

2025 Work Programme for the High-Level Climate Champions and the Marrakech Partnership

Consultation Response submitted on behalf of the World Business Council for Sustainable Development (WBCSD)

Introduction

The World Business Council for Sustainable Development (WBCSD) welcomes the opportunity to provide input to the Climate High-Level Champions on the five-year vision for the Marrakech Partnership for Global Climate Action (MPGCA) and the Global Climate Action Agenda (GCAA).

We welcome the leadership the Champions' have provided over the past five years in strengthening the GCAA as the central platform for mobilizing stakeholders across the private sector, governments and sub-national actors to drive action. This submission shares reflections on how the Global Climate Action Agenda can be strengthened further to support the shift towards implementation that both fosters inclusivity from a wide-range of stakeholders whilst focusing resources on the most impactful priorities and levers to support delivery of the Paris Agreement and the Global Stocktake. Drawing on engagement with our business members, wider networks, our experience as Marrakech Partnership focal point for Industry and Breakthrough Agenda partner, we highlight five elements to strengthened the Action Agenda to accelerate implementation over the next five years. We also outline reflections on supporting effective engagement between Parties and NPS to support implementation efforts at national levels, in order to advance the full delivery of NDCs and NAPs.

Business is already moving at pace. As the Business Breakthrough Barometer 2025 highlighted, businesses are staying committed to climate action as it is central to long-term competitiveness and business resilience. However, to achieve the transformations required, the private sector recognises the need to work with governments, investors and civil society to accelerate implementation. These five elements will ensure that businesses continue to see strong value in deep engagement and participation in the Action Agenda through greater clarity on key priorities, follow-through on commitments, and impact from senior level mobilization.

1. **Maintain a consistent framework** that drives progress from COP-to-COP
2. **Ensure inclusivity** to showcase solutions and spotlight challenges
3. **Ratchet action** by identifying and delivering on key levers to unlock speed and scale
4. Strengthen and expand the **Action Agenda leadership**
5. **Reform GCAA COP events** to drive momentum

1. Maintain a consistent framework that drives progress from COP-to-COP

The GCAA fundamentally needs to drive sustained momentum around implementation, to close the gaps identified in the Global Stocktake. Alongside the formal negotiations and the ratchet mechanism of the NDCs and NAPs, it provides a valuable action ratchet mechanism through smaller coalitions of action that demonstrate what is possible and that continuously target the

levers that are blocking accelerated investment. To ensure the Action Agenda delivers meaningful impact, a consistent COP-to-COP framework is needed. Creating continuity of goals across Presidencies and Climate High-level Champions, whilst enabling each to lean in behind key annual priorities, will enable continued momentum, preserve progress, reduce duplication, and strengthen trust in the process. This framework must be designed to enable strengthened engagement across both government and non-state actors, enabling shared ownership and delivery.

We welcome the framework that the Presidency and Climate High-Level Champions have created for the COP30 Action Agenda by anchoring and aligning implementation with the Global Stocktake (GST). This supports the identification of where efforts are most needed and clearly aligns with delivery of the Paris Agreement. The six axes provide a strong framework for COP-to-COP continuity. We also value links and connection points to the other Rio Conventions, such as on land restoration, with businesses seeking a more systemic approach and alignment across the Rio Conventions. The Objective driven approach of the Activation Groups (AGs) is a helpful model to coordinate initiatives and identify key priorities for further acceleration. Some of this would benefit from sustained engagement over multiple years, however, sustaining 30 Activation Groups and many further Plans to Accelerate Solutions may be resource intensive and so some evolution annually is likely to be needed.

Within this COP-to-COP framework there is a need for both inclusivity and focus, and a tension between these. Without a structured mechanism to sustain political and business attention, as well as track progress, the GCAA risks becoming a catalogue rather than a driver of implementation. The GCAA needs to balance these elements and we outline below recommendations for achieving this.

2. Ensure inclusivity to showcase solutions and spotlight challenges

Inclusivity is vital to the credibility, effectiveness, and legitimacy of the Global Climate Action Agenda. It ensures that climate action reflects the diversity of global stakeholders, showcases a range of solutions, enables ideas and approaches to emerge from different settings, builds trust, and unlocks broader political and social momentum.

Balancing inclusivity with focus is essential to ensure that diverse solutions and challenges are represented whilst achieving results. We recommend that the goal should be that the GCAA reflects a diverse and balanced mix of effort that overall reflects a wide range of voices, geographies and needs, ultimately supporting all countries and actors to make progress and achieve mitigation and adaptation goals. In particular, there should needs to be wider engagement on **showcasing solutions** and engaging widely on **challenges and gaps**.

Showcasing Implementation

The Global Climate Action Portal (NAZCA) can play an important role in showcasing solutions, but its value depends on more than simply collecting and storing data. To be effective, the portal must meet a clear demand for its information: it should answer not just what data is collected, but who will use it and how. This ensures reporting is meaningful rather than a box-ticking exercise, creating tangible value for participants and making the portal better utilized.

Transparency efforts should focus on real evidence of impact through the Action Agenda as well as annual reporting on KPIs, such as aggregate committed investments, policy changes, and the deployment of solutions at scale. Business leaders have highlighted that demonstrating tangible proof points build trust, shows that COP-linked action delivers real-world outcomes, and illustrates the potential to close gaps identified in the Global Stocktake. Visibility during major moments such as COP, recognition in official communications, or opportunities to shape future priorities can further incentivize transparency and participation.

To maximize its utility, transparency tools should connect with other data systems like CDP, avoid duplication, and organize information in ways that respond to the distinct needs of users.

Spotlighting Challenges and Identifying Gaps

A strengthened approach to inform decision-makers about challenges and gaps would help to better inform the Presidency and Climate Champions each year about where to prioritize efforts. This could begin with a broad call for contributions from all stakeholder groups — including national and subnational governments, private sector actors, civil society, youth, Indigenous Peoples, and the scientific community and initiatives – on the key issues that need addressing that year under each of the six axis of the Action Agenda to accelerate momentum and close the gaps on the Global Stocktake. Ideally these would be at the level of levers (e.g. procurement policy or mitigating foreign-exchange fluctuations) rather than topic areas (e.g. Agriculture).

This process could be requested by the Climate High-level Champions and involve the initiatives contributing to Activation Groups. Specific organizations, such as IGOs, the Marrakech Partnership focal points and the Axes Group Secretariats could be invited to provide expert input. Both countries and other actors (e.g. businesses, sub-national actors) could also be asked for the key challenges they are facing in accelerating mitigation and adaptation.

This ‘Delphi’ style process which has proved effective in other settings, such as identifying research goals or forecasting, would result in an annual “Challenges & Gaps Brief” delivered to the incoming COP Presidency and High-Level Champions, highlighting urgent cross-cutting barriers and high-impact opportunities for intervention. Critical would be ensuring a strong connection to the GST, country challenges to achieve NDCs, and specific levers of action that can unlock further investment and scale.

By publishing the findings and tracking how they inform future action, the process would create a transparent feedback loop, building institutional knowledge and aligning annual Action Agenda efforts with the delivery of the Global Stocktake. This would enable participation by a wide-range of actors and contributions to the “Challenges & Gaps Brief” could be linked to a requirement to provide up-to-date information on the NAZCA portal to incentivize transparency.

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The evolution of the GCAA has already helped expand participation and transparency. It has opened the door to new actors and supported collaboration across a wide landscape. The next step is to expand that openness to enhance transparency and visibility of efforts whilst utilizing it to enable more focused and strategic approaches in specific areas. Consultations with the

WBCSD CEO Advisory Board echoed this view. Business leaders stressed that diversity and a range of efforts and initiatives is needed, but impact requires focus.

3. Ratchet action by identifying and delivering on key levers to unlock speed and scale

The Action Agenda has still not fully delivered on its potential to shift real-world impact and scale investments. In consultations with the WBCSD COP30 CEO Advisory Board, business leaders consistently underlined the need to anchor mobilization each year around a small set of clear outcomes that both scale policy action and non-state actor efforts – effectively driving the ambition loop. Companies want to engage in targeted, outcome driven discussions that focus on the levers that will unlock speed and scale investment. This requires clarity on what the priority levers are, who is responsible for driving them and how progress will be measured. Levers cited as particularly critical for scaling private sector investment include internationally aligned standards (e.g. for hydrogen or green steel), demand creation policies, well-functioning carbon markets, carbon product footprints and harmonised climate-related financial reporting. By making these kinds of unlocks the focus for annual Action Agenda engagement it could increase its relevance for governments and the real economy alike, by supporting governments to achieve NDCs and businesses to achieve corporate transition plans. An example of this successful approach was the momentum created around policies to set phaseout dates for internal combustion engines at COP26, which resulted in real shifts in market scale and investments.

There are different ways this type of focus could be determined. A starting point would be the identification of challenges and gaps through the process described above. Existing mechanisms such as the Breakthrough Agenda identify priority actions for specific sectors. There is also a need for more structured engagement between governments and non-state actors to identify and prioritize key barriers to implementation – for instance, the annual Business Breakthrough Barometer that WBCSD has delivered for the past two years in partnership with the Climate High-level Champions, the Marrakech Partnership and Breakthrough engages with hundreds of businesses around the world, tens of initiatives and convenes Sector Business Groups to identify the critical and most urgent priorities to scale investment and enable countries to achieve their NDCs.

To ensure these priorities deliver, our members highlight the value of having a set of success criteria for the introduction of new initiatives or announcements at COP such as clearly defined outcomes, tight scope, the right stakeholder participation (govs, business, civil society), ongoing resourcing, end date and credible accountability frameworks. For these criteria the GCAA can learn from existing successful initiatives that have driven implementation.

Each year, a small number of priority outcomes could be taken forward based on where action is most needed to scale investments and markets. These could be advanced throughout the year by focused coalitions and supported by the Champions and Presidency, leading to clearer outcomes and greater impact at COP. This requires strengthened Action Agenda Leadership as outlined next.

4. Strengthen and expand the Action Agenda leadership

There is a need for sustained political and non-state actor support to ensure the Action Agenda is a central driver of meaningful action, rather than a catalogue of activities. Real momentum comes when there is accountability, leadership and the sense that delivery will be followed up and supported. Political attention helps to focus resources, encourage coordination and create consequences for inaction.

Clear leadership for the Action Agenda can ensure continuity, accountability, and strategic direction. This leadership can align stakeholders around shared priorities, maintain momentum on targeted issues, and bridge the gap between technical initiatives and high-level political decision-making. We welcome the approach taken this year to appoint a COP CEO, working together with the Climate High-level Champions to ensure a joined-up Action Agenda, that enables the mobilization and engagement across both governments and NPS.

Expanding Action Agenda Leadership

At present, Presidencies typically take on significant responsibility for driving forward the most significant outcomes of the Action Agenda themselves. Wider engagement political and non-state actor leadership could be a powerful tool for accelerating progress on specific outcomes by designating visible and accountable leads – similar to how the Climate Action Summit in 2019 invited country and NPA co-chairs on specific topics. Drawing on the experience and approach of the Breakthrough Agenda (which has country co-leads for each Breakthrough) countries and NSA Champions with relevant expertise, political will, or strong track records could be invited to drive forward priority outcomes or Activation Groups, such as tripling renewable energy, or nature-based solutions.

To be effective, these leads would need to have clear mandates, defined targets, and regular reporting mechanisms to the COP Presidency and Climate High-Level Champions. They would need to build on existing mechanisms and initiatives rather than duplicating existing efforts. This would require providing them with technical support (cf the Champions team, Breakthrough Facilitators or from Marrakech Partnership focal points) who are already linked to initiatives and actors, ensuring that progress is sustained and builds on prior efforts. By embedding political and non-state actor leadership in this way, the GCAA can move from broad commitments to focused, sustained action that keeps momentum alive between COPs.

5. Reform GCAA COP events to drive momentum

The COPs' convening power could also be used more effectively by shifting from broad roundtables and pavilion panels to targeted, solution-oriented discussions that build momentum. Instead of treating COP gatherings solely as platforms for showcasing initiatives, the Action Agenda can design curated sessions that bring together the exact mix of political leaders, technical experts, financiers, and frontline actors needed to unlock progress on specific challenges. This is what businesses (and CEOs) are asking for to ensure that their participation is valuable, focuses on real challenges and drives outcomes.

These conversations should focus on overcoming defined barriers, aligning resources, and committing to concrete next steps, with clear follow-up built into the process. By using the COP as both a global stage and a working forum — where political weight, technical knowledge, and financial leverage converge — the Action Agenda can turn high-level attention into a mechanism to take the next steps towards enhanced implementation. This approach ensures that each COP acts as a milestone in an ongoing cycle of collaboration, accountability, and tangible results, rather than a one-off event.

It would also be valuable to make this a moment for Ministerial-CEO dialogues that are maintained on an annual basis – for instance aligned with key sectoral goals such as tripling renewables and the Buildings Breakthrough. These might be chaired by the Country and NSA Activation Group or sector leads, again creating an incentive and mechanisms to bring forward further momentum and implementation.

As above, what is critically important here is that dialogues and participants are designed with impact and momentum in mind. This means that inclusivity is achieved across the range of dialogues rather than within each dialogue to drive momentum.

Regional Activations

In addition, regional activation could be used to a greater extent and more effectively. Not every discussion and challenge needs to be discussed at the COP itself and utilizing regional engagement could drive faster momentum and enable greater inclusivity. The goal should not be to create new infrastructure but to support and amplify what already exists. Many regional climate events are now self-organizing, such as New York and London Climate Weeks, and other recurring platforms like the Petersberg Dialogue, Food Systems Summit, Clean Energy Ministerial or Mission Innovation Ministerial. These moments are already shaping political and technical agendas and offer valuable entry points into the COP process. Rather than duplicating these efforts, the UNFCCC and the COP Presidencies could support better connectivity by docking into these existing and successful moments, helping to seed regional dialogues, share best practices and bring greater alignment with the global agenda. One option is to focus on linking these events more clearly to COP milestones. For example, a regional climate event held alongside a sectoral summit (such as a Food Systems or Energy Forum) could feed into the COP more directly if planned with that connection in mind.

Additional Comments

Aligning NDCs, NAPs, and Corporate Transition Plans: new mechanisms are needed to align corporate transition plans with country transition, national policies and sectoral pathways. WBCSD are currently exploring approaches and recommendations that can effectively enable this.

Focusing on replicable and scalable solutions: Businesses are keen to work with national governments to support NDC and NAP implementation, including curating solutions that are most replicable and critical for advancing investment and implementation – and building project pipelines.



Mobilizing the private sector: The private sector is looking for a clear rallying point for action and engagement to effectively demonstrate solutions and focus their implementation efforts at COPs.

Build a strong narrative: A compelling narrative is needed for the Action Agenda that enhances visibility of progress and highlights the role of all stakeholders in contributing to its success.