
Accountability of voluntary initiatives including non-Party stakeholders at COP28 and beyond

Technical Paper

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Considerations

- How can trust in announcements and voluntary initiatives (by Parties and non-Party stakeholders) made at the COP that are outside the multilateral process be strengthened?
- How can transparency and accountability in relation to these announcements and initiatives be established or enhanced, and to what extent?
- What signals from the outcomes of COP28 and the global stocktake would best catalyze credible climate action through voluntary initiatives?

A. The role of non-Party stakeholders¹ in the implementation of climate commitments

1. The Intergovernmental Panel on Climate Change (*IPCC*) synthesis report sets out the clearest evidence yet of how humans have caused over 1 degree C temperature rise since the beginning of the industrial era, and what we need to do to combat and avoid catastrophic climate change.² Staying within the 1.5 degree C limit of the Paris Agreement is still possible.³
2. However, even as announced targets in nationally determined contributions (*NDCs*) become more ambitious, emissions continue to rise despite the fact they need to halve in this “critical decade” to align with the goals of the Paris Agreement.⁴
3. The role of non-negotiated outcomes and credible climate action by non-Party stakeholders (*NPS*) is gaining momentum,⁵ is crucial to the achievement of NDCs, and can contribute to Paris-aligned climate action beyond NDCs.⁶ As such, pledges by NPSs and by Parties in collaboration with NPSs have proliferated in the past years in line with the urgency, as the global climate action agenda (*GCAA*) has played an increasingly central role in the international climate process under the UN Framework Convention on Climate Change (*UNFCCC*).⁷

B. Issues regarding accountability of voluntary initiatives

4. COP27 dedicated a section of its cover decision to the role of NPSs in enhancing implementation.⁸ In the Sharm el-Sheikh Implementation Plan, Parties recognized the need

¹ Non-Party stakeholders is a term used by the UNFCCC to indicate all stakeholders to the Paris Agreement that are not signatory countries, namely, civil society (e.g. businesses, NGOs, academia, organized youth and communities), subnational governments (e.g. state, regional, and local), and single individuals.

² IPCC synthesis report, <https://www.ipcc.ch/report/ar6/syr/>.

³ C2ES (2023), Kaveh Guilanpour on the IPCC AR6 Synthesis Report, <https://www.c2es.org/press-release/kaveh-guilanpour-on-the-ipcc-ar6-synthesis-report/>.

⁴ C2ES (2023), Re-invigorating the UN Climate Regime in the wider landscape of climate action, by Lavanya Rajamani, Sebastian Oberthür, Harro van Asselt and Kaveh Guilanpour, <https://www.c2es.org/wp-content/uploads/2023/03/20230306-Reinvigorating-the-UNFCCC-C2ES-GST-submission-FINAL.pdf>.

⁵ C2ES (2023), A Solutions-Oriented Approach to the Global Stocktake, Interim Technical Paper for Consultation (May 2023), <https://www.c2es.org/wp-content/uploads/2023/05/20230531-GST-Solutions-Approach-to-the-GST-Consultation-Draft-v1.pdf>.

⁶ While the role of NPSs is recognized as fundamental to deliver the goals of the Paris Agreement, NPSs are, strictly speaking, only indirectly accountable to the Paris Agreement through Parties’ reporting on efforts to achieve their NDCs. Through those efforts, Parties may set out policies that make NPSs accountable toward NDCs and other climate commitments.

⁷ The GCAA includes the work of the Marrakech Partnership led by the High Level Champions as well as other international cooperative initiatives.

⁸ Section XVI of Decision 1/CMA.4 Sharm el-Sheikh Implementation Plan https://unfccc.int/event/cma-4#decisions_reports

to further strengthen accountability of voluntary initiatives,⁹ including through the Non-State Actor Zone for Climate Action (**NAZCA**) platform.¹⁰ Parties also welcomed the recommendations on credible net-zero pledges by the UN High-Level Expert Group on Net-Zero Emissions Commitments of Non-State Entities (**HLEG**).¹¹

5. Parties do have mandatory reporting requirements under the enhanced transparency framework (**ETF**).¹² However, there is no centralized framework under the UNFCCC that provides transparency or accountability in relation to voluntary initiatives including international cooperative initiatives (**ICIs**) by NPS and/or Parties (this paper will refer to '**voluntary initiatives**' or '**voluntary climate action**' interchangeably).
6. There is an increasing demand for a stronger focus on accountability of these voluntary initiatives, which may or may not currently have accountability requirements. Those that do have these requirements may embed them in their governance structure. The lack of clarity and consistency across voluntary initiatives makes it difficult to have a clear or consistent overview and creates fertile ground for potential greenwashing. This in turn reduces confidence and detracts from stakeholders working to foster international collaboration and enhance ambition.
7. There is an ongoing debate as to whether strengthening accountability of voluntary initiatives would ultimately stifle innovation and ambition. Such concerns need to be balanced against accusations of greenwashing and empty promises, which could hinder further climate action. Some would argue that an accountability framework would, in fact, generate greater real climate action.
8. Moreover, both Parties and NPSs face difficulties collecting and producing reliable and relevant data for policymakers. The challenges include technical limitations and capacity constraints (including finance) in collecting data, as well as measuring, reporting, aggregating, and verifying voluntary climate action with any accuracy. More accurate information could improve the scope and granularity of NDCs and tracking of progress toward their implementation.¹³

⁹ Sharm el-Sheikh Implementation Plan, para. 93 (“Invites the secretariat to ensure greater accountability of voluntary initiatives through the Non-State Actor Zone for Climate Action platform”).

¹⁰ Also called the [Global Climate Action](#) platform (GCAP), NAZCA is a UNFCCC platform listing commitments by NPSs and Parties, channeled through a set of data providers.

¹¹ <https://www.un.org/en/climatechange/high-level-expert-group>.

¹² Essentially, there are two means by which Parties are held “accountable” under the Paris Agreement: for reporting and review under the enhanced transparency framework, and, where applicable, the Paris Agreement Implementation and Compliance Committee.

¹³ A series of subnational data aggregation tools have been developed in the wider climate ecosystem and are being tested to draw data from cities, regions, and companies to inform NDCs. Nevertheless, their application is still incipient. Examples of these aggregation tools are Initiative for Climate Transparency (ICAT)’s <https://climateactiontransparency.org/our-work/icat-toolbox/caat/> and the Global Covenant of Mayors (GCOM)’s Multilevel Climate Action Playbook <https://www.globalcovenantofmayors.org/press/the-multilevel-climate-action-playbook-for-local-and-regional-governments/>.

C. Current requirements

9. There are currently no UNFCCC overarching criteria for voluntary initiatives announced or discussed at COPs. For side events or exhibits occurring in the Blue Zone or the formal negotiations area that showcase voluntary initiatives, the only requirements are that participants be accredited observers and that Parties partner with an observer organization. Basic criteria for the UNFCCC to select among the pool of applications include a preference for joint side events, as well as ensuring a balance of stakeholders across constituencies and gender and among topics covered.¹⁴
10. The NAZCA portal does not have overarching criteria for registering initiatives. It currently relies on the criteria set out by its data partners—CDP, the carbonn Center at ICLEI, Climate Bonds Initiative, The Climate Group, and the Global Covenant of Mayors—and UNDP’s Climate Initiative Platform, which is hosted outside of the UNFCCC.¹⁵ These data partners—not the UNFCCC—also handle the compilation and reporting/verification of actions; the UNFCCC simply provides a platform to showcase and take stock of these initiatives.
11. Since COP26, the transparency of NAZCA-registered initiatives has improved with the launch of actor, cooperative initiative, and event tracking tools.^{16,17,18} For instance, the portal is currently tracking announcements made during COP27 and their progress in the lead up to COP28.¹⁹ It is not widely known that NAZCA also tracks voluntary initiatives including both Parties and NPSs.
12. The High-Level Champions (**HLCs**) have embedded common minimum or “starting line” criteria for NPS members of the Race to Zero (**RTZ**) and Race to Resilience (**RTR**) campaigns, with options for members to also disclose “leadership practices.”²⁰ These campaigns gather data from members through partner organizations which are required to manage the operationalization and achievement of members’ pledges and progress against these criteria and best practices.

¹⁴ <https://seors.unfccc.int/>.

¹⁵ <https://climateaction.unfccc.int/Register>.

¹⁶ <https://climateaction.unfccc.int/Actors>.

¹⁷ <https://climateaction.unfccc.int/Initiatives>.

¹⁸ <https://climateaction.unfccc.int/Events>.

¹⁹ <https://climateaction.unfccc.int/Events/COP27>.

²⁰ RTZ criteria <https://climatechampions.unfccc.int/the-race-to-zero-is-on/> and RTR criteria <https://climatechampions.unfccc.int/wp-content/uploads/2022/08/RTR-EOI-July-2022.pdf> in <https://racetozero.unfccc.int/join-the-race-to-resilience/>.

13. The HLCs have also adopted approaches to track NPS progress toward goals related to the 2030 breakthrough agenda through RTZ and RTR.²¹ The 2030 breakthroughs provide reference points (“tipping points” or interim targets) indicating the level of ambition needed to catalyze transformation at the scale and speed required. These points occur along sectoral net-zero pathways or take the approach of broad adaptation targets by focus area. Enhancing accountability is one of the 2023 priorities of the work program for the HLCs and the Marrakech Partnership for Global Climate Action.²²
14. The HLEG’s ‘Integrity Matters’ report outlines ten sets of recommendations for NPS net-zero commitments, namely: announce a net zero pledge, set net zero targets, use voluntary credits, create a transition plan, phase out fossil fuels and scale up renewable energy, align lobbying and advocacy, protect people and nature in the just transition, increase transparency and accountability, invest in just transitions, and accelerate the road to regulation. The HLEG report calls for a task force on net-zero regulation to explore how these recommendations could be adopted as regulatory requirements in the near future.²³
15. The HLEG report, when discussing “increasing transparency and accountability,” suggests that NPSs report through a standardized, open format and via public platforms that feed into the UNFCCC NAZCA portal.
16. Responding to the launch of the November 2022 HLEG report, the UN Secretary General (**UNSG**) invited the UNFCCC to present in early 2023 a plan to address the lack of universally recognized, credible, third-party authorities conducting verification and accountability processes.²⁴ In June 2023, the UNFCCC published a Recognition and Accountability Framework²⁵ and Draft Implementation Plan to begin to operationalize the HLEG recommendations.²⁶ After stakeholder consultations, the Plan calls for progress reports and public dialogues ahead of COP28 and COP29.
17. It is not clear to what extent the Framework and Plan will apply to voluntary initiatives already registered in the NAZCA portal, including those that engage Parties. The Framework does

²¹ The Data Explorer for RTZ is a visually friendly tool to track progress of commitments <https://climatechampions.unfccc.int/race-to-zero-campaign-launches-new-tool-to-enhance-transparency-of-net-zero-commitments/>. The RTR equivalent tool is available here <https://rtrdataexplorer.streamlit.app/>.

²² https://unfccc.int/sites/default/files/resource/MP_Work%20Programme_2023.pdf

²³ HLEG report “[Integrity Matters: Net Zero Commitments by Businesses, Financial Institutions, Cities and Regions.](#)”

²⁴ Response of the UN Secretary General to the HLEG report <https://www.un.org/sg/en/content/sg/statement/2022-11-08/secretary-generals-remarks-launch-of-report-of-high-level-expert-group-net-zero-commitments-delivered>.

²⁵ [The Framework sets the principles of engagement, governance, and data management to achieve the aim of recognizing leadership and ensuring greater accountability of both individual and alliances of NPS](https://unfccc.int/documents/629039)
<https://unfccc.int/documents/629039>.

²⁶ Draft Implementation Plan with respect to Net-Zero Pledges of non-State actors and Integrity Matters <https://unfccc.int/documents/629036>.

acknowledge that the Paris Agreement and its implementing provisions provide the legal obligations of an accountability framework for Parties.²⁷

18. The Plan states that further consideration will be given to how the Framework can support the global stocktake (**GST**) and the implementation of its outcomes.

19. The Annex below provides additional details on NAZCA, RTZ and RTR, HLEG guidelines, and UNFCCC Implementation Plan highlights.

D. Options for enhancing accountability of voluntary initiatives

20. There is still debate on how strong a role the UNFCCC can and should play in improving transparency and accountability of voluntary initiatives and related announcements. However, in recent months, Parties and NPSs have voiced several ideas to that end, including what signals COP28 and the GST could send in this regard. Some examples are:

COP28

- establish overarching principles for NPS accountability, perhaps by the COP Presidency and HLCs
- establish overarching principles for NPS participating at the COP and particularly those wishing to make announcements in the Blue Zone, perhaps by the COP Presidency and HLCs²⁸
- potentially announce, through the UNFCCC, a review of observer registration criteria
- reinforce COP27 language on the need to enhance accountability of voluntary initiatives, including through the use of review mechanisms. Potential review mechanisms could include, at minimum, a requirement that voluntary initiatives report on the accountability structures they have put in place, but could also require that these meet certain high-level criteria.
- ensure that voluntary initiatives must meet certain standards before they can participate in high-profile events curated by the COP Presidency or UNFCCC Secretariat
- highlight in the GST the need for better transparency and accountability of voluntary initiatives
- encourage voluntary initiatives to state whether or how they could help NDC implementation and enhancement
- encourage Parties to reflect voluntary initiatives in their NDCs and make recommendations in this regard, such as in relation to:
 - the potential adoption of principles for accountability (e.g., HLEG) into NDCs and domestic regulatory frameworks
 - the structure and granularity of NDCs including in terms of the scope of sectoral and greenhouse gas coverage

²⁸ https://www.washingtonpost.com/documents/28b5777b-b4d8-42ff-9861-49edc49cd792.pdf?itid=lk_inline_manual_4.

- the integration of aspects beyond mitigation, such as adaptation, means of implementation, and just transition
- encourage reflection of voluntary initiatives in NDCs and require reporting of these in the context of the ETF²⁹
- capacity building activities to improve accountability in relation to voluntary initiatives, including in a domestic context, such as:
 - best practices for the measuring, reporting and verification of voluntary climate action
 - reporting and tracking of voluntary initiatives—including those involving Parties—through the NAZCA portal
 - the use of tools for subnational and voluntary data aggregation for reflection in NDCs
 - a technical resource made available to Parties and NPS highlighting existing accountability frameworks and options to strengthen international cooperation through them.

The NAZCA portal

- make the NAZCA portal the central registry for all types of voluntary initiatives, making registration within a certain timeframe (e.g., 12 months) a prerequisite to feature these at COPs
- set overarching criteria for registration of initiatives onto the NAZCA portal, which in the current design would require data partners to hold members accountable to them. These criteria could:
 - consider existing guidelines such, as RTZ and RTR minimum criteria and/or the HLEG recommendations
 - include a requirement for initiatives to provide information on how they are contribute to or are reflected in NDCs
- upgrade the portal to better show implementation status, synergies, and facilitate scrutiny by third parties, as well as avoid duplication of reporting obligations and accountability checks that occur outside the UNFCCC. For instance, the portal could group initiatives by topic or sector, in the attempt to foster collaboration and minimize redundancy among similar efforts.

²⁹ <https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review-under-the-paris-agreement>.

Annex – further detail on NAZCA, RTZ and RTR, HLEG and UNFCCC Draft Implementation Plan

Non-State Actor Zone for Climate Action requirements

21. Registering new initiatives onto the NAZCA portal³⁰ first requires sending an expression of interest and filling an initial survey. The NAZCA team then makes a determination whether the initiative is recognized or not. No criteria are explicitly set out for an initiative to pass this initial screening. Registering a new initiative is done via one of five data partners: CDP, carbonn Center at ICLEI, Climate Bonds Initiative, The Climate Group, and Global Covenant of Mayors.³¹ Parties and NPSs can join existing registered initiatives, but this requires contacting these initiatives directly.
22. Annual surveys are now complemented by new tracking capabilities by actor (NPS or Party) and by initiative. These are based on components and metrics developed in collaboration with organizations within Camda.³² Visualization of progress provides greater transparency on voluntary initiatives.
23. Metrics differ for initiatives and actors. For initiatives, metrics include: ambition (goals and targets), robustness (dedicated staff, monitoring arrangements, participation criteria, budget), and delivery (actions undertaken, deliverables and outputs, challenges and opportunities). For actors, components include: commitments, emissions inventory, risk assessment, initiative participation, climate action plan, action undertaken, and impact. NAZCA does not offer further insight on what can be considered within these metrics and components.
24. Accountability criteria are established by each data partner and mainly focus on transparency for mitigation efforts. These criteria are not homogeneous and can vary depending on the type of NPS:
 - CDP is a global environmental disclosure system that also provides scoring of initiatives by companies, against different sets of criteria depending on the program and the sector to which the organization belongs. The climate change program is mitigation focused. Scoring criteria relate to leadership, management, awareness, and disclosure levels, assessed through specific questionnaires, which need to be submitted on an annual basis.³³

³⁰ Current data partners are CDP <https://www.cdp.net/en/campaigns/nazca>; carbonn Center at ICLEI <https://carbonn.org/>; Climate Bonds Initiative <https://www.climatebonds.net/get-involved>; The Climate Group <https://www.theclimategroup.org/under2-coalition>; Global Covenant of Mayors <https://www.globalcovenantofmayors.org/how-to-join/>.

³¹ <https://climateaction.unfccc.int/Register>.

³² <https://camda.global/>.

³³ <https://www.cdp.net/en/guidance>.

- The Climate Group’s Under2 Coalition sets criteria for new signatories, which include a public commitment and strategy, annual measurement, and disclosure of greenhouse gas emissions through CDP, and compliance with the Under2 MOU.³⁴
- The Climate Bonds Initiative establishes a standard to assess whether specific projects and assets are eligible for a green bond. It requires annual reporting as well as independent assurance on proceeds’ allocation, performance, and impact.³⁵
- The Global Covenant of Mayors establishes procedural steps for cities and local government initiatives to make a public commitment, define targets and action plans, develop a greenhouse gas inventory and a climate risks and vulnerabilities map, and track and report on a regular basis.³⁶
- The carbonn Center at ICLEI is a unified reporting system for subnational climate action reporting that partners with CDP and is supported by coalitions such as the Global Covenant of Mayors.³⁷

Race to Zero and Race to Resilience minimum criteria

25. RTZ criteria³⁸ fall in two categories:

- “Starting line” criteria lay out common procedural requirements for all members to meet, known as the five “P”s: Pledge, Plan, Proceed, Publish, and Persuade
- “Leadership practices” for leading entities to provide best practices toward a net-zero economy.

26. Starting line RTZ criteria essentially require different levels of public disclosure and engagement in time:

- first, to Pledge a net-zero target, across scope 1, 2, and 3 emissions
- second, within a year of joining, to have a transition Plan including actions for implementation in the next 12 months, within 2–3 years, and by 2030, but also other criteria such as setting clear governance structures and review ambition on a five-year cycle³⁹
- third, to Proceed to implementation of interim targets, and where relevant contribute to sectoral breakthroughs
- fourth, to Publish progress, at least annually
- fifth, within a year of joining, to Persuade others to align external policy and engagement with the goals of the Paris Agreement.

³⁴ https://theclimategroup.prod.acquia-sites.com/sites/default/files/2020-11/under2_coalition_signatory_and_endorser_criteria_december_2018.pdf.

³⁵ <https://www.climatebonds.net/standard> and <https://www.climatebonds.net/files/files/climate-bonds-standard-v3-20191210.pdf>.

³⁶ <https://www.globalcovenantofmayors.org/how-to-join/>.

³⁷ <https://carbonn.org/initiatives>.

³⁸ <https://racetozero.unfccc.int/system/criteria/>.

³⁹ <https://climatechampions.unfccc.int/wp-content/uploads/2022/09/EPRG-interpretation-guide.pdf>.

27. For each P, members can disclose a series of leadership practices. For instance, these range from how they use carbon credits along their net-zero pathway and how they have assessed their “fair share” of effort to decarbonize (Pledge), to how they are supporting the just transition and integrating nature in their targets (Plan), or to how they are scaling up climate solutions and empowering their ecosystem (Proceed) and advocacy (Persuade).
28. Other criteria include that disclosed net-zero pledges and transition plans set out accountability mechanisms for ambition and implementation (e.g., clear governance structures, disclosure, performance incentives), and that members publicly disengage from any trade association that repeatedly fails to align with the Paris Agreement.
29. RTR only sets common minimum process criteria, called the four “P”s,⁴⁰ leaving additional criteria for partner initiatives to establish. To join RTR, NPSs must: Pledge to contribute to supporting four billion people from vulnerable groups and communities be more resilient by 2030; Plan to take action towards this commitment with interim targets; Proceed toward implementing the targets specified; and Publish progress against interim and long-term targets at least annually.
30. RTZ and RTR partners and members are listed on the campaigns’ webpages and can be scrutinized by stakeholders anytime.

Summary of key recommendations by the HLEG

31. Recommendation 1: Announcing a net-zero pledge
 - Make the pledge public by the leadership of the organization and representative of a fair share of needed global climate mitigation effort.
 - Include interim targets in line with IPCC or IEA greenhouse gas pathways, with global emissions declining by at least 50 percent by 2030, reaching net zero by 2050 or sooner.
 - Use methodologies to define a net-zero pledge, targets, and pathway that are third party-verified.
32. Recommendation 2: Setting a net-zero target
 - Short, medium, and long-term absolute emissions reductions targets need to be set up, and, where appropriate, relative targets across their value chain.
33. Recommendation 3: Using voluntary carbon credits
 - Prioritize urgent and deep reductions of emissions across their value chain. The use of carbon credits in voluntary markets cannot count toward achieving interim reductions along the net-zero pathway.
 - NPS meeting their interim targets are encouraged to balance out remaining unabated emissions by purchasing high-integrity carbon credits.

⁴⁰ <https://racetozero.unfccc.int/join-the-race-to-resilience/>.

34. Recommendation 4: Creating a transition plan

- Publicly disclose a comprehensive transition plan indicating actions that will be undertaken to meet all targets, to be updated every five years and report progress annually.
- Align governance and incentive structures, capital expenditures, research and development, skills and human resource development, and public advocacy, while also supporting a just transition.

35. Recommendation 5: Phasing out of fossil fuels and scaling up renewable energy

- Include specific targets aimed at ending the use of and/or support for fossil fuels in net-zero pledges.
- The transition away from fossil fuels must be just for affected communities, workers, and all consumers. The transition away from fossil fuels must be matched by a fully-funded transition toward renewable energy.

36. Recommendation 6: Aligning lobbying and advocacy

- Align external policy and engagement efforts, including membership in trade associations, to the goal of reducing global emissions by at least 50 percent by 2030 and reaching net zero by 2050.

37. Recommendation 7: (Protecting) people and nature in the just transition

- NPS with material land use emissions must avoid the conversion of remaining natural ecosystems—in line with eliminating deforestation and peatland loss—by 2025 at the latest, and the conversion of other remaining natural ecosystems by 2030.
- Financial institutions should have a policy of not investing or financing businesses linked to deforestation and eliminating agricultural commodity-driven deforestation from their investment and credit portfolios by 2025.

38. Recommendation 8: Increasing transparency and accountability

- Disclose annually on the above requirements and relevant information against a baseline along with comparable data to enable effective tracking of progress toward net-zero targets.
- Develop a global, central, digital, open-source repository of climate disclosures consistent with its recommendations, that would be overseen by the UNFCCC and feed into the NAZCA portal.
- Have reported emissions verified by independent third parties.
- Large financial and non-financial businesses should also seek opinions on climate governance, internal controls, metrics and targets setting.

39. Recommendation 9: Investing in just transitions

- Support a new deal for development that includes financial institutions and multinational corporations working with governments, multilateral development banks, and development finance institutions to consistently take more risk and set targets to greatly

scale investments in the clean energy transition in developing countries, while ensuring a just transition and sustainable development.

40. Recommendation 10: Accelerating the road to regulation

- Regulators should develop regulation and standards in areas including net-zero pledges, transition plans and disclosure, starting with high-impact corporate emitters, including private and state-owned enterprises and financial institutions.
- Tackle the challenge of fragmented regulatory regimes through a new task force on net-zero regulation.

Highlights of the UNFCCC Draft Implementation Plan with respect to Net-Zero Pledges of non-State actors and Integrity Matters

41. The NAZCA portal will be upgraded to allow for direct submission of pledges and initiatives, through a standardized format reflecting the HLEG’s criteria for credible pledges.

42. Several actions will be undertaken to reflect the HLEG’s recommendations in the NAZCA portal, particularly the first—“announcing a net zero pledge”—and eighth—“increasing transparency and accountability”—recommendations, including the establishment of:

- a requirement to annually disclose all value chain emissions and use of carbon credits to analyze progress with respect to the registered plans. Data on individual entities will be transmitted free of charge in aggregate and agreed formats by other existing reporting platforms. The UNFCCC is collaborating with CDP in this regard and has partnered with the Climate Data Steering Committee and the Net Zero Data Public Utility (**NZDPU**)⁴¹ to develop an open-access registry providing the core progress reporting on all greenhouse gas emissions and carbon credit use by NPSs.
- an expectation that verifiers will confirm their assessment of the pledges registered in the NAZCA portal and the methodology employed. The UNFCCC will create working groups to define best practices and enhance consistency across different approaches for third party verification of pledges, assessment of transition plans, and verification of greenhouse gas inventories and carbon credit use for progress reports.

43. In addition to getting immediate feedback on the Plan itself, including the detailed timeline of deliverables by COP28, consultations will also be undertaken on creating a sustainable funding model for the work involved in its ongoing delivery.

⁴¹ The NZDPU is an effort to create a global central digital repository of reliable information on corporate climate performance to guide investment decisions by financial institutions and ultimately feed into the NAZCA portal, <https://www.nzdpu.com/>.