



## Design considerations for a registry of sub- and non-state actions in the UN Framework Convention on Climate Change

*Dr. Thomas Hale, Postdoctoral research fellow, Blavatnik School of Government, University of Oxford*  
*Louis Chambers, MPP Candidate, Blavatnik School of Government, University of Oxford*

### Introduction

Countries negotiating the next climate treaty, due in 2015, are considering if and how the intergovernmental process should link to the vast array of mitigation and adaptation actions being taken by cities, provinces, states, and regions, private companies, civil society groups, and other sub- and non-state actors. A number of observers have called for such a registry.<sup>1</sup> At the same time, governments and negotiating blocs including AOSIS,<sup>2</sup> the African Group,<sup>3</sup> the Environmental Integrity Group,<sup>4</sup> Australia,<sup>5</sup> Canada,<sup>6</sup> the European Union,<sup>7</sup> Japan,<sup>8</sup> the United States,<sup>9</sup> and Norway<sup>10</sup> have expressed interest in recognizing sub- and non-state actors in the UNFCCC process in some way.

At COP19 in Warsaw in November 2013, the ADP co-chairs convened a special session to consider this question.<sup>11</sup> Cities and businesses also featured prominently at COP19, with special sessions dedicated to highlighting leadership in these sectors. The UNFCCC Secretariat has drawn attention to a wide array of “cooperative initiatives” on its website, and to individual examples of leadership through its Momentum for Change Initiative. And parallel to the UNFCCC process, the UN Secretary General has asked CEOs and mayors, alongside national governments, to make pledges at a special summit in September 2014, as well as appointing former New York mayor Michael Bloomberg as the UN’s special envoy for cities and climate.

### Key points

- Over 14,000 cities, companies, civil society groups, and other sub- and non-state actors participated in international initiatives to fight climate change between 1990 and 2012. Domestic actions are likely even greater.
- Relative to their GDP, cities and companies from some poor countries participate as much as their counterparts in some rich countries
- A registry of such actions, potentially connected to the UNFCCC process, has the potential to catalyze further climate action at all levels
- A “registry of registries” that captures the vast range of climate action, but that also clusters actions in sub-groups by region, policy area, levels of ambition, or other characteristics—building on existing networks—will be best suited to drive further climate action.

Should there be a registry of such actions connected to the UN? If so, what purposes could it serve, and how should it be designed to achieve those goals?

*This memorandum seeks to inform this discussion in four ways:*

## Mapping existing sub- and non-state actions

Alongside the slow-moving multilateral negotiations, *sub-state actors* like cities, provinces, states, and regions, and *non-state actors* like private companies, civil society groups, and others have demonstrated extraordinary climate leadership.

These actions are highly diverse, ranging from city- or company-level emission reduction targets, to changes in local governments' building, transportation, or other climate-relevant policies, to measuring and pricing carbon within firms. Some actions are undertaken in cooperation with other cities, companies, or civil society groups, or with national governments or intergovernmental organizations. In other instances sub- and non-state actors act alone, or perhaps loosely inspired by peer efforts.

While some of these actions represent substantial and ambitious commitments, others are largely symbolic. However, given that cities alone account for 70 percent of global emissions, and given that the top 500 companies produce some 3.6 billion tons of GHGs per year, the potential of these sub- and non-state actions is vast<sup>12</sup>.

While the diversity of these actions makes them difficult to track, researchers have been able to map the participation of cities, companies, civil society groups, and other sub- and non-state actors in *international initiatives*.<sup>13</sup> This "transnational climate governance" (typically categorized under "cooperative initiatives" in the UNFCCC context) includes city networks like the C40 or ICLEI, corporate reporting standards like CDP or voluntary reduction programs like WWF ClimateSavers, standards for carbon markets, and many other activities. By aggregating the membership/participation lists of these initiatives from 1990–2012, researchers have been able to map the international component of sub- and non-state climate action.<sup>14</sup> Actions not connected to these international initiatives, i.e., domestic actions, may be even more substantial. *Two important patterns in sub- and non-state actor participation emerge.*

**First**, the scale of participation is vast. *Over 14,000 sub- and non-state actors have joined an international initiative between 1990 and 2012, the last year for which data were collected.* Figure one shows participation by country.

**Second**, the participants come from a wide range of nations. Looking at absolute participation, large countries unsurprisingly dominate (figure two).

But when participation is weighted by GDP, a rough measure of countries' capacity to participate, a number of smaller and medium-sized countries perform better. Figure three shows the world's top 20 emitters of CO<sub>2</sub> between 1990 and 2012,

1. Mapping existing patterns of sub- and non-state climate actions
2. Comparing key elements of previous registries of sub- and non-state actions in multilateral fora
3. Suggesting purposes a registry could serve
4. Outlining forms a registry might take

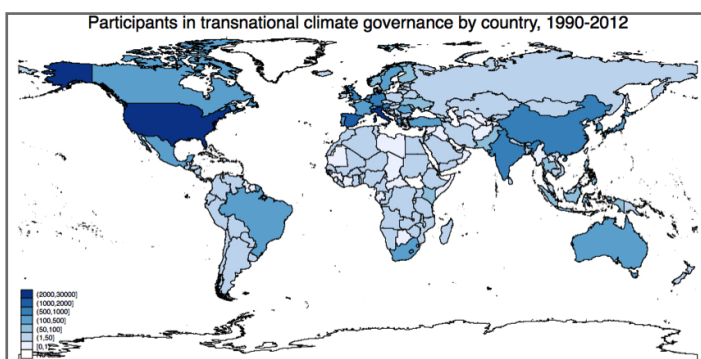


Figure 1: Over 14,000 sub- and non-state actors have participated in transnational climate governance (source: Andonova, Hale, and Roger 2014).

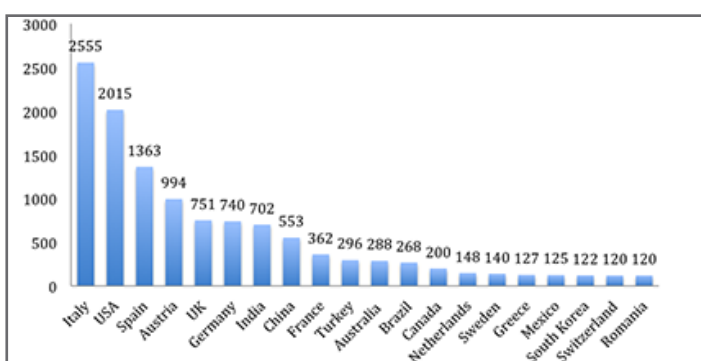


Figure 2: Countries with the most sub- and non-state actor participation in transnational climate governance, 1990–2012 (source: Andonova, Hale, and Roger 2014)

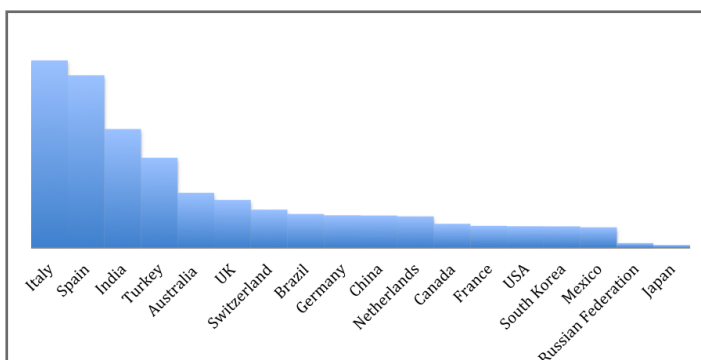


Figure 3: Participation in transnational climate governance per unit GDP, top 20 emitters 1990–2012 (source: Andonova, Hale, and Roger 2014)

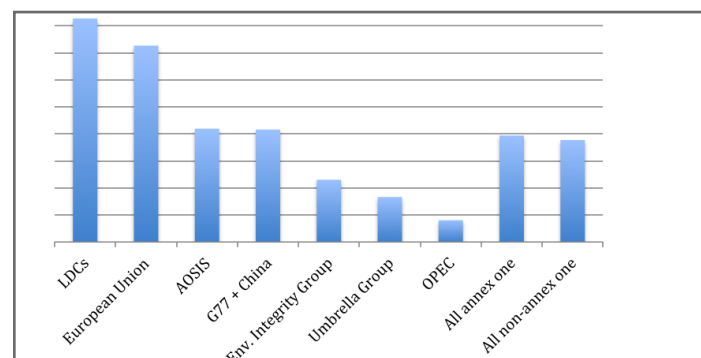


Figure 4: Participation in transnational climate governance per unit GDP by bloc, 1990–2012 (Source: Andonova, Hale, and Roger 2014).

ranked by the participation of their sub- and non-state actors, per unit of GDP. A number of small and medium-size countries lead participation.

And if we look at blocs within the UNFCCC negotiations, a similar picture of broad participation can be found. Figure four shows participation per unit GDP for a number of groupings. By this measure, Annex 1 and non-Annex 1 countries participate roughly equally, and least developed countries (LDCs) are amongst the strongest participants among the major groups.

## Learning from existing registries

If the UNFCCC decides to create a registry or other form of engagement with sub- and non-state climate actions, it will not be the first time the United Nations or other bodies have sought to register, track, or galvanize sub- and non-state action toward a global public good. Table one (on page 4) compares some key examples.

1. **Goals:** Some registries seek to galvanize action, while others aim to promote transparency and accountability.
2. **Inclusiveness:** Some registries have relatively strict criteria for participation, seeking deep commitments. Others aim to have broad participation, accepting a wider array of participants.
3. **Structure:** Some registries amalgamate all commitments into a single depository. Others break commitments into

## What purposes might a climate registry serve?

A registry of sub- and non-state climate actions may serve a number of purposes. While some of these goals are complementary, there are trade-offs between others. To be effective, a registry will need to be designed to serve a particular, clear set of objectives.

**Demonstrating momentum.** Existing efforts, including the UNFCCC's Momentum for Change initiative, have showcased inspiring examples of climate action. Recording the full scope of existing climate actions could provide an even more powerful demonstration effect. It would show that a wide range of actors are taking real steps to avert climate change now, reinforce an expectation for action, and potentially inspire others to follow suit. Equally important, it changes the public discourse from one of international gridlock to one of concrete, pragmatic progress. Such a framing is crucial to changing the political conditions that now impede a global deal.

**Rewarding initiative.** While the Sustainable Development in Action portal and others already recognise many actions, there is no UN-supported registry exclusively focused upon

*Though sub- and non-state actions have often been emphasized by European and North American countries, and these countries participate the most in absolute terms, it is in fact developing countries that are participating more vigorously relative to the size of their economies.*

In sum, a vast array of sub- and non-state actors from a wide range of countries is taking action on climate change through international initiatives. Purely domestic actions, not included in these data, may be even more significant. How might the UNFCCC recognize and further catalyze this trend?

“sub-registries” around certain kinds of commitments, actors, or regional groupings. Still other registries simply aggregate other registries into a kind of “registry of registries.” The UN hosts several registries, but independent organizations can also serve this function.

4. **Activities:** Some registries simply present information about specific, one-off commitments. For others, commitments are only one tool in the development of a broader network from which further initiatives and learning can emerge. These networks often organize activities and events to share information or facilitate joint actions.
5. **Monitoring and compliance:** Some registries have policies to review commitments and/or to impose penalties on non-compliance

sub and non-state climate actions. Aggregating commitments to a central, UNFCCC supported platform may give additional encouragement to actors who have made commitments and to others who are contemplating potential commitments.

**Sharing knowledge.** Recording and reviewing pledges pools knowledge on how to design and implement effective measures. Seeing how peers address a problem can help sub- and non-state actors plan their own climate actions.

**Transparency and accountability.** Some countries and stakeholders fear that recognizing sub- and non-state actions risks granting legitimacy to efforts that are not particularly ambitious, additional, or equity-enhancing. One potential role for a registry, therefore, would be to set minimum criteria for inclusion and to legitimize beneficial actions over merely superficial ones.

Table 1: Comparison of registries that link sub- and non-state actions to multilateral processes

Registry	Sustainable Development in Action (UN)	Cloud of Commitments (Natural Resources Defense Council)	Sustainable Energy For All (UN-initiated independent initiative)	Global Compact (UN)
Goals	Galvanize action on sustainable development	Aggregate commitments from a variety of registries to enhance transparency	Galvanize action for sustainable energy	Promote corporate social responsibility
Commitments	757	261	163	10,000+
Stakeholders	Government, Civil Society, Business.	Government, Civil Society, Business	Government, Civil Society, Business	Business, Civil Society,
Criteria for participation	Description of commitment; Implementation methodologies; Deliverables & timeline	Description & Implementation of commitment; Date delivered; Amount of commitment	Description of commitment; Deliverables & date delivered; Resources	Statement of commitment to 10 principles; and Small financial commitment
Source of commitments	Aggregated from existing UN registries* or Voluntary registration	Aggregated from existing UN, business and civil society registries**	Voluntary registration	Voluntary registration
Monitoring	Occurs within Action Networks; significant variability across these	"Cornerstone commitments" from Rio + 20 will be tracked	Top-down global energy analysis and bottom-up commitment reporting, review, learning and recognition	Mandatory annual Communication of Progress, including: Statement by Chief Executive; Description of practical actions; Measurement of outcomes
Other activities	Events, information-sharing and joint work streams within Action Networks	-	50 strategies for High Impact Opportunities, including collaboration, information-sharing and standards	Events; Local Networks with regional meetings and self-organized initiatives
Origin	UN Rio+20 meeting, 2012	Launched at Rio+20, 2012	Launched by UN Secretary-General in 2011	Announced by UN Secretary-General at WEF 1999
Compliance	Infrequent review: Rio + 10 commitments reviewed in 2010.	-	Commitments delisted if off track or not being seriously pursued	Participants who fail to submit a report within a year are expelled and listed on the website

\* The commitments come from Sustainable Energy for All, the UN Global Compact, the Higher Education Sustainability Initiative, Green economy policies and practices, the Sustainable Transport Action Network, Partnerships for Sustainable Development (Rio + 10), and Every Woman Every Child.

\*\* The commitments come from Sustainable Development in Action, the Small Island Developing States partnerships, Sustainable Energy for All, the UN Global Compact, the Corporate Eco Forum, The Access Initiative, and the Partnership on Sustainable Low Carbon Transport (SLoCaT)



## Designing a climate registry

*What features might a climate registry adopt?*

Given the vast diversity of sub- and non-state actions on climate change, it is likely impossible to capture the breadth of climate action within a single format. Instead, a UNFCCC registry that seeks to demonstrate the wide scope of climate action would be more effective if it functions as a “registry of registries,” aggregating commitments from different sub-registries and networks—many of which already exist—into a common pool. This would allow it to capture the full range of climate actions, while also embedding sub- and non-state actions in specific networks (e.g. issue-related networks such as those focusing on renewable energy, actor-specific networks such as those focusing on cities, regional networks, etc.).

For example, a city participating in ICLEI’s city network would interface mostly with the ICLEI network. The nature of its commitment, rules on reporting and compliance, and activities like information-sharing would be determined by ICLEI. But the city’s commitment would be passed on to the central clearinghouse and thus be counted alongside all others.

Because so many networks and international initiatives already exist, it makes far more sense for the UNFCCC to build upon what is already there, rather than trying to re-invent them. At the same time, the UNFCCC secretariat may find it useful to help build networks in areas where they do not exist (e.g. regional networks). Because networks often focus upon a particular type of actor (businesses, cities, communities),

regional connectivity may be being neglected and substantial learning could occur if regional sub-groupings were convened more deliberately, as the UN Global Compact has done.

Within this system, the UNFCCC may also wish to develop crosscutting programs to recognize particularly valuable commitments and enhance the transparency of initiatives. These could include a sub-registry of particularly high quality commitments that achieved a high level of ambition and were subject to more stringent inclusion criteria and reporting and compliance rules. It may also seek to recognize and provide incentives for action by issuing prizes.<sup>15</sup>

A complicating factor is that participation in transnational governance initiatives will not necessarily be expressed in terms of commitments. Often, participation will involve membership of a network, with action being motivated information-sharing and networking rather than explicit commitments. A registry would need to be able to differentiate between these different modes of organising sub- and non-state actors.

Finally, it is important to determine the relationship between the sub- and non-state actions included in the registry, and the inter-state treaty negotiations. While cities, companies, and others can facilitate, catalyze, and inspire national action, they are unlikely to substitute for it. It is therefore important that actions collected in the registry are not treated as an alternative to national commitments under the 2015 agreement, but as complements to them.

## Notes

<sup>1</sup> For example, see Haites, E., F. Yamin, and N. Höhne. 2013. “Possible Elements of a 2015 Legal Agreement on Climate Change.” Working Paper No. 16. Institut du développement durable et des relations internationales, Paris.

<sup>2</sup> AOSIS submission of May 2, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_workstream2\\_aosis\\_02052013.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_workstream2_aosis_02052013.pdf)

<sup>3</sup> African Group submission of September 19, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_african\\_group\\_workstream\\_2\\_20130919.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_african_group_workstream_2_20130919.pdf)

<sup>4</sup> Environmental Integrity Group submission of September 20, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_liechtenstein\\_mexico\\_monaco\\_and\\_switzerland\\_workstream\\_2\\_20130309.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_liechtenstein_mexico_monaco_and_switzerland_workstream_2_20130309.pdf)

<sup>5</sup> Australia submission of April 22, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_australia\\_workstream\\_2\\_20130422.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_australia_workstream_2_20130422.pdf)

<sup>6</sup> Canada submission of April 12, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_canada\\_workstream\\_1\\_and\\_2\\_en\\_20130412.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_canada_workstream_1_and_2_en_20130412.pdf)

<sup>7</sup> European Union submission of September 16, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_eu\\_workstream\\_2\\_20130916.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_eu_workstream_2_20130916.pdf)

<sup>8</sup> Japan submission of September 10, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_japan\\_workstream\\_2\\_20130312.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_japan_workstream_2_20130312.pdf)

<sup>9</sup> United States submission of March 11, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_usa\\_workstream\\_2\\_20130312.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_usa_workstream_2_20130312.pdf)

<sup>10</sup> Norway submission of March 8, 2013. Available: [http://unfccc.int/files/documentation/submissions\\_from\\_parties/adp/application/pdf/adp\\_norway\\_workstream\\_2\\_20130308.pdf](http://unfccc.int/files/documentation/submissions_from_parties/adp/application/pdf/adp_norway_workstream_2_20130308.pdf)

<sup>11</sup> Summary of the ADP Co-Chairs’ special event ADP 2, part 3 Warsaw, Poland, 19 November 2013. Note by the Co-Chairs. 6 February 2014. UN Doc. ADP.2013.19.InformalSummary

<sup>12</sup> UN Habitat, “Global Report for Human Settlement 2011.” Available: <http://www.unhabitat.org/downloads/docs/GRHS2011/P1HotCities.pdf>. CDP, “Global 500 Climate Change Report 2013.” Available: <https://www.cdproject.net/CDPResults/CDP-Global-500-Climate-Change-Report-2013.pdf>

<sup>13</sup> Andonova, L., T. Hale and C. Roger. 2014. “How Do Domestic Politics Condition Participation in Transnational Climate Governance?” Working paper.

<sup>14</sup> For a list of the initiatives included, see the online supplement to Hale, T. and C. Roger. 2014. “Orchestration and Transnational Climate Governance.” *The Review of International Organizations*. Volume 9, Issue 1, pp 59–82

<sup>15</sup> Haites, E., F. Yamin, and N. Höhne. 2013. “Possible Elements of a 2015 Legal Agreement on Climate Change.” Working Paper No. 16. Institut du développement durable et des relations internationales, Paris

*Photo: Amsterdam cityscape, Wikimedia Commons*

Dr Thomas Hale is a postdoctoral research fellow at the Blavatnik School of Government, Oxford  
[www.bsg.ox.ac.uk/people/thomas-hale](http://www.bsg.ox.ac.uk/people/thomas-hale) | [thomas.hale@bsg.ox.ac.uk](mailto:thomas.hale@bsg.ox.ac.uk) | @thomasnhale  
Louis Chambers is an MPP Candidate, Blavatnik School of Government, University of Oxford

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[www.bsg.ox.ac.uk](http://www.bsg.ox.ac.uk) | [enquiries@bsg.ox.ac.uk](mailto:enquiries@bsg.ox.ac.uk)