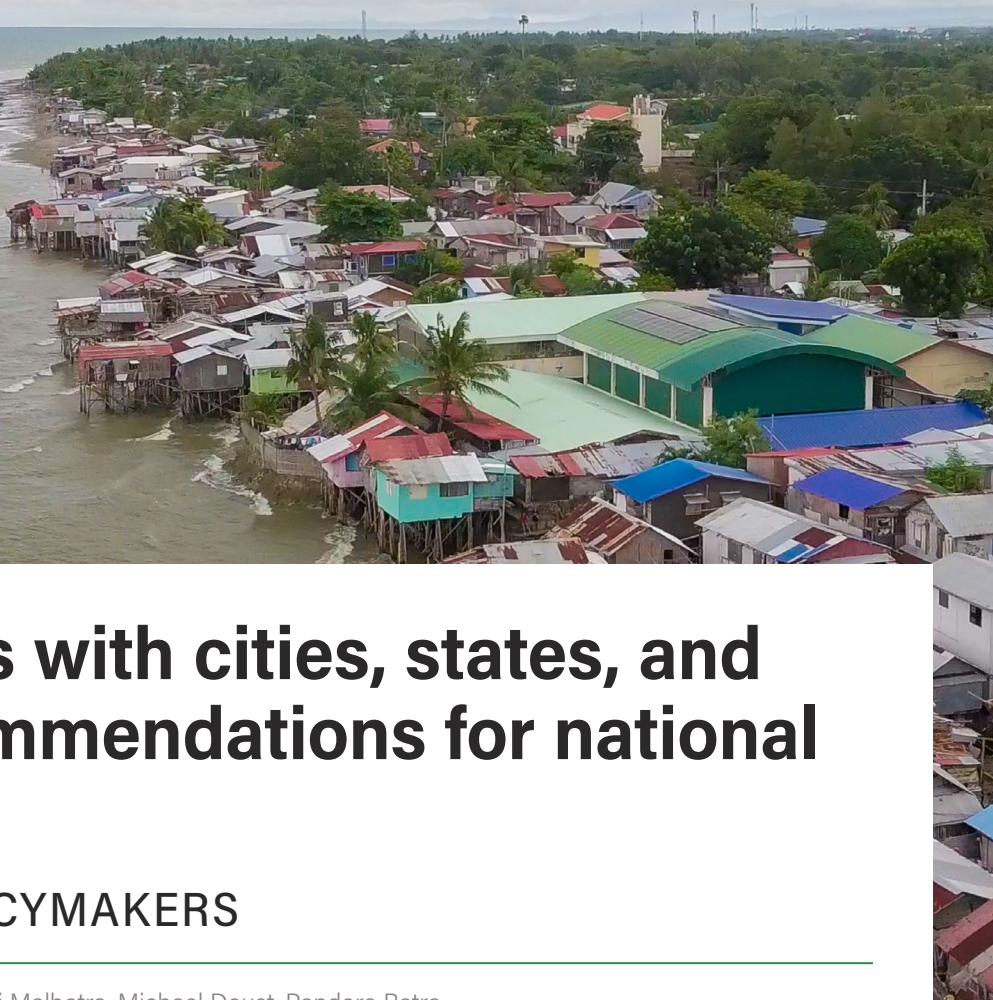




Stronger NDCs with cities, states, and regions: Recommendations for national governments

SUMMARY FOR POLICYMAKERS

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The 2023 Global Stocktake revealed that current commitments and efforts to reduce greenhouse gas emissions (GHGs) are insufficient to meet the goals of the Paris Agreement and calls on national governments to significantly enhance the ambition of their Nationally Determined Contributions (NDCs) ahead of COP30 in November 2025.

While national commitments are essential to driving climate action, a comprehensive global climate response necessitates a multi-level approach. Subnational governments – often overlooked in international negotiations – play a critical role, providing platforms for collaboration and integration among diverse local actors.

Current NDCs frequently fall short of empowering subnational governments to undertake ambitious climate action. These commitments remain challenging to translate into concrete, locally relevant initiatives. Enhanced coordination between different levels of government is a vital, yet underutilized, mechanism for developing effective NDCs that align with the scale and pace of transformation required.

By fostering a more collaborative and integrated approach with subnational governments, countries can significantly enhance the ambition of their NDCs and align them more effectively with the Paris Agreement's objectives. Enabling subnational participation at every stage of NDC development is pivotal for creating realistic and meaningful climate targets while ensuring equitable and beneficial outcomes across diverse regions and scales.

THE MULTILEVEL PARTNERSHIP OPPORTUNITY

An estimated 90% of global urban GHGs can be cut by technically feasible and widely available measures.¹ Yet few of these identified measures fall exclusively within the sphere of either national or subnational government influence. For much of the urban (and wider subnational) abatement potential, there is significant overlap in the roles that various government levels need to play.

To unlock this opportunity, it is critical to build national climate plans on a foundation of multilevel partnerships, fully integrated with subnational perspectives and content. NDCs have the unique role of informing national development agendas for long-term climate action, which can promote investment in public infrastructure, prepare for future risks and support a just transition.

Subnational governments are well-placed to scale implementation, ensure that climate solutions are context-sensitive and that the benefits of climate actions are distributed fairly and locally.

National governments should keep in mind the complementary nature of NDCs to other climate plans, such as National Adaptation Plans, National Biodiversity Strategies and Action Plans, and National Urban Policies. Such formal mechanisms also require coordinated and consistent action from various levels of government and other stakeholders.

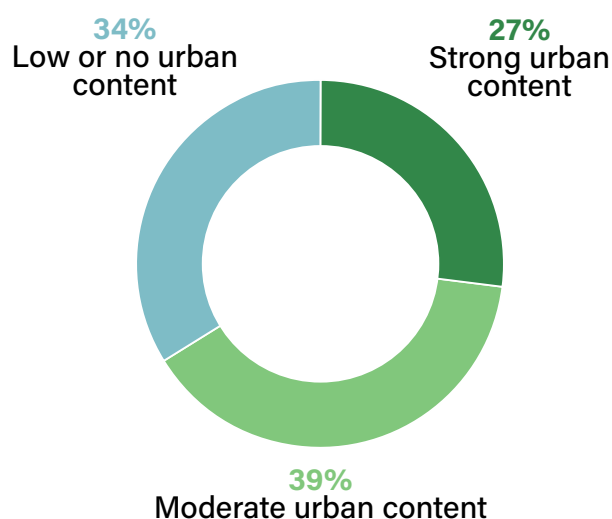
THE SUBNATIONAL PERSPECTIVE

A review conducted by UN-Habitat, the UN Development Programme, and the University of Southern Denmark on the urban content of NDCs submitted before July 2023 demonstrates that national climate commitments continue to struggle with integrating urban climate action. The analysis reveals that only 27% of the 194 NDCs have strong urban content.² Of those, less than half (40%) identify climate hazards at the urban level, compared to 89% of NDCs identifying climate hazards at the national level.

Including cities, states, and regions in every step of planning and delivering climate goals is essential. This helps make NDCs more realistic, credible and ambitious. It also helps inform what local people need and how to help them

Setting climate targets must be an inclusive process. Cities, states, and regions are important partners in this regard. They can bring stakeholders together, are closer to local people and experiences, and can be held accountable. Improved multilevel partnerships can help make sure everyone's voice is heard, create more transparent processes, and secure support across sectors and geographies.

Figure 1. Urban content found in NDCs submitted before July 2023



Source: Tollin et al. 2024

While the recommendations of this working paper focus on subnational governments, the role of non-governmental actors such as universities or community groups cannot be overlooked. It is critical that national governments take a whole-of-society approach³ and ensure that the principles of inclusivity and equity underpin not only NDCs but all climate policies.

Lastly, the scope of this working paper is limited to the NDC development process. While several recommendations aim to ensure that an NDC is more likely to be implemented, financing and implementation is beyond the scope of this working paper.

Defining Subnational Content in NDCs

Subnational content in NDCs includes climate- and development-related data, trends, targets, risks, policies and actions associated with subnational government levels, including cities, states, and regions. This could result in a dedicated subnational government section in each country's NDC, co-developed with local and regional governments, detailing subnational goals, actions and needs. Alternatively, subnational content can be embedded throughout the NDC, including integrating subnational priorities within sectoral targets.

Figure 2. Interconnected priorities to support national governments in producing more ambitious NDCs



Source: Authors.

STRONGER NDCS WITH CITIES, STATES, AND REGIONS

At COP28, over 70 countries endorsed a set of principles to enhance cooperation with subnational governments in the planning, financing, implementation and monitoring of climate strategies, including NDCs.⁴ This Coalition for High Ambition Multilevel Partnerships (CHAMP) for Climate Action was established to help national governments realize the multilevel partnership opportunity.

Stronger NDCs With Cities, States, and Regions has two interconnected priorities to support CHAMP-endorsing countries and other national governments in producing more ambitious and credible NDCs.

The first priority is to **empower national governments** with practices to meaningfully collaborate with subnational governments throughout the NDC development process. The second is to **integrate subnational content** into NDCs to increase climate ambition and likelihood of implementation.

A broad literature review, complemented by expert interviews, identified eight key recommendations that are structured into chronological stages for national governments to collaborate and integrate subnational content in their NDCs. Acknowledging that different countries are at different stages of NDC development, some recommendations and practices may not be directly applicable to all contexts and should be tailored accordingly.

Table 1. Summary of key recommendations for national governments

Stage 1: Review the status of multilevel partnerships, the present level of subnational content in the NDC and the potential contributions of subnational governments towards achieving national climate mitigation and adaptation commitments in line with development goals.	▪ Assess the state and effectiveness of multilevel partnerships and the institutional arrangements in place to support horizontal and vertical collaboration. ▪ Collect an evidence base of subnational content to understand gaps and opportunities for multilevel partnerships. ▪ Evaluate the extent to which national and subnational goals align and where synergies or trade-offs in objectives may arise.
Stage 2: Plan for strengthened collaboration with subnational governments through a collective vision and meaningful stakeholder engagement to foster a shared sense of ownership and responsibility of developing a more ambitious NDC.	▪ Create a vision and stakeholder engagement plan for developing a NDC in collaboration with subnational governments. ▪ In consultation with subnational governments, develop clear objectives to guide the NDC development process, incorporate strong subnational content and enhance the visibility of subnational contributions.
Stage 3: Develop an ambitious NDC that incorporates strong subnational participation and content by integrating subnational data, trends, targets, risks, policies and actions and creates greater incentive for joint implementation across all government levels.	▪ Enhance the evidence base for the NDC by integrating subnational content into national emissions inventories, mitigation scenarios and vulnerability assessments. ▪ Collaborate with subnational governments to develop economy-wide and sector-specific climate targets and actions at both subnational and national levels of government that attract support to enhance NDC ambition and catalyze implementation. ▪ Draft the NDC with a particular focus on incorporating strong subnational content, promoting the highest possible ambition, comprehensiveness and likelihood to be implemented and recognizing trade-offs.

Case Study: Applying the Stages in Practice with Colombia's NDC

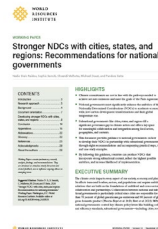
Colombia's 2020 NDC increased its emissions reduction targets and led to the development of a comprehensive long-term climate strategy. This strategy emphasizes the importance of local and regional actors in addressing environmental challenges, particularly deforestation and transportation, and covers mitigation and adaptation targets across all NDC sectors. However, initial efforts revealed the need for improved alignment and feasibility of proposed measures.

For the 2025 NDC update, the Colombian government is actively engaging with subnational governments through open discussions, workshops and practical exercises to draft climate action proposals and better understand proposal implications and outcomes. There is also an open forum on the national government website for subnational government actors to share initiatives.

Colombia's 2025 NDC update offers an example of effective strategy, enhanced impact and collaborative NDC development. By providing support and guidance, the national government aims to ensure that proposed climate initiatives are realistic, credible and aligned with national goals. This collaborative approach is expected to enhance the effectiveness of Colombia's climate action and contribute to a more sustainable future.

View the working paper on wri.org

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Recommendations for National Governments*



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