

Regions4's Position Paper for COP30

Subnational Governments Driving Real Climate Action

From the Amazon to the Alps, the Mediterranean to the Atlantic Forest, regions are leading climate and nature solutions.

The Critical Role of Subnational Governments

Science is clear. We are on a dangerous path. The 2024 UNEP Emissions Gap Report warns that, without urgent action, the world is heading toward a 2.6–3.1°C rise this century. Every fraction of a degree fuels climate impacts, widens inequalities, and erodes resilience and our capacity to adapt.

Adaptation is no longer optional. It is a global imperative. Yet, the 2024 UNEP Adaptation Gap Report shows a tenfold finance shortfall, with annual needs of US\$187 to 359 billion. The US\$1.3 trillion adaptation finance goal set at COP29 remains unmet. Closing this gap requires empowering subnational governments - states, regions, and provinces - with resources and authority to deliver solutions where they are most needed.

Nature is our greatest ally. Scaling up nature-based solutions and restoring ecosystems is essential for adaptation, mitigation, and resilience. Subnational governments are uniquely positioned to lead this integration, managing land, water, forests, coasts, infrastructure, and public services. Their actions embody 'mutirão' - the principle of collective, community-driven effort championed by the COP30 Brazilian Presidency.

2025 is decisive. The next round of Nationally Determined Contributions (NDCs), the 10th anniversary of the Paris Agreement and [RegionsAdapt](#), and a test of global commitment to closing adaptation and finance gaps. This is the moment to recognize subnational governments as indispensable partners in turning ambition into action. A just, resilient, and nature-positive future depends on their leadership.

At COP30, Regions4 calls on Parties to:

- 1 Integrate Subnational Governments in climate planning and implementation
- 2 Make adaptation a non-negotiable global imperative
- 3 Invest in nature – our greatest ally for climate and resilience
- 4 Unlock direct access to climate finance for subnational action
- 5 Reform global climate architecture to institutionalise subnational leadership

Regions4 Key Messages for COP30

1. Integrate Subnational Governments in climate planning and implementation

As COP30 approaches, the world is at a decisive turning point. **The next generation of national climate plans must move beyond symbolic ambition and deliver at scale:** accelerating renewable energy, reduce greenhouse gases, phasing out fossil fuels, transforming infrastructure and transport, restoring ecosystems, and strengthening adaptation by building capacity, resilience and reducing vulnerability. As recognized in Article 7.2 of the Paris Agreement, adaptation spans local, subnational, national, regional and international levels; national commitments must therefore be anchored in territorial realities.

States, provinces, and regions hold core mandates over land, water, forests, energy, and infrastructure; convene communities and businesses, and enhance municipal actions. Their proximity to both people and assets enables national ambition to turn into real-world decarbonization and resilience. **Unlocking the full potential of inclusive, multilevel governance is essential to closing the implementation gap and building a resilient, equitable, and nature-positive future.** In practical terms, this means subnational governments are fully integrated into the design, review and delivery of national climate commitments, with clear roles, resources and accountability.

What we call for:

- Embed subnational participation in the design, review, and implementation of national commitments such as NDCs, NAPs, and NBSAPs.
- Recognise, empower and institutionalise vertical integration and whole-of-government approaches. The [Coalition for High Ambition Multilevel Partnerships \(CHAMP\)](#) initiative offers a key platform to advance this vertical integration.



#RegionsVoice

Explore how regions lead in **multilevel governance** through our #RegionsVoice campaign:

- ◆ **Brazil:** Brazil's new Nationally Determined Contribution (NDC) recognizes the key role of states in climate action through federalism. Several initiatives reinforce the updated ambition of the country's NDC. In Rio de Janeiro, *Ambiente Resiliente* and *Rio Inclusivo e Sustentável* promote collaboration between regional and national levels on action for climate and nature.
- ◆ **Ecuador:** All 23 provinces from the Consortium of Provincial Autonomous Governments of Ecuador (CONGOPE) developed provincial climate action roadmaps aligned with the country's NDCs and NAPs, showing multilevel delivery.
- ◆ **Kenya:** The program *Financing Locally-Led Climate Action (FLLoCA)* channels predictable transfers from national budget directly to counties, with legislation and participatory planning ensuring community-driven adaptation.



2. Make adaptation a Non-Negotiable Global Imperative

Adapting to climate change is no longer optional — it is a global imperative. As extreme weather events intensify, adaptation is essential to protect lives, livelihoods, and ecosystems, while upholding just resilience and climate justice. **Yet this imperative is not reflected in political priorities.**

Adaptation continues to lag behind mitigation in overall support. In 2023, only about 3.4% of global climate finance flows went to adaptation, and the 2024 UNEP Adaptation Gap Report reveals a nearly tenfold finance shortfall. This occurs despite evidence that **every \$1 invested in adaptation generates over \$10 in benefits** - through avoided damages, resilient infrastructure, healthier communities, job creation, and stronger ecosystems (WRI, 2025).

Since COP28, the UAE Framework for Global Climate Resilience has set a pathway to operationalize Adaptation, focusing on seven key systems (water, food, health, ecosystems, infrastructure, livelihoods, cultural heritage) and calling for engagement across the full adaptation cycle. **Subnational governments are already leading these efforts**, using their legislative powers when available, assessing risks, co-designing and delivering adaptation plans, embedding adaptation in sectoral and territorial planning, and scaling Nature-based Solutions (NbS). **It is time to formalize this role.**

Meaningful inclusion in the Global Goal on Adaptation (GGA) framework would ensure **global targets are translated into locally relevant, anticipatory, and just strategies, while progress is tracked where delivery happens.**

What we call for:

- **Reaffirm adaptation as a core priority and on equal footing as mitigation**, with finance scaled up to match needs, and underpinned by measurable global targets and indicators
- **Track the pivotal role of subnational governments in building resilience**, by officially monitoring their contribution through dedicated local-level adaptation indicators within the UAE–Belém Work Programme.
- **Advance anticipatory, just, and locally led nature-based adaptation**, with strategies that prioritise vulnerable communities and ecosystems.



#RegionsVoice

Explore how regions lead on **adaptation** through our #RegionsVoice campaign:

- ◆ **Basque Country (Spain):** A data-driven assessment made through the project *Kostaegoki* revealed €5.2 billion in potential coastal losses without action, making the economic case for urgent investment and reaffirming adaptation as a core priority.
- ◆ **Catalonia (Spain):** *The Global Indicator on Adaptation (IGA)*, a monitoring system with 74 indicators, including climate justice, demonstrates how subnational contributions can be measured and embedded in global frameworks like the UAE–Belém Work Programme.
- ◆ **Gauteng (South Africa):** The *Resilient Kaalspruit Catchment Programme* is a World Bank–funded partnership that is tackling pollution, flooding, and erosion in the Kaalspruit River. It delivers climate adaptation through flood warning systems, infrastructure repairs, and ecosystem restoration.
- ◆ **Lombardy (Italy):** The region launched the *Regional Climate Law*, the first climate law in Italy, integrating mitigation and adaptation across all sectors, creating a coherent legal framework that embeds adaptation on equal footing with mitigation.
- ◆ **Paraná (Brazil):** The initiative *Selo Clima* serves as the State's Public Registry of Greenhouse Gas Emissions. It recognises corporate climate action, linking mitigation and adaptation planning, and showing how local progress can be officially tracked with dedicated indicators.
- ◆ **Québec (Canada):** *The Flood Protection Plan* is a CA\$479 million programme combining mapping, regulation, resilient planning, and communication tools - an example of anticipatory adaptation strategies that prioritise vulnerable communities.

RegionsAdapt: A Decade of Turning Commitment into Action



Subnational governments are already advancing the global adaptation imperative. Through Regions4's flagship climate initiative, RegionsAdapt, states and regions are translating ambition into measurable resilience.

Since 2021, 41 regions have reported regularly through CDP, showing steady progress:

- 73% now have climate strategies including adaptation (up from 59% in 2016)
- 68% have completed risk and vulnerability assessments
- In 2024, members reported 257 adaptation actions, 63 of which already show measurable results — reaching and protecting over 209 million people worldwide.

Ten years on, [RegionsAdapt](#) demonstrates that when empowered, subnational governments make adaptation not just a global priority, but a lived reality.



3. Invest in nature – our greatest ally for climate and resilience

Nature is our greatest ally in addressing the climate crisis. Healthy ecosystems provide food, water, carbon storage, and natural buffers against disasters, while sustaining livelihoods and cultural identity. Yet, **ecosystems continue to be degraded at alarming rates, undermining both mitigation and adaptation.**

Scaling up Nature-based Solutions (NbS) – from reforestation and wetland restoration to regenerative agriculture and coastal protection – is one of the most cost-effective ways to build resilience, safeguard biodiversity, and deliver multiple co-benefits for people and the planet. **Subnational governments are uniquely positioned to lead this integration, given their competencies over land, forests, water, and spatial planning.**

COP30 in Belém, at the heart of the Amazon, must be remembered as a turning point for both climate and nature – where integrated action delivers resilience for people and the planet.

What we call for:

- **Elevate nature and NbS** as a core component of both mitigation and adaptation strategies under COP30 outcomes.
- **Ensure future NDCs, NAPs, and NBSAPs include measurable targets** for NbS and ecosystem restoration.
- **Mobilise finance dedicated to NbS at the subnational level**, with direct access channels for regional governments.
- **Align climate finance with the Kunming–Montreal Global Biodiversity Framework** to bridge climate and nature agendas.



#RegionsVoice

Explore how regions lead in **nature-based solutions** through our **#RegionsVoice** campaign:

- ◆ **Brazil:** The country is leading conservation in the Atlantic Forest, a biome that hosts 70% of its population in 17 states. Rio de Janeiro, Minas Gerais, and São Paulo are restoring the Forest through *Conexão Mata Atlântica* with \$31.5 million invested in 973 payments for environmental services contracts, protecting 6,575 hectares of forest.
- ◆ **California (USA):** California's *30x30 Initiative* is conserving 30% of land and ocean ecosystems to strengthen biodiversity and climate resilience.
- ◆ **Ecuador:** The provinces of Pastaza and Zamora Chinchipe are pioneering subnational *REDD+ plans* that combine indigenous leadership and gender equality to drive inclusive, community-led forest conservation and a just green transition.



4. Unlock Direct Access to Climate Finance for Subnational Action

At COP29 (Baku, 2024), Parties agreed on a new collective quantified goal of at least USD 300 billion a year for developing countries by 2035, alongside a Baku to Belém roadmap towards USD 1.3 trillion a year by 2035 from public and private sources. **These headline figures will only deliver results if finance reaches the frontline.** Today, only 17% of adaptation finance between 2017 and 2021 supported local resilience, limiting the implementation of effective climate and nature solutions (UNEP).

Subnational governments are central to fixing this, contributing 70% of climate-related public investment in OECD countries and attracting co-financing (OECD). Yet systemic barriers hinder their full potential, including limited recognition in national strategies, restricted access to direct funding, and complex donor requirements that often block early-stage project support.

COP30 is a pivotal opportunity to remove them by decentralizing finance and strengthening enabling conditions: simplified finance instruments, localized data systems, and investment-ready project pipelines.

What we call for:

- **Decentralise climate finance to the subnational level**, recognising Regions, States and Provinces as essential partners and prioritising bankable and just, resilient subnational solutions.
- **Ensure direct finance for subnational government**, opening access windows for subnational governments under the Green Climate Fund and the Adaptation Fund, and scaling other bilateral funds and philanthropy investments.
- **Create country-led subnational platforms** to develop, finance, and track bankable local projects, looking and elevating projects that focus on Just Resilience.



#RegionsVoice

Explore how regions lead in **climate finance** through our **#RegionsVoice** campaign:

- ◆ **Catalonia (Spain):** Catalonia's *Climate Fund* has raised over €380 million from green taxes, directly financing climate projects from municipalities, SMEs, research and citizens.
- ◆ **Minas Gerais (Brazil):** The state development bank (BDMG) is mobilising US\$400 million, issuing sustainable bonds, and creating a *Climate Fund* for subnational projects.
- ◆ **Paraná (Brazil):** The initiative *ICMS Ecológico*, created in Paraná in 1991, has now expanded to 17 states, redistributing part of their tax revenue to municipalities according to conservation and environmental criteria, creating incentives for local adaptation, ecosystem services, and sustainable land use.



- ◆ **Québec:** The province has channelled CA\$400 million to its municipalities for adaptation and over US\$30 million in carbon revenues into adaptation projects abroad through its *International Climate Cooperation Programme* with 65 projects in Africa and the Caribbean.
- ◆ **São Paulo (Brazil):** The initiative *Finaclima-SP* is a blended finance platform combining public, private, and philanthropic capital for large-scale restoration and resilience, targeting to restore 37,500 ha by 2026 and 1.5 million ha by 2050.
- ◆ **Scotland:** Scotland was the first devolved government to dedicate funding for Loss and Damage, mobilizing £10 million for climate justice and supporting communities in Asia, Africa, and the Pacific. At home, its 2024 Adaptation Plan reaffirms this commitment through a place-based approach rooted in fairness, inclusivity and equity.

5. Reform global climate architecture to institutionalise subnational leadership

Multilevel governance is essential to scaling up climate action and ensuring it is inclusive, participatory, and rooted in territorial realities. The Paris Agreement recognises that action spans all levels (Articles 7.2, 7.5, 11.2), yet, UNFCCC processes still do not systematically incorporate territorial evidence and leadership into core delivery arenas (national planning cycles, the Global Stocktake, finance).

Because subnational governments engage directly with local communities and citizens, they are indispensable to implementing transformative solutions at the pace and scale required, therefore, their inputs must be reflected and heard. **COP30 should upgrade the architecture so subnational contributions are routinely captured, recorded, and used to shape negotiation tracks, implementation guidance, and accountability, while fully respecting Party-driven decision-making.**

What we call for:

- **Establish a formal mechanism for multilevel action in the COP30 Belém outcome document** to strengthen collaboration between national and subnational governments through the launch of a dedicated UNFCCC work programme on multilevel climate action, working with local and subnational governments in the lead-up to the 2028 Global Stocktake.
- **Accelerate synergies between the New Urban Agenda and global climate action**, building on past UNFCCC decisions and the forthcoming IPCC Special Report on Cities (2027).
- **Mainstream multilevel action across negotiation tracks** — including finance, adaptation, and Loss and Damage — ensuring operationalisation of the Santiago Network, the L&D Fund, and the UAE Dialogue outcomes translate into collaborative, ground-level action.
- **Strengthen the COP30 Action Agenda and Local Leaders Forum as platforms** to broker partnerships, unlock finance, and align voluntary subnational contributions with national goals



About us

Regions4 is a global network of subnational governments driving action in climate change, biodiversity, and sustainable development. **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. **We were born in 2002 to represent states, regions and provinces at UN negotiations,** European Union initiatives and global discussions on biodiversity, climate change and sustainable development. **Today we represent 50+ regional governments from +20 countries across 5 continents.**

Driving Subnational Resilience through RegionsAdapt

Launched in 2015, RegionsAdapt is Regions4's pioneering global initiative for subnational adaptation, today connecting 84 regions and associations representing 440+ million people. It is the heart of our climate work, supporting members to:

- Develop climate risk assessments and robust adaptation plans.
- Champion **Just Resilience** by integrating equity, nature, and human rights into adaptation strategies.
- **Collaborate** in two EU Mission on Adaptation projects, supporting 150+ regions to co-design systemic resilience pathways.
- **Track and showcase progress** through annual RegionsAdapt Reports, the Subnational Tracker, and the global **#RegionsVoice** campaign.
- Contribute to the **Race to Resilience**, mobilising regional action to strengthen the resilience of 4 billion people by 2030.

Advocating for Multilevel Governance

Regions4 ensures that regional governments shape international frameworks by:

- Co-leading the LGMA Adaptation Group under the UNFCCC.
- Coordinating the Advisory Committee on Subnational Governments to the CBD.
- Supporting CHAMP and partnering with the NAP Global Network on engaging subnational authorities in adaptation planning.
- Participating in the COP30 Action Agenda on Multilevel Governance.
- Acting as an official partner of the UNFCCC's Race to Resilience campaign.

Through these platforms, we embed regional perspectives into global decision-making, aligning climate and biodiversity goals across all levels of government.

Expanding Impact Beyond Climate and connecting global agendas

Regions4 adopts a holistic approach that bridges climate, biodiversity, and sustainable development:

- Strengthening biodiversity action through [RegionsWithNature](#) and knowledge resources such as the Policy Brief of Just Resilience and [The Case Study Database](#).
- Amplifying regional leadership at major events, from UNFCCC COPs to the [2025 UN Ocean Conference](#).
- Promoting the green transition by partnering with the SME climate proof campaign to support small and medium-sized enterprises, and [how subnational governments collaborate with the private sector](#).

