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Research Report

Boosting non-state climate action in the European Union

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Boosting Non-State Climate Action in the European Union

Summary

The 2015 Paris Agreement and the accompanying Paris Decision recognise the importance of climate actions by non-state actors, such as businesses, civil society organisations, cities, regions and cooperative initiatives, to reduce greenhouse gases (GHG) and to adapt to climate change as necessary complements to governmental commitments. Prominent international platforms, such as the Non-State Actor Zone for Climate Action (NAZCA) by the Secretariat of the United Nations Framework Convention on Climate Change (UNFCCC) and the Climate Initiatives Platform administered by the United Nations Environmental Programme/Technical University of Denmark (UNEP/DTU) Partnership, have greatly improved the visibility of such actions.

Within this dynamic field of non-state climate action, non-state actors based in the European Union (EU) can be considered global leaders. Actions led by EU-based actors represent most initiatives registered with UNFCCC's NAZCA platform. Moreover, individual member states have played leading roles in the Global Climate Action Agenda (also known as the Marrakech Partnership for Global Climate Action). A recent study by the European Economic and Social Committee (EESC) and the German Development Institute / Deutsches Institut für Entwicklungspolitik (DIE) moreover finds that actions led by EU-based non-state actors are performing well compared with the global average (EESC, 2018).

However, the implementation of non-state actions is not evenly distributed. In absolute terms, existing initiatives in

Central and Eastern Europe (CEE) are underrepresented. Moreover, few actions led by EU-based non-state actors are recorded in international platforms in areas such as forestry, transport and construction (EESC, 2018).

The need for more, and more effective, non-state actions is evident given the fact that current EU climate policies are inconsistent with the goals of the Paris Agreement. According to the Climate Action Tracker, the EU's Nationally Determined Contribution (NDC) is insufficient; if all governments had targets similar to the EU, global warming could exceed 2°C and possibly even 3°C.

Non-state actors could make important additional mitigation and adaptation contributions, both directly, for example, through new installations, as well as indirectly, for example, by encouraging behavioural change. Moreover, they could inspire governments and the EU to be more ambitious. However, currently non-state actions are not easy to track. Despite a strong focus on climate mitigation, most actions led by EU-based actors do not set clear GHG reduction targets. In addition, many relevant actions remain unrecorded.

This paper explores what is necessary to accelerate non-state actions and enhance their effectiveness in the EU and as a solution suggests that a light-touch framework be implemented to stimulate bottom-up climate actions. This framework should respond to the needs and challenges experienced by a range of stakeholders while building on existing efforts. Moreover, a well-designed framework could help address the imbalances identified in this study.

Introduction

The EU and its member states have long advocated non-state actor engagement in global climate politics. As early as 2013, the EU proposed recognising international cooperative initiatives (ICIs) in the context of the UNFCCC. ICI were conceived as arrangements that include state and non-state actors. The conversation around ICI cast non-state actors in a different light. Non-state actors have long been admitted as observers to the intergovernmental climate process, suggesting their role is as bystanders rather than as active participants. In recent years however, non-state actors are increasingly recast as frontrunners in climate action.

Member states have also played a key role in promoting non-state actions. For instance, with sponsorship by Nordic countries, a platform was established to record and showcase ICIs. With support from the Dutch government, the platform was further developed into the UNEP/DTU Partnership administered Climate Initiatives Platform (CIP), which remains the largest register of cooperative climate actions and provides data for UNFCCC's NAZCA platform.

EU member states have also exerted considerable political leadership in promoting non-state engagement. The French government, in the run-up to the Paris Climate Conference, initiated high-level mobilisation campaigns. Together with the preceding Peruvian UNFCCC presidency, France launched the Lima-Paris Action Agenda, which mobilised around 70 large-scale cooperative climate initiatives involving over 10,000 state and non-state actors. After the Paris Agreement, France continued to support the subsequent Marrakesh Partnership together with the Moroccan government,

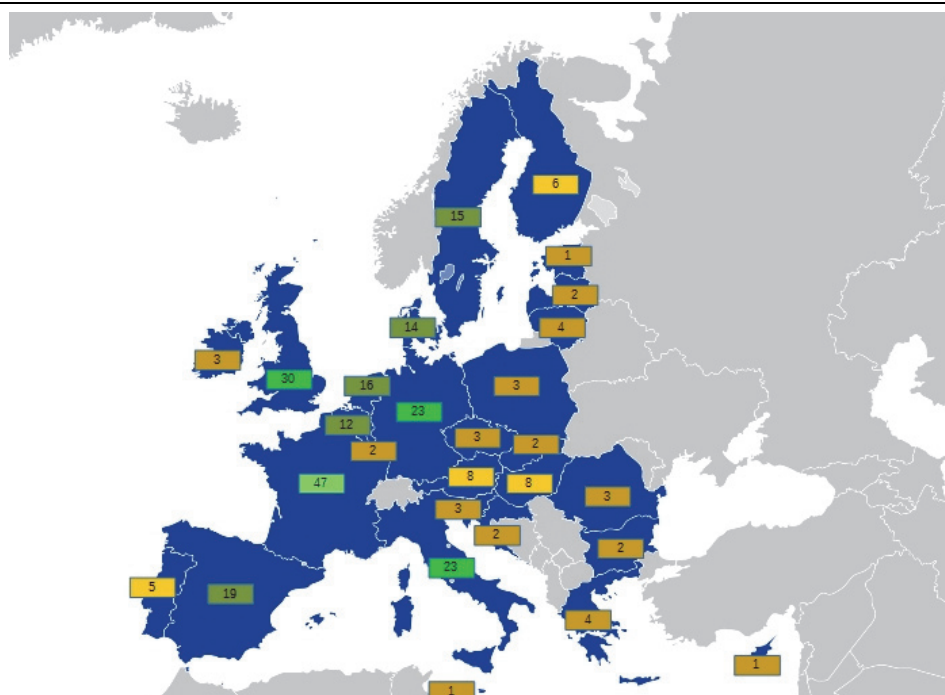
which has the similar goal of widening non-state engagement in line with the aims of the Paris Agreement. European strength in non-state engagement is also evidenced by the leadership of the "High-Level Climate Champions", established in the Paris Conference of the Parties (COP) decision. To date, two European officers have held champion positions: Laurence Tubiana (France, 2015 to 2016) and Tomasz Chruszczow (Poland, 2017 to present). These high-level champions are charged with leading global efforts to mobilise climate actions, particularly among non-state actors.

To what extent has European leadership in non-state action in the global realm been matched by domestic leadership? This question is difficult to answer as evidence of domestic/intra-EU leadership in bottom-up climate action is scarce.

Distribution of climate actions in Europe

Based on an analysis of 42 cooperative initiatives registered in NAZCA and UNEP/DTU Partnership's CIP that are led by EU-based non-state actors, we investigated where initiatives produced outputs (observable and tangible products ranging from infrastructure to studies) between 2015 and 2017. We find Europe-wide but unequal distribution of implementation of non-state climate actions across the EU (see Figure 1). Generally, fewer non-state actions are recorded in Central and Eastern Europe. This pattern may be due to different socio-economic and historical factors, and it may also reflect biases within international platforms of cooperative initiatives. Moreover, the use of absolute numbers, rather than percentages, can be deceiving: fewer actions can be expected from smaller countries.

Figure 1: Distribution of implementation activities by EU-led cooperative initiatives



Source: EESC, 2018

Tracking non-state mitigation in Europe

In addition to the above mapping, we sampled 57 initiatives led by EU-based actors launched at the 2014 UN Climate Summit or presented under the 2016 Lima-Paris Action Agenda to understand target-setting and thematic scopes. In line with the EU NDC, most EU-based actions focus primarily on mitigation (64 per cent), or on both mitigation and adaptation (9 per cent). However, only 31 per cent set quantifiable mitigation targets.

The discrepancy between the focus on mitigation and the low number of targets raises a few questions. First, can progress and actual contributions of EU-based non-state actions be assessed when no clear targets are set? Second, do non-state actions primarily achieve mitigation in an indirect manner? For instance, instead of building installations that result in emissions reduction, an action might aim to change the behaviour of target groups by raising awareness. Resulting indirect emissions reductions may be sizeable but difficult to attribute. Both the lack of data on indirect mitigation and the unclear target-setting complicate assessments of non-state contributions.

Perceived needs and challenges

From 96 survey responses by EU-based non-state actors, we identified the most urgent perceived needs and challenges (EESC, 2018). Respondents included representatives from businesses and business associations (28 per cent); smaller, community-led actors (19 per cent); researcher and expert organisations (18 per cent); civil society organisations, including trade unions (16 per cent); multi-stakeholder partnerships (7 per cent); and local and regional governments (6 per cent).

The challenges that were most frequently mentioned by respondents were: (1) a lack of access to finance (63 per cent); (2) a lack of expertise (49 per cent); (3) too many or too complicated regulatory and administrative burdens (41 per cent); (4) a lack of recognition by public authorities (31 per cent); and (5) a lack of staff (31 per cent) (see Figure 2).

All types of actors identify the lack of access to climate finance as one of the chief challenges hindering climate action. The actors differ however in which other challenges affect them most. For instance, respondents from community-led initiatives need better access to policy makers; civil society organisations emphasise the need for expertise; both civil society and local governments find regulatory and administrative procedures to be too complicated; multi-stakeholder partnerships need more staff; and researchers point out the need for expertise and examples to follow.

Recommendations

Based on results from our analysis and taking into account survey responses (EESC, 2018), we see merit in a European framework for non-state actions that builds advantageous linkages between non-state actions and EU climate governance. Such a framework would accelerate and sustain action by performing functions that are interconnected and mutually reinforcing. The EESC refers to these functions as “ARIAS” (EESC, 2017): **A**ssessing actions, **R**ecognising actions, **I**mproving governance, **A**ccelerating actions and **S**upporting actions. Based on our analysis, we emphasise the following.

Recognising actions: The EU should consider establishing its own platform to give visibility and recognition to EU-based initiatives across all action areas. The platform should not replicate existing international platforms but should focus on local and intra-EU non-state initiatives. Better visibility of

Figure 2: Perceived challenges faced by EU-based non-state climate actors



Source: EESC, 2018

actions within Europe could help to determine whether climate action is indeed concentrated in Western Europe as international platforms suggest. If this is the case, EU-led mobilisation of actors based in CEE would be appropriate. In addition, an EU platform could effectively recognise non-state leadership.

Supporting actions: Access to funding remains a chief challenge. EU-based non-state climate actors – especially smaller ones – expect help from EU institutions to mobilise funds, and to gain better access to existing funding through simpler procedures. An EU framework could develop guidance for non-state actors to make use of existing funding mechanisms. Moreover, it could help connect particularly promising non-state solutions to private and institutional investors. To perform this function, collaboration should be sought with, for instance, the European Investment Bank and the European Bank for Reconstruction and Development.

Building capacity and confidence to take action: Multiple stakeholders have pointed out complex regulatory environments as obstacles to climate action. Civil society organisations and community-led organisations, in particular, could benefit from capacity building efforts that would help navigate these environments. An EU framework should provide policy and legislative support in collaboration with regional authorities and/or the EU Committee of the Regions, for example, by developing national and regional guides for climate action, possibly adapted for specific types of actors. Trainings and seminars could further help build knowledge and confidence among non-state actors, especially smaller and local ones, allowing them to take action and feel part of a larger effort to realise a climate-safe future.

A light-touch and inclusive framework

To avoid organisational duplication and to prevent adding to administrative burdens for non-state actors, any framework

for non-state action should have only a light institutional footprint. To achieve this, a framework should be developed together with a variety of EU-based institutions, as many functions are already being performed. For instance, the EU's funding instrument for the environment and climate action, L'Instrument Financier pour l'Environnement (LIFE), and investment programmes by the European Investment Bank already provide support to many climate projects; research on non-state actions is already undertaken by, for example, the Joint Research Centre (JRC), DIE and Oxford University, among others. Initiatives are underway to link non-state actions to NDC implementation, in particular, the Initiative for Climate Action Transparency (ICAT). Awards schemes, like the EU Sustainable Energy Awards, the European Corporate Social Responsibility Awards and the SEED Awards for Entrepreneurship in Sustainable Development, are already recognising promising non-state actions. EU institutions could facilitate cooperation to guarantee that actors perform functions in a compatible manner, ensuring a close correspondence between capacity building, recognition, NDC implementation, learning and investment.

The transition to a low-carbon and climate resilient Europe presents an enormous challenge that cannot be met without the involvement of stakeholders. However, dialogues that involve all actors are scarce. The European Dialogue on Non-State Climate Action (ED-NSCA) by the EESC is an interesting starting point from which to develop a European framework (EESC, 2018) as it is uniquely representative of all social partners. Moreover, some actors and sectors may stand to lose from transitions. Not only do all EU institutions need to ensure more state and non-state climate action, they need to make certain that the transition they bring is just and will ultimately benefit all. An inclusive, light-touch framework should set the stage for necessary dialogue among all social partners.

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