Submission from Office of the High Commissioner for Human Rights to the Climate High-Level Champions and the Marrakech Partnership on the five-year vision and plan for the Global Climate Action Agenda

30 September 2025

The Office of the United Nations High Commissioner for Human Rights (OHCHR) welcomes the opportunity to provide feedback in response to the request from the Climate High-Level Champion and the Marrakech Partnership on the five-year vision and plan for the Global Climate Action Agenda (GCAA).

The Human Rights Council has mandated numerous reports on climate change, most recently on the just transition. The Special Procedures of the Human Rights Council and human rights treaty bodies have also consistently produced thematic reports, communications, and country visit reports touching on human rights and climate change. This body of work documents not just the human impacts of climate change but also the tremendous resilience of rights-holders, many of whom are already experiencing the catastrophic impacts of climate change. Therefore, in line with the Paris Agreement, the ICJ Advisory Opinion of July 2025 on the obligations of States in respect of climate change, and UN Human Rights Council and General Assembly resolutions 48/13 and 76/300, we strongly urge the inclusion of human rights language and safeguards in the five-year vision and plan for the GCAA.

1. **What should success look like for the GCAA in the next five years, and how can it be measured effectively?**

OHCHR notes that the previous five-year plan was centered around six key functions:

- Mobilizing and aligning non-Party stakeholders (NPS) towards credible, transparent, science-based goals that maximize ambition;
- Supporting NPS to drive systems transformation around sector pathways with actionable short, medium- and long-term milestones that facilitate all stakeholders working collaboratively across sectors and value-chains towards a shared vision;
- Strengthening collaboration between national governments and NPS by identifying opportunities where climate action from NPS helps to create the conditions for enhancing ambition and accelerating implementation;
- Broadening and deepening engagement globally, with a particular focus on helping developing country stakeholders to identify opportunities and the solutions most appropriate for their context;
- Tracking progress and enhancing the transparency and credibility of NPS action to build confidence and a shared understanding of the overall state of systems transformation and game-changing solutions to inform and accelerate action;
- Building a shared narrative to collectively understand the overall direction of climate action and inspire further action.

Moving forward, OHCHR also takes note of the Synthesis Report by the Secretariat from 22 September 2025 on the feedback received thus far in response to the letter from the climate high-level champions for the next five-year plan,[1] which includes the following overarching themes:

- Anchor the GCAA based on the goals of the Paris Agreement and outcome of the first Global Stocktake (GST) by embedding their priorities into its five-year vision and plan to ensure credibility, coherence, and relevance across mitigation, adaptation, and means of implementation.
- Translate commitments into measurable implementation by supporting Nationally Determined Contributions (NDC) and National Adaptation Plans (NAP) delivery, scaling solutions, strengthening existing initiatives, mobilizing finance, and enabling systemic and sectoral transformation that delivers tangible results on the ground.
- Mobilize climate finance, in particular, for adaptation and resilience and ensure equitable access for developing countries.
- Strengthen accountability through indicators and milestones by establishing clear metrics, review points, and both quantitative and qualitative measures tied to the cycle of the GST to track progress and capture outcomes.
- Continuously strengthen GCAA governance and impact by regularly refining priorities, enhancing leadership and coordination mechanisms, and fostering synergies.

OHCHR underlines that, overall, success for the GCAA in the next five years should be defined by its ability to advance climate action that is inclusive, equitable, and rights-based.[2] This includes the integration of human rights across all climate initiatives. In that context, OHCHR provides the following inputs:

- Human rights guarantees will make a difference between nominal participation with stakeholders and **meaningful engagement with rights-holders**. OHCHR highlights the importance of increasing the meaningful participation of groups in vulnerable situations in climate decision-making processes, including free, prior and informed consent for Indigenous Peoples. This is in line with the acknowledgment in the Paris Agreement that Parties should, when taking action to address climate change, respect, promote and consider their respective obligations on human rights, the right to health, the rights of Indigenous Peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity. As part of these efforts, guaranteeing civic space across GCAA events and platforms, and adopting minimum standards for safe participation and reprisal policies, including for environmental human

[1] Feedback received in response to the letter from the Climate High-Level Champions on the five-year vision and plan for the Global Climate Action Agenda - Synthesis Report
[2] See e.g., A/HRC/60/52: Synthesis report on opportunities, best practices, actionable solutions, challenges and barriers relevant to just transition and the full realization of human rights for all people - Report of the Secretary-General

rights defenders, will be key to ensure the protection and fulfilment of human rights.[3] Meaningful engagement with stakeholders is key to ensure credibility, coherence and relevance across mitigation, adaptation and means of implementation. It will also be key in terms of achieving the goal of accelerating NDC and NAP implementation, scaling finance, and supporting sectoral transformations, with on-the-ground delivery being considered an indicator of impactful climate action.

- In terms of measurable implementation and tracking commitments to deliver tangible results, OHCHR underscores the need for metrics, for instance in the Global Climate Action Portal and Yearbook, to capture **data related to the intersection of human rights and climate change** (e.g., human rights due diligence status in line with the UN Guiding Principles on business and human rights, accessible grievance mechanisms).[4] This is in line with NPS calling for the inclusion of qualitative outcomes that capture, for example, community empowerment and multi-level collaboration.
- Many Parties and NPS in their responses linked success to mobilization of finance for developing countries, with a particular focus on strengthening initiatives and resources for adaptation and resilience. OHCHR has also repeatedly commented on the need for human rights safeguards in relation to climate finance.[5] OHCHR's draft Guidance on integrating human rights in the New Collective Quantified Goal (NCQG) on climate finance highlights that **climate finance should adopt a human rights-based approach**, pegging total climate finance to actual needs. It should take into account in particular the rights of people disproportionately affected by climate change, including Indigenous Peoples, peasants, persons with disabilities, and children. In this sense, States should:
    - Anchor climate finance in their obligations to respect, protect and fulfil human rights, including gender equality, for all.
    - Prioritize international cooperation and public climate finance aligned with the principles of equity, polluter pays and CBDR-RC.
    - Ensure new, additional, predictable and adequate climate finance aligned with State human rights obligations across all climate action, in particular, mitigation, adaptation, and loss and damage.

[3] See e.g. OHCHR work on acts of intimidation and reprisals and the Guidance Note for UN Resident Coordinators and Country teams on Environmental Human Rights Defenders (in English and Español).
[4] See e.g. A/HRC/56/55: Investors, environmental, social and governance approaches and human rights – Report by the Working Group on business and human rights
[5] See e.g., A/HRC/60/95: Climate justice, sustainability and the right to development - Thematic study by the Expert Mechanism on the Right to Development; A/HRC/58/51: Understanding the landscape of climate finance, debt, tax and illicit financial flows and human rights – Thematic report by the Independent expert on foreign debt; A/HRC/57/30: Analytical study on the impact of loss and damage from the adverse effects of climate change on the full enjoyment of human rights, exploring equity-based approaches and solutions to addressing the same – Report of the Secretary General; A/HRC/56/55: Investors, environmental, social and governance approaches and human rights – Report by the Working Group on business and human rights; A/HRC/54/31: Green financing – a just transition to protect the rights of Indigenous Peoples - Report of the Special Rapporteur on the human rights of Indigenous Peoples; OHCHR Guidance on Integrating Human Rights in the New Collective Quantified Goal (NCQG) on Climate Finance; Policy Brief: Mobilizing Trillions for the Global South: The Imperative of Human Rights-based Climate Finance by the Special Rapporteur on human rights and the environment; and Policy Brief: "Human Rights-Based Finance for the Environment".

  - Support a rapid, equitable and just transition, inclusive of social dialogue and stakeholder engagement.
  - Advance inclusive, participatory and gender-transformative climate action.
  - Ensure finance to developing countries in the form of grants, as well as debt-relief, that is new and additional to official development assistance.
  - Ensure transparency and enhance accountability through a common and enhanced reporting format for public climate finance flows that addresses both quantity and quality with more granularity, including by reporting flows in grant-equivalent terms.
  - Make finance better and more directly accessible to the people and countries most affected by climate change.
- OHCHR agrees with the need for strengthened accountability. As part of this, OHCHR highlights the need for enhanced **grievance mechanisms** for both Parties and NPS, including access to remedy (State-based and non-State-based) for affected communities.[6] **Access to remedy** will play a key role to avoid the repetition of historical injustices.
- Fostering coherence and advancing synergies to strengthen GCAA governance by ensuring that the **obligation to respect, protect and fulfil human rights** is a priority across initiatives for States and NPS, in line with the Paris Agreement, the ICJ Advisory Opinion, and Human Rights Council and General Assembly resolutions. This can be done by codifying human rights principles.

To measure the integration of human rights, indicators could include:

- Tracking progress on implementation of the right to a clean, healthy and sustainable environment by States and businesses;
- Share of GCAA initiatives that have conducted human rights due diligence (in line with the UN Guiding Principles on business and human rights);
- Number of reprisal incidents reported and/or mitigated,
- Participation rates of underrepresented groups in key decision-making discussions;
- Establishment of effective State-based and non-State-based grievance mechanisms; and,
- Tracking progress on implementation of recommendations from relevant OHCHR, Special Procedures reports and commitments under Universal Periodic Review and treaty body processes.

2. How can the GCAA facilitate direct and impactful engagement between Parties and NPS to support implementation efforts at both national and sectoral levels, in order to advance the full delivery of the GST, NDCs, and NAPs?

- Institutionalize inclusive multi-stakeholder dialogues that prioritize the voices of Indigenous Peoples, youth, persons with disabilities, and other underrepresented groups.

[6] For guidance, see e.g. OHCHR Accountability and Remedy Project: Improving accountability and access to remedy in cases of business involvement in human rights abuses

- Promote rights-based capacity-building, such as trainings, for NPS to align their actions with human rights standards.
- Encourage Parties to co-create climate policies with civil society and Indigenous Peoples, ensuring that NDCs and NAPs reflect local realities and human rights obligations.[7]
- Support human rights-based monitoring frameworks for implementation, including through collaboration with the mechanisms of the Human Rights Council, National Human Rights Institutions, Indigenous Peoples, and civil society organizations.

3. How can the GCAA promote an inclusive and equitable engagement, in particular from underrepresented groups and regions?

- Dedicated funding and logistical support (e.g. interpretation, accessibility measures, etc.) to enable participation from underrepresented regions, especially Small Island Developing States, Least Developed Countries, and Indigenous communities as well as of persons with disabilities.
- Use of digital platforms and local consultations to overcome geographic and language barriers.
- Gender-responsive approaches and youth engagement strategies, building on relevant UN guidance including from OHCHR as well as under the Lima Work Program on Gender and the UNFCCC's Action for Climate Empowerment agenda.
- Implement mechanisms to identify, prevent, address and account for reprisals for participation and engagement with GCAA, to promote the safe participation and protection of environmental human rights defenders. [8]

4. What improvements can be made to ensure better transparency, reporting and follow up of the GCAA, including in existing tools such as the Global Climate Action Portal (a.k.a NAZCA) and the Yearbook of Global Climate Action?

- Implement the recommendations of the Special Rapporteur's report on access to climate information (A/79/176):
    - Map out major international climate-related information initiatives to ascertain to what extent they are collectively satisfying the needs for effective information on climate change and human rights in a gender-responsive, age-sensitive and disability-inclusive manner;
    - Identify gaps, opportunities for further integration and interoperability and areas for collaboration, including with civil society and the research community, on information on climate change sources and effects, including on biodiversity and ecosystem services, weather and natural disaster patterns, as well as on impacts on human health, mobility, labour, social, economic and cultural rights, and the right

[7] See e.g. Center for International Environment Law and the OHCHR Toolkit for Practitioners on Integrating Human Rights in Nationally Determined Contributions

[8] See e.g. OHCHR and the UN's work on reprisals and the Guidance Note for UN Resident Coordinators and Country teams on Environmental Human Rights Defenders (in English and Español).

to a clean, healthy and sustainable environment, in terrestrial, freshwater and marine contexts;
    - Enhance collaboration between the Intergovernmental Panel on Climate Change, the Early Warnings for All initiative and the One Health approach on an integrated evidence base to consider more systematically and explicitly the impacts of climate change and proposed and ongoing response measures on human rights; and,
    - Support the integration of the information identified in the present report in United Nations-led education initiatives.
- Ensure accessibility of information, including translations, simplified formats, user-friendly and child-friendly versions.
- Embed human rights indicators into the Global Climate Action Portal and Yearbook, including metrics on human rights due diligence in line with the UN Guiding Principles on business and human rights, participation, and access to remedy.
- Conduct independent reviews of NPS commitments and actions, with civil society input.
- Link reporting mechanisms to the Universal Periodic Review and treaty body processes to enhance coherence and accountability and follow-up on relevant recommendations from Special Procedures.