

COP30: Addressing implementation

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The Brazilian COP30 Presidency has framed this year's Conference of the Parties as a "COP of implementation." There is, however, no common understanding of what the term entails. This paper disentangles the various dimensions of the implementation of the international climate framework deriving from the UNFCCC process and offers practical suggestions to the COP30 Presidency, focusing on three areas: 1) fostering the use of current UNFCCC mechanisms; 2) orchestrating the enabling climate action of international fora outside of the UNFCCC; and 3) harnessing the positive action of those on the ground.

KEY MESSAGES

There is room for making better use of existing arrangements within the UNFCCC and the Paris Climate Agreement to support implementation, including through reforming the Action Agenda. There is capacity for collecting detailed relevant information and knowledge that can be used to enhance accountability, collective learning and strengthening international collaboration. It requires a shift away from targets to focus on implementation barriers and gaps for effective collaboration.

There is a particular challenge to consider the mechanisms that would support greater transparency and convergence of climate efforts at the international level beyond the UNFCCC. There are several possibilities to consider, including a dedicated observatory of international organizations (IOs)' Paris-aligned activities, a stocktake of international efforts under COP or Global Stocktake and a dialogue between UNFCCC and relevant IOs and a steering process by willing countries of coordination of climate action across IOs.

We need to recognize that existing international efforts and fora may fall short of achieving the climate objectives, which are generally not in their core mandate. This may require establishing dedicated focused cooperation to address specific needs in areas where existing platforms are not equipped to deal with them.

Ultimately, implementation needs to be addressed in national jurisdictions where action is taking place. Supporting ownership and take-up of international decisions may require strengthening regional peer learning across country authorities, supporting networks and mechanisms that can provide independent advice and review within countries, and elevating the voice of sub-national governments, parliamentarians and citizens in relevant decision-making process.

COP30 must shift from negotiating new promises to orchestrating, enabling and accelerating delivery (and over-delivery, when considering current NDCs) on existing ones. This may come with a re-focus of existing processes, establishing an implementation forum at COP, as well as a recognition of the limits of the UNFCCC process and an invitation for countries to contribute diplomatic efforts and political capital into innovative ways of collaboration that increase policy coherence within countries and internationally.

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1. INTRODUCTION: DEFINING IMPLEMENTATION

The Brazilian COP30 Presidency has framed this year's Conference of the Parties as a "COP of implementation." This reflects not only an ambition to drive practical progress but also a need to manage the high expectations placed on Brazil—particularly in the wake of underwhelming outcomes from recent COPs, which stand in contrast to Brazil's ambitious diplomatic agenda, both within the UNFCCC and through its recent presidencies of the G20 and BRICS.

While there is a strategic shift away from launching new international commitments, the push for implementation is not merely symbolic if not new.¹ It stems from a growing recognition that the pace of climate action is being held back not by a lack of agreements within the UNFCCC, but by persistent barriers to putting existing ones into practice, particularly at the national level. Many feel that the foundational elements of the international climate regime are already in place and that little remains to be negotiated in terms of new legal instruments—and this becomes even more important in times of unfavourable geopolitical contexts.

States have, for instance, already acknowledged the urgency of limiting global warming to well below 2°C, and pursuing efforts to limit to just 1.5°C—and subsequent decisions have

underlined the importance of that 1.5°C goal in the light of the science. They have set collective goals to halt and reverse deforestation and environmental degradation by 2030, triple global renewable energy capacity, double energy efficiency, and transition away from fossil fuels in a just, orderly and equitable manner. They have reiterated the principle of Common but Differentiated Responsibilities to contribute to global goals on mitigation and adaptation, but also to align finance flows to these, recognizing that developed countries must provide financial resources to assist developing country Parties and take the lead efforts in mobilizing finance. And they have prepared plans, legislations and institutions to enable their pledges and integration of climate priorities into decision-making. The challenge now is to ensure that COP decisions, and the UNFCCC process itself, serve as catalysts for translating these commitments into reality, with greater speed, scale, and, above all, in a fair and equitable manner.

Several steps still need to be set in motion to action international climate commitments already agreed under the UNFCCC framework—through the Paris Agreement and subsequent COP decisions. While this is often broadly referred to as "implementation", there is no shared understanding of what the term entails. Its meaning varies depending on who is using it: a national policymaker, an international or UNFCCC actor, a civil society representative, or others. For some, it refers narrowly to the enforcement of laws and regulations adopted by countries in response to their climate commitments as delineated in the Paris Agreement. For others, it encompasses a broader view—focused on the progress on policy "signals" sent by the international climate framework. Others, still, understand the term

¹ COP22 held in Morocco in 2016 was called the "Action and Implementation COP" and COP27 held in Egypt in 2022 was dubbed "the Implementation COP".

as including influences that go beyond climate policy and the UNFCCC.

There are several distinct though interrelated dimensions to the implementation of the international climate framework deriving from the UNFCCC process calling on a range of different players—that can be broadly organized along the lines of “within”/ “outside” the UNFCCC, international/national drivers and state/non-state actors with strong linkages across:

- There is a dimension of making sure that the mechanisms and processes foreseen in the UNFCCC framework are fully working and supporting action on the ground, including the transparency frameworks, the cycle of national determined contributions (NDCs), long-term low-emission development strategies (LT-LEDS) and global stocktakes (GST) and various guidelines. It can also unblock specific areas and facilitate future take up through dedicated discussions (i.e. specification of the global goal on adaptation, including indicators to better track the provision the means of implementation), or through mechanism to coordinate actions, provide tools and knowledge and strengthen the Action Agenda as a bridge to actors and processes beyond the UNFCCC.
- There are the enabling conditions decided outside the UNFCCC but essential to unlock climate outcomes—for example the decisions taken by the finance or the trade community that significantly impact the allocation of financial flows towards more or less climate compatible uses and enable the circulation of more or less green goods and technologies (i.e. taxonomies, country platforms, green bonds, de-risking mechanisms etc.); or the plurilateral (if not multilateral) discussions needed to unblock specific areas such as green steel or other key components of the green transition, including green industrialization or dedicated taxation discussions targeting polluting industries such as maritime or aviation. Some of these (non-UNFCCC) decisions relevant to emissions reduction or adaptation may be adopted in response to or in coherence with the signals sent by the UNFCCC. Others may be motivated by a range of other policy concerns, including costs reduction, security, diversification, jobs, competitiveness.
- There is the trickledown effect and dynamics of the adoption of international decisions at country level through domestic policies in a context where climate and other international laws need to be transposed in national legislation and policies to take effect. How countries incorporate the Paris Agreement and COP decisions in their domestic policy frameworks and institutions, the barriers they encounter and the ways they overcome them are critical to understanding domestic implementation, including considerations of the political economy that influence government's action.
- All through these dimensions, and although not formal parties to the inter-governmental agreements on climate, non-state actors—including sub-national levels of government, businesses, members of parliament, unions, civil society and citizens—are the key implementers of climate decisions on the ground. They respond to a vast array of rules and incentives, critically from national governments, but

can also drive changes, including through voluntary initiatives, the introduction of new policies and regulations and cross-sectoral partnerships. Their consideration deserves specific attention, especially in a context where state willingness and capacity to act have become more limited.

In this context where “implementation” has no unequivocal meaning and calls on a multiplicity of players from both within and outside the UNFCCC and at different scales to unlock meaningful progress on the ground, this piece aims to disentangle the various components of implementation of the international climate framework and offer practical suggestions of areas that could be advanced and where the COP30 Presidency could make a difference. It focuses on three areas:

1. What can be expected within the UNFCCC framework to foster the use of current mechanisms in support of greater implementation of decisions, including through a renewed action agenda?
2. How can greater orchestration of international fora outside of the UNFCCC that hold critical pieces of the climate puzzle be better harnessed to unlock climate action and how can the gaps of international cooperation be addressed through climate-focused initiatives?
3. How can the positive action of those on the ground be better harnessed and their practical intelligence of the blockages and positive achievements better reflected in international discussions, including sub-national levels of government and parliamentarians, to foster national ownership and implementation?

2. WHY AND WHERE DOES THE UPTAKE OF THE DECISIONS TAKEN IN THE UNFCCC FRAMEWORK FALL SHORT?

2.1. International organizations/laws are generally weak in implementation

Generally speaking, implementation of international law is done through transposition in domestic legislation and rely on countries' enforcement mechanisms. Relatively few international instruments are directly applicable on member states. The international organizations (IOs) that produce international law, be they the UNFCCC or others, are generally tasked with exchange of information and experience, data collection; research and policy analysis; and discussion of good policy practices, development of rules, standards and best practice rather than enforcement, dispute settlement and crisis management. IOs may however encourage and/or monitor the implementation of their instruments using soft tools such as benchmarking of progress, voluntary peer review and, to a lesser extent, technical cooperation and positive incentives for implementation.

FIGURE 1. Regulatory activities of international organizations (a) and their procedures to encourage implementation (b)



Source: OECD (2016), International Regulatory Co-operation: The Role of International Organisations in Fostering Better Rules of Globalisation, OECD Publishing, Paris. <http://dx.doi.org/10.1787/9789264244047-en>

Note: sample comprises 50 IOs, including 32 intergovernmental organizations (IGOs), 5 international private standard-setting organizations, 4 secretariats of international conventions and 9 trans-governmental networks of regulators. The exact list is available at the publication's hyperlink above.

Formal mechanisms, such as sanctions, dispute settlement procedures and mandatory peer reviews are less commonly used, but not inexistent. Among the harder forms of cooperation with enforcement mechanisms are, for example, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), where failure to meet the Convention's requirements may lead to trade suspensions;² the International Atomic Energy Agency (IAEA), whose Incident and Emergency Center co-ordinates interagency responses to nuclear or radiological safety or security related incidents and emergencies;³ or the World Trade Organisation (WTO), despite its dispute resolution mechanism currently largely impeded. (Figure 1)

Of course, it is important to note that not all international cooperation takes the form of international law. Other types of cooperation—whether among large or small groups of countries—include joint research initiatives, development assistance, coordination on regional infrastructure investments, intelligence-sharing, and security dialogues or joint military exercises.

² <https://cites.org/eng/prog/compliance>

³ <https://www.iaea.org/about/organizational-structure/departments-of-nuclear-safety-and-security/incident-and-emergency-centre>

In some cases, a legally binding agreement is the end result, while in others, this is never the aim. This shows that many forms of cooperation on the low-carbon transition can be useful and effective without necessarily taking the form of international legal agreements.

2.2. As part of its theory of change, the Paris Agreement seeks to address some of the implementation challenges faced by the international legal frameworks

The UNFCCC and, particularly the Paris Agreement, have sought to strike a balance between the established scientific call for strong, universal and urgent action to tackle climate change, and the need for parties and non-parties to define and get the necessary political and economic support for the action required on a bottom-up basis, and over time. This led to a back and forth between national and international levels through NDCs/GST; the involvement of non-party actors to reconcile the top-down approach of international framework with the bottom-up needs; the set-up of transparency; and accountability mechanisms to speed up the trickle-down effect of the international decisions,

and provide for space to address the implementation challenges that undoubtedly arise from the application on the ground. Such a framework was agreed because it was understood that differentiated legally binding agreements on matters of substance (such as national emissions targets) could not be achieved in a top-down mode, hence the focus of the Paris Agreement on both, characterizing global objectives that individual contributions must contribute to, and on process (when and how to submit a document, and how to organise collective discussion and review). If substance is left to domestic decisions only—be on ambition or implementation—it becomes harder for the multilateral regime to achieve the required levels of collaboration. The recent advisory opinion of the International Court of Justice also indicates how the provisions of the Convention, the Paris Agreement and COP decisions are likely to increasingly serve as references for the work of national courts.

From IDDRI's Paris+10 diagnosis, this approach and related mechanisms are showing limits, and it has become hard to continue advancing negotiations without addressing the "implementation" bottlenecks and substantial issues that are slowing down progress and creating frustration. Transformations required on the ground are not fully taking place, or not fast enough, despite a relatively satisfactory procedural implementation of the PA treaty. All things considered, the verdict is that the Paris Agreement continues to be relevant and play a vital role in supporting a shared vision aligned with long-term goals that serve the interests of all nations. However, changes are needed in the process to foster the use of current mechanisms in support of greater action, as well to recognise and connect the complementary efforts required from outside the UNFCCC—both operational frameworks as well as broader political efforts. Going forward, the Paris Agreement not only needs to evolve its thinking and tools to catalyse action in line with the broader transformation agenda, but also to become an effective platform for monitoring whether this transformation upholds the promise of inclusiveness—while supporting it through targeted climate actions such as technology transfer, capacity building, and finance.

Two major types of challenges to effective implementation can be identified: 1) those related to the difficulties on the ground, including matters of human, financial and institutional capacity and policy coherence at country-level (section 3); and 2) those related to a poor international orchestration (section 4). Both are largely shaped by barriers and obstacles within national and international political systems that hinder effective action and increase resistance to change. Some argue that the important political battles must be won nationally, that this will enable more international cooperation which is also highly contested in challenging times.⁴ For others, national political battles cannot be won without unlocking specific blocking factors at international level (for instance on trade).

⁴ Just Transitions Dialogues, 2025, Reflections on Global enablers of just transitions to net zero emissions. UCT and IDDRI, <https://www.iddri.org/en/publications-and-events/note/reflections-global-enablers-just-transitions-net-zero-emissions>

2.3. How do international climate signals trickle down, and what conditions at national level to perform on implementation

Under the Paris Agreement, every country must regularly put forward progressive commitments of the "highest possible ambition" and implement policies with the aim of achieving them. Yet, taken together, current efforts still fall short of what is needed. One (unrealistic) hypothesis is that many nations may already be reaching for their "highest possible ambition", but even those best efforts do not add up to a trajectory consistent with the Paris goals. Part of the challenge is uncertainty: countries often cannot know in advance what they can achieve. Change can be non-linear—sometimes far exceeding expectations, as when global deployment of solar PV in 2020 was more than ten times higher than what national targets set around 2005–2006 had implied. At other times, countries may struggle to achieve change despite best efforts for various reasons. Bridging this gap demands collective learning, fresh approaches, and far greater political, human, and financial resources.

But weak collective results may also mask noncompliance or backsliding by specific Parties, which is why the Agreement's transparency provisions are important. Stronger country-level analysis and clearer reporting will not only allow to measure individual contributions against global benchmarks, but to understand the different suite of strategies needed to facilitate implementation. Viewed this way, there may be an overemphasis on targets; without abandoning them, there ought to be stronger focus on actions and enabling conditions.

There are multiple enablers of climate action at country level, and they go beyond the means of implementation discussed within UNFCCC: technology transfer, capacity building and finance. Expanding knowledge generation and exchange can help improve our understanding of transitions, their costs, associated domestic political economies, and the global factors that support national action. From experience, we know that transitions—despite all being very country specific—have some recognizable patterns that allow to anticipate the kinds of policies needed to advance through their stages.⁵ To identify the specific policies that are likely to be most effective, governments will need to draw on the best available knowledge for the relevant sector. This, in turn, can inform efforts to enhance international cooperation and diplomacy—because for these systemic transitions, most countries cannot replace the set of technologies and its associated business models, markets, infrastructure, and social practices, with another, on their own. A country's options depend on global conditions, which arise as the emergent outcome of other countries' actions. International collaboration can aim to create the global conditions that make national action more attractive and less difficult.

⁵ Geels, F. W. (2005). "Processes and patterns in transitions and system innovations: Refining the co-evolutionary multi-level perspective." *Technological Forecasting & Social Change*, 72(6), 681–696.

The mobilization and expansion of knowledge need to result in enhanced in-country capabilities.

Access to finance is a key enabler of national climate action—particularly when it supports structural transformation aligned with both climate goals and social equity. Beyond the commitment to provide climate finance to developing countries, the Paris Agreement's most systemic contribution is its long-term goal of aligning all finance flows with climate objectives. This alignment is explicitly set within the broader context of sustainable development and poverty eradication.

Another barrier to national action is the tendency to take a narrow approach to decarbonization. Much of the climate literature has traditionally framed development as a co-benefit of climate action. However, evidence increasingly suggests that, from a political standpoint, climate change—or the low carbon transition—must be understood and addressed as a development challenge in its own right.⁶ In response, all countries are beginning to frame domestic strategies around long-term visions and narratives that reflect the futures their societies wish to pursue—paired with efforts to build coalitions in support of just transitions.⁷

2.4. Many enablers are outside of the climate area and need further attention and greater orchestration internationally

The climate framework reflects a vision of transformational change and is often described as having a systemic ambition. Its vision for a new economy goes beyond emissions reductions across sectors, to envision the emergence of an economy beyond fossil fuels—one requiring radical changes in production, supply chains, governance models, and more. Yet, for that vision to unfold, significant action needs to take place outside the realm of climate policy, mobilizing a wide range of actors and to enable progress and avoid obstructing climate objectives. In other words, it requires "alignment" of efforts, policies and practices, along with capacity to anticipate the transformations that are needed. One such prominent example is the need for the underpinning financial sector rules to support a reallocation of finance towards climate compatible businesses, activities and projects, away from harmful practices. Despite Article 2.1(c) of the Paris Agreement that sets the aim of making financial flows consistent with a low-carbon and climate-resilient development pathway, financial institutions and stakeholders remain insufficiently integrated into climate governance.

Beyond finance, there is a wide range of actors and policy areas that need to be mobilised to enable climate action—be they sectoral (energy, transport, agriculture, among others) or

cross-cutting (trade, Foreign Direct Investment (FDI), innovation, etc.). At country level, these areas can be mobilised through the declination of national policies aligned with NDCs and LTS. In some of these areas, there are platforms and mechanisms at the international level to support international cooperation and collectively agree on common rules—for example the World Trade Organization (WTO) is the multilateral platform where countries agree and seek to implement common trade rules of the game; trade rules largely determine the circulation of green goods and technologies; and the consideration of climate in financial stability will determine how critical climate action will be taken notably by finance ministries, central banks and financial regulators in a sector of high international dependencies. But while there may be inter-departmental/cross-government processes at the national level to support policy coherence and align objectives across policy areas (still to be strengthened and systematized), such orchestration does not exist at the international level.

The UNFCCC and its instruments, including the Paris Agreement, cannot directly mandate non-parties, including other international organizations to align with its own objectives (similarly for the other way around). Once countries agree on the overarching climate goals under the UNFCCC and its instruments and integrate these into their national policy processes, they can in turn seek to align action in other international fora with those climate objectives. The UNFCCC also has a sort of "soft power" influence on the discussions taking place in other fora, helping to set the framing for what is and is not acceptable—although recent examples show that this soft power is not a given and may evolve in time depending on geopolitical context and shifting priorities. It is an attribute that needs to be nurtured and built based on credible initiatives and successes. *De facto*, there is evidence that the climate objectives have percolated the multiplicity of international fora that support the international rules-based system, illustrating the mainstreaming of climate considerations and the percolation of the PA objectives across sectors and policy areas at the international level (see [Paris+10 diagnosis](#)).

Nevertheless, this path through trickle effects and influence takes time, and international law has been developing fast to accommodate increasing complexity and interdependencies. There may remain divergences within governments—despite their climate commitments, the representatives of line ministries in other international fora may resist integrating climate considerations into their work. The risk of inconsistencies across the bodies of international law is not negligible. Some kind of orchestration is needed—including *ex ante* to avoid that new instruments contradict the climate "acquis", and *ex post* to ensure impacts and consistency. In addition, the existing platforms may not have the mandate or be equipped to address the system transitions needed to achieve decarbonization or adaptation for example. In some instances, these changes may need to be driven by sector-specific policies—in this case, orchestration is not enough, dedicated policy processes are needed.

Beyond, with some internationally powerful countries rolling back of the climate priority, we can witness a shift (at least) in

⁶ Winkler, Harald (2015). "Reconsidering Development by Reflecting on Climate Change." International Environmental Agreements: Politics, Law and Economics, Springer Science and Business Media LLC.

⁷ Just Transitions Dialogues, 2025, Reflections on Global enablers of just transitions to net zero emissions. UCT and IDDRI, www.iddri.org/en/publications-and-events/note/reflections-global-enablers-just-transitions-net-zero-emissions

international fora narratives and a refocus on core mandate away from climate objectives. This is also affecting support for climate cooperation internationally. This trend is still to be confirmed, as some of these players had started a structural alignment that is not so easily reversible and may be supported by strong market dynamics beyond individual state rhetorics. Still, regardless whether this is a cyclical disruption or a more permanent fragmentation, this raises the question of how to prevent potential roll back in the short-term on a number of decisions/strategies/international laws that may be happening in boards and councils of specific fora (such as the adoption of net-zero framework by IMO, agreed last April but to be formally voted on in October or the renegotiation of the World Bank Group climate strategy post 2025).

3. WHAT (ELSE) CAN THE BRAZILIAN COP30 PRESIDENCY AND THE INTERNATIONAL CLIMATE COMMUNITY DO?

3.1. Making better use of existing arrangements within the UNFCCC and the Paris Agreement to support implementation and reforming the Action Agenda

Making better use of existing arrangements for implementation purpose

After many years of developing its implementing rules, the Paris Agreement is now fully functional: the first GST was completed in 2023, parties submitted their first Biennial Transparency Reports (BTRs) last year, the first sessions of Facilitative Multilateral Consideration of Progress (FMCP) were held in June, parties are in the process of updating their NDCs, informed by the outcomes of the GST, and many are updating or providing for the first time their NAPs and their LT-LEDs.

The enhanced transparency framework is at the heart of the arrangements put in place by the Paris Agreement to incentivise implementation because it allows for accountability, as well as collective learning. There is, however, a risk that this could become little more than a tick the box exercise, rather than seeking to leverage the submission of NDCs, NAPs, BTRs and LT-LEDs to support implementation. Without modifying the existing rules or guidelines, the enhanced transparency framework could be better used to support implementation, enabling for example a greater focus on the blockages that countries face in developing and implementing their NDCs or their NAPs. This includes the FMCP, with [calls to leverage this process at COP30](#). Improvements should also address transparency around the means of implementation provisions, so it is possible to better track the quantity and quality of finance associated to the NCQG and other finance mechanisms, as well as progress on technology transfer objectives.

Current NDCs and BTRs provide a good basis to support implementation ahead of the next cycle, though they have rather been used to formally account for the delivery on the Paris Agreement so far. One way to leverage NDCs and BTRs internationally is through the NDC synthesis report and BTR synthesis report (prepared by the UNFCCC secretariat). These reports could help understand whether provided information is adequate and granular enough to underpin implementation across the energy, land-use and ecosystems, industrial and the urban systems as well in achieving global goals such as in tripling renewables, doubling energy efficiency, transitioning away from fossil fuel, or halting deforestation. They could also highlight and categorise the challenges that parties encounter in developing and implementing their NDCs and BTRs, as well as some of the solutions that have been identified. These might, for example, cover how parties have taken into account a national long-term perspective, developed strong policy frameworks, anchored them in legislation, strengthened interministerial coordination and aligned with other national priorities, addressed specific challenges such as just transition, and gained access to affordable and adequate finance and technical support. Likewise, parties could be encouraged to use directly the outputs of the transparency process to improve climate action. Abundant literature on 'actionable' NDCs and analysis on NDC content is emerging that can contribute to these reports.⁸ Furthermore, these reports should inspire similar assessments by independent bodies and sector-specific organizations, which could go further and be less constrained by capacity or mandating considerations.

LT-LEDs are intended to be revised regularly, and if conceived as a process to strengthen long-term planning capacities, they can be a powerful channel to unpack barriers and foster domestic discussion on how to remove them—and then internationally, if key takeaways are captured in the actual submissions to the Paris Agreement process. They can also provide a valuable tool to appraise how a party's long-term goal is linked to its shorter-term objectives as set out in its NDC and assessing how those might be better aligned and strengthen resilience over time.

The building of a stronger knowledge base is not enough in itself—it needs to find a meaningful way to create political momentum and peer-to-peer pressure internationally, ultimately to increase liability domestically. COP30 has an important capacity to create such momentum, particularly through high-level events—particularly featuring NDC Synthesis Report and providing an implementation narrative beyond aggregated emission numbers—, and also as part of the UNFCCC review mechanisms. A response to today's NDCs must be a response to remove implementation barriers to enable overachievement of current goals. COP30 workshops in the

⁸ To name few: Global renewables Alliance (2025). Briefing: GRA Position on NDCs. <https://globalrenewablesalliance.org/wp-content/uploads/2024/09/GRA-Briefing-on-NDCs.pdf>; Ambition for Action, IDDRI, available at : <https://www.iddri.org/en/publications-and-events/policy-brief/ambition-action-framework-assessing-ndcs>; Jeudy-Hugo, S. *et al.* (2024). Insights for designing mitigation elements in the next round of Nationally Determined Contributions (NDCs), OECD/IEA Climate Change Expert Group Papers, No. 2024/01, OECD Publishing, Paris, <https://doi.org/10.1787/b70a88ef-en>

context of the GST Annual Dialogue and the Facilitative Multi-lateral Consideration of Progress (FMCP) should be featured events that attract preparatory work and strong participation from observers. The Roadmap to Mission 1.5 can also serve as a political platform to highlight implementation barriers and gaps in international cooperation, helping to reinforce the credibility of efforts and intentions to course-correct alignment with the 1.5°C goal.

Reforming the Action Agenda

The Action Agenda has come to occupy an increasing space in the COP since its beginnings in the Lima Paris Action Agenda in 2015 as a complementary space for voluntary climate initiatives. It is responsible for a major part of the growth in attendance at recent COPs—with close to 50,000 participants in Sharm El Sheikh and Baku, and almost 100,000 in Dubai. The Action Agenda has also trickled down outside of COPs and infused high level international meetings (such as the Clean Energy Ministerials). Its strengths include the ability to associate national governments, intergovernmental organizations, and non-state actors such as business, cities and subnational governments and other civil society actors. It can address specific climate challenges but also build links to work and organizations in other fields. It is also able to move forward with greater freedom to organise coordinated responses to specific challenges in relation to mitigation, adaptation, loss and damage, and finance through coalitions of the willing (rather than consensus, which is required for the formal COP outcomes). But its growth in scale has also seen increasing criticism of its lack of focus, limited follow-up and growing confusion between the initiatives launched by successive COP presidencies, the work of the high-level climate champions, and the Marrakech Partnership working above all with non-party stakeholders.

As a result, there is growing recognition that the COPs Action Agenda is not delivering its full potential and requires reform to become a more effective implementation platform or forum.⁹ A critical first step is to take stock of the more than 600 voluntary initiatives and pledges launched since the adoption of the Paris Agreement—both those that remain active and those that have faltered. This review should assess their adequacy and effectiveness at achieving the global climate goals, as well as the extent to which they foster coordination among actors and enable transparent monitoring and evaluation. This would allow identifying the initiatives that are successfully driving transformative action and those that are struggling and need improvement or rationalizing. It would provide a strong basis for tracking and supporting progress and would help avoid the multiplication of announcements that has questioned the credibility of the approach. On this basis, new initiatives could be launched where there are gaps or existing ones are unable to address relevant issues adequately. Beyond assessing individual initiatives, and in line with the Breakthrough Agenda, there should be systematic reviews of the practical cooperations taking place in each of the

largest emitting sectors and assess them against the types of cooperation that could be most effective. These reviews should help identify gaps and core general principles for effective initiatives (participation, focus and political capital).

The Brazilian COP30 Presidency has taken concrete steps in this direction. In its Fourth Letter¹⁰ to the international community, it outlined a vision to transform the Action Agenda from a complementary set of voluntary efforts into a coordinated implementation platform anchored in the outcomes of the 1st GST of the Paris Agreement. Key priorities include:

- Aligning the Action Agenda with existing UNFCCC decisions and Paris Agreement goals;
 - Leveraging and scaling up existing initiatives rather than launching disconnected new ones;
 - Embedding transparency, monitoring, and accountability as core elements for both new and ongoing efforts.
- To put this vision into practice, the COP30 Action Agenda is structured around six thematic axes¹¹ and thirty key objectives aligned with GST outcomes. Of particular importance is the cross-cutting axis on unleashing enablers and accelerators, especially finance. To achieve lasting impact, these priorities must not be confined to a single COP cycle but sustained and strengthened over time. It should inform and guide the work of future Presidencies, helping to establish the Action Agenda as a consistent engine of actors' mobilization and accountability for climate action. Building on the efforts of the COP30 Presidency, the Action Agenda should be given a new, long-term structure to:
- 1) Promote the implementation of the Paris Agreement and its first and future Global Stocktakes, above all by enabling cooperation and collaboration to overcome the barriers to the development and implementation of climate action.
 - 2) Introduce arrangements or mechanisms to track progress and provide regular feedback through the Presidencies with the support of the high-level champions on the overall state of the action agenda and recommendations on the way forward.
 - 3) Embed core accountability principles in any new initiatives launched by future COP presidencies to ensure that they are necessary, credible, transparent and support the goals and principles of the Paris Agreement, the GSTs and the broader UNFCCC framework.
 - 4) Encourage the use of these as benchmarks for initiatives across the wider climate landscape, including initiatives beyond the action agenda and the UNFCCC process led by private and non-state actors.
 - 5) Recognise the need for technical and diplomatic efforts outside of the UNFCCC (and the COP Action Agenda) to

⁹ See for instance Paul Watkinson: [Putting an implementation forum at the heart of the COP](#) | LinkedIn

¹⁰ See Fourth Letter from the COP30 Presidency: <https://cop30.br/en/brazilian-presidency/letters-from-the-presidency/fourth-letter-from-the-presidency>

¹¹ The six thematic axes are: 1. Transitioning Energy, Industry, and Transport; 2. Stewarding Forests, Oceans, and Biodiversity; 3. Transforming Agriculture and Food Systems; 4. Building Resilience for Cities, Infrastructure, and Water; 5. Fostering Human and Social Development; 6. Unleashing Enablers and Accelerators, including finance, technology, and capacity building

accelerate transitions and encourage innovative ways of collaboration and orchestration.

Well-structured and with the political and diplomatic weight of successive presidencies behind it, such an approach could transform future meetings of the COP and provide an implementation forum to complement the traditional normative role of the COP. Such a forum would bring actors working on action, within sectors or regions, providing an opportunity to better connect diplomatic and implementation efforts in the international climate discussion. COPs would create a common expectation that every country should participate in collaborative efforts in the sectors where it has some international influence, and invite countries to take the lead in specific areas. Reporting on progress to the COPs could also help increase visibility of collaborative efforts and its benefits, and encourage more countries to participate.

Pulling this together should not be a one-off initiative of the COP30 Presidency limited to the two weeks of the COP, but the start of a process that will roll forward through 2026 and then under the guidance of successive presidencies in the following years. It should also be aligned with the work and revised work programme of the high-level champions. A concrete way for COP30 to underline this might be for the presidency to present a plan of work at the closing of the conference setting out who is responsible for taking forward each strand of work and initiative, the results that are expected, and the events where the presidency will reconvene the implementation forum to oversee progress during 2026.

3.2. Orchestration of efforts beyond the UNFCCC and bridging the international cooperation gaps

Orchestration of efforts beyond the UNFCCC

As described earlier, there is no hierarchy across international legal instruments or fora. In practice, efforts are largely carried out in siloes and rely on the overlapping constituencies of IOs to ensure consistency in international rulemaking. This is not enough, as countries themselves also tend to work in siloes, and because IOs (although country led) face a certain inertia in their actions. As a result, transmission through countries is often too lengthy and the system lacks an effective feedback loop into the UNFCCC.

There is therefore a particular challenge to consider the mechanisms that would support greater transparency and convergence of climate efforts across normative IOs. Several possibilities can be considered and pursued in parallel, none of which a silver bullet in itself:

- 1) Better evaluation disciplines at the international level, including systematic ex ante impact assessment and ex post evaluation that include climate objectives alignment checks;
- 2) A dedicated observatory of Paris-aligned activities of International Organizations to collect information on climate relevant measures adopted at international level and help contextualise the efforts by categorizing and structuring the information against climate objectives;
- 3) A stocktake of international efforts under COP or GST and a dialogue between UNFCCC and relevant IOs to understand how the IO activities contribute to the PA objectives and subsequent gaps—the IEA high profile work can be used as an example, notably its contribution to GST1 on the energy mix compatible with the PA and subsequent monitoring of country declaration of this energy mix. GST2 could be an opportunity to pilot such information collection and dialogue on IO climate work;
- 4) Ultimately, members need to drive the policy coherence efforts internationally as they strive to do domestically. For many reasons, international policy coherence is not easy to achieve and needs proof of concept. A coalition of countries piloting coordinated approaches on climate across IOs could go a long way to provide practical suggestions of how to do it depending on their specific institutional set up. This piloting would not be possible at a general level and would need to focus on specific sectors or policy areas.

Brazil's proposal for a "UN Climate Council" may represent a step toward addressing fragmentation in international climate governance. As outlined in the Proposal for a New Climate Change Council by the Center for Climate and Energy Solutions,¹² the Council has the potential to serve as a high-level political platform to provide directions on complex implementation challenges, strengthens accountability by serving as a forum for addressing disputes, complaints and enhance coordination across UN bodies. However, a coordination mechanism limited to UN agencies would fall short of what is required. To be effective and systemic, it must also engage the broader ecosystem of international financial institutions (IFIs), other relevant financial actors—including ministries of finance and central banks—and the WTO, especially in light of the growing intersections between trade, climate, and sustainability, and increasing concerns about the cross-border impacts of unilateral trade measures.

When it comes to bridging the divide with the finance community, a promising development was the creation of the Task Force for Global Mobilization against Climate Change (TF-CLIMA) under Brazil's G20 presidency in 2024, bringing together ministers of Environment, Finance, and Foreign Affairs, along with central bank governors and international organizations. Its goal was to align macroeconomic and climate agendas, mobilize finance and promote ecological transitions within and beyond the G20. The TF-CLIMA experience inspired the launch of the COP30 Presidency Circle of Finance Ministers, which aims to support the development of the Baku to Belém Roadmap to \$1.3 trillion. The Circle, composed of finance ministers, in consultation with experts, private sector leaders and civil society representatives, serves as a platform for strategic dialogue. It will provide inputs to the COP30 Presidency, which,

¹² <https://www.c2es.org/document/the-proposal-for-a-new-climate-change-council/>

together with the COP29 Presidency, will present the Roadmap to the Parties of the UNFCCC. However, in both cases, the platform is *ad hoc* and temporary. To ensure lasting impact, ways to institutionalise coordination with finance stakeholders within the UNFCCC and in the broader global governance architecture could be pursued to play a sustained role in scaling up climate finance, mobilizing new and additional resources and aligning global investment flows with the goals of the Paris Agreement.

Lessons should also be drawn from past attempts to establish similar coordination mechanisms. For instance, the UN Secretary-General's proposal for an "Emergency Platform"¹³—a standing mechanism to convene leaders and stakeholders in response to complex global crises, introduced in the context of the Pact for the Future negotiations—has faced challenges in securing institutional traction and sustained political support. Any new initiative must therefore be carefully designed to ensure legitimacy, inclusiveness, and the sustained political backing required to be effective. Regarding finance, lessons from the achievements and shortcomings of the World Bank led Coalition of Finance Ministers, as well as those of the G20 (through the Working Group on Environment and Climate Sustainability, the Sustainability Finance Working Group and Presidency decisions to host joint Ministerials) should be drawn.

Addressing the cooperation gaps through targeted efforts

Beyond greater orchestration of on-going efforts, there is a need to recognise that existing efforts and fora may fall short of achieving the climate objectives, which are generally not in their core mandate, and to create renewed political space for cooperation outside of formal negotiations. Establishing dedicated and focused cooperation to address specific needs in areas where existing platforms are not equipped to do so is essential. In this context, questions regarding the scope of activity and membership are critical for ensuring both relevance and impact. For example, while there is a need to advance the transition away from fossil fuels, the question arises of whether this can be supported through dedicated governance platforms bringing together large consumers and producers. An approach that would allow for more granular and maybe effective discussion would involve establishing cooperation fora within each of the emitting sub-sectors, allowing for variable country participation to advance on developing and deploying zero emissions as a necessary step before negotiating the closing down of the fossil fuel system. A separate approach in each sector is needed because each is distinct in its political economy, the challenges and solutions of its zero-carbon transition, the nature of its international connections, the countries that are most influential in global markets, and the forms of cooperation that are most likely to be effective at a given point in time.

The highest leverage opportunities in terms of actions that countries can take together may be identified by considering several criteria, including a sector's contribution to global

emissions, the potential for progress including as a knocked-on effect on other sectors, and the potential for international cooperation to make national actions easier at the current stage of the transition. Examples of these opportunities for cooperation that can be identified using these criteria include bilateral and regional interconnection and joint research and development of long-duration energy storage in the power sector, coordinated deployment of interoperable electric truck charging infrastructure on international road freight corridors, and measures to establish a level playing field for near-zero emission steel in international trade.¹⁴ These cooperation initiatives would need to be supported by institutions with clear decarbonization mandates, participation of the right countries (those with influence in the relevant global market) the right government officials within those countries (those making the relevant policies), high quality analysis to inform discussions, and processes sustained over time, with frequent meetings (not just at COPs).

3.3. Implementation at the national level: strengthening regional peer learning and elevating the voice of sub-national governments and parliamentarians

While international agreements provide the strategic direction for climate action, the real test lies in how effectively they are implemented at the national and local levels. As highlighted throughout this document, resource constraints, limited institutional capacity and variable levels of political ambition continue to undermine the full implementation of existing commitments on the ground.

Internationally, there is a growing call for transparency and peer learning. This is an area where cooperation could act as "implementation" forums designed to promote the exchange of practices and provide guidance on translating GST outcomes into national pathways. These platforms could embed peer learning mechanism, enabling countries—particularly those with similar economic characteristics, so more likely at regional or sub-regional level—to observe and learn from each other's experience in aligning national policies with GST results.

In the realm of finance, critical lessons can be drawn from the experience with country platforms, alongside potential regional adaptations, that have been strongly championed by Brazil's G20 and BRICS presidencies. These platforms offer a structured, country-led approach to aligning international climate finance with national priorities. When properly designed, they help coordinate contributions from donors and investors, enhance policy coherence, and improve project visibility, while strengthening domestic fiscal frameworks and institutional capacities. As highlighted in the BRICS Finance Track Technical Note, effective country platforms require clear governance, cross-ministerial coordination, alignment with NDCs and long-term strategies and integration with national planning and budgeting.

¹³ https://jordan.un.org/sites/default/files/2023-03/2302794E_PolicyBrief-2.pdf

¹⁴ Breakthrough Agenda Report 2024. Available at: <https://breakthroughagenda.org/report-2024/>

At the national level, how countries engage with core instruments of the Paris Agreement, such as their Nationally Determined Contributions (NDCs), adaptation plans, and biennial transparency reports, directly shapes their institutional capacity, national ownership and implementation readiness. These instruments must be more than reporting tools: they should serve as integrated policy frameworks, capable of mobilizing resources and aligning national development strategies with climate ambition.

The COP30 Presidency has emphasized that effective national implementation requires a whole-of-society approach, and that subnational actors, such as regional governments, provinces, cities, and local communities, are essential drivers of climate action. It recognized that many of the most impactful climate actions—from urban mobility systems to ecosystem restoration and climate-resilient infrastructure—are designed and delivered at the subnational level. These actors are often closest to the populations most affected by climate impacts and are well-positioned to tailor solutions to specific territorial, social and economic contexts.

To that end, Brazil has called for stronger multilevel governance, emphasizing the importance of greater coordination across national and subnational institutions to ensure coherence in climate planning, finance and implementation. This includes supporting decentralized access to resources, enhancing local capacity, and fostering participatory mechanisms that bring Indigenous Peoples, youth, and marginalized communities into decision-making processes. Yet, one critical element that remains largely absent from the COP30 Presidency's letters to date and is generally overlooked in the wider climate governance debates, relates to the role of national parliaments and parliamentarians.

The Paris Agreement cannot be delivered without legislation that is fully aligned with the 1.5°C target. Parliaments in some countries hold constitutional responsibilities to legislate, oversee executive action, approve budgets and ensure government accountability. They contribute to transforming international climate pledges into enforceable domestic laws, coherent regulatory frameworks and propose public policies supported by predictable resources. In some instances, their institutional position allows them to safeguard continuity across political cycles, helping to maintain long-term climate ambition even amid changes in executive governments. As democratic representatives, parliamentarians also contribute to anchoring climate action in public debate and informed decision-making.

Strengthening the engagement of subnational authorities and parliamentarians would help ensure that climate policies are more locally relevant and nationally owned. Therefore, it is critical to understand how they feed into the national position of their country through the processes in place, like the NDC and LT-LEDS development process. Strengthening their voice internationally can enable the sharing of their experiences and could enhance peer-to-peer learning and preparations for the second Global Stocktake (GST2). Consequently, some argue for a more inclusive approach to developing the GST to improve the quality of the assessment, increase the uptake of

its conclusions and strengthen societal and political momentum for implementation.¹⁵

In recognition of this role in international fora, there is a growing call for the establishment of a formal parliamentary constituency within the UNFCCC. Moving beyond the current informal group would enable institutionalized access to key climate governance spaces. This includes the ability for parliamentarians to submit written inputs, deliver oral interventions during negotiations, receive regular briefings from the UNFCCC Secretariat, and engage in structured dialogue with national delegations. Creating such a constituency could build on existing precedents, such as the formal recognition of the Local Governments and Municipal Authorities (LGMA) constituency within the UNFCCC. Without downplaying the political sensitivities and practical considerations that this would involve, extending similar recognition to national parliaments could help bridge the gap between global agreements and national implementation—ensuring that climate ambition is sustained through legal frameworks, democratic oversight and inclusive governance.

COP30 Presidency fourth letter¹⁶ reaffirms a commitment to advancing the "Global Mutirão" against climate change and calls on all stakeholders (not only on Parties to the UNFCCC) to act decisively in the face of climate urgency. The fifth letter¹⁷ further underlines that climate action begins and ends with people who need to be at the centre of COP30. Mobilizing grass-root initiatives to advance and revive enthusiasm for climate action is very much at the core of this ambition. Creating mechanisms to include citizens would capitalize on this mobilization effort and can strengthen legitimacy, address polarization, and accelerate implementation at scale through greater public support. Well-designed deliberative processes allow citizens to explore trade-offs, balance short-, medium- and long-term goals, and shape pathways to a just transition that does not leave anyone behind. This is very much in line with initiatives such as the Global Citizens Assembly¹⁸ that aims to strengthen people's ownership of climate policies as well as improve their design through practical knowledge of their implementation.

¹⁵ [What Does an Inclusive Global Stocktake Look Like for Civil Society? | International Institute for Sustainable Development](#)

¹⁶ [Fourth Letter from the Presidency](#)

¹⁷ [Fifth Letter from the Presidency](#)

¹⁸ [How a New Global Citizens' Assembly Can Revive Climate Action, European Democracy Hub; The Case for a Global Climate Assembly by Laurence Tubiana & Ana Toni, Project Syndicate and Strengthening citizen participation in global governance, United Nations Foundation, Iswe, Plataforma CIPÓ, Blue Smoke and Southern Voice.](#)

4. CONCLUSION FOR COP30

By shifting its focus from target-setting to implementation, the Brazilian COP30 Presidency and the wider climate community aim to accelerate climate progress. This paper provides a number of avenues for consideration in support of this objective.

Building on the latest NDC cycle, COP30 can emphasize that Paris Agreement instruments must serve not just as compliance tools but as levers to identify and overcome barriers, using transparency frameworks and synthesis reports to spotlight gaps, solutions, and sectoral pathways. Because generating knowledge alone is insufficient, COP30 should create expectations for how this knowledge will be used—inviting actors to develop mechanisms, within the Action Agenda or beyond the UNFCCC, to address specific challenges where international collaboration can make a difference. Some of these mechanisms may find a home under the UNFCCC—such as the proposed mechanism to support just transitions—but COP30 should also call for efforts beyond it, engaging those with the capacity to influence enabling conditions.

COP30 can build political momentum by using high-level events and review mechanisms to highlight barriers and successes, and by empowering those who can drive further action and cooperation. In addition, COP30 has identified a governance reform agenda to be addressed, which could provide a roadmap for exploring how to improve orchestration across international organisations and financial actors, breaking down silos and aligning global investment flows with climate goals, backed by institutionalised finance–climate coordination.

Overall, COP30 should launch a sustained, coordinated implementation drive that extends beyond a single COP cycle—promoting sector-specific cooperation platforms, fostering regional peer learning, and mobilizing grassroots participation to build legitimacy and reduce polarization. This could mark the beginning of a genuine post-negotiation era in the climate regime.

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