Submission to the Presidency Consultation on the COP30 Presidency Roadmap for Transitioning Away from Fossil Fuels in a Just, Orderly and Equitable Manner
8 April 2026

C40 Cities welcomes the opportunity to engage with the COP30 Presidency's consultation process to develop a Roadmap for Transitioning Away from Fossil Fuels in a Just, Orderly and Equitable Manner. We are responding to questions a), b), and c).

The following recommendations, structured in accordance with the questions posed in the COP30 Presidency's invitation for submissions, are based on cities' years of experience of delivering action to transition away from fossil fuels, and in particular the principles of the C40 Cities Climate Transition Framework (CCTF) – which guides cities' climate action planning efforts for mitigation, adaptation and socio-economic equity. The framework requires cities to use all their available powers to end the use of, and support for, fossil fuels. It is the only subnational framework that requires cities to take action on fossil fuels, and has successfully ramped up cities' ambition and fossil fuel phase-out policy adoption.

SUMMARY:

- Urban centres account for 70% of global energy-related emissions. The global transition away from fossil fuels must prioritise urban just energy transitions, harnessing the leadership cities are already demonstrating and addressing the significant contribution from cities to energy-related global emissions.
- The City Climate Transition Framework (CCTF) provides a tested structure to contribute to international and national roadmaps, focusing on utilising all available municipal powers to transition away from fossil fuels, tackling both supply and demand, and ensuring social equity. **Cities' climate action plans, aligned with the CCTF, serve as local-level Roadmaps for a transition away from fossil fuels.**
- Cities are already driving a significant portion of the energy transition, with equity, affordability and workforce development at the forefront. C40 cities are leveraging their authority and powers to halve fossil fuel use by 2030, a vital contribution toward the global target of tripling renewable energy capacity by the end of the decade. However, cities cannot deliver the transition alone. To empower and fully leverage city leadership and actions, **national governments should**:
    - **Partner with cities to collaboratively design, finance, and implement strategies for a just transition away from fossil fuels,** including by integrating city action, policy and financing needs into the COP30 Roadmap and subsequent global or national frameworks.
    - **Catalyse the transformation of urban energy systems and deliver electrified, renewable-powered cities** – by granting cities the mandates and financial resources they need and working together with all relevant stakeholders, including utilities and workers, to accelerate grid modernisation, expand renewable supply, improve energy efficiency, and ensure a just transition.
- Current climate finance falls drastically short of the estimated $4.3 trillion needed annually by cities. The Roadmap should help progress mechanisms for direct, localised access to just transition funding to scale local projects and protect vulnerable communities and workers

Introduction

The first Global Stocktake (GST) delivered a definitive wake-up call: to stay on track for 1.5°C and deliver on the goals of the Paris Agreement, the world must transition away from fossil fuels, and also double energy efficiency and triple renewable energy capacity by 2030. **Cities are at the forefront of this mandate: urban centres are responsible for 70% of global energy-related emissions, meaning the global energy transition will be won or lost on city streets.**

Any roadmap for the global transition away from fossil fuels must address the enormous energy-related greenhouse gas emissions from urban fossil fuel use by **prioritising urban just energy transitions**. This means harnessing the leadership and powers that city governments already have to deliver the fair energy transition we need to protect and enhance the livelihoods of urban residents today.

Blueprint for a Roadmap: City Climate Transition Framework (CCTF)

For over two decades, **C40 has united ambitious cities to turn global goals into local action.** C40 mayors are already reducing per capita emissions 5 times faster than the global average, and have committed to collectively halving fossil fuel use by 2030. Their work directly supports the Global Stocktake's goal of tripling renewable energy capacity by 2030, proving that a global energy system powered by renewables is technologically, financially & economically viable. To turn these ambitious targets into reality, cities are already committed to developing and implementing local strategies to accelerate a just and equitable transition away from fossil fuels.

All C40 cities must meet the **City Climate Transition Framework (CCTF),** which serves as a powerful blueprint for local, national and global action. It is built on years of urban experience, aligns with the Paris Agreement and the *2023 Integrity Matters for Cities, States, and Regions* recommendations, and has proven highly effective at ramping up cities' ambition and policies on fossil fuels.

CCTF-aligned Climate Action Plans serve as local-level Roadmaps for a transition away from fossil fuels, incorporating targets, strategies and actions to support the switch to clean and just economies. The CCTF provides the structure for city-led contributions to the global climate effort, helping reach net zero by ensuring cities use all their available powers to end the use of, and support for, fossil fuels.

The CCTF framework identifies three core principles that can also inform the development of international and national strategies, including the COP30 Presidency's roadmap, to transition away from fossil fuels:

- **Use all available powers to end the use of and support for fossil fuels**: leveraging both direct powers (e.g. regulation, asset management, and fiscal authority) and indirect powers (e.g. communications, partnerships, and advocacy) to change the wider conversation and drive a total shift to clean energy and electrification.

- **Tackle all applications of fossil fuel use**: applying these powers across the entire spectrum, including demand-side use, supply-side infrastructure, and financial links.
- **Pursue a just transition**: ensuring all action is fair and inclusive and enables decent work creation, workforce development, energy poverty alleviation, enhanced clean energy access and security, especially for low-income and marginalised communities.

Cities are already delivering on these principles, proving the model's robustness and demonstrating that they must be key agents and partners in national and global roadmaps:

- **Harnessing direct powers**: 15 C40 cities that have joined the Renewable Energy Accelerator are pioneering clean energy systems by maximising renewables across all municipal infrastructure and operations.
- **Reorienting global capital**: 21 cities in the Clean Investment Accelerator have ensured USD 81 billion of municipal finance is now fossil fuel-free, with over USD 42 billion of pension capital re-invested in green jobs.
- **Improving quality of life**: Cities are using a wide range of convening and incentivisation powers to boost the use of electric heating and cooking, and through programmes like Breathe Cities are dramatically improving air quality, affordability, and productivity.
- **Yearly Offer of Action**: Cities are showing the actions that need to be taken now, to be delivered over the next 12 months, not in five or ten years — helping turn pledges into real-world action that is not just accelerating a transition to renewables and avoiding catastrophic climate impacts, but bringing down energy bills and creating good green jobs.
- **Green job creation**: 21 million green jobs exist across 81 C40 cities today – especially in sectors like transport, construction and waste – while 4 out of 10 jobs are expected to be green by 2040, if local climate action plans are delivered at scale.

National and local collaboration is essential

City action is already driving progress toward a fossil fuel-free future on the ground, while lowering energy bills, cleaning our air and delivering millions of the good green jobs of the future. For example, **73% of C40 members have already peaked their emissions while simultaneously growing their GDP**, showing that ambitious climate targets, just social outcomes and effective economic policies can go hand-in-hand. By phasing out coal and expanding zero-carbon energy, cities can create 6.4 million jobs and prevent over 260,000 premature deaths by 2030 that research shows existing coal policies and expansion plans would otherwise result in.

However, cities cannot deliver this transition alone. Success will require coordinated leadership from cities, regional and national governments – and, in particular, **stronger governance structures for national governments to consult and collaborate with cities to plan, implement and finance the just transition away from fossil fuels**.

To leverage the full potential of urban climate leadership, the Roadmap must move beyond high-level recognition of the importance of urban action, and deliver structural alignment across the following pillars:

- Recognise how **partnering with cities to collaboratively design, finance, and implement strategies for a just transition away from fossil fuels is essential to raise global ambition,** including by integrating city action and financing needs into the COP30 Roadmap and subsequent global or national frameworks.
    - For a successful energy transition, cities must be integrated into the design, implementation, and financing of national and international strategies to transition away from fossil fuels.
    - City-level design and implementation should be directly incorporated into National Energy Plans, Nationally Determined Contributions (NDCs) and national just transition strategies. These co-created strategies/plans should support local governments in drastically reducing emissions from urban infrastructure and municipal operations.
- **Accelerate global action by leveraging the key powers cities have at their disposal to end the use of and support for fossil fuels, in line with the C40 Cities Climate Transition Framework.** Areas in which cities contribute action include:
    - 'Demand-side' action to reduce fossil fuel demand through electrification and improved efficiency across many sectors (from transport to buildings);
    - 'Supply-side' action to transform and modernise local energy systems;
    - Action to ensure local energy infrastructure is clean, resilient and supportive of the local economy;
    - Shifting municipal assets, such as transport and schools, to clean energy and electric alternatives;
    - Action to ensure financial independence from fossil fuels.
- **Improve city governments' access to just transition finance to progress a just and equitable transition away from fossil fuels.**
    - National governments should **establish common principles, metrics, and allocation criteria for just transition finance** to help guide investors and development partners and enable tracking progress.
    - Direct city and subnational access to funding and financing is essential to scale up successful local projects and support replication, especially for the most vulnerable communities, including women, youth, informal workers and migrants.
- **Recognise the urgency of closing the urban green skills gap** by ramping up green workforce development programmes in cities, working with mayors, communities, workers, and businesses to ensure that a growing demand for green labour is adequately met with a qualified and inclusive workforce.

The next section includes further detail on the action cities contribute to each of these areas.

Levers: How urban action can unlock an accelerated just transition away from fossil fuels

This section elaborates on how urban action can accelerate the transition away from fossil fuels through targeted interventions in demand, supply, and infrastructure, while simultaneously protecting workers and creating new economic opportunities. This section addresses each of the key levers in turn:

1. **DEMAND-SIDE**

'Demand side' efforts to encourage electrification and improve efficiency are essential to drive the transition away from fossil fuels and reduce indoor and outdoor air pollution.

Cities can contribute action on:

- **Electrifying and improving the efficiency of buildings**, to reduce indoor air pollution and fuel poverty, and improve living and working conditions. This includes municipal buildings, including public housing and schools run by the city.
    - Planning powers can ensure new buildings are efficient and fossil-free. Cities in the US, such as Seattle, San Francisco, Los Angeles and New York City have used building energy codes to enact bans on the use of fossil gas in new buildings.

- **Accelerating the switch away from internal combustion engines by supporting electric vehicles, public transport and walking or wheeling,** to reduce congestion and pollution, and improve journeys around the city.
    - 35 cities, including 28 C40 and 7 non-C40 cities, have committed to decarbonising urban transport by establishing a major area of their city as zero-emission by 2030, creating car-free or low-emission zones in which the majority of trips are taken by walking, cycling and clean public transport.

- **Electrifying and improving commercial and industrial efficiency** to improve air quality, support worker welfare, and boost economic productivity.
    - Launched in April 2010, Tokyo's cap-and-trade programme is a mandatory emissions trading scheme. The programme, which covers large buildings, factories, heat suppliers and other facilities that consume large amounts of fossil fuels, sets limits on the emissions that facilities can produce. 27 cities are committed to the C40 Net Zero Carbon Buildings Accelerator to ensure that new and existing buildings use energy extremely efficiently and are supplied by renewable sources.

- **Reducing unsustainable consumption and the use of fossil fuel- and oil-based products,** to reduce costs, improve health and create jobs in new sectors.
    - Salvador embeds circular economy principles into public procurement processes, requiring consideration of the life-cycle costs of materials, the share of biodegradable, recycled or re-used materials, and whether the supplier will "take back" products at the end of their useful life.

2. **SUPPLY-SIDE: Empower cities to enhance their contribution to energy system transformation by delivering cleaner energy systems at the local level.**

Cities play a vital role in ensuring the local energy system is flexible and reliable, running off renewable energy sources. This can help increase access to electricity, improve grid reliability and increase local energy security and resilience. Cities can contribute action on:

- **Facilitating installations of renewable energy by residents and businesses through regulatory arrangements, incentives and information sharing**, to increase access to electricity and reduce fuel bills.
    - Chennai prepared an in-depth roadmap and needs assessment to scale rooftop solar adoption across the city, identifying actionable measures to revise metering and tariff structures, address financial gaps, launch public awareness campaigns and develop a framework for enforcing rooftop solar installation in line with Tamil Nadu's building regulations.
    - The Cape Town Small Scale Embedded Generation (SSEG) programme allows households and businesses to install generation systems such as rooftop solar PV and export power to the grid for credit.

- **Using municipal assets and land to generate clean energy,** reducing fuel bills and improving energy resilience.
    - Curitiba's Solar Pyramid Project utilises a deactivated landfill site to supply clean energy to public buildings. It is expected to generate over US$ 500,000 in yearly savings. The project also incorporated gender-specific measures in the tender process to generate good, green jobs for women.

- **Funding new renewable energy generation and clean infrastructure,** such as solar farms, smart grids and energy storage capacity.
    - By facilitating two collective Power Purchase Agreements that aggregate demand with other large energy consumers, Melbourne enabled the construction of two new wind farms in the surrounding regions, which now supply 100% of the city's operational energy needs and that of the wider purchasing group, as well as bringing clean energy to the market.

- **Leading or contributing to clean local area energy plans and research**, working with businesses, local groups, other levels of governments and workers to smoothly coordinate and plan a shift towards clean energy sources.
    - Amsterdam created a Heat Transition Vision, a neighbourhood-level plan to transition the city's 550,000 homes and offices from fossil gas to sustainable heating solutions by 2040.
    - London supported local councils to create 12 energy masterplans for different areas of London, targeting a sustainable, secure, cost-effective and low-carbon energy supply.

3. **INFRASTRUCTURE: Ensure local energy infrastructure supports the transition away from fossil fuels, working with cities.**

Cities can also support efforts to ensure local energy infrastructure is resilient, clean and supportive of the local economy long-term. This includes energy extraction sites, refineries, power plants and pipelines, as well as any infrastructure used to distribute and transport energy products.

Cities can contribute action on:

- **Using local infrastructure sites – including ports, land and energy facilities – to support the shift to clean energy**, and where appropriate converting city-owned and operated plants to renewable energy, to maximise opportunities for good, green jobs and the formation of new industries.
    - Yokohama and its port authority partnered with a local utility company to establish a green energy supply hub. This hub will utilise battery tankers to store and transport electricity generated by offshore wind farms to coastal centres.

- **Controlling permits and licenses for unsafe new energy infrastructure,** to avoid locking in future emissions, creating stranded assets and generating more pollution.
    - Cities can intervene in utility or regulatory dockets, as in the case of Toronto, which in 2024 formally opposed Ontario's Keeping Energy Costs Down Act, on the grounds that it would reintroduce a cross-subsidy for new connections to the natural gas grid, creating incentives for new gas connections that put ratepayers at risk of bearing the future costs of stranded assets.

- **Developing just transition strategies and policies** to ensure that workers and communities are protected and supported during local energy transitions.
    - Seattle adopted a landmark Maritime and Industrial Strategy, co-developed with the Port of Seattle, unions, and communities, to protect industrial land and create 35,000 jobs. The plan includes training pathways aligned with the city's green job goals.
    - Spain's Just Transition Agreements invited municipalities, businesses, unions and others to work together on strategies to mitigate the socioeconomic impact of coal and nuclear closures and revitalise local economies. This is an effective model to learn from for national fossil fuel transition plans.

Barriers: addressing the barriers limiting an urban just transition away from fossil fuels

1. NEED FOR STRONGER LOCAL AND NATIONAL GOVERNMENT COLLABORATION

There is a strong need to strengthen collaboration between cities, local and regional governments, and national governments in planning and delivery of a just transition away from fossil fuels.

By leveraging their authority over key sectors identified above, cities can make an essential contribution to translating national-level strategies for a just transition away from fossil fuels into local realities. Cities are the world's primary engines of economic activity, are responsible for the bulk of energy-related emissions, and have a broad range of powers at their disposal – from building codes to renewable energy incentives – that directly address fossil fuel demand.

However, the success of urban fossil fuel reduction depends on strong alignment and integration with national-level governance structures, as highlighted in the IEA's Blueprint for Action on Just and Inclusive Energy Transitions. Cities typically possess direct executive control over only 30-50% of the urban emissions reduction actions required to reach net zero. The remaining 50-70% of the needed urban emissions reductions are dictated by factors outside of municipal control – such as the carbon intensity of the national electricity grid, large-scale industrial regulations, and national building standards. This creates a governance bottleneck, where local innovation is frequently stalled by national-level bottlenecks, preventing cities from addressing the vast majority of emissions that lie just beyond their legal jurisdiction.

Without strong vertical integration, the transition away from fossil fuels risks being fragmented, fiscally inefficient, and socially exclusionary. While national governments hold the high-level fiscal and regulatory levers, municipal authorities often oversee the demand-side uses where these are implemented on the ground. In the absence of collaboration across all levels of government, national net-zero, climate and energy targets remain rhetorical, and cities are left with stranded assets, such as gas-dependent housing and infrastructure, that impose long-term financial burdens on residents and taxpayers. Furthermore, a transition that lacks a whole-of-government and whole-of-society approach risks a social backlash, and top-down climate mandates that fail to account for local economic realities can lead to localised job losses and energy poverty, ultimately undermining the political mandate for climate action.

The solution: Local and national just transition planning

The success of global strategies to transition away from fossil fuels, including the Roadmap, hinges on the meaningful involvement of cities in the development, financing and implementation of these strategies.

This can be achieved by **partnering with cities to collaboratively design, finance, and implement strategies for a just transition away from fossil fuels,** including by:

- **Integrating city action and financing needs into the COP30 Presidency Roadmap and subsequent global or national frameworks and strategies.**
    - The Coalition for High Ambition Multi-level Partnerships (CHAMP) is an initiative demonstrating how stronger multilevel partnerships can catalyse the ambition of national climate strategies. CHAMP was established to bridge the divide between local implementation and national policy. CHAMP illustrates that when subnational leaders are formally integrated into the development of Nationally Determined Contributions (NDCs), climate targets become significantly more granular and achievable.
    - Research indicates that countries utilising such multilevel partnerships can close the 1.5°C ambition gap by up to 37%, as localised data and community buy-in allow for more precise, high-impact investment in the energy transition.

- **Establishing multi-level governance mechanisms, with city leadership included, to improve policy coherence, enhance social dialogue and ensure localised outcomes.** For instance, since 2021, the South African Presidential Commission (PCC) has been a critical vehicle for vertical integration and enhanced alignment of local just transition delivery in South Africa, leading to the appointment of mayors as Commissioners and to the formal recognition of municipalities in the national Just Transition Framework.

2. THE NEED FOR TRANSFORMATION IN ENERGY SYSTEMS FOR ELECTRIFIED, RENEWABLE-POWERED CITIES.

Cities need reliable and affordable electricity to realise ambitious climate targets while mitigating the socioeconomic impact of a shift away from fossil fuels on workers and local economies. Currently, there is a lack of coordination between key actors, which limits the supply of renewable electricity and delays the electrification of housing and transportation.

The solution: Urban energy system transformation

National governments can help catalyse the transformation of urban energy systems needed to deliver electrified, renewable-powered cities, by:

- **Working together with all relevant stakeholders to plan local energy system transformations:** collaboration with cities, the private sector, utilities and workers to develop plans to accelerate grid modernisation, expand renewable supply, and ensure a just transition that leaves no one behind.

- **Granting city governments the mandates and financial resources they need,** including:
    - The mandate and power to enter and negotiate Power Purchase Agreements (PPAs) for renewable power, and where appropriate, participate in wholesale electricity markets. This will help to kickstart local clean energy industries, suppress demand for unnecessary and dangerous local fossil fuel

infrastructure expansion, lower energy costs for residents, and secure long-term investments in large-scale renewable energy projects.

    - The authority to develop and implement mandates for renewable energy on new buildings and buildings undergoing major renovations through building codes, as well as energy efficiency and renewable retrofits on existing buildings.

    - Powers to facilitate and provide clean and renewable alternative energy services, distributed and localised energy supply (including small-scale embedded generation), diversifying energy asset ownership and benefit sharing, energy infrastructure site leasing & development, municipal lending for clean energy solutions, and property assessed clean energy programmes for residential and commercial buildings.

- **Synchronising grid investment with city demand**: National infrastructure upgrades must match the speed of city-led electrification. Cities cannot replace fossil fuel boilers with heat pumps or scale EV charging if the grid remains a bottleneck.

- **Increasing annual grid investment**: Align with IEA recommendations to increase annual grid investment by approximately 50% by 2030 (from USD 400 billion to 600 billion).

- **Scaling supply chains and workforce**: Proactively manage grid supply chain constraints and workforce challenges to facilitate a rapid, nationwide transition to clean power.

- **Using regulatory powers**: National governments should use their fiscal and regulatory powers to ensure electricity is more competitive than fossil fuels, ensuring a just and affordable transition. Electrification is the future of modern cities, but subsidised and easily available fossil fuels are often favoured by consumers despite their critical health, energy security and financial risks.

3. SUBNATIONAL JUST TRANSITION FINANCE GAP

Existing climate and development finance flows currently fall far short of the scale needed – and are a significant barrier to urban delivery of a just transition. For mitigation alone, cities worldwide require an estimated USD 4.3 trillion annually from now until 2030, meaning that current flows (USD $832 billion per year) only represent around 18-19% of what is needed. Moreover, this gap varies significantly across regions, highlighting the challenges and inequalities in access to climate finance across the world.

While there is a growing supply of just transition funds and finance initiatives, such as Just Energy Transition Partnerships (JETP), provision of support to cities is still hindered by challenges around regional disparity, lack of recognition of subnational needs, top-down approaches, and reliance on loans.

C40 research has found that out of 63 global, national, regional, and private sources of finance and funding for climate action, only 16 were dedicated to just transition measures, and only 3 funds provide direct access to cities. **This evidence demonstrates the critical importance and urgency of localising just transition finance in a way that meets cities' needs to deliver local just transitions at scale.**

The solution: Improving city governments' access to climate finance

By channelling fit-for-purpose, localised financial resources to the key areas where cities have powers and are already delivering a just transition away from fossil fuels, national governments and international institutions can help cities increase the pace and scale of local delivery. This is essential to fostering national and international ambition on just transition solutions, targets, and goals.

This can be achieved by:

- **Ensuring direct city and subnational access to funding and financing** to scale up successful local projects and support replication, especially for the most vulnerable communities, including women, youth, informal workers and migrants.
- **Establishing common principles, metrics, and allocation criteria for just transition finance** to help guide investors and development partners and enable tracking progress.

Roadmap experiences: CCTF-aligned Climate Action Plans serve as local-level roadmaps for a transition away from fossil fuels.

The section above titled "*Blueprint for a Roadmap: City Climate Transition Framework (CCTF)*" (page 2) highlights how cities' Climate Action Plans, aligned with the C40 City Climate Transition Framework, serve as local-level roadmaps to guide and accelerate a transition away from fossil fuels.

At the time of writing, ten cities have reviewed their climate action plans under the new CCTF framework, and it has already shown great effectiveness. CCTF reviews have secured public commitments to reducing or ending fossil fuel use in 3 of the 4 cities which did not previously have them or were considering dropping them. Ambitious new policies adopted directly as a result of the CCTF include city commitments to divest from fossil fuels, not to support fossil fuel infrastructure, and to screen budgets for fossil fuel spending, among many others. The framework has opened up direct dialogue with cities about what they can do about fossil fuel infrastructure, covering major fossil fuel power plants, oil refineries and terminals.

Further information and case studies of cities' experience will be available in the upcoming publication '***How Cities Can Take Action on Fossil Fuels***', which will be available shortly.

For further reference:

- C40 Issue Brief: Financing Local Just Transitions for Climate Justice
- ***Coming soon in May 2026*** - '*How Cities can Take Action on Fossil Fuels*', a publication by C40 with case studies of city action and demonstrating how cities can accelerate their action on the transition away from fossil fuels, in line with the CCTF framework.