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internacional@fnp.org.br

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Submission of the National Front of Mayors of Brazil

On the Work Programme of the High-Level Champions and the Marrakech Partnership (CHLC/MP) 2025

About the FNP

Founded in 1989, the **National Front of Mayors (FNP)** is the only national municipalist entity in **Brazil** led exclusively by sitting mayors. It brings together all state capitals and municipalities with more than 80,000 inhabitants. With a growing trend, it currently represents **415 medium and large cities**, where **61% of Brazilians live** and **74% of the national GDP** is produced (2021 data). The organization is structured through an executive board, thematic vice-presidencies, population-based and state-level vice-presidencies, and a fiscal council. This institutional arrangement allows FNP to effectively represent the urban perspective of Brazilian municipalities in national and international policymaking arenas.

Question 1 – How can the High-Level Champions and the Marrakech Partnership add the most value and complement existing efforts to accelerate climate action and drive implementation?

The FNP highlights that the greatest added value lies in **institutionalizing multilevel governance** within the UNFCCC. Subnational governments should be recognized as **co-authors of NDCs** and as formal contributors to cooperative mechanisms under Article 6.2. Furthermore, the establishment of a **permanent urban-climate agenda**, co-led by UNFCCC and UN-Habitat, would address core areas such as territorial planning, housing, mobility, socio-spatial justice, and urban economic transition. This integration ensures that climate action responds directly to local realities, accelerating effective implementation. Finally, the Marrakech Partnership can provide concrete added value by promoting reforms in **climate finance architecture**, enabling **direct access to climate funds** for subnational governments, tailored to their institutional and socioeconomic capacities.

Question 2 – How can the High-Level Champions enhance collaboration between Parties and NPS to advance the outcomes of the first Global Stocktake?

To strengthen collaboration, the FNP proposes:

- Establishing **formal co-authorship mechanisms** for NDCs that include subnational governments and their official associations.

- Creating a **permanent institutional arrangement within the UNFCCC** for subnational engagement, ensuring that national associations of municipalities participate officially in GST dialogues and in the design, monitoring, and revision of NDCs.
- Integrating **urban economic transformation** into the climate transition, prioritizing green public procurement and facilitating access to climate technologies through TRIPS flexibilities.

Such measures will bridge the gap between Parties and non-Party stakeholders, enhancing synergies and ensuring that GST outcomes translate into actionable policies at the territorial level.

Question 3 – *How can the Marrakech Partnership be enhanced to support Parties in achieving the goals of the Paris Agreement, including through new and existing tools?*

The Marrakech Partnership can be strengthened through the following enhancements:

- **Subnational climate finance access:** Reform eligibility criteria to guarantee direct access for municipalities to international climate funds, with modalities adapted to local contexts.
- **Dedicated capacity-building programmes:** Allocate a share of the NCQG resources for technical and institutional capacity-building of subnational governments, ensuring they can effectively implement Paris Agreement commitments.
- **Institutional permanence:** Establish a permanent, formalized space within the UNFCCC for subnational government associations, ensuring continuity of engagement beyond ad hoc consultations.

By embedding these enhancements, the Marrakech Partnership will become a more effective tool to support Parties in achieving the Paris Agreement goals, leveraging the role of cities and local governments as frontline implementers of climate action.

Original Excerpt from the WP CHLC/MP 2025	FNP Proposal (Inclusion)
<p>Paragraph 4: "...inclusive, multilevel, gender-responsive and cooperative action..."</p>	<p>[Multilevel Governance] Add that "multilevel" must include the full decision-making participation of subnational governments or their official representative entities in the formal spaces of the UNFCCC, ensuring that these actors are recognized as co-authors of the NDCs and directly contribute to the cooperative mechanisms of Article 6.2, with formal recognition in the accounting and verification rules.</p>

<p>Paragraph 15 – Axis IV: "(11) multilevel governance, (12) sustainable and resilient constructions..."</p>	<p>[Urban-Climae Agenda] Include the creation of a permanent urban-climate agenda, institutionally articulated between the UNFCCC and UN-Habitat, addressing territorial planning, housing, mobility, socio-spatial justice, and economic transition, as a structuring axis of climate action at the local level.</p>
<p>Paragraph 15 – Axis VI: "(20) climate and sustainable finance... (26) governance, state capacities..."</p>	<p>[Financial Architecture] Insert that financial mechanisms must provide modalities for direct access to climate resources for subnational governments, adapted to their institutional and socioeconomic realities, with guarantees and eligibility criteria revised to reduce access barriers.</p> <p>[Capacity-Building] Allocate part of the NCQG resources to a specific program for technical and institutional capacity-building of subnational governments, integrating this support into climate finance mechanisms.</p>
<p>Paragraph 19(a): "...strengthening collaboration between national governments and NPS..."</p>	<p>[Urban Governance and Economy] Reinforce that collaboration should include formal co-authorship mechanisms of the NDCs by subnational governments and their official representative entities, and the incorporation of urban economic transformation as part of a just green transition, with priority for green public procurement and TRIPS flexibility for the adoption of urban climate technologies.</p>
<p>Paragraph 19(f)(ii): "Subnational engagement will include a focus on increasing action and finance..."</p>	<p>[Institutionalization of Subnational Participation] Add that this engagement must evolve into a permanent institutional arrangement within the UNFCCC, ensuring the participation of national associations of municipalities as official interlocutors in the strategic dialogues of the GST and in the processes of drafting, monitoring, and reviewing the NDCs.</p>



Gilberto Perre
Executive Secretary