

SUBMISSION

Launch of the 2025 MPGCA Work Programme

GCAA vision and plan for the next five years

August 2025

Le Réseau Action Climat fédère les associations impliquées dans la lutte contre le dérèglement climatique



Presentation of Réseau Action Climat – France

and its work on non-state climate action over the past years

Réseau Action Climat – France (Climate Action Network France - CANFR) is an association under the French law of 1901 founded in 1996 and focused on climate change. It is the French representative of Climate Action Network International (CAN-I), a global network of more than 1,900 NGOs around the world. A federation of national and local associations (36 NGOs in total), it fights the causes of climate change, from the local to the international level, and aims to encourage governments and citizens to act and limit the impact of human activities on climate.

CANFR has been working on non-state action credibility and accountability for the past three years. In 2020, CANFR published its own overview of non-state climate initiatives and proposed in 2021 a methodology to better assess their impact.

These two publications were updated thanks to a partnership in 2023 with the World Benchmarking Alliance, which resulted in a new publication with a methodology both for non-state climate initiatives and for non-state actors individually. This was completed with a submission under the UNFCCC NSA recognition and accountability framework in September 2023.

The present submission is a short summary of the contents presented previously, according to the questions that were listed in the Letter to Parties and non-Party stakeholders from the Climate High-Level Champions, published on the 17th of July 2025. For more details on each question, CANFR invites the readers to refer to its previous publications.

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1. What should success look like for the GCAA in the next five years, and how can it be measured effectively?

As we approach 2030, strengthening climate accountability will be a critical tool in achieving the Paris Agreement. Since 2015, States have not succeeded in implementing the 1.5°C scenario. This year, with the submission of the new National Determined Contributions (NDCs), States will have to address their insufficient efforts and will need to implement significantly more climate policies. This statement is also true for non-state actors (NSAs): in the past few years, the greenwashing around net-zero pledges has been a growing issue. Most climate initiatives and companies are struggling to shift to an implementation mindset. They do not have a comprehensive vision on climate and do not include enough cross-cutting issues, such as human rights, gender equality or biodiversity. In this report, most of the actors and initiatives analysed did not achieve their climate pledge yet. Accountability of NSAs will be critical to ensure they effectively contribute to implement the Paris Agreement.

More generally, this is very connected to the wider credibility issue the climate governance is facing, especially concerning the representation of private interests during COPs and the presence of several industries in the negotiation rooms. While they are important actors to implement the Paris Agreement, they should not be able to influence the direct negotiations, as the Tobacco Industry is not allowed to interfere inside the World Health Organisation, for example. The success of the GCAA is depending on the credibility of the UNFCCC itself, which would be restored by a **conflict of interest policy**. Civil society organisations are asking for such a policy since years, especially looking at the fact that for example, fossil fuel industry lobbyists are always more present in COPs, and next to this fact, even some COP presidencies had to recognize a strong conflict of interest in the recent years. This can be quite easy to measure, with the following indicator: **in 5 years, polluting industries such as fossil fuel or industrial agroindustry will not be allowed in the negotiation rooms anymore (no pink badges) and will not be able to hold a stand or have a pavilion in the UNFCCC venue.**

Finally, thanks to the improvement of the Global Climate Action Portal (GCAP) that will be developed further under the next questions, other indicators could ensure success for the GCAA, such as:

- **HLEG net-zero criteria are established as a common reference for NSA action tracking inside the UNFCCC, but also at the national level**
- **Half of the reported initiatives and actions from individual actors are based in the Global South**
- **In 2026 and 2027, at least 5 GST People's Assemblies have been organised thanks to the support of the MPGCA team**
- **Every year, the MPGCA and the High-Level Champions' Team are publishing a report on progress and results from its members**

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- In five years, there is inside the MPGCA an advisor committee composed of each UN-FCCC constituency, supporting the work on the yearly report and the strategy implementation of the MPGCA
- New criteria on GCAP to be added, such as respect of Human Rights, Gender Equality, etc
- Initiatives that do not comply with a new accountability and monitoring system, must bear consequences (no invitations on panels and events, no COP badges, visibility on GCAP that the initiative or actor is not respecting principles or reporting elements etc)

In a nutshell, in five years, we need ambitious, credible, accountable and transparent global climate action, with clear mechanisms of reporting and a conflict of interest policy inside the UNFCCC.

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2. How can the GCAA facilitate direct and impactful engagement between Parties and NPS to support implementation efforts at both national and sectoral levels, in order to advance the full delivery of the GST, NDCs, and NAPs?

The GCAA could be the space where States and NSA exchange together on implementation and regulation of non-state climate action. Indeed, the UNFCCC can regulate its own space and make sure there is no greenwashing during its conferences, but it can't do more. States are the entity to regulate their own NSA, they can use their legislative power to guide and regulate them towards a more sustainable and just ecological transition. **Next to sectoral discussions that the GCAA could organise between Parties and NSA, it could also provide a room to exchange on NSA regulation** and how to learn from good practices. In the [CANFR publication in 2023](#), all interviewed initiatives mentioned that they are very limited in terms of accountability and implementation results, because States are not providing enough frameworks and support. This point was also reinforced by companies. Initiatives do not have the power to regulate their members or to provide enough incentives or support them in their transition. They can only guide them and report their results.

This question is also linked to the current accountability system (or lack of it) inside the UNFCCC. In the publication mentioned above, CAN France suggests an update version that could be developed during the 5 coming years:

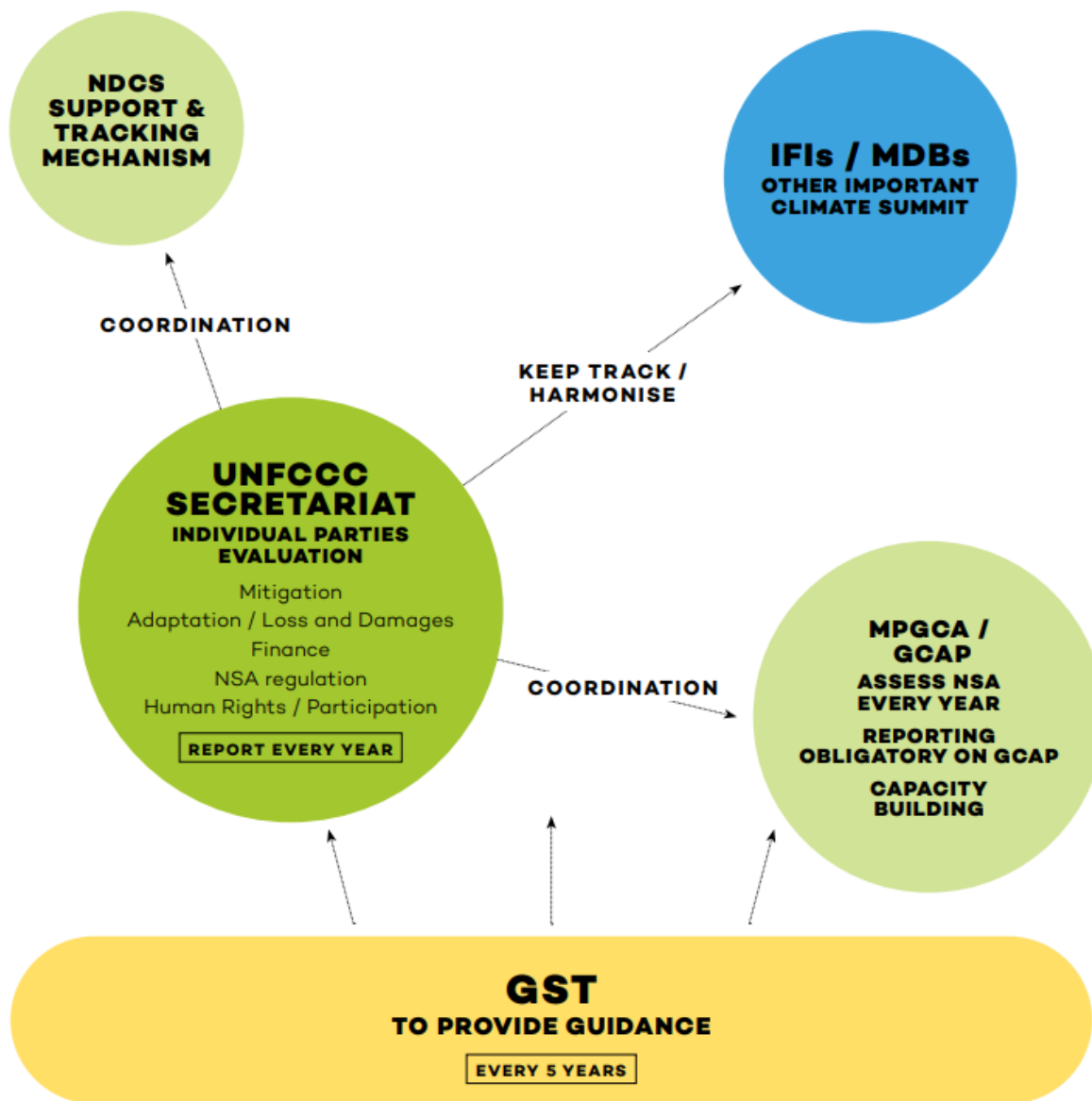
- The Global Stocktake would be the compass. It provides guidance on what to achieve, and how, from whom.
- The UNFCCC secretariat would be the main facilitator. The secretariat should coordinate all aspects of accountability with its own mechanisms, such as NDC tracking and NSA accountability framework.
- A NDC Support and Tracking Unit would be established This is the new element of the vision that needs to support States to implement and enhance the ambition of their NDCs. This unit must be composed of UNFCCC staff and several external committees on all pillars of the Paris Agreement. The committees can be solicited by the States on relevant issues for technical advice, or by the UNFCCC secretariat directly. Next to support, this unit should track the individual progress of NDCs.
- **The MPGCA and GCAP would be responsible for reporting efforts and results by NSAs. It would also be the space to implement a policy against conflict for interests inside the UNFCCC**, making it consequential for NSAs which are not reporting or respecting the HLEG criteria. Every year, a report on progress has to be published, such as one report on the past 5 years before the Global Stocktake (see in the UNFCCC accountability cycle page 23). These reports should be an important source of information for the GST

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and the next NDCs. They would provide individual progress of the members of the GCAA, not only a general overview as the yearbook is currently doing.

GRAPHIQUE :
GLOBAL VISION OF ACCOUNTABILITY AT THE UNFCCC LEVEL⁴⁰



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3. How can the GCAA promote an inclusive and equitable engagement, in particular from underrepresented groups and regions?

If the GCAA is lacking of inclusion, **part of the reason is that its members are not representative enough**. For most non-state initiatives, there is no balance between actors from the Global North and South (the North being overrepresented) and also a lack of representation of civil society and indigenous communities. This means the expertise and the needs from the most impacted States (Global South mainly) cannot be sufficiently considered and thus, targets or activities might not be relevant enough in different contexts. In addition, beyond the inclusion of the most vulnerable groups, for most initiatives and companies, **the linkages with other cross-cutting issues are still difficult to raise**, such as human and labour rights, gender equality or biodiversity protection. These issues are priority to most civil society movements, or indigenous people, for example. While it is clear that for initiatives, the diversity of their members can be a barrier for better accountability (since it is too hard to monitor all members with small teams and with such a diversity of contexts and sectors), dedicated spaces can be created. Through an advisory or strategic committee, local communities, indigenous people, youth organisation or civil society more generally can contribute to elaborate the strategy of the initiative for example and prepare the important moments of the year (such as a COP, a climate week, etc).

Secondly, inside the GCAA, civil society could be better engaged for example in **the report on NSA climate Action**. The UNFCCC teams could call on external experts at least every two years and allow marginalised actors to contribute to the evaluation of the GCAA. External experts must be diversified with the insurance of representativity of civil society, with geographical and gender balance (as well as gender expertise and other cross-cutting issues such as Human Rights). Another idea for the **global assessment report every 5 years** before the Global Stocktake: it could be co-designed with external experts and representatives of each UNFCCC constituency. A last idea: for the second GST, during the technical phase, **the GCAA could support constituencies to organise GST People's Assemblies** so that the process is directly feed by citizens from all over the globe. This could be organised next to the climate weeks in 2027, for example.

Finally, the GCAA is also a victim of its broader governance. The international climate regime is relatively strong compared to others, since the Paris Agreement provides a common framework for States to work together towards common goals. However, this does not mean that there is no space to improve governance elsewhere. For example, the Committee on World Food Security (CFS) is one of the most inclusive multilateral platforms. Civil society is self-organised within the Civil Society and Indigenous Peoples' Mechanism (CSIPM) representing 11 constituencies and can actively participate in political products negotiations. Next to inspiration from other governance systems at the international level, it is important to remember that the UNFCCC is part of a larger globalised economic and political system. This system is not equitable, failing to recognize the needs of the most

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impacted communities and persons, such as indigenous people. **It would be crucial for the UN-FCCC and Parties to establish rules for a stronger involvement and better inclusion of these communities or social groups, not only in the GCAA context.** Next to being more effective in supporting climate action, this would have a positive impact on the international climate regime overall.

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4. What improvements can be made to ensure better transparency, reporting and follow up of the GCAA, including in existing tools such as the Global Climate Action Portal (a.k.a NAZCA) and the Yearbook of Global Climate Action?

The UNFCCC should be the main facilitator in determining international climate ambition, including non-state action. It should have a dual role: monitoring States' climate commitments and acting as an arbitrator for non-state commitments. To achieve the above, **States must accept that the UNFCCC exercises a role of arbitrator over non-state climate action**. At COP30, they must deliver a mandate to the UNFCCC to be able to do this tracking work and arbitrate which initiative or NSA has the right profile to attend its conferences. The UNFCCC budget must also be increased to conduct this work.

Tools as already available, but could be improved, especially the GCAP: **currently, the portal is not fully reporting impacts and progress** of its members, initiatives are mostly reporting their members, date of foundation and goals. Many do not report (or not fully) on their governance structure, nor their progress towards the goals they communicate or activities they actually do every year. **Another issue is that GCAP is generally not visible enough in the UNFCCC sphere** and companies or initiatives do not have high interests to report their efforts there. Initiatives already have to report on several platforms every year and some need to prioritise where they report due to capacity issues. **This is also related to the fact that reporting is not mandatory**, and this is not pushing companies or initiatives

to do it themselves. Through the interviews¹ CANFR and the World Benchmarking Alliance could organise, some initiatives also highlighted the fact that the portal is very complex because it is bringing both individual actors and initiatives with very similar reporting systems. Opinions are quite similar concerning the Race to Zero movement: Some initiatives are working closely with the team, others do not and are part of it mostly because their members joined the initiative. Regular engagement between initiatives and the Race to Zero is quite rare, and this can be explained by similar reasons as GCAP: lack of capacity, commitments to several portals and initiatives, need to prioritise, and the lack of visibility of the Race to Zero inside and outside the UNFCCC space.

¹ https://reseauactionclimat.org/wp-content/uploads/2023/10/coalition_23_10_09_en.pdf

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These would be the important steps according to CANFR to improve the GCAP in the next five years

- Initiatives and companies must **provide all the information** currently requested on the Global Climate Action portal (on governance, membership, goals, outcomes) on an annual basis
- The UNFCCC teams must **update the portal and remove non-active initiatives**
- The UNFCCC teams shall **ensure the value-added** of new initiatives for their members and that they supplement rather than duplicate other already existing initiatives.
- The focus of initiatives (ex EV100) can represent a minor share of the emissions from companies that join. It is therefore **important to ensure initiatives also bring in relevant new members** whose emissions are impacted by initiative actions.
- The UNFCCC teams **should adapt questions and reporting requirements between companies and initiatives, but also depending on sectors** (such as what WBA is doing to assess companies)
 - o Clarify the link between initiatives' reporting exercise and initiatives' members reporting exercise
 - o Clarify the relationship between GCAP and its companies level data provider(s), knowing that, in some regions, some companies pay to disclose their climate information to some data gatherers/providers
 - o Reinforce the connection between GCAP and NSA's mandatory climate disclosure requirements that States implement
- **Additional selection criteria** are needed for NSAs and initiatives to join the UNFCCC and register on the portal, with 4 main redlines which cannot be crossed:
 - o Direct or indirect support to the oil, coal and gas industries
 - o Violation of human rights, such as forced displacements or land grabbing in project implementation
 - o Activities threatening biodiversity
 - o Non-respect of gender equality
- **Initiatives that do not comply with this new accountability and monitoring system, must bear consequences.** Otherwise, it will only be an incomplete transparency framework, which will not reduce greenwashing and foster climate ambition. These consequences could be the following
 - o No invitation to take the floor during COP, such as in MPGCA or UNFCCC events
 - o No badges to attend the COP
 - o Visibility on the portal and other communication indicating that the concerned initiative is not respecting the monitoring process or/and is not achieving its goals. If the initiative is still not making any visible progress or is clearly inactive UNFCCC and GCAP teams should take action to either remove the initiative or indicate this very clearly in the portal.

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Finally, in order to achieve a better reporting, CANFR is proposing a fact sheet and an evaluation grid for GCAP that would allow a better overview of the progresses of initiatives. The World Benchmarking Alliance is also proposing a methodology to assess individual companies. Details can be found in our previous submission², with also examples of companies and initiatives that have been evaluated through these methodologies. The fact sheet and the evaluation grid for initiatives can be found below.

4.1 The fact sheet

This fact sheet identifies the initiative and its members, its sector of action and objectives, as well as its activities. The categorization of members is aligned with GCAP: companies, banks and financial institutions, local and regional authorities (federal states, regions, departments, or cities), sovereign states, and other types of actors (NGOs, universities, think tanks, inter-governmental and international organisations). The categorization of activities is also inspired by that of UN platforms, distinguishing among the organisation of events promoting exchange, awareness-raising, and the production of expertise. Some initiatives also declare activities related to the labelling of their members, while others engage in communication activities, particularly campaigns. Some communicate advocacy work with governments or investors. Finally, some do fundraising and implement pilot projects, such as the development of renewable technologies.

General presentation of the initiative	Name
	Sectors
	Founding date
	Founding place
	Geographic area
	Number and type of members
	Links with other relevant initiatives
Climate and biodiversity objectives	
Activities	Exchange and dialogue
	Awareness raising
	Expertise development
	Labelling
	Advocacy
	Campaigns / Declarations
	Fundraising
Funders	Projects

² https://reseauactionclimat.org/wp-content/uploads/2023/10/canfr_wba_submission_nsa_accountability_framework-1.pdf, pages 10 to 18 for the methodologies, and from page 24 for case studies and examples of actors that have been assessed

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4.2 The Evaluation Grid

The evaluation grid lists and evaluates detailed information about the initiative, in order to rate it based on governance, monitoring and evaluation indicators. Four areas of assessment were identified: the quality of the initiative's goals and impact, the inclusiveness and representativeness of its members, its transparency and internal functioning, and its monitoring and evaluation system. The first area addresses the quality of the objectives (Are they quantified? Is there a time frame?), as well as whether the initiative communicates the achievement of its goals or not. It also integrates a qualitative evaluation using a sustainability indicator based on the positions of CANFR and the World Benchmarking Alliance. For example, the initiative's work should not encourage technologies that reduce greenhouse gas emissions but have negative social, economic, or environmental impacts. If that is the case, the sustainability indicators will not receive any points. The second area concerns the inclusiveness and representativeness of the initiative, in terms of types of actors, but also of geographies. This section attempts to assess whether civil society is represented (and if so, whether via international or local organisations), but also to identify its role. It will also address the role of developing countries in implementation and decision-making. The third area of evaluation examines the internal functioning of the initiative: our methodology has attempted to identify the initiative's various bodies and to analyse access to information on meetings and decisions taken. Financial reports, action plans, and charters are also consulted in this axis. Finally, the fourth area concerns the initiative's internal monitoring and evaluation processes: beyond communication through a website and registration on GCAP, CANFR attempted to identify whether and with what tools the initiative communicates its activities and their results. Some elements proposed here are already embedded in GCAP, some are not or under a different angle.

Once the fact sheet and evaluation grid are complete, the coalition is rated. For each indicator in the evaluation grid, there are three possible answers: Yes, Incomplete, No. If the information available is more than two years old, it will not be considered. Absence or lack of information is counted as a "No". A score is attributed for each area of the grid on a basis of 2.5 points in order to balance overall ratings, despite the unequal number of indicators per area. The overall score of the coalition is on a scale of 10 points: 10 points will be considered excellent (represented by four stars). 9 or 8 points is a good score (three stars), 7 or 6 is acceptable (two stars), 5 or 4 is insufficient (one star), and any score under 4 is mediocre (dotted star). Within each area, a total score of 2 points or more will be represented by a gold star, a score between 1 and 2 points by a silver star, and below one point with a dotted star.

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Areas of work	Indicators for satisfactory governance, monitoring and evaluation
Objectives	Quantitative objective, with time frame
	Communication about achievement of objectives
	The initiative's activities and objectives are sustainable: they do not have negative environmental, social, or economic consequences and take into consideration the needs of the most vulnerable such as women or youth
	Just Transition Strategy
Inclusiveness	Online publication of initiative's members
	At least two different types of stakeholders represented among members
	Balanced representation of civil society
	Balanced representation of developed and developing countries
Governance	All initiative bodies are clear and their functions are explicit
	The decision-making body meets at least once a year (e.g. General Assembly) and records of decisions are published and publicly available
	At a minimum, the initiative has a coordinating body (with its own support team), a decision-making body, a charter, and a work plan. It holds regular meetings.
	Decisions and minutes from initiative's meetings are accessible
	Information about the initiative's funding and its use of those funds is accessible
	Dedicated attention to the gender balance in the governance bodies / decision making processes
Evaluation	The initiative communicates through a website
	The initiative reports its activities and tracks its projects. It must provide the following information: sources, amounts, and dates of funding; reports or briefing notes on the project or activity; participants and/or beneficiaries; objectives and outcomes
	The initiative provides information on the achievement of its objectives for each member
	All information requested by GCAP and the Race to Zero criteria are available on these platforms

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