



**European Committee
of the Regions**

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OPINION

Towards a structural inclusion of Cities and Regions in UNFCCC COP 27

THE EUROPEAN COMMITTEE OF THE REGIONS

- highlights that the objective of global energy security is not to be considered an alternative to the Paris Agreement and calls on the Parties to speed up the shift to an energy system fully powered by renewable energy and promote energy sufficiency;
- recalls that local and regional authorities (LRAs) are responsible for providing their communities with essential services and immediate responses and relief to the consequences of climate change, such as climate-related disasters, social impacts such as energy poverty and increasing weather-related health problems, and existing inequalities that climate change deepens;
- underlines the unique position of the CoR as a driver for the implementation of climate actions at the local level and its readiness to cooperate and partner with European institutions and Parties of the Paris Agreement to further multilevel cooperation on the way to COP27 and beyond;
- reiterates the need for the formal inclusion of Regionally and Locally Determined Contributions (RLDCs), to complement the Nationally Determined Contributions (NDCs);
- welcomes the Glasgow-Sharm el-Sheikh work programme for the Global Goal on Adaptation (GGA) and highlights that LRAs are the most suitable actors to define adaptation goals, as they retain first-hand knowledge of resilience needs and solutions;
- stresses the importance of making direct funding available for LRAs to deliver climate action, as well as the need for LRAs to partner with the private sector and financial institutions;
- notes that vulnerable groups are the ones who suffer the most from the negative impacts of the climate-related crisis; underlines that a just transition needs to fully accommodate the social effects through designated support and funding, as also called for by the 2030 Agenda;
- calls on the UNFCCC Secretariat to establish a structured cooperation with the CoR to facilitate cooperation between the two institutions.

Rapporteur

Alison Gilliland (IE/PES), Dublin City Councillor

Reference document

Outlook opinion

**Opinion of the European Committee of the Regions –
Towards a structural inclusion of Cities and Regions in UNFCCC COP 27**
*Closing the gap between commitment and implementation by promoting multilevel participation to
deliver multilevel climate action*

I. POLICY RECOMMENDATIONS

THE EUROPEAN COMMITTEE OF THE REGIONS

Providing an urgent, large-scale response to the climate emergency by effectively coupling adaptation and mitigation measures through multilevel action

1. is deeply concerned about the findings of the International Panel on Climate Change (IPCC) Sixth Assessment Report (AR6), which highlights how climate hazards have substantially damaged ecosystems across the globe, further confirming that many of the impacts of climate change are already irreversible; takes note of the evidence included in the report, highlighting how current climate adaptation measures are often ineffective due to insufficient finance and poor planning, which could be addressed through more inclusive governance;
2. highlights that the IPCC reports recognise local and regional authorities (LRAs) as key actors in delivering adaptation and mitigation solutions; reiterates that LRAs are responsible for implementing 70% of climate mitigation measures and 90% of climate adaptation measures¹; underlines how solutions must be provided by and in cooperation with LRAs as direct responses to climate change threats which impact villages, towns, cities and their wider regions, all with their own particular climate context; highlights that more than one billion people in low-lying settlements face hazards such as sea-level rise, subsiding coasts, or flooding at high tides, while 350 million urban residents live with the threat of water scarcity globally;
3. refers in this regard to the COP 26 agreement to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels² and calls for swifter implementation of climate measures along with more financial support and guidance for LRAs;
4. reiterates its call to the United Nations Framework Convention on Climate Change (UNFCCC) to work in partnership with the UN Convention on Biological Diversity (UNCBD) and the United Nations Development Programme (UNDP) towards a consistent framework for climate neutrality and resilience, biodiversity protection and sustainable development, avoiding overlapping strategies; welcomes the Edinburgh Declaration on the post-2020 global biodiversity framework³, which provides an example of an inclusive "whole of government" approach;

¹ [CoR resolution on *The Green Deal in partnership with local and regional authorities*](#), December 2019.

² Glasgow Climate Pact, Paragraph 15.

³ [Edinburgh Declaration on the post-2020 global biodiversity framework](#).

5. reiterates the role of the EU in showing leadership by acting on the European Green Deal to become the first climate neutral continent; stresses the importance of stepping up the EU's efforts to effectively achieve climate neutrality by 2050 whilst systematically implementing the "do no harm" principle, striving to avoid carbon lock-in and carbon leakage; welcomes the pathway set out by the European Climate Law and the Fit for 55 package and by targeted initiatives such as the EU Missions on Adaptation and on Climate-Neutral and Smart Cities; highlights the importance of considering the current geopolitical crisis and its economic consequences, strengthening support, while delivering on this pathway; underlines the importance of eradicating energy poverty and tackling the social consequences of the clean energy transition, in particular in regions that heavily depend on fossil fuels, when implementing the climate plans and providing long-term solutions for energy sufficiency;
6. highlights that the objective of global energy security is not to be considered an alternative to the Paris Agreement and calls on the Parties to speed up the shift to an energy system fully powered by renewable energy and promote energy sufficiency; welcomes the REPowerEU Plan's response to the global energy market disruption caused by Russia's illegal invasion of Ukraine, as a clear signal that climate action can and must accelerate; underlines that LRAs are best positioned to support a fair, inclusive and sustainable transition by implementing measures to support the most vulnerable groups affected by energy and mobility poverty, building partnerships to mobilize the business sector and civil society, and by developing decentralised innovative solutions, which significantly increase the security of supply while also reducing transmission losses and lowering emissions;

Enhancing the EU's climate ambition by building on effective multilevel governance

7. underlines how the Glasgow Climate Pact highlights the "urgent need for multilevel and cooperative action⁴" and formally "recognizes the important role of non-Party stakeholders, including civil society, indigenous peoples, local communities, youth, children, local and regional governments, in contributing to progress towards the objective of the Paris Agreement⁵"; points out, therefore, that the success of the European Green Deal and the Paris Agreement is dependent on effectively engaging with all levels of governance;
8. expresses its readiness to work with the EU institutions on a coherent operational strategy to be developed ahead of COP 27; points out the openness and desire for an effective, regular consultation and cooperation both at the preparation stage and during the negotiations;
9. calls upon the European Commission to raise the profile of LRAs at COP 27 by boosting the visibility of EU subnational climate action in the EU pavilion's programme and side events, in cooperation with the CoR;
10. recognises the importance of national governments to commit themselves to the Paris and Glasgow goals, and the role they have in supporting LRAs; calls upon the Council of the European Union to formally recognise the pivotal role of subnational governments in

⁴ Glasgow Climate Pact, Preamble, Paragraph 9.

⁵ Glasgow Climate Pact, Paragraph 55.

accelerating a just climate transition and making it socially compatible with local and regional needs in its conclusions on the preparations for COP 27; invites the Czech Presidency of the Council of the EU to open a dialogue with cities and regions through the CoR;

11. welcomes the recognition of the role of subnational governments in the European Parliament Resolution on COP 26 and encourages the European Parliament to further enhance this message in its Resolution on COP 27; highlights the importance of strong coordinated action between the European Parliament delegation and the CoR delegation to COP 27 and calls for joint preparation of the respective delegations;
12. calls upon the European Commission, the Czech Presidency and the European Parliament to strongly support the organization of the First UNFCCC COP housing and urban development ministerial meeting on cities and climate change, welcoming the decision of the UN-Habitat Executive Board⁶;

Moving from the recognition of the role of LRAs to effective implementation of multilevel action

13. acknowledges that, whilst not succeeding in capturing the urgency and scale of the actions needed, the Glasgow Climate Pact did succeed in kicking off the second phase of the Paris Agreement, bringing to a close all outstanding items in the Paris Rulebook⁷; remains nonetheless deeply concerned that the currently submitted Nationally Determined Contributions (NDCs) put the world on track for a 2.5 °C temperature rise;
14. reiterates the calls set out in the final report of the Conference on the Future of Europe for quicker implementation of the green transition; remains concerned about affordability of energy for consumers and business, in particular amidst the current crisis; stresses the need to safeguard the most vulnerable groups and territories, from any unwanted negative impacts of the energy transition, recalling the findings of the European Commission 2022 Foresight Report;
15. highlights how the scale of action needed requires integrated, multilevel policies and cross-sectoral solutions; stresses therefore the need for formal recognition of the role of LRAs in tackling climate change; underlines that effective and systematic participation of LRAs, both at the preparation stage and during the negotiations, should be facilitated;
16. emphasises the role of the CoR as the institutional representative of more than one million local and regional leaders and network of networks; underlines its unique position as a driver for the implementation of climate actions at local and its readiness to cooperate and partner with European institutions and Parties of the Paris Agreement to further multilevel cooperation on the way to COP27 and beyond;

⁶ <https://unhabitat.org/sites/default/files/2022/04/hsp-eb-2022-crp2-rev.3.pdf>.

⁷ While the Paris Agreement has provided the framework for international action, the Paris Rulebook set this Agreement in motion by laying out the tools and processes to enable its full, fair, and effective implementation.

17. stresses the importance of the Under2 Coalition as the first global climate agreement for subnational governments, which was launched in the run-up to the Paris Agreement; highlights the updated and more ambitious Under2 Coalition targets set out in the 2021 Memorandum of Understanding, with a commitment to take action to achieve the 1.5°C target and net zero emissions by 2050 or earlier; encourages CoR members to sign this agreement too, and past Under2 Coalition signatories to sign the more ambitious 2021 Memorandum of Understanding;
18. highlights the crucial role of the Local Governments and Municipal Authorities (LGMA) Constituency in bringing together LRAs' voices globally and in continuously reinforcing a worldwide network of subnational governments willing to fight climate change; encourages all Parties to the UNFCCC to cooperate with the LGMA Constituency and all non-state actors to contribute constructively to the process leading up to COP 27 and to establish stronger collaboration with the UNFCCC Friends of Multilevel Action;

Keeping the mitigation ambition and fostering capacity by scaling up research and innovation

19. recalls that around 10 000 LRAs across Europe have made ambitious commitments to reduce greenhouse gas (GHG) emissions and tackle climate change by participating in initiatives such as the Covenant of Mayors, developing strategies and climate action such as Sustainable Energy and Climate Action Plans (SECAPs) or other local climate action plans driven by regional initiatives; highlights that 75% of the over 11 000 Global Covenant of Mayors (GCoM) signatories have set more ambitious GHG reduction targets⁸ than their respective national governments, and more than 50% are accelerating the rate at which they aim to reduce their emissions, building up critical political resilience against national level backsliding;
20. underlines how LRAs' commitment and action complements and underpins efforts undertaken both in international processes and at national level, and how LRAs' action is necessary to meet national and international targets; reiterates the need for the formal inclusion of Regionally and Locally Determined Contributions (RLDCs), to complement the NDCs and to formally acknowledge, monitor and encourage the reduction of GHG emissions by subnational governments globally;
21. recommends the inclusion of a dedicated subnational governments section with the national inventory reports as part of the Paris Agreement transparency framework, to strengthen accountability, impact assessment, and transparency of global climate action; endorses the adoption and use of the Common Reporting Framework by the Global Covenant of Mayors as a step towards comparability⁹ of local and regional efforts;
22. considers that in the EU, the role and contributions of LRAs should be formalised by enshrining them in the provisions of the Regulation on the Governance of the Energy Union, and notably by making RLDCs an integral part of the National Energy and Climate Plans (NECPs);

⁸ Source: [2021 Global Covenant of Mayors \(GCoM\) Impact Report](#).

⁹ <https://www.globalcovenantofmayors.org/our-initiatives/data4cities/common-global-reporting-framework/>.

23. underlines that cities and regions are already driving forward innovation, implementing technical and financial solutions, and shaping innovative governance processes; welcomes in this regard the launch of the UNFCCC Global Innovation Hub at COP 26, the EU Missions on Adaptation and on Climate-Neutral and Smart Cities, as well as the launch of the global Mission Innovation on Urban Transitions¹⁰, and welcomes collaboration and synergies between these;
24. highlights the need for stronger cooperation and integration across the local, regional, national, EU and global levels in the field of data access, to provide LRAs with the necessary access for data-driven and science-based policy making;
25. stresses the need to boost the reskilling and upskilling of the workforce, in line with the need to adapt professional practices to tackling climate change;

Boosting effective and cross-sectoral adaptation action and addressing loss and damage

26. welcomes the Glasgow-Sharm el-Sheikh work programme for the Global Goal on Adaptation (GGA); highlights that adaptation challenges may greatly vary within each country and region, and that LRAs are the most suitable actors to define adaptation goals, as they retain first-hand knowledge of both the resilience needs and solutions of specific localities;
27. stresses the urgency for Parties to work with LRAs to further integrate adaptation into local, national and regional planning; therefore, asks for the formal inclusion of subnational governments adaptation contributions to complement National Action Plans (NAPs) and NDCs;
28. highlights the importance of preventing "maladaptation" and the implementation of adaptation actions that further deepen existing social inequities; underlines how the impacts of climate change affect marginalized and vulnerable communities disproportionately;
29. recalls that LRAs are responsible for providing their communities with essential services and immediate responses and relief to the consequences of climate change, such as climate-related disasters, social impacts such as energy poverty and increasing weather-related health problems, and existing inequalities that climate change deepens; stresses the need to address capacity gaps through informed locally accountable decision-making, facilitated by access to scientific evidence, technology and local knowledge to support widespread application of adaptation solutions; emphasizes that innovative Nature Based Solutions (NBSs) are key tools supporting climate change mitigation and adaptation; and, in line with the Glasgow Climate Pact, encourages Parties to take an integrated approach to addressing biodiversity in national, regional and local policy and planning decisions;
30. welcomes the establishment of the Glasgow Climate Dialogue on Loss and Damage; and, in the absence of financial flows, highlights the need for local and regional authorities from developed and developing countries alike to identify and deploy alternative means of addressing loss and damage;

¹⁰ <http://mission-innovation.net/missions/urban-transitions-mission/>.

31. recalls the examples set by the financial pledges undertaken by Scotland and Wallonia at COP 26¹¹ to address loss and damage; emphasises therefore the role and contribution that subnational climate diplomacy and cooperation among LRAs in the Global North and Global South can provide for raising ambitions across levels, ahead of COP 27 and COP28;

Ensuring adequate access to climate finance and promoting a just transition through collaboration and engagement

32. stresses the importance of making direct funding available for LRAs to deliver climate action, as well as the need for LRAs to partner with the private sector and financial institutions to unlock sustainable investments; underlines that a direct link between access to funding and integrated development of plans and measures in cooperation with the local and regional levels should be established to facilitate cost-effective implementation;
33. emphasises, in line with the Paris Agreement, the recognition of "the importance of integrated, holistic and balanced non-market approaches¹² to enable voluntary cooperation" as a key instrument "available to Parties to assist in the implementation of their NDCs in a coordinated and effective manner"; encourages public and private sector stakeholders and civil society organizations to actively engage in the research, development and implementation of non-market approaches.
34. welcomes the COP 26 decision to strengthen the Marrakech Partnership for Global Climate Action as a space to encourage non-state actors to take immediate climate action; welcomes the furthering of the Race to Zero and the Race to Resilience as key initiatives to support and showcase ambitious bottom-up climate action, whilst also facilitating reporting and stocktaking of commitments by non-party stakeholders;
35. welcomes the Glasgow Work Programme on Action for Climate Empowerment (ACE)¹³; expresses the readiness to continuing working on implementing actions under its six elements – education, training, public awareness, public participation, public access to information and international cooperation; invites Parties to continue to support these processes;
36. notes that vulnerable groups are the ones who suffer the most from the negative impacts of the climate-related crisis; underlines that a just transition needs to fully accommodate the social effects through designated support and funding, as also called for by the 2030 Agenda;
37. underlines that the IPCC reports recognise that women's capacities to adapt and fight climate change are often constrained due to their roles in their household and society, institutional barriers and social norms; encourages Parties to continue advancing gender-responsive climate policy by further implementing the Lima Work Programme on Gender and Gender Action Plan

¹¹ GBP 2 million (USD 2.6 million) and EUR 1 million (USD 1.1 million) respectively.

¹² [Paris Agreement Art.6.8 \(Non-Market Approaches to Climate Finance\)](#).

¹³ [Glasgow Work Programme on Action for Climate Empowerment](#).

and by ensuring women's equal representation in decision-making processes; strongly believes that women should not be seen as vulnerable beneficiaries but as effective actors mitigating and adapting to climate change;

38. recognizes that climate action requires input from all generations; highlights the role of young people in driving social progress and inspiring political change and the need for meaningful and informed participation of young people in the formulation of climate policy; is committed to further involving CoR Young Elected Politicians (YEPs) in the preparations for COP 27, building upon the conclusions of the Conference on the Future of Europe and the objectives of the European Year of Youth;

Enhancing cooperation and partnership with the UNFCCC

39. encourages the UNFCCC to engage with the LGMA Constituency through its participation in the technical dialogues for the First Global Stocktake (GST); welcomes the decision of the Subsidiary Body for Scientific and Technological Advice (SBSTA) and the Subsidiary Body for Implementation (SBI) to design the GST in the spirit of inclusive, open and year-round Talanoa Dialogues; calls upon the UNFCCC to include, recognize and monitor commitments under the Race to Resilience and Race to Zero in GST reports in order to have a measurable overview of progress at the local and regional level;
40. welcomes the inclusion of a priority focus on sustainable cities and urbanization within the COP 27 agenda by the Egyptian Presidency; seeks cooperation opportunities with the presidency to further enhance the role of the LRA and stands ready to support the extension of UNFCCC Regional Climate Weeks to Europe, as an opportunity to reinforce the engagement of subnational authorities and civil society in the UNFCCC process;
41. highlights the key role of the CoR as the institutional representative of European cities and regions; calls therefore on the UNFCCC Secretariat to establish a structured cooperation with the CoR to facilitate the cooperation between the two institutions;
42. welcomes the G7 Development Ministers' Meeting Communiqué¹⁴, recognizing the role of cities and local governments in championing a just climate and energy transition; flags the openness to support the work of the Urban7 Group to strengthen multilevel cooperation as an underpinning principle of sustainable, effective climate action ahead of COP 27;
43. welcomes the announced alignment between the COP 27 and COP 26 presidencies' priorities (mitigation, adaptation, finance and collaboration), and the linkages with the announced priorities of the High-Level Champions (holistic approach, resilience, finance, regionalization, localization); looks forward to supporting the most effective synergies and complementarities among these priorities on the way towards and at COP 27;
44. notes that social movements in cities and regions have heightened public awareness about the need for urgent, inclusive climate action; in line with the conclusions of the SBSTA and the

¹⁴ [220519-G7-Development-Ministers-Meeting-Communique.pdf \(bmz.de\)](https://www.bmz.de/SharedDocs/DE/02/2020/202019-G7-Development-Ministers-Meeting-Communique.pdf?__blob=publicationFile)

SBI on the matters relating to the global stocktake under the Paris Agreement, encourages CoR members to organise local Talanoa Dialogues¹⁵ or similar inclusive processes at local and regional level;

45. commits to acting as a direct link, providing access to information and regular updates to CoR members, and LRAs in Europe on the progress of the negotiations, throughout the two weeks of COP 27; welcomes the partnership and support of other EU institutions in delivering this information regularly, bringing LRAs closer to the international negotiations.

Brussels, 12 October 2022

The President
of the European Committee of the Regions

Vasco Alves Cordeiro

The Secretary-General
of the European Committee of the Regions

Petr Blížkovský

¹⁵ Cities and regions Talanoa Dialogues were designed in 2018 to convene local and regional governments and national ministries of climate, environment and urbanization, along with host organizations and climate stakeholders to take stock of, shape and strengthen NDCs.

II. PROCEDURE

Title	Towards a structural inclusion of Cities and Regions in UNFCCC COP 27
Reference(s)	Outlook opinion
Legal basis	Optional (outlook), Art. 307, 1er al.
Procedural basis	Art. 41a
Date of Council/EP referral/Date of Commission letter	
Date of Bureau/President's decision	26 April 2022
Commission responsible	Commission for the Environment, Climate change and Energy (ENVE)
Rapporteur	Alison GILLILAND (IE/PES), Dublin City Councillor
Analysis	
Discussed in commission	31 May 2022
Date adopted by commission	15 July 2022
Result of the vote in commission (majority, unanimity)	Unanimity
Date adopted in plenary	12 October 2022
Previous Committee opinions	
Date of subsidiarity monitoring consultation	