

Regions4

Bridging the Adaptation Gap: Subnational Implementation of National Adaptation Plans

Legal mandates and financial capacity shaping multilevel implementation

Key Messages:

- **Around 88% of countries[1] with National Adaptation Plans (NAPs) have established multilevel coordination mechanisms, but implementation remains uneven.** Subnational governments are often assigned responsibilities within NAPs without clearly defined roles, coordination arrangements, accountability frameworks, or dedicated funding, limiting delivery in practice.

- Where legal mandates are vague or non-binding, subnational governments[2] develop their own adaptation planning, whether aligned with NAPs or not, largely driven by political will rather than systemic frameworks, contributing to uneven implementation across regions.

- Subnational governments are key actors in adaptation delivery, managing climate-sensitive sectors, and increasingly developing their own adaptation plans. RegionsAdapt (2025) data shows that over 80% of participating regions have an adaptation strategy or plan in place, while CDP disclosures indicate that most reporting states and regions have developed dedicated adaptation plans that are increasingly aligned with national frameworks and NDCs.

- Insufficient mainstreaming of adaptation across government sectors (integration into sectoral policies and planning) constrains implementation at subnational level. Sectors such as transport, housing, infrastructure, and agriculture where subnational governments play a central role, are only partially integrated into national adaptation priorities[3] (UNEP, 2025).

- Subnational governments are already responsible for nearly 70% of climate-related public investment in OECD countries (RegionsAdapt, 2025), yet international climate finance remains difficult for them to access. Global adaptation finance needs exceed current international flows by more than tenfold (UNEP, 2025), while funding mechanisms remain competitive, complex and short-term. Subnational governments continue to rely primarily on their own budgets and revenue streams to fund adaptation projects.

- Closing the finance gap requires strengthening governance and financing mechanisms that enable implementation at subnational level, including improved coordination through existing adaptation mechanisms and cross-level collaboration.

- Stronger institutional support for aligning regional adaptation planning and capacity building is required. Also, more targeted finance for investment plans, and programs/projects at the subnational level that are aligned with NAP priorities can channel resources to local adaptation priorities.

[1] Based on an analysis of 77 countries that have submitted National Adaptation Plans (NAPs) to the UNFCCC, as of 31 January 2026, of which 68 have established multilevel coordination mechanisms (88%). Out of the 68 mechanisms identified, only 29 include subnational level coordination (42%) (Luna Rodriguez M. et al. 2026).

[2] In this brief, "subnational governments" is used as a collective term referring to state, provincial, and regional levels of government.

[3] For more information, consult Figure 2.4. B from the Adaptation Gap Report 2025 (UNEP, 2025).

Executive summary

Climate adaptation is fundamentally a subnational challenge, as many climate-sensitive sectors and functions, such as nature conservation, agriculture, water supply, and forestry, are primarily governed at this level. Yet National Adaptation Plans often assign responsibilities to subnational governments without the legal clarity or financial resources needed for implementation.

This creates a persistent gap between national adaptation commitments and delivery at subnational level.

This brief examines the conditions that enable or constrain subnational implementation of NAP priorities. It draws on in-depth interviews with three subnational governments — São Paulo (Brazil), Paris Region (France), and Gauteng (South Africa), and consultations with Lombardy (Italy), representing federal, unitary, and hybrid governance systems.

Each case is examined in relation to its national framework - South Africa's National Climate Change Adaptation Strategy (NCCAS), Brazil's Plano Clima Adaptação, and France's PNACC-3 - representing three different approaches to defining and resourcing subnational roles in adaptation. The Lombardy consultation provides additional insights into multilevel coordination in the context of Italy's National Climate Change Adaptation Plan, including the role of regions in national adaptation governance.

It focuses on two key implementation instruments: legal mandates that define responsibilities and financial mechanisms that determine whether those responsibilities can be delivered in practice. The recommendations are directed at national governments, subnational authorities, and international partners, including UNFCCC bodies, donors, and transnational networks, to strengthen multilevel implementation of NAP priorities.







Introduction

The Promise and the Gap

Climate adaptation is not delivered only in national capitals; it is implemented across regions, states, and provinces. Subnational governments manage the systems most exposed to climate risk, such as land use and nature preservation, infrastructure, water, disaster risk management, and public health, and are closest to the communities most affected by a changing climate (Regions4, 2025). They are increasingly recognised as being "on the front lines" of climate impacts and as essential actors in translating global adaptation frameworks into concrete protection for communities, infrastructure, and livelihoods (UNFCCC, 2025).

And yet, across countries, the gap between what National Adaptation Plans (NAPs) commit to and what subnational governments can deliver continues to widen.

This gap is well recognized. Evidence from 109 reporting states and regions confirms that while adaptation planning is widespread, implementation capacity remains uneven, with engagement concentrated in reporting and planning rather than co-decision in NAP processes (CDP, 2025; RegionsAdapt, 2025)[4].

Since the NAP process was established under the Cancun Adaptation Framework in 2010, there has been broad consensus that effective adaptation depends on action across governance levels (NAP Global Network, 2024). International initiatives and multilevel partnerships such as the NAP Global Network and the Coalition for High Ambition Multilevel Partnerships (CHAMP) have consistently called for stronger integration of subnational governments into NAP processes and for governance arrangements that bridge national commitments with territorial realities (UNFCCC, 2025).

This recognition is increasingly reflected in NAP documents themselves: analysis shows that all NAPs reference at least one subnational actor, most assign formal roles in planning and implementation, and many establish coordination mechanisms across governance levels (Luna Rodríguez et al., 2026). Some countries have gone further: Italy's PNACC explicitly recognises regions as key territorial implementers, providing methodological guidelines for regional strategy development and establishing a National Observatory on Adaptation as a formal multilevel coordination platform where regions participate as official members, with the region of Lombardy explicitly cited in the national plan as a leading and replicable example.

It is relevant to note that mentioning states and regions is different from integration. Frequently, subnational governments are referenced in NAPs primarily as implementers of nationally defined priorities, with more limited involvement in the co-development of plans or the design of coordination mechanisms. Finance references are more common than dedicated funding flows, and coordination tends to be stronger at the planning stage than through implementation. For instance, Lombardy participates in a national adaptation observatory that supports methodological harmonization, shared indicators, and data exchange between national and regional levels. However, this coordination does not yet systematically translate into regular reporting or resource alignment within NAP implementation processes.

Most NAPs assign responsibilities to subnational governments without providing coordination frameworks, legal clarity, or financial resources required to meet them. Evidence from the CDP (2025) disclosure dataset shows that while subnational governments widely report collaboration with national authorities, this is primarily focused on technical data sharing, reporting, and participation in national processes, with far fewer examples of substantive involvement in the co-development of National Adaptation Plans.

The result is a system that appears coherent in national plans but breaks down at the point of implementation (UNEP, 2025), despite increasing global progress in adaptation planning.

This brief examines why, and what it will take to close this gap. It draws on qualitative evidence from three subnational case studies, São Paulo (Brazil), Paris Region (France), and Gauteng (South Africa), representing federal, unitary, and hybrid governance systems. It is complemented by consultation evidence from Lombardy (Italy), used to triangulate findings on multilevel coordination, and by data from over 109 regions through CDP and the RegionsAdapt 2025 report.

[4] 257 adaptation actions were reported in 2024 across only 31 regions, indicating significant concentration of implementation capacity rather than broad systemic delivery (Regions4, 2025).

From Governance to Delivery: The Role of Legal Mandates and Finance

The NAP process was designed as an iterative, country-driven effort to identify and address medium- and long-term adaptation priorities.

One of the main objectives of that process has always been vertical integration: ensuring that national adaptation goals are translated into action at the subnational level, and that subnational realities inform national planning in return (NAP Global Network, 2024). In practice, this vertical dimension remains the weakest link in the chain[5] (UNEP, 2025).

Research Approach

This brief builds on a multilevel governance framework developed through the NAP Global Network (Luna Rodríguez et al., 2026) to examine why that gap persists.

Rather than cataloguing what subnational governments are doing, it focuses on the conditions that make implementation possible or impossible, specifically, the legal and financial instruments that determine whether national adaptation priorities can be translated into subnational action.

1. Understanding Legal Mandates and Mainstreaming (Luna Rodríguez et al., 2023)

- **Legal mandates** are the provisions that formally assign adaptation responsibilities to subnational governments, establishing who is expected to act and the scope of that responsibility.
- **Mainstreaming instruments** go further, embedding climate risk into existing planning and regulatory frameworks- spatial plans, sectoral policies, development strategies- so that adaptation becomes a routine part of governance rather than a parallel exercise
- **Together**, these define whether subnational governments have a clear, enforceable obligation to act.

2. Understanding Financial Mechanisms and Instruments (NAP Global Network, 2024)

- **Financial mechanisms** are the broader systems through which adaptation resources flow- intergovernmental transfers, national climate funds, international finance windows.
- **Financial instruments** are the specific tools within those systems- grants, co-financing arrangements, concessional loans, results-based payments.
- **Together**, they determine whether subnational governments have access to funding that is sufficient, predictable, and structured to support long-term, cross-sectoral implementation.

These two sets of instruments are interdependent: a legal mandate without finance is an unfunded obligation; finance without a mandate is discretionary and fragile. Their interaction, or lack of it, is what ultimately determines whether subnational adaptation happens.

The analysis is also consistent with a growing body of evidence showing that cities, states, and regions are not merely implementers of national commitments; they are essential partners in raising ambition and demonstrating what works (WRI, 2024). Strengthening the conditions under which subnational governments operate is therefore not just about closing an implementation gap; it is about unlocking a force multiplier for climate action at every scale.

[5] For more information, consult Figure 2.4. from the Adaptation Gap Report 2025 (UNEP, 2025).

On the Ground:
Three Regions, Three Stories

The following case studies examine how these dynamics play out in practice. Each region operates in a different governance context, federal, unitary, and hybrid, but the underlying challenge is the same: closing the distance between national ambition and subnational delivery.

1

São Paulo, Brazil

São Paulo is Brazil's most populous state, with **645 municipalities** and an economy that rivals many national GDPs. Its 2025 State Climate Adaptation and Resilience Plan (PEARC), covering five thematic axes: biodiversity, One Health, food and nutritional security, water security, and coastal zone, developed with explicit reference to federal NAP priorities.

Brazil's Plano Clima Adaptação (2025), references subnational governments as key implementation actors, operating through SISNAMA[6] and the National Climate Change Policy (PNMC), with a federal governance structure designed to include subnational participation in implementation, monitoring, and review.

Coordination in practice: Through *AdaptaCidades*[7], the state provides regionalised climate data and technical expertise to municipalities, under a shared national target - 35% of municipalities with adaptation plans- that aligns with work the state was already doing. Beyond this programme, São Paulo participates in several consortia, including the South and Southeast Integration Consortium (COSUD), which promotes cooperation among states, including joint commitments to Atlantic Forest restoration.

On mandates: PEARC was driven by São Paulo's own institutional commitment, rooted in its State Climate Change Policy (PEMC) of 2009. The state first presented the PEARC framework at COP28 in 2023, prior to Brazil's most recent National Adaptation Plan update, demonstrating subnational ambition that in some areas preceded national policy direction.

In scope, PEARC goes beyond federal requirements: its 10-year horizon, climate justice and infrastructure cross-cutting axes, and accompanying Municípios Paulistas Resilientes programme. Coordination occurs through existing multilevel platforms, including the Interministerial Committee on Climate Change (CIM), though roles and implementation pathways across levels are still being worked out in practice.

On finance: São Paulo relies primarily on its own budget, complemented by international funding and public-private partnerships. While the state has autonomy over the allocation of its own resources, limited financial resources remain a primary implementation barrier. Scaling up adaptation implementation requires adequate and sustained financing, alongside continued efforts to improve access to predictable funding within applicable budgetary and fiscal rules.

Coordination with the national government on finance occurs through intergovernmental working groups and information exchange networks, but no dedicated reporting framework is yet in place. The recent update of the NAP document creates an opportunity to influence the the still-developing nature of monitoring arrangements. *AdaptaCidades* delivers technical rather than financial support.

At the federal level, the Climate Fund (Fundo Clima), Brazil's main climate finance instrument, is currently being strengthened to support the implementation of the National Adaptation Plan (NAP) and expand financing for climate adaptation and resilience actions.

São Paulo is the clearest case in this brief of subnational action producing effects that moved upward into national policy design, notably through its influence on the creation of *AdaptaCidades*. This experience illustrates how subnational policy and institutional practices can inform national adaptation initiatives and highlights the potential for states to play an intermediary role in multilevel adaptation governance.

[6] SISNAMA (National Environmental System) is Brazil's system of environmental governance, bringing together institutions at the federal, state and municipal levels to coordinate environmental policy and implementation.

[7] *AdaptaCidades* (Ministry of Environment) provides training, technical assistance, and workshops to municipalities via state intermediaries. It does not include direct financial transfers. São Paulo's prior municipal support programme served as a model for the national initiative's design.

2

Paris Region, France

Paris Region is France's most populous region and economic center, facing acute climate risks including heat waves, flooding, and droughts. The region voluntarily adopted its Regional Adaptation Plan (PRACC) in 2022, three years before the 3rd national plan, covering over 61 actions across land use, climate, energy, and ecological planning frameworks. In practice, that mandate has produced tangible outputs: a regional climate adaptation observatory, heat island mapping, a climate shelters map, wetland and riverbed restoration, greened school courtyards, and high school renovations with heat comfort standards[8]. The region also supports over 1,200 municipalities in developing their own adaptation strategies.

France's National Climate Change Adaptation Plan 2025 (PNACC-3) formally designates regions as climate leadership actors, requiring adaptation to be mainstreamed across all public policies against a compulsory +4°C warming trajectory.

Coordination in practice: The region and the regional representation of the national government jointly elaborate the Schéma Régional du Climat, de l'Air et de l'Énergie[9] (SRCAE). The region, through a network of French Regions called Régions de France, indirectly participates in the Conseil National de la Transition Écologique[10] (CNTE), which has a formal say in the national adaptation strategy, and co-created a regional climate observatory with consultation of the state.

During the PNACC-3 elaboration, Paris Region participated in national consultation workshops and submitted a formal written response. No mandatory reporting framework is yet in place, though the new NAP references a future indicator system.

On mandates: French law provides a strong formal mandate[11] for regions, requiring adaptation to be mainstreamed across major planning instruments. The framework therefore gives regions clear formal recognition and establishes adaptation as a responsibility to be integrated into regional planning. In practice, the mandate is strong on requirements but limited on operational guidance, with the region noting clarity on objectives but weaker definition of implementation pathways. Regional ambition has consistently preceded rather than followed national direction. The region has advocated greater formal recognition of its intermediary role between the national government and municipalities, a function it already performs in practice, but that is not yet systematically embedded in national coordination structures.

On finance: Paris Region benefits from a diversified and relatively stable funding base: its own regional budget, EU funding including the Horizon Europe Pathway to Resilience programme, a public-private forestry fund, and green bonds[12]. The region has full autonomy over resource allocation. A structural tension exists between the investment-oriented nature of available instruments and the operational costs long-term adaptation increasingly requires. Declining national transfers are compounding this gap, with no dedicated national financing mechanism for subnational adaptation in place.

Paris Region illustrates how strong legal mandates and institutional capacity can enable significant adaptation action at regional level. The key challenge lies in consolidating these outcomes within a more structured national coordination framework and ensuring the financial architecture is aligned with the long-term operational needs of regional adaptation.

[8] The region's full set of adaptation measures under PRACC also includes: support to over 200 greened school courtyards and public spaces; support to over 300 projects to create or enhance green spaces accessible to Paris Region residents; installation of refrigerated ventilation or air conditioning across all public transport in the region; a €1 million fund to adapt forestry to climate change impacts; and support to the deployment of public water fountains.

[9] Regional Climate, Air and Energy Scheme.

[10] National Council for Ecological Transition.

[11] France has a unitary political system, however, since 2014 (loi MAPTAM, reinforced by loi NOTRe in 2015), regions have instead been designated "chef de file" for climate, air, and energy, coordinating joint action across local authorities through binding planning instruments (SRCAE/SRADDET). It is a statutory delegation, revocable by ordinary law, not a constitutional transfer of power, justifying a strong and specific mandate while still formally originating from the central state.

[12] Green bonds are debt instruments that ring-fence proceeds for environmental and climate projects. Paris Region has issued them since 2012, financing projects including school renovations with heat comfort integration and nature-based solutions.

3

Gauteng, South Africa

Gauteng is South Africa's economic hub, the smallest province by area but home to the largest share of the country's GDP and urban population. It faces some of the country's most acute climate hazards and risks: heat stress, water scarcity, flooding, and the infrastructure pressures of rapid urbanisation. The province has developed an Overarching Climate Change Strategy and Action Plan integrating adaptation across water, infrastructure, human settlements, and disaster risk management, with concrete actions underway including tree planting, wetland restoration, and a heat action plan.

South Africa's National Climate Change Adaptation Strategy NCCAS (2020), submitted to the UNFCCC as the country's NAP, provides the strategic framework for adaptation across governance levels; the Climate Change Act (No. 22 of 2024), which entered into force in March 2025, translates it into binding subnational obligations, requiring provinces and municipalities to conduct climate risk assessments, develop implementation plans within defined timeframes, and integrate adaptation into existing instruments including Integrated Development Plans and Spatial Development Frameworks.

Coordination in practice: Gauteng engages with the national government through intergovernmental working groups, formal vertical coordination platforms, and multistakeholder forums that bring together government, civil society, academia, and the private sector. Horizontal coordination across sectors within the provincial government is also in place.

The province reports formally to the national government on an annual basis, supplemented by quarterly informal updates, making Gauteng's reporting framework the most structured of the three cases. A provincial climate change register has been established to track climate-related projects and actions, currently being developed into a web-based monitoring and verification platform aligned with national systems. The national government provides capacity-building support through workshops, training, and targeted technical assistance on strategy development and access to climate finance.

On mandates: The national Climate Change Act[13] provides the strongest and most explicit legal framework of the three cases, with binding obligations, defined responsibilities and timeframes, and accountability across governance levels. Unlike São Paulo or Paris Region, Gauteng's adaptation planning is legally required rather than driven primarily by regional initiative. In scope, the Act goes further than most national frameworks, embedding adaptation into existing planning instruments across sectors and specifying requirements such as climate risk assessments and implementation plans. The province assesses its effectiveness as moderate to strong, with the expectation that implementation will improve as the Act beds in.

The main gap identified is operationalization: technical guidelines for conducting needs assessments and developing provincial implementation plans are not yet finalised, and adaptation remains more concentrated in environmental departments than fully mainstreamed across sectors such as transport and infrastructure.

On finance: Gauteng relies primarily on intergovernmental fiscal transfers, complemented by national government funding and limited international finance accessed via national channels. While the province has full autonomy to allocate its own resources, **funding is assessed as highly insufficient relative to need and somewhat unstable**, varying year to year according to national budget cycles.

A stark illustration of the mismatch between legal ambition and financial reality: 47% of potable water in Gauteng is lost through leaking infrastructure, yet no dedicated budget has been allocated to address it. **Administrative complexity** further constrains access, with complex procedures, competitive selection, short-term cycles, and limited technical capacity for grant writing all identified as barriers.

Gauteng shows the reverse of Paris Region: a strong, binding mandate without the finance to match it, producing a visible and measurable shortfall rather than delivery. The province's experience illustrates both the potential and limits of legal mandates in driving subnational adaptation, and the urgent need to align finance with legal ambition.

[13] The main objectives of the Climate Change Act 22 include establishing a comprehensive national climate change response, which enables South Africa to meet its nationally determined contributions and facilitating the transition to a low-carbon economy and society.

From Evidence to Action

The gap between national adaptation ambition and subnational delivery is not inevitable; it is the product of specific policy choices, and it can be closed by different ones.

The recommendations that follow are grounded in the evidence from this brief and are deliberately specific: they are not calls for more collaboration in general, but concrete changes to the legal, institutional, and financial instruments that determine whether subnational adaptation happens.

Recommendations For National Governments

The evidence from this brief points to a consistent pattern: subnational governments are assigned responsibilities that national frameworks do not legally compel and are expected to deliver outcomes that national finance systems do not adequately resource. Changing this requires national governments to act on both dimensions simultaneously.

Across cases, effective coordination appears less dependent on formal recognition alone, and more on whether there are sustained over time, structured mechanisms linking national ministries and subnational administrations around planning, data, and implementation cycles.

Recommendation 1.1.

Clarify and structure subnational roles in adaptation processes

Where responsibilities are broadly defined, implementation tends to depend on existing institutional capacity and informal coordination practices, leading to uneven delivery across territories.

Evidence from the case studies shows that coordination is most effective where it is embedded in recurring institutional interfaces rather than ad hoc consultation processes:

- In Brazil, coordination between federal and subnational levels is operationalised through the the nterministerial Committee on Climate Change (CIM), and programmes such as *AdaptaCidades*. There is a practical “bridge function” between national priorities and local implementation, even in the absence of fully binding coordination requirements.
- In France, coordination is structured through formal planning instruments such as the Regional Climate, Air and Energy Scheme (SRCAE) between the national government and Paris Region, combined with participation in national advisory bodies. This enables an institutionalised interface, although implementation responsibilities remain largely interpreted at regional level.
- In South Africa, coordination is more explicitly structured through the **Climate Change Act (2024)** and the **Presidential Climate Commission (PCC)**, which sets out defined roles across national, provincial and municipal levels. However, implementation systems (technical guidance, reporting formats, cross-sector integration mechanisms) are still being operationalised.

Practical steps

- Define clearer role distribution across levels of government for planning, implementation, and monitoring, based on sectoral responsibilities (e.g. water, land use, infrastructure) rather than only institutional levels;
- Establish structured coordination mechanisms that operate on a recurring basis (e.g. joint planning platforms, technical working groups, or co-produced planning instruments), building on existing models such as *AdaptaCidades* and CIM for reference of intermediary systems;
- Integrate subnational adaptation progress into national NAP monitoring and reporting systems by systematically capturing data from subnational governments, ensuring that national reporting reflects implementation realities at territorial level, including differences in capacity, progress, and priorities, such as through Gauteng's provincial climate register and MRV platform currently being developed to feed into national systems.
- Strengthen subnational implementation capacity through sustained technical support, including adaptation support hubs, embedded technical assistance, and peer-learning between regions and municipalities (e.g. *AdaptaCidades*-type intermediary systems linking national priorities with local implementation)

Recommendation 1.2.

Connect mandates to dedicated and predictable finance

Across case studies, subnational governments are actively developing adaptation strategies or plans, but implementation varies significantly depending on access to technical capacity, fiscal space, and support systems that translate plans into investable actions.

- In São Paulo, the state-level adaptation plan (PEARC) is strongly developed and aligned with national priorities, but implementation relies heavily on state-level resources and external project-based finance (including GCF readiness support).
- In Paris Region, adaptation planning is embedded in multiple sectoral instruments and supported by diversified financing (regional budget, EU funds, green bonds), but operational costs for long-term adaptation are increasingly difficult to cover.
- In Gauteng, planning capacity is strong under South Africa's new Climate Change Act (2024), but technical implementation systems are still being developed.

These differences suggest that alignment alone is insufficient without systems that support translation from planning to implementation.

Practical steps

- Create dedicated adaptation financing mechanisms for subnational governments within intergovernmental funding systems, linked to long-term planning cycles rather than short-term project calls
- Develop national or regional adaptation coordination mechanisms that strengthen collaboration across governance levels and support local project preparation, technical assistance, climate data access, and capacity building for subnational governments
- Improve transparency and coordination across governance levels through clearer reporting on how adaptation responsibilities, financial transfers, and technical support are distributed and implemented



Recommendations For Subnational Governments

Across the case studies, subnational governments are already integrating adaptation into sectors such as water, infrastructure, land use and nature, disaster risk management, and public health. However, implementation capacity remains uneven and often concentrated within environment departments, limiting cross-sector coordination and long-term delivery.

In São Paulo and Paris Region, adaptation planning is supported by relatively strong technical structures and institutional continuity, while Gauteng illustrates the challenge of operationalising new legal frameworks without fully developed implementation systems and technical guidance.

Across all cases, adaptation capacity is strongest where technical support, planning, and coordination are embedded within regular government functions rather than isolated projects. However, implementation capacity varies significantly depending on legal mandates and finance and financial mechanism/ instruments at the disposal.

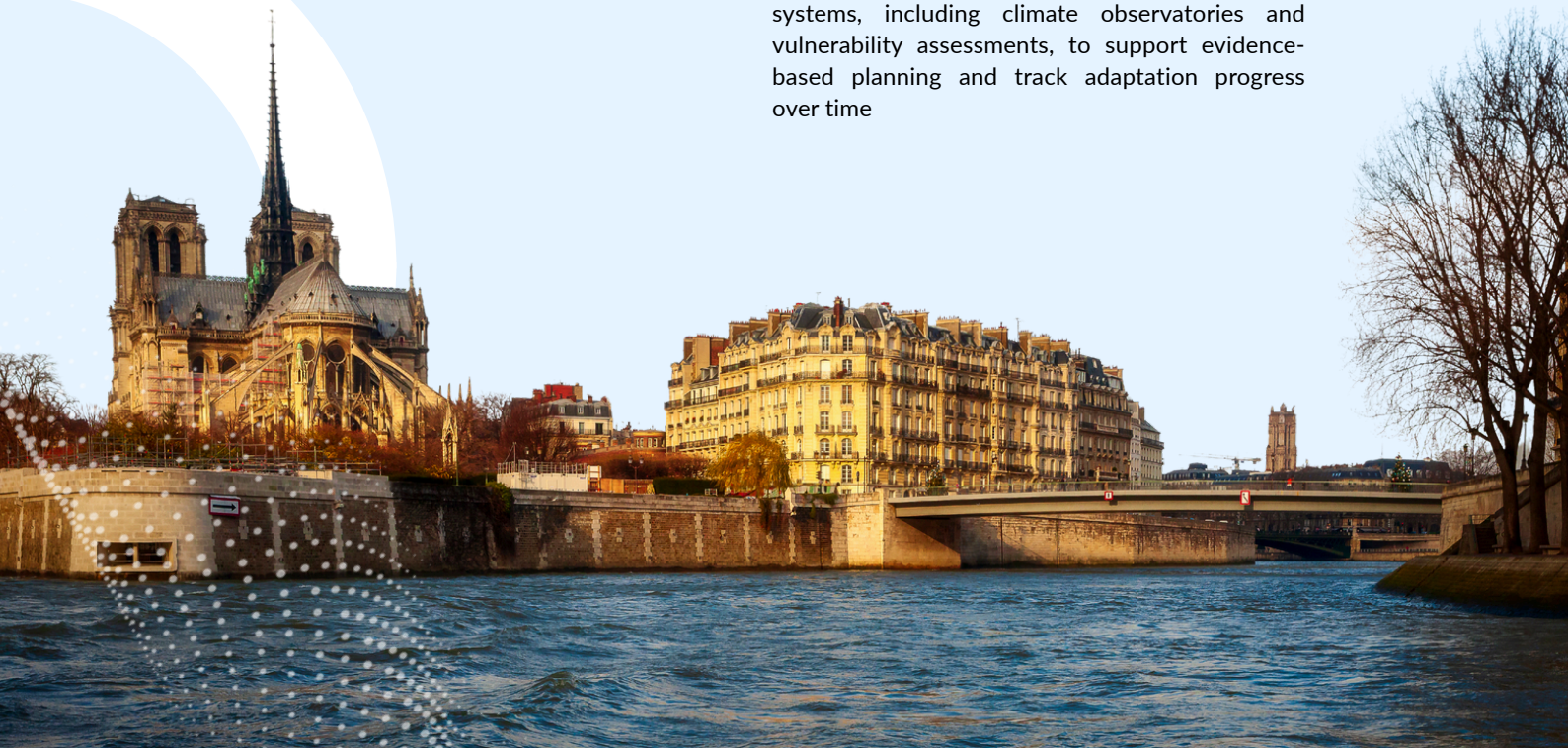
Recommendation 2.1.

Build permanent institutional capacity for adaptation Implementation

Effective adaptation requires sustained institutional knowledge, not project-based consultants or one-off capacity-building events but embedded technical teams with the mandate and authority to work across departments over the long term.

Practical steps

- Establish dedicated adaptation teams or coordination units within subnational administrations with the capacity to work across sectors and levels of government
- Integrate climate risk and adaptation priorities into infrastructure planning, land-use planning and nature, public investment, and budget processes rather than treating adaptation as a standalone environmental issue
- Develop regional monitoring and reporting systems, including climate observatories and vulnerability assessments, to support evidence-based planning and track adaptation progress over time



Recommendations For Subnational Governments

Recommendation 2.2.

Engage the international climate finance mechanisms strategically and collectively

Across all three case studies, subnational governments rely heavily on their own budgets and revenue streams to finance adaptation, while access to international climate finance remains limited by complex procedures, short funding cycles, and high administrative requirements.

The cases also show that regions and national governments are increasingly developing adaptation plans aligned with national frameworks but often lack the technical and financial systems needed to translate these plans into implementable investment pipelines.

Practical steps

- Strengthen institutional capacity to develop investment-ready subnational adaptation programs/projects that are aligned with countries' NAP processes and engage with national and international climate finance mechanisms.
- Encourage collaboration between subnational governments through networks such as Regions4, CHAMP, and the NAP Global Network to exchange implementation experience, strengthen technical capacity, and improve collective access to finance and knowledge systems.
- Expand technical assistance and project preparation support for subnational governments, including through country adaptation support hubs, intermediary platforms, and peer-learning networks.



Recommendations for international, national and financial partners

International finance and governance systems shape the extent to which subnational governments can implement adaptation priorities defined in national frameworks.

Recommendation 3.1.

Strengthen the enabling conditions for subnational implementation within international systems

Practical steps

- Expand facilitated access for subnational governments within climate finance mechanisms, including simplified procedures and longer funding cycles.
- Increase transparency on how much international climate finance reaches subnational levels through disaggregated reporting.
- Strengthen coordination platforms that support multilevel implementation of adaptation priorities, including technical assistance and project preparation support linked to existing national plans.



Conclusion

We are entering a new phase focused on the implementation of NAPs, in which local adaptation led by subnational governments is essential for effective action. Regions and states manage many of the systems most vulnerable to climate risk, but they cannot deliver meaningful adaptation outcomes without the right enabling conditions.

This brief shows that progress is possible: where legal frameworks are explicit and clarify roles and responsabilities, empowering subnational governments to act, institutions are coordinated, and political commitment is sustained;

subnational governments are already advancing implementation.

But these conditions are not yet systemic.

Across countries, NAP responsibilities continue to outpace authority and funding, leaving delivery uneven and incomplete. The gap is not technical; it is structural, and it carries a cost. Delaying investment in subnational adaptation capacity is not a neutral choice:



Regions on the frontline are already absorbing the costs of inaction with their own budgets, even as international finance flows remain centralised and inaccessible.

(RegionsAdapt, 2025; UNEP, 2025)

Adaptation deficits are driven less by lack of planning and more by persistent gaps in finance, institutional capacity, and implementation systems.

Until that happens, multilevel NAP processes will remain stronger on paper than in practice. The experiences of Gauteng, São Paulo, and Paris Region - implementing South Africa's NCCAS, Brazil's Plano Clima Adaptação, and France's PNACC-3 respectively - show that

progress is possible when legal frameworks, coordination mechanisms, and financial instruments are aligned. When they are, subnational governments can deliver resilience at the scale and speed the climate crisis demands.

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About this brief:

This brief analyses subnational implementation of National Adaptation Plans (NAPs). It focuses on how subnational governments are integrated into adaptation governance and how implementation is shaped by legal, planning, and financial instruments.

The analysis draws on a qualitative comparative design across three case studies, São Paulo (Brazil), Paris Region (France), and Gauteng (South Africa), complemented by consultation evidence from Lombardy (Italy) and other regions. It combines survey data from subnational actors, semi-structured interviews, and a review of national and subnational policy frameworks, including NAPs and related instruments.

The framework examines two core dimensions of implementation: (1) regulatory and planning instruments, including adaptation strategies and mainstreaming into sectoral frameworks at subnational levels, and (2) financial mechanisms, including intergovernmental transfers and access to climate finance. It also considers enabling conditions such as technical capacity and institutional support.

This approach has limitations. It is based on a small number of cases and does not capture the full diversity of governance systems or subnational capacities. It also focuses on contexts where subnational roles are formally recognised in NAPs, excluding cases where these roles are absent or informal.

Disclaimer:

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At Regions4, we act, we connect, we transform. We act by staying close to the territories we serve, embodying transformative change on the ground. We connect regions to each other and to the UN, ensuring their voices are heard in global discussions. We transform by driving real, localized progress in climate change, biodiversity, and sustainable development.

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