‘ratcheting’ mechanism for increasing the scale of emissions reductions?

This paper reviews the role that sub-state and non-state actors have played in international climate change governance thus far, and outlines milestones and recommendations for their future engagement. Drawing on the author’s prior writing for *Global Policy* and the ‘Galvanizing the Groundswell of Climate Actions’ network,<sup>5</sup> it also compares and brings together key findings from four companion papers, each of which addresses a specific community of actors: businesses; city and regional governments; civil society; and financial institutions. Section 2 outlines the kinds of contributions sub-state/non-state actors make to climate governance. Section 3 reviews how these contributions figured in the political dynamics around Paris in 2015. Section 4 considers changes since Paris and outlines current challenges, while Section 5 concludes with recommendations for future steps.

## 2. What roles can sub-state and non-state actors play in international climate governance?

While the potential of sub-state/non-state actors to address climate change is vast, their growing role is often difficult to analyse because it is so diverse. Three overlapping forms of sub-state/non-state climate action can be identified: *individual actions* by municipal, state and regional governments, businesses or other entities; *collective actions* by networks of these actors, such as C40, ICLEI, the Under 2 Coalition and We Mean Business, among others; and *cooperative initiatives* in which different actors come together around a common goal, as seen with the New York Declaration on Forests or the Climate and Clean Air Coalition. In the latter category, cooperative initiatives often also include national governments and international organizations as key participants and drivers. While many sub-state/non-state climate actions target emissions

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<sup>4</sup> Note, this performance indicator does not measure progress towards goals, but rather evaluates whether initiatives are producing the kinds of tangible outputs (e.g. publications, conferences, workshops, regulations, physical infrastructure) they would need to take to achieve their objectives. For more details, see Hale et al. (2018), ‘Cooperative Climate Action: Global Performance & Delivery in the Global South’.

<sup>5</sup> Adapted with permission from Hale, T. (2016), ‘After Trump, the Groundswell of Global Climate Action is ever more Central to the Climate Regime’, *Global Policy*, 22 November 2016, <https://www.globalpolicyjournal.com/blog/22/11/2016/after-trump-groundswell-global-climate-action-ever-more-central-climate-regime> (accessed 26 Nov. 2018); and Galvanizing the Groundswell of Climate Actions (2017), ‘Memorandum: How Can Funders Accelerate Climate Action to 2018-2020?’, 1 March 2017, <https://www.cisl.cam.ac.uk/resources/publication-pdfs/ggca-memorandum-to-funders-on-sub-non-state-climate-action-mar-2017-1.pdf> (accessed 26 Nov. 2018).

reductions, many are also focused on adaptation or resilience, or on generating enabling conditions through finance, information exchange, technical capacity-building or other measures.

It is important to note that several features of climate change and the political dynamics around it are particularly favourable for sub-state/non-state action. This is different from the situation for some other issues in world politics, such as trade or migration. Because climate change is caused by, and also affects, nearly every aspect of the economy and society, nearly every actor has a potential role to play in addressing it. Whereas only nation states can raise or lower tariffs or accept or reject refugees, for example, all of us have scope to contribute to climate efforts.

In general terms, climate action by cities, regions, businesses and other sub-state/non-state actors can drive the transition to a safe climate. By one estimate, cities account for 70 per cent of all emissions and possess direct control over many aspects of planning, transport, energy and infrastructure that can raise or lower these emissions.<sup>6</sup> Similarly, another study estimates that just 100 companies accounted for 71 per cent of global emissions between 1988 and 2015.<sup>7</sup> The companion papers outline in more detail how different kinds of actors can affect the problem, focusing on three causal mechanisms. These are as follows:<sup>8</sup>

**Sub-state/non-state climate actions contribute directly to climate mitigation and adaptation, and mobilize resources for both.** Many sub-state/non-state actors have direct control over activities relevant for both mitigation and adaptation (e.g. transport structures in cities, electricity purchases by firms). Their decision-making structures can also make them both more ambitious and nimbler than many nation states. To the extent that their actions overlap with those of national governments, sub-state/non-state actors help countries implement and deliver their NDCs; to the extent that they do not, they close the emissions gap even further by introducing action in excess of country commitments. Equally important, many sub-state/non-state actors are reducing emissions *now*, helping the world lower emissions before 2020. Less quantifiable but critically important, many sub-state/non-state climate actions also focus on increasing resilience and adapting to the effects of climate change. Finally, many transnational initiatives exist chiefly to mobilize resources – technical knowledge, capacity-building or finances – for sub-state/non-state climate actions.

**Sub-state/non-state climate action can boost the confidence, resources and political will of governments to raise their own ambition, strengthening the Paris process.**

Alongside its direct impacts on mitigation, resilience and resource mobilization, the groundswell of climate action can play a catalytic role within national politics. First, to the extent that sub-state/non-state climate actions fit within current NDCs, they help governments deliver or

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<sup>6</sup> See Intergovernmental Panel on Climate Change (2014), 'ADP Technical Expert Meeting: Urban Environment – Statement by Renate Christ, Secretary of the Intergovernmental Panel on Climate Change', 10 June 2014, [https://www.ipcc.ch/pdf/unfccc/sbsta40/140610\\_urban\\_environment\\_Christ.pdf](https://www.ipcc.ch/pdf/unfccc/sbsta40/140610_urban_environment_Christ.pdf) (accessed 26 Nov. 2018).

<sup>7</sup> Griffin, P. (2017), *The Carbon Majors Database: CDP Carbon Majors Report 2017*, Carbon Disclosure Project, July 2017, <https://b8f65cb373b1b7b15feb-c70d8ead6ced550b4d987d7c03fcedd1d.ssl.cf3.rackcdn.com/cms/reports/documents/000/002/327/original/Carbon-Majors-Report-2017.pdf?1499691240> (accessed 26 Nov. 2018).

<sup>8</sup> The text below draws on arguments made in *Galvanizing the Groundswell of Climate Actions* (2017), 'Memorandum: How Can Funders Accelerate Climate Action to 2018-2020?'

overachieve on their pledges. This kind of accelerated implementation creates the conditions for more ambitious actions in the future. Second, because progressive sub-state/non-state action can be more ambitious than national policies, it has a powerful demonstration effect, showing governments that it is possible to set ambitious targets without impairing the economy. Third, such actions allow for policy innovations through experimentation on a local scale that can then be scaled up to the national level and diffused internationally. Fourth, bottom-up actions, particularly in the private sector, provide ‘political cover’ for decision-makers who want to be more ambitious but are vulnerable to criticism from incumbent groups. Fifth, such actions build new political and economic constituencies, such as renewable energy providers or electric car drivers, that favour and advocate more ambitious national policies. By building and strengthening pro-climate groups at the domestic level, international networks can positively influence the political climate in key countries. Finally, sub-state/non-state action builds political resilience in the face of national backsliding. For example, even as the Trump administration seeks to undo federal climate measures in the US, leading states, cities and private-sector firms are only accelerating their efforts, which may help to keep the US on track to deliver its Paris commitment.

While this sort of positive influence is the case for many sub-state/non-state actors – especially members of progressive coalitions, etc. – there are of course also groups opposing progressive action and seeking to delay or reduce climate mitigation. Industry groups especially have lobbied against bolder policies.

Strengthening national policies of course supports implementation of the Paris Agreement, but sub-state/non-state action also reinforces the United Nations Framework Convention on Climate Change (UNFCCC) process more broadly. By providing positive examples of concrete action, it helps build a narrative of inevitable transition to a low-carbon economy. More concretely, sub-state/non-state action provides crucial inputs to the UNFCCC’s Technical Examination Process; features in the ‘Action Days’ now regularly held at Conferences of the Parties (COPs); has played a critical role in informing the 2018 Facilitative Dialogue; and will perhaps do the same for future Global Stocktakes assessing progress on climate action.

### **Sub-state/non-state entities can drive change in technological and economic systems.**

Sub-state/non-state climate action is now reaching sufficient scale to shift these systems. For example, the pledges of major companies to go 100 per cent renewable are helping kick-start the technological innovations required to completely decarbonize energy production. These kinds of interventions may be particularly relevant for helping new technologies gain a commercial foothold, facilitating the identification of ‘routes to market’ that can then be scaled up. For example, the deployment of electric vehicles at scale in some cities and in corporate fleets can fundamentally alter the personal transportation market. Further up the innovation chain, groups such as the Breakthrough Energy Coalition are channelling new resources to basic R&D. Such actions by the most ambitious actors lower the costs and increase the benefits of climate action for less ambitious actors, creating a chain reaction of exponential, self-perpetuating growth in low-carbon policies and results. In this way, these changes in the real economy have the potential to shift the constellation of political power and interests around climate change over time, tipping the balance of political power away from fossil fuel-based interests and towards clean sectors of the economy.

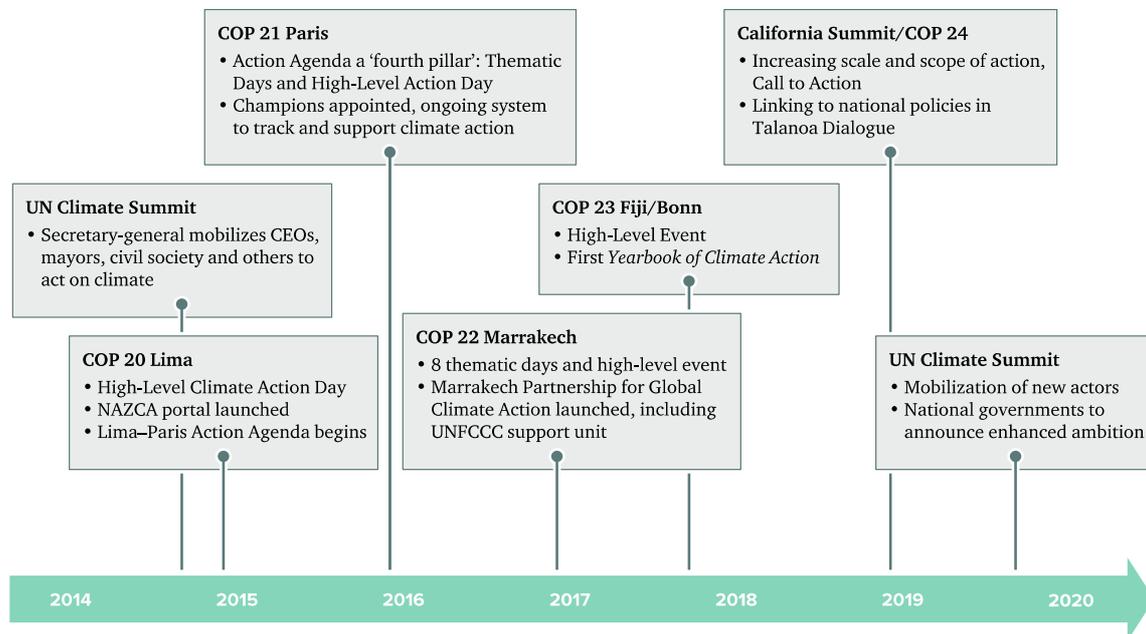
### 3. What role did sub-state/non-state actors play in the Paris Agreement?

The previous section outlined the kinds of contributions sub-state/non-state actors can make to climate governance. But how has this potential played out in practice?

While sub-state/non-state entities have been acting on climate change for decades, since 2014 there has been a more conscious and forceful effort to link this action closely to the intergovernmental process in the UNFCCC. Figure 1 traces this trend from the September 2014 UN Climate Summit to the first ‘ratchet’ of the Paris system in 2020.<sup>9</sup>

In September 2014, UN Secretary-General Ban Ki-moon organized a Climate Summit in New York, inviting not just heads of state but also mayors, CEOs, civil society groups and others. All actors – state, non-state and sub-state – were encouraged to make ambitious pledges. The secretary-general’s office had also been working for several months ahead of the summit to orchestrate dozens of initiatives bringing together various actors around specific climate goals.

**Figure 1: The growing role of subnational and non-state climate action in the UNFCCC process<sup>10</sup>**



<sup>9</sup> For more detail, see Hale (2016), ‘After Trump, the Groundswell of Global Climate Action is ever more Central to the Climate Regime’.

<sup>10</sup> Modification of figure originally presented in Hale (2016), ‘After Trump, the Groundswell of Global Climate Action is ever more Central to the Climate Regime’.

This opening of the regime to other kinds of actors was reinforced at COP 20 in Lima in December 2014. The UNFCCC and the Peruvian host government launched the Non-state Actor Zone for Climate Action (NAZCA) portal (now the Climate Action Portal), an online tool to track and aggregate information on the actions being taken around the world by sub-state and non-state actors, both individually and through joint initiatives. Shortly thereafter, with COP 21 in Paris approaching, the UNFCCC secretariat, the UN secretary-general's office and the governments of Peru and France created the Lima–Paris Action Agenda, an unprecedented attempt to orchestrate further commitments and initiatives from all actors and all sectors. The Action Agenda ended up mobilizing over 10,000 commitments from sub-state/non-state actors, and was declared a 'fourth pillar' of COP 21 by the French COP presidency.

How influential was this mobilization for the outcomes of COP 21? The perceived success of Paris has led many to claim part of the credit, and sub-state and non-state actors have been no exception. Most experts believe that the barrage of announcements and action helped generate positive 'mood music' and built a narrative of opportunity and momentum, particularly in the media and elite forums, which countries were reluctant to disrupt. It is very difficult, however, to draw causal links between the Action Agenda and specific outcomes at Paris. The companion papers outline specific instances in which certain kinds of actors have been influential, for example in respect of the role of business in carbon pricing.

At the national level, sub-state and non-state actors played an important role in shaping NDCs in some countries but not others.<sup>11</sup> For example, in Chile and India, extensive consultation with subnational jurisdictions and the private sector took place, feeding into both countries' eventual NDCs. In the US, the Obama White House actively sought to mobilize cities, businesses and others to support its position and insulate the administration from domestic critiques. In many other countries, however, NDCs were developed with very little input from sub-state or non-state actors.

In sum, it seems reasonable to conclude that sub-state and non-state action was an important driver of success at Paris, though it is difficult to say precisely to what extent.

What is unambiguous is the importance of the Paris Agreement and the COP 21 decision text in institutionalizing the role of sub-state and non-state actors in the new architecture of the UNFCCC regime.<sup>12</sup> Governments in Paris created a new system to track, support and accelerate sub-state/non-state climate action in the future. They appointed two 'High-Level Champions' to mobilize additional action from cities, states, regions, businesses, investors and others. They recognized the NAZCA portal as the global system to track such actions. They mandated that a High-Level Event be held at every COP for sub-state/non-state actors to announce new commitments and report on progress. And they decided to link the Action Agenda to the technical

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<sup>11</sup> For a global mapping of interactions between national governments and sub-state and non-state actors, see Galvanizing the Groundswell of Climate Actions (2018), 'Meeting Summary: Stepping up Climate Action at Home', 28 September 2018, <http://www.climategroundswell.org/blog-test/2018/10/15/meeting-summary-stepping-up-climate-action-at-home> (26 Nov. 2018).

<sup>12</sup> For a more detailed account, see Hale, T. (2016), "All Hands on Deck": The Paris Agreement and Nonstate Climate Action', *Global Environmental Politics*, 16:3, August 2016, Massachusetts Institute of Technology, [https://www.mitpressjournals.org/doi/10.1162/GLEP\\_a\\_00362](https://www.mitpressjournals.org/doi/10.1162/GLEP_a_00362) (accessed 26 Nov. 2018).

process in the negotiations through which countries consider new policy options they might adopt, so that sub-state/non-state action can inform national policy and vice versa.

The following year, COP 22 brought additional clarity to this process, with the Marrakech Partnership for Global Climate Action<sup>13</sup> outlining a light-touch coordination system. It specifies the role of High-Level Champions as being to foster bottom-up climate action in areas where it is needed, and to increase collaboration and linkage between bottom-up action and countries' policies. The Marrakech Partnership has enhanced the tracking and transparency around the Global Climate Action (GCA) process by creating an annual *Yearbook of Climate Action* to assess the scale and scope of sub- and non-state action, and to feed this information into countries' decision-making processes as they implement and ratchet up their own policies. The new coordination system sets criteria for sub-state/non-state actors' participation in the GCA process to enhance accountability and raise credibility. And it forms a support unit in the UNFCCC secretariat to coordinate the process, bolstered by a hybrid support network envisioned to include a mix of governments, representatives of city and business networks, international organizations and other actors.

Beyond the UNFCCC itself, sub-state/non-state actors have become more prominent in other elements of the broader climate regime. For example, sub-state/non-state actors have institutionalized themselves in the scientific processes through which the climate challenge is analysed, with a significant increase in academic attention to the subject. This shift has translated to the Intergovernmental Panel on Climate Change (IPCC), which in 2018 held a conference on cities, and which will release a special report on the subject in the next assessment review.<sup>14</sup> The special IPCC report on the impacts of global warming of 1.5°C<sup>15</sup> also included numerous references to the potential of sub-state and non-state actors to help close the emissions gap. In a different forum, there has also been increased action by some sub-state and non-state actors around climate policy in the G20 process. In 2017, companies, cities and, particularly, financial institutions worked closely with the German hosts to ensure that the Trump administration's rejection of climate science would not undermine other countries' commitments, leading to an extraordinary 'G19' statement on the subject. More recently, city groups have launched the 'Urban 20' affinity group to raise the role of cities in the G20 context.

#### 4. Other key changes since Paris

Since Paris, the prominence of sub-state and non-state climate action in international climate policy has continued to grow. Perhaps surprisingly, the election of Donald Trump in 2016, and his 2017 pledge to withdraw the US from the Paris Agreement, accelerated this trend. The grassroots upwelling of support for Paris from US states, cities, businesses, civil society and other actors has crystallized into national initiatives such as 'We Are Still In' and 'America's Pledge'. A recent report estimates that these actions could be enough to put the US within striking distance of meeting its

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<sup>13</sup> See the Marrakech Partnership text, available at UNFCCC (2016), *Marrakech Partnership for Global Climate Action*, [http://unfccc.int/files/paris\\_agreement/application/pdf/marrakech\\_partnership\\_for\\_global\\_climate\\_action.pdf](http://unfccc.int/files/paris_agreement/application/pdf/marrakech_partnership_for_global_climate_action.pdf) (accessed 26 Nov. 2018).

<sup>14</sup> Information on the IPCC's engagement with cities is available at Cities IPCC (2018), 'Cities 2018 Conference IPCC', <https://citiesipcc.org/> (accessed 26 Nov. 2018).

<sup>15</sup> IPCC (2018), 'Global Warming of 1.5 °C', <http://www.ipcc.ch/report/sr15/> (accessed 26 Nov. 2018).

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2025 NDC target.<sup>16</sup> While the US represents an extreme case, the global presence of US subnational and non-state actors – including, notably, in an alternative US pavilion adjacent to the negotiating venue at COP 23 – has raised the issue’s salience in the broader regime.

But larger political shifts, towards populism domestically and geopolitical tension internationally, of which Trump’s election is both a symptom and a further driver, raise serious questions about the robustness of sub-state and non-state climate action in a changed environment.

Perhaps the most important question is whether sub-state and non-state climate action can expand beyond the ‘usual suspects’. As global platforms and initiatives have expanded, in many areas they are probably now close to including all of the ‘easy’ targets – those companies, subnational governments and other groups that are naturally inclined towards climate action. These first movers have acted largely because they are responsive in some way to pro-climate consumers, investors or voters, or because their activities can benefit from decarbonization. It remains to be seen, however, if actors for whom climate action is more distant or more difficult will follow suit. In some areas, for example with electric vehicles or renewable energy, the first movers stand a strong chance of creating a critical mass of activity that can ‘tip’ laggards into more ambitious action over time. As technology improves, businesses models mature and governments work out supportive regulatory frameworks, climate action becomes easier for all. In other areas, for example land use, the barriers to action are highly localized and so incumbents may be less responsive to such diffusion dynamics.

The extent to which climate action expands further will largely be determined by countries in the Global South. Global platforms currently capture much more participation and leadership in climate action from developed countries than from developing countries. A recent report found that only around a quarter of sub-state and non-state actors participating in UN-registered cooperative initiatives were from the Global South, despite a rising number of developing-country participants since Paris and particular attention to this issue from the Moroccan and Fijian COP presidencies.<sup>17</sup> It is unclear, however, if this apparent lack of participation is just a ‘visibility gap’. Global platforms tend to only capture climate action that a) actually has the label ‘climate’;<sup>18</sup> and b) is linked to transnational networks of some kind. For both these reasons, current estimates likely miss a substantial portion of sub- and non-state climate action around the world, and likely systematically underrepresent actors from developing countries, adaptation activities and more informal arrangements.

However, research on sub- and non-state action is rapidly expanding. Interestingly, we see an increasing number of platforms emerging in the developing world that aim to catalyse and increase the visibility of sub-state and non-state climate action at a regional or national level, including the ActionLAC platform in Latin America,<sup>19</sup> the Africa Non-State Climate Action (ANSCA) platform and

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<sup>16</sup> America’s Pledge (2018), ‘Fulfilling America’s Pledge: How States, Cities and Businesses are Leading the United States to a Low-Carbon Future’.

<sup>17</sup> Hale et al. (2018), ‘Cooperative Climate Action: Global Performance & Delivery in the Global South’.

<sup>18</sup> There will be many who are responding to technology or making other changes to cut emissions and/or adapt to climate change, without their activities being registered as climate action *per se*.

<sup>19</sup> See ActionLAC Acción Climática Latinoamericana (2018), ‘What is ActionLAC?’, <https://actionlac.net/en/> (accessed 26 Nov. 2018).

the Chinese Business Climate Action initiative. To the extent that these kinds of platforms can close the visibility gap, they may reveal much more sub-state and non-state climate action than previously recorded. This would be good news for the climate and suggests that sub-state/non-state climate action has significant scope to grow.

An equally important question for the post-Paris context is how the groundswell of climate action organizes itself to maximize its impact on national governments and the international process. Around Paris, high-level political leadership from the UN secretary general, the UNFCCC secretariat, and the Peruvian and French COP presidencies, as well as from governments such as that of the US, helped to galvanize sub-state and non-state climate action and channel and strengthen its political impact. The relationship between political leaders and the sub-state/non-state climate action networks was at times difficult and confused, but it broadly pushed in a common direction. After Paris, such cohesion has been difficult to maintain in an era of what can be called ‘distributed leadership’. However, this was probably inevitable and not necessarily a negative development as long as the actions taken move emissions reductions towards internationally agreed climate goals. Having unified or coherent platforms is important at key moments in the UN process for the reason noted above, but less so with respect to on-the-ground actions. Here bottom-up, often spontaneous, initiatives that are unburdened by the bureaucracy of coordination may be more effective.

In theory, the High-Level Champions should play a central role in orchestrating and mobilizing climate action, as the parties to the UNFCCC gave them an explicit mandate to do so at COP 21. In practice, this has proven difficult for several reasons. First, many envisaged the Champions as high-profile CEOs, mayors or similar individuals, with the global stature and real-world connections to mobilize climate action. Since Paris, however, COP presidencies have instead nominated ministers or lower-ranking government officials to play this role. Second, though the Champions are appointed for two-year terms, in practice they have required significant start-up time to figure out how to be most effective in their role, meaning that important momentum is lost with each transition. Each presidency has also naturally brought its own priorities to the role, raising a question of consistency across time. Third, the Champions have had very few resources to support them in their mandate. While the French COP presidency invested heavily in the Lima–Paris Action Agenda, subsequent presidencies have not provided their Champions with comparable personnel or budgets. Nor have other parties and foundations provided resources to the Champions commensurate with their mandate.

With the potential of the Champions underutilized, the UNFCCC secretariat has played a larger de facto role in facilitating sub-state and non-state actor engagement with the UNFCCC process. However, the secretariat has only just this year been able to staff its support unit, the Global Climate Action team, at an adequate level, and many processes remain in development, such as updating and improving the online Climate Action Portal. Given these constraints, most of the secretariat’s engagement with climate action has inevitably focused on preparing the mandatory events and reports, as opposed to mobilizing and furthering concrete actions from a growing range of actors. The tendency has often been ‘centripetal’, in effect pulling the Marrakech Partnership closer into the UN process, as opposed to ‘centrifugal’, which would imply pushing the UN process outward to connect with sub-state and non-state action on the ground.

In sum, while the UNFCCC process has managed (albeit slowly) to improve its recognition and tracking of sub-state and non-state climate action, much of the mobilization of action has been left to others. This year, the Global Climate Action Summit in California provided a key international moment for advancing sub-state and non-state climate action. Hosted by the governor of California, the summit was co-chaired by a diverse range of actors, including the businessman and former mayor of New York (and also the current UN special envoy) Michael Bloomberg, private businessman Anand Mahindra, UNFCCC Executive Secretary Patricia Espinosa, Chinese climate negotiator Ambassador Xie Zhenhua, and UN youth envoy Jayathama Wickramanayake. The summit succeeded in attracting significant attention and in mobilizing over 500 new commitments, but the deeper questions regarding the future of sub-state and non-state climate action still loom large, making the next two years critically important for the future of this issue.

## 5. Upcoming milestones and recommendations

The ultimate test of the Paris Agreement is whether its ratchet mechanism can support a sufficiently large and rapid increase in collective ambition to limit climate change to manageable levels. The first and perhaps most critical test of this mechanism will come in 2020, when countries have the opportunity to update or ‘enhance’ their NDCs and to submit long-term strategies. Current political conditions weigh against success, with few major emitters yet close to raising ambition. Three key milestones will inform this process between 2018 and 2020, each of which creates opportunities for sub-state and non-state actors.

First, in 2018, under the leadership of the Fijian COP presidency, the Talanoa (originally ‘Facilitative’) Dialogue has created a process to discuss the (in)adequacy of current targets and what can be done to increase them. The Talanoa Dialogue has been structured in a robustly open fashion, allowing sub-state and non-state actors to directly contribute to the proceedings. Indeed, many sub-state and non-state actors have organized their own Talanoa sessions around the world.<sup>20</sup>

Second, the UN secretary-general has announced another Climate Summit for September 2019. Like the 2014 version, this will be the key political moment to push national governments to raise ambition. As in 2014, the summit will look to mobilize a wide range of leaders from cities, companies and civil society to assist in this effort by delivering their own enhanced ambition.

Third, between these two milestones, domestic processes to discuss increasing ambition will be critical. These processes include the revision of NDCs in advance of 2020, and the development of long-term strategies, sectoral processes and other nationally specific planning (for example, China’s current five-year plan ends in 2020, meaning preparations are starting for post-2020 targets). Many national governments are already working with sub-state/non-state actors to enhance climate action, though each country’s context of course differs.<sup>21</sup> The nature of these interactions varies according to 1) which actors are pushing for greater ambition; 2) which actors have resources and

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<sup>20</sup> For example, the city network ICLEI has organized dozens of city-level Talanoa Dialogues around the world in 2018. See ICLEI (2018), ‘First 20+ events of Cities and Regions Talanoa Dialogues announced at CitiesIPCC’, 8 March 2018, [https://iclei.org/en/Talanoa\\_Dialogue.html](https://iclei.org/en/Talanoa_Dialogue.html) (accessed 26 Nov. 2018).

<sup>21</sup> See Galvanizing the Groundswell of Climate Actions (2018), ‘Meeting Summary: Stepping up Climate Action at Home’.

authority over policymaking and implementation; and 3) the degree to which sub-state/non-state action is integrated into national climate policymaking. Several common patterns emerge:

- Through **consultation** processes, national governments seek input from sub-state/non-actors on national climate policy. In India, the national government invited state governments, academic institutes, think-tanks and NGOs to assist in the NDC formation process.
- National governments can **delegate** the implementation of specific policies and targets to sub-state/non-state actors. In China, for example, provincial governments, cities and industrial sectors are tasked with designing regionally tailored policies to achieve the national targets.
- **Orchestration** occurs when national governments call upon sub-state/non-state actors to increase their action by tapping into nationally convened platforms and resources. The Swedish government's coordinating initiative 'Fossil Free Sweden' is an example others can emulate.
- **Vertical integration** describes the full incorporation of sub-state/non-state actors into the design of national policies. This is the case in Canada, where the national climate action plan requires all provinces to be signatories. While this can ensure buy-in and agreed delegated actions, it can also result in less progressive policies due to the influence of laggard actors – especially where these are economically/politically powerful, e.g. Alberta and Ontario in Canada, coal states in Australia.
- **Advocacy coalitions** are driven by sub-state/non-state actors which come together to leverage their own voice and actions to engage with national governments in support of stronger national policies. In Japan, the Japan Climate Initiative is a cross-sectoral coalition of domestic stakeholders with aims to expand and accelerate efforts to build a decarbonized Japanese society.
- In the US, where the national government has stepped away from its commitments, sub-state/non-state actors aim to compensate for lacklustre national ambition and action through a 'do it ourselves' approach.

These milestones and possibilities provide a range of opportunities for sub-state and non-state climate action, and point the way towards higher ambition over the next years. But maximizing the potential of sub-state/non-state action will require significant effort given the strong political headwinds.

### Recommendations for cities, other subnational governments, businesses, financial institutions and civil society, and the global networks that link them

Recommendations specific to cities, states and regions, the corporate sector, financial institutions and civil society can be found in the companion papers. In addition, there is a need to:

- **Reach out to new or under-represented constituencies, especially in the Global South.** To maintain momentum, the number of cities, businesses, subnational governments and financial institutions committed to climate action will need to continue to grow even as the current community of actors deepens implementation and raises the ambition of their current

commitments. This means finding new partners and models of organization that can reach beyond the first movers. Two areas are critical. First, to bring more actors from the Global South on board, it will be necessary to align climate action targets around development goals that speak to developing-country contexts. Second, the climate action community must engage ‘difficult’ sectors that are currently far from decarbonization, such as the heat sector. An emphasis on a fair and equitable transition will be needed to reassure workers in these sectors that a climate-safe world offers them a bright future.

- **Work across constituencies.** An increasing number of initiatives are bringing different kinds of sub-state and non-state actors together on common targets, for example, the procurement of zero-emissions vehicles or the adoption of 100 per cent renewable energy. Finding more such synergies will strengthen action.
- **Align around system-wide KPIs.** The vast diversity of sub-state and non-state action often makes it difficult to track progress or identify a common narrative. The climate action community can increasingly align around common, systems-level, key performance indicators (KPIs) that help put individual and sectoral actions into a global frame. Examples include the following questions: Are you on track to be carbon-neutral by 2050? Have you identified how climate change will affect you, and have you implemented plans to adapt to impacts and manage future risks? What percentage of your money is ‘clean’ versus ‘dirty’, and by when will you shift to 100 per cent clean?

### Recommendations for national governments

- **On the way to 2020, create consultative processes or give an official role to local governments, the private sector and civil society in climate policymaking and implementation.** When national governments consult with all stakeholders, they gain a more accurate picture of what ambition is possible, and also identify policies and practices that can be scaled up nationally. Moving beyond consultation, national governments can create new processes and institutions to give local governments, the private sector and civil society a greater role in climate policymaking and implementation.
- **Call on local governments, businesses and civil society to act on climate change and empower them with platforms, resources and expertise.** National governments can empower local governments, the private sector and civil society to take climate action by providing recognition and resources. In the cases of cities, this also needs to include providing clarity on respective responsibilities so that required actions and policies don’t fall (intentionally or otherwise) through the cracks. This support can be most effective when it goes beyond simply implementing national mandates and builds the capacity of other actors to taken even more ambitious climate action.
- **Link local governments, the private sector and civil society to expertise and resources through transnational peer networks at the global, regional and national levels.** Global networks of cities, businesses and other actors offer a critical way to transmit information, expertise and resources to their constituents around the world. By linking domestic stakeholders to these networks, governments build domestic capacity to reach national goals.

National and regional information-sharing is an important complement because climate action invariably involves national and regional particularities.

### Recommendations for the UNFCCC process

- **Strengthen the power of the UNFCCC process to mobilize and catalyse sub-state and non-state action.** Building on the growing capacity to track sub-state and non-state action, parties and the UNFCCC secretariat should work to make sure that the High-Level Champions are able to deliver on their mandate to expand climate action. This will likely require increasing use of formal and informal ‘friends of the Champions’ outside the UN system, and better integrating the work of the secretariat’s support unit with the broader climate action community.
- **Beyond 2020, institutionalize the role of sub-state and non-state actors in the Paris ratchet mechanism.** As the 2018 Talanoa Dialogue is demonstrating, sub-state and non-state actors are a critical part of reviewing collective ambition. For the Global Stocktake to be effective, it will need to be able to aggregate the contributions of sub-state and non-state actors alongside those of national governments, and to understand what opportunities this creates for revising NDCs upward.

## About the author

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ISBN 978 1 78413 310 8