



CLIMATE ACTION NETWORK

Submission: Review of the Doha Work Programme and the Future Work on Action for Climate Empowerment

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Climate Action Network (CAN) is the world's largest network of civil society organizations working together to promote government action to address the climate crisis, with more than 1300 members in over 120 countries.

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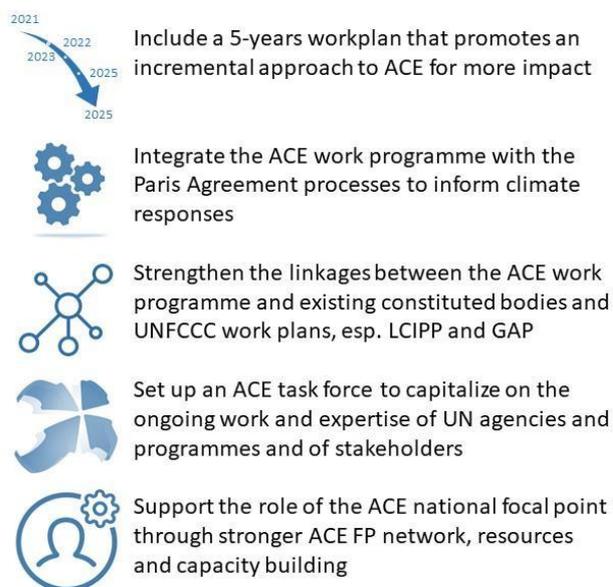
Review of the Doha Work Programme and the Future Work on Action for Climate Empowerment

Climate Action Network (CAN) welcomes the opportunity to provide its recommendations for the future work to enhance the implementation of Article 6 of the Convention and Article 12 of the Paris Agreement, as well as topics for the workshop to be held during SB52. CAN is the world's largest network of civil society organizations working together to promote government action to address the climate crisis, with more than 1300 members in over 120 countries. As its member organizations are involved on a day-to-day basis in activities related to the six thematic areas of Action for Climate Empowerment (ACE) at the local, national, and international level, CAN reiterates its commitment to support implementation of ACE and to work with state Parties to secure better integration of ACE into climate action.

CAN strongly believes that policy measures covered by Action for Climate Empowerment have the potential to act as catalysts for climate ambition and for a people-centered implementation of the Paris Agreement. CAN urges state Parties to adopt at the COP26 a Work Programme that is fit for purpose so as to foster effectively the implementation of these actions in order to unlock additional ambition and to promote mainstreaming of ACE across other UNFCCC workstreams and constituted bodies.

Overview of key proposals for a new ACE Work Programme

Structure of the new ACE Work Programme



Substantive Focus for the new ACE Work Programme



A. Introduction: ACE as a key to deliver ambition and effective implementation

1. ACE can raise ambition

The IPCC Special Report on 1.5 degrees leaves no doubt that we need to radically increase the ambition of climate policies in order to prevent global heating over 1.5 degrees and adapt to the unavoidable impacts of climate change. While the IPCC emphasizes that it remains physically possible to stay below 1.5 degrees of global warming, this requires far-reaching action capable of transforming our societal structure and economic system. Such far reaching changes cannot be achieved by top-down centralized policy making alone. The effective implementation of the Paris Agreement and Sustainable Development Goal 16 related to good governance can only be achieved through empowerment and inclusion of grassroots groups, trade unions, civil society, and indigenous peoples as well as cities and regions.

With the engagement of non-state actors, public ownership of climate action can be nourished, and barriers to implementation such as limited capacity and missing expertise can be tackled. Simultaneously, the public scrutiny of climate policies and compliance can drive the ambition of political leaders. As the IPCC noted in its Special Report in 2018, “civil society is to a great extent the only reliable motor for driving institutions to change at the pace required”¹. The elements of ACE are essential to catalyze such collective action, ensuring that

¹p. 352, “Strengthening and Implementing the Global Response”. In: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [Masson- Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)]. In Press.

all stakeholders are equipped with the necessary tools to take action on the climate crisis. The access to all necessary information, the dissemination of values and skills required for a decarbonized future, and the right to effectively engage in policy-making form the basis of harnessing the potential of all parts of society to drive ambitious climate action.

2. ACE can drive people-centered climate policies

Climate policies must go hand in hand with protecting the rights of all people to ensure that all can contribute and have a say in climate responses and that no segment of society is left behind. In the Preamble of the Paris Agreement, state Parties stressed the importance of respecting, promoting, and considering their human rights obligations when taking action to address climate change. Many cases over the past years have showcased the negative impacts of technocratic climate policies that placed corporate profits and economic growth above the interest of people.

Examples range from millions protesting on the streets against ill-designed carbon taxes impacting primarily the working and middle classes, to displacement and violence against indigenous peoples due to development projects implemented in the name of climate action such as hydro-electric dams.

To achieve the objectives of the Paris Agreement and those of the Sustainable Development Goals, a people-centered approach is essential. The development and implementation of such people-centered policies require an inclusive policy-making process with effective and meaningful participation of the public. Such engagement needs to be supported by providing stakeholders with the necessary tools including knowledge, transformative skills to drive the transition to a carbon neutral and climate resilient society, and the avenues to participate, as promoted by the elements of ACE. Policy-making that fosters the six ACE elements (education, training, public awareness, public access to information, public participation, and international cooperation) leads to more inclusive and effective climate policies, as it increases public ownership and builds the resilience of communities, thus driving the far-reaching changes so urgently needed.

3. ACE can strengthen synergies and drive policy coherence in the UNFCCC framework and beyond

ACE offers an opportunity to better link the implementation of the Paris Agreement with other policy objectives and commitments of state Parties related to education, good governance, or human rights protection. These linkages would contribute to ensuring that state Parties meet their respective legal obligations under relevant international frameworks. For instance, all but one Party to the UNFCCC² have accepted the legal obligation to provide children with the right to environmental education under Article 29 of the Convention on the Rights of the Child. ACE thus offers an opportunity to foster policy coherence by implementing the Paris Agreement in a manner that contributes to the realization of obligations and policy objectives embraced by state Parties.

² The United States is the only Party to the UNFCCC that has refused to ratify the Convention on the Rights of the Child.

Mainstreaming ACE effectively throughout all key dimensions of climate policies would create bridges with international agendas so as to leverage the expertise and capacity of other stakeholders, including UN agencies such as UNESCO, UNICEF and the Office of the High Commissioner for Human Rights (OHCHR). In 2016, for instance, the UNFCCC and UNESCO jointly developed Guidelines on ACE intended to facilitate the work of ACE focal points³. This example shows the potential of ACE to connect workstreams beyond the UNFCCC counteracting the increasing trend of institutional fragmentation in the international sphere. Enhancing the implementation of ACE and recognizing its value in promoting policy coherence could thus unlock additional resources, expertise, and energy by better integrating existing agencies and synergies.

B. Priorities for the Future Work Programme: Focusing on Effective Implementation and Mainstreaming

1. Mainstream ACE elements across UNFCCC workstreams

To drive effective climate policies by engaging all stakeholders, the priority of the new work programme must be to ensure that all six elements of ACE are considered and implemented across the workstreams of the Convention and by all constituted bodies. Such mainstreaming of ACE elements across the UNFCCC is important to strengthen policy coherence in the implementation of the Paris Agreement, to prevent the duplication of work, and to ensure that members of civil society and indigenous peoples are truly empowered in relation to all key areas of climate policy-making. To promote the mainstreaming of ACE across workstreams, state Parties could draw inspiration from other workstreams and constituted bodies that have already sought to provide incentives for other constituted bodies to take their respective issues into account. For instance, the Lima Work Programme (LWP) includes a request to all constituted bodies to report on the progress of integrating gender perspectives into their work,⁴ while the Paris Committee on Capacity Building, the Gender Action Plan, and the Local Communities and Indigenous Peoples Platform have invited other constituted bodies to participate in joint meetings to consider issues related to mainstreaming.

The new ACE Work Programme should include an invitation that other **constituted bodies nominate an ACE focal point** within their membership and provide a report on progress made with regards to the integration of ACE in their respective work. These focal points should be invited to participate at each session of the Subsidiary Bodies in an **informal dialogue to share lessons learned, challenges, and opportunities regarding the mainstreaming of ACE**. Further building on the example set out in the LWP⁵, the Secretariat should be mandated to prepare during the first year of the new Work Programme a **technical report identifying the entry points of ACE considerations** in other workstreams to facilitate this reporting.

³ Action for climate empowerment: guidelines for accelerating solutions through education, training and public awareness (2016), <https://unesdoc.unesco.org/ark:/48223/pf0000246435>

⁴ Decision 3/CP.25 (2019), para.12, https://unfccc.int/sites/default/files/resource/cp2019_L03E.pdf

⁵ Decision 21/CP.22 (2016), para. 13, <https://unfccc.int/sites/default/files/resource/docs/2016/cop22/eng/10a02.pdf>

2. Integration of ACE in Nationally Determined Contributions and National Reports

State Parties have acknowledged the need to apply ACE to the development of policies under the Paris Agreement, including their Nationally Determined Contributions (NDCs)⁶. Given the great disparity in the implementation of this approach to date, CAN re-emphasizes the need to integrate all six ACE elements in state Parties' NDCs in two complementary ways. Firstly, ACE must be applied to NDCs in a procedural manner, meaning that the **process of developing the NDCs must be participatory, inclusive, and accountable, thus fostering public awareness** – as suggested in the Paris Agreement implementation guidelines⁷. To ensure such meaningful participation of civil society, state Parties need to provide accessible and coherent information to all citizens. Secondly, ACE elements need to be integrated in NDCs in a substantive manner, meaning that state **Parties must set out clear and measurable goals for each of the elements of ACE and report on the progress made with regards to their implementation**.

CAN notes with concern that, to date, the sharing of information among state Parties regarding the implementation of ACE remains impaired by inconsistent reporting approaches. State Parties lack guidance regarding how to report effectively on these elements in a manner that could promote the replication of good practices and the sharing of lessons learned. The value of the information currently reported is often limited, as state Parties may “cherry-pick” singular examples of projects of interdisciplinary education in favorable contexts, rather than taking an all-of-society perspective and assessing progress made towards integrating ACE systematically throughout national policies. Furthermore, uncoordinated reporting approaches have limited the number of state Parties reporting on all dimensions of ACE. The new work programme should **request that all state Parties report adequately on ACE in their national reports submitted under the UNFCCC and the Paris Agreement**, and should mandate the Secretariat to develop **informal guidance regarding how to report effectively on these policies in the context of National Communications, Bilateral Reports, and National Adaptation Plans**.

3. Strengthening ACE Focal Points

The Doha Work Programme invited every state Party to appoint a national focal point on ACE and to provide them with the necessary financial and technical support, as well as with the access to information and materials they require⁸. While this invitation was reiterated *inter alia* in 2018⁹, to date only 108 out of 187 state Parties have proceeded with this such an appointment. Moreover, amongst the official focal points, only a handful are active and engaged in ACE discussions. ACE focal points themselves have pointed out that this lack of engagement is owed to the limited resources and capacity given to their mandate, as the position of ACE focal point is frequently added onto existing obligations of government officials without providing additional support. Their work is further limited by the

⁶ Decision 17/CMA.1 (2018), para. 5, https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf

⁷ Decision 4/cma.1, 'Further guidance in relation to the mitigation section of decision 1/CP.21', [fccc/PA/cma/2018/3/Add.1](https://unfccc.int/sites/default/files/resource/PA/cma/2018/3/Add.1) (2018), Annex i at para. 4(a)ii(c) and Decision 17/CMA.1, “

Ways of enhancing the implementation of education, training, public awareness, public participation and public access to information so as to enhance actions under the Paris Agreement” (2018), para. 5.

⁸ Decision 15/CP.18, (2012), para. 22, https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf

⁹ Decision 17/CMA.1 (2018) Para.4 https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf

architecture of national governance. Efforts on different elements of ACE should emerge from various ministries, while the focal point often only has the mandate to work within a specific ministry.

Active and well-equipped national focal points are essential to drive the implementation of ACE, as they are tasked with developing a national ACE strategy and with informing the process for the developments of NDCs and other national climate policies, including the mobilization of technical and financial capacity, assessing progress made, and identifying synergies with other climate policies. Therefore, the new work programme should **request that all state Parties appoint an ACE Focal Point mandated to work across relevant national institutions** to reflect the cross-sectoral nature of ACE (i.e. Ministry of Environment and Ministry of Education). State Parties should consider the benefits of **longer appointment terms** to ensure efforts on ACE can be continuous and incremental. The Secretariat should be invited to continue its work to support the national focal points on all six elements of ACE, including making public the contact information for all ACE focal points, as is standard with National Focal Points and National Gender and Climate Change Focal Points.

4. Defining Activities of the Work Programme through a 5-year-Action Plan

The UNFCCC has developed Work Programmes and Action Plans to drive the effective implementation of all key workstreams under the UNFCCC. Such work plans are critical in order to elaborate a mid-term implementation plan seeking to deliver key priorities through an incremental approach. State Parties should build on this well-tried approach by adopting a **coherent and incremental Action Plan for ACE**. To align with the implementation cycles defined in the Paris Agreement, the Action Plan should span a **period of five years**, allowing for substantive evaluation for the steps after. The Action Plan should set out the activities to be organized each year throughout the full term of the work programme and the concrete goals these activities pursue. Such an Action Plan could include activities and events such as in-session ACE dialogues, technical reports and background papers, and international and/or regional workshops addressing specific dimensions of ACE. The Action Plan should seek to address all six elements of ACE in a balanced manner.

Activities and events set forth in the Action Plan should be **aligned with priorities and timeframes under the UNFCCC**, including the gathering of information and lessons learned from the ongoing cycle of NDC enhancement and updating (2021), the Global Stocktake (2022-2023), and the preparation of new NDCs (2025). The adoption of a 5-year Action Plan would provide some visibility and clarity regarding how events and activities held under ACE contribute to a strategic vision and would ensure that despite limited resources, the Work Programme is well positioned to foster the implementation of the Paris Agreement.

5. ACE Task Force

State Parties and focal points have repeatedly stressed the need for additional expertise and support regarding the development of effective policies to drive the implementation of ACE. Much of this expertise is already available or being developed through a wide range of intergovernmental and non-governmental organizations. The contributions of these UN institutions, academic experts, regional organizations, and NGOs have however remained largely uncoordinated and disjointed from the work under the Doha Work Programme. To

ensure more effective coordination of stakeholder engagement under and beyond the UNFCCC, as well as the development of tailored resources for state Parties to drive the objectives of ACE, an **ACE Task Force should be established under the SBI**.¹⁰

Such a Task Force could be inspired by the Task Force on Displacement under the Warsaw International Mechanism on Loss and Damage. With membership including representatives from relevant constituted bodies, UN agencies, and civil society and indigenous peoples' representatives, the Task Force could draw primarily on the experience and expertise already available to accelerate the implementation of ACE and to provide Parties with relevant tools and guidance, while requiring very limited resources. Not only could such a format strengthen the implementation of ACE, but it could also **promote coordination and policy coherence** across the UNFCCC and broader international processes and institutions. Bringing representatives of relevant committees and expert groups under the Convention together with other experts working on different ACE elements ensures mutual learning and the consideration of ACE within the context of broader climate policy-making on mitigation, adaptation, loss and damage, and means of implementation. The work of the Task Force should be incorporated in the Action Plan described above (4) and feed into the ACE dialogues and other activities conducted throughout the year.

C. Substantive Focus for the new ACE Work Programme

1. Linking ACE to international processes and institutions and situating ACE within the SDG framework

The six elements of ACE can be found in the work of many different international organizations and institutions, but as these efforts are not formally subsumed under ACE, they remain disconnected from ongoing work under the UNFCCC. These parallel processes often benefit from more participation by relevant governmental and non-governmental stakeholders, and have generated a significant amount of expertise and resources. Such organizations outside the UNFCCC approach the different ACE elements from the perspective of their focal area of work, e.g. children's rights or indigenous peoples. Consequently, they have developed specific expertise on driving ACE in different contexts and groups of society, gathered an extensive collection of best practices, and collected experiences in overcoming barriers to implementation. Failing to capitalize on these processes would be a missed opportunity, would risk duplicating work, and would increase international policy fragmentation.

The **2030 Agenda and the Sustainable Development Goals (SDGs)** provide the framework to ensure more policy coherence. By analyzing inherent linkages of ACE to different SDGs and targets, in particular SDG 4 (education), 13 (climate action), and 16 (good governance), potential partners working towards similar goals can be identified. Therefore, these linkages need to be operationalized, ensuring the building and strengthening of the integration of ACE in ongoing work of organizations such as UNESCO and the Education for Sustainable

¹⁰ OHCHR, ILO, UN Women, UNESCO, UNEP, UNECE, UNICEF, UN ECLAC (February, 2020) Response to the call for Submissions for the review of the Doha Work Programme; <https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202002210212---OHCHR,%20ILO,%20UN%20Women,%20UNESCO,%20UNEP,%20ECLAC,%20UNICEF%20and%20UNECE%20Joint%20Submission%20on%20ACE.pdf>

Development 2030 Agenda, UNICEF, the International Labour Organisation, the UN Regional Economic Commissions, and the Office of the High Commissioner for Human Rights, amongst others.

2. Taking a human rights-based approach to ACE

The Paris Agreement and decision 1/CP.21 explicitly mention the importance of guaranteeing the rights and facilitating the participation of specific groups, including local communities, women, indigenous peoples, children, migrants, persons with disabilities, and persons in vulnerable situations. There exists a broad understanding in the climate regime that a rights-based approach leads to more inclusive, sustainable, and effective climate policies. This is not only reflected in the recognition of human rights in the preamble of the Paris Agreement, but also in other workstreams under the UNFCCC, including for instance the Gender Action Plan¹¹, the Local Communities and Indigenous Peoples Platform,¹² and the Paris Committee on Capacity Building¹³. **ACE has natural linkages to these human rights** given that the right to environmental education recognized under the Convention on the Rights of the Child (ratified by all but one Parties to the Paris Agreement), and procedural rights including access to information and public participation in environmental matters are a key component of international human rights law and of environmental governance¹⁴ (including Principle 10 of the 1992 Rio Declaration). These rights have been reaffirmed through international legal instruments such as the Aarhus Convention and the Escazú Agreement.

Despite these natural linkages between ACE and existing human rights principles and institutions, this link has not been operationalized to date. CAN believes this is a missed opportunity, as taking a human rights-based approach to ACE would drive more **inclusive development and implementation of ACE** at the national level. By taking into account the specific needs and perspectives of the most disenfranchised communities with limited access to decision-making, a human rights-based approach would ensure that these communities are empowered and that ACE is implemented in a manner that truly “leaves no one behind”. CAN therefore strongly recommends that the future work on ACE make use of this expertise and be guided by a human-rights based approach as set out in the Paris Agreement.

3. Promoting Inclusive and Socially Just Climate Responses

Effective climate action simultaneously fulfills the human rights obligations of states by putting a focus on a just and inclusive approach. This requires hearing and responding adequately to the voices of disenfranchised and, in particular, segments of the population who have no or little access to policy making to understand their perspectives and priorities and to build on their expertise. To ensure their voices can be heard, particular attention must be given to creating environments that **enable the participation of marginalized groups in climate policy-making**, including investing in the necessary tools and support mechanisms, such as funding opportunities and capacity-building. State Parties should be requested to incorporate this focus in all levels of policy-making, including national ACE strategies, by

¹¹ Decision 3/CP.25 (2019); https://unfccc.int/sites/default/files/resource/cp2019_L03E.pdf

¹² Decision 2/CP.24 (2018); <https://unfccc.int/sites/default/files/resource/10a1.pdf>

¹³ Decision 16/CP.22 (2017); <https://unfccc.int/resource/docs/2016/cop22/eng/10a02.pdf>

¹⁴ Rio Declaration, Principle 10, among others

identifying obstacles to the engagement of disenfranchised groups and developing strategies to tackle them. CAN wants to emphasize that **ACE must be sensitive to barriers to engagement of persons with disabilities in all areas of climate policy-making.**

Since the groups most vulnerable to the impacts of the climate crisis are already socio-economically and politically marginalized, investing only in traditional approaches to engage civil society will not suffice. High rates of illiteracy will, for instance, limit the effectiveness of certain materials and mediums used to drive action on ACE. Similarly, while schools are an essential avenue to educate children about the climate crisis and empower them to take action together, children on the frontlines and in impoverished communities often do not attend formal schools. The impacts of climate change-induced phenomena, for instance droughts or floods, on the livelihoods of families further exacerbate these circumstances, impairing their ability to afford schooling costs. Therefore, the element of education within ACE needs to encompass more than the formal education system to realize SDG 4 related to inclusive education and target 4.7 on education for sustainable development and human rights. State Parties shall **develop strategies for non-formal and informal education**, including radio and television programmes, participatory exhibitions, and community-based trainings, as well as cooperate with actors providing informal education such as churches, associations, and unions. Such approaches not only reach marginalized communities outside of the formal education system, but also the wider community and decision-makers, both adults and children.

4. Identifying and addressing Barriers to Implementation

The past ACE work programmes have focused to a large extent on the identification and sharing of good practices, enabling mutual learning amongst state Parties and stakeholders. To complement and go beyond this work and to further contribute to the enhanced implementation of ACE, we believe that the new work programme should **review proactively the barriers to the promotion of ACE and opportunities to overcome those.** As the IPCC has emphasized that civil society is essential to drive effective climate action, the new ACE work programme should strive to identify and solve any hindrance posed to full and effective contributions of stakeholders to climate action.

A well-informed population and an enabling environment to proactively engage with issues related to the climate crisis and its impacts form the basis of effective civil society participation. The public perception of the state of climate science does not match the almost universal scientific consensus on the gravity and urgency of the climate crisis. It has been shown that misinformation is able to lower people's understanding and acceptance of the anthropogenic origin of climate change. As the spread of misinformation is accelerating on a broad range of media platforms, governments and non-state actors should review good practices and lessons learned in relation to interferences by non-state actors in the public discourse on climate change, as this undermines states' own ability to drive climate action.

5. Promoting ACE through existing Financial Instruments

The areas of ACE are critical for climate finance activities as involving stakeholders in designing and implementing adaptation and mitigation projects and programmes is essential to their success. This has been particularly true for access to information and public participation. The Green Climate Fund (GCF), Adaptation Fund (AF), and Global Environment Facility (GEF) all have policies that require the disclosure of project information and consultation with stakeholders regarding their proposed activities. Additionally, they allow for comments from stakeholders through various means including through the Secretariat at the Adaptation Fund and directly at the board meetings at the GCF. All three also support training and capacity-building activities.

Thus, entities proposing and implementing climate finance projects, including governments, international organizations, financial institutions, and NGOs, must incorporate some ACE principles in their activities. However, these elements are not necessarily translated beyond the specific project context and used more broadly, for example, to provide lessons for implementing ACE nor does it mean that they are funding ACE activities directly. The COP has mandated the GEF to report on how it was supporting the implementation of the Doha Work Programme and the GEF continues to see areas of ACE as part of its capacity-building work, and the Adaptation Fund's current strategic plan considers the areas of ACE part of its theory of change. State Parties should continue to ensure through COP guidance that the GCF, GEF, and Adaptation Fund are supporting elements of ACE both directly and indirectly through their projects and programmes.

However, despite best practices in climate finance including ACE elements, in particular timely and accessible access to information and the participation of stakeholders, during most of the ACE workshop, actors mentioned a significant challenge in implementing ACE activities on the ground: the lack of finance. Climate finance instruments often are focused on a narrow conception of mitigation or adaptation activities without recognizing the vital role of ACE elements in creating the enabling environment and ensuring the effectiveness and sustainability of outcomes. Unfortunately, projects directly concerning education or focused directly on implementing elements of ACE such as ensuring access to information and participatory decision-making often are missing. ACE elements all can serve to complement and improve mitigation and adaptation actions. Increasing public awareness, ensuring access to information, implementing participatory decision-making, ensuring climate education, and increasing training all require significant time and investment and therefore require support so as to improve climate action.

Therefore, CAN calls for the participation of the climate finance funds that are part of the UNFCCC financial mechanism (GCF, GEF, and Adaptation Fund) in the ACE workshops and meetings, to share lessons and opportunities and to increase the financing of the 6 elements of ACE through these institutions. This can also be the opportunity to invite the delegates of state Parties focused on the negotiations on finance matters, to attend the ACE workshops and meetings, so as to ensure the link between ACE and climate finance.

D. Theme and format of the 8th ACE Dialogue

According to the alternating consideration of the two focal areas during the dialogue as established in Decision 15/CP.18, paragraph 10, the focus of the 8th dialogue on Action for Climate Empowerment to be held at SB52 (October 2020) should be on the second focal area of elements, including **access to information, public participation, public awareness, and the cross-cutting theme of international cooperation.**

As many state Parties will likely still be working domestically on the updating or enhancement of their NDCs at the time of the workshop, CAN calls for the workshop to address primarily **how these elements can inform and strengthen the planning and the implementation of NDCs, building on lessons learned and the experience of state Parties and stakeholders.** The dialogue should consider both the **procedural and substantive** aspects of the **integration of ACE in NDCs:** Procedurally, the NDCs themselves should be developed and implemented through effective and meaningful public participation. Substantively, Parties should include the ACE elements as a policy and component of their NDCs by setting out specific goals for all ACE elements.