

## **Under2 Coalition Submission: A) the COP30 Presidency Roadmap on the Transition Away from Fossil Fuels in a Just, Orderly and Equitable Manner**

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On behalf of the states, regions and provinces of the Under2 Coalition, we welcome the opportunity to contribute to the COP30 Presidency Roadmap on the Transition Away from Fossil Fuels in a Just, Orderly and Equitable Manner (TAFF).

These governments are already delivering many of the policies and investments that make the transition away from fossil fuels possible. Across the nearly 200 governments in the Under2 Coalition, states and regions are accelerating renewable energy deployment, transforming transport systems, supporting industrial decarbonisation, and planning economic diversification in fossil-fuel-dependent regions. Through these actions, subnational governments are helping translate national and international climate commitments into practical implementation.

The vast majority of global fossil fuel production is managed by national governments and/or the private sector, and the extraction facilities, workforce, and communities associated with these industries are located within states and regions. These governments therefore represent a critical node within the global fossil fuel economy and possess significant regulatory, planning, fiscal and convening powers. At the same time, subnational governments operate within different constitutional systems and possess varying levels of authority over energy systems, economic policy and fiscal instruments.

This submission reflects various perspectives across the Under2 Coalition. Its central message is that the most effective pathway to transitioning away from fossil fuels is one that is polycentric, collaborative and multilevel, linking local communities, subnational governments and national authorities. The final roadmap should explicitly recognise this reality. Working in unison across levels of governance can materially accelerate implementation. The swiftest and most effective action on TAFF will therefore be designed and delivered across multiple levels of government.

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### **(a) What are the most critical barriers — whether physical, economic, financial, institutional, technological or social— preventing a transition away from fossil fuels?**

This question is answered from the perspective of subnational governments and organised around three overarching themes referenced in the submission guidelines:

#### **1. Energy Transition: supply-side perspectives**

If current production trajectories continue, global fossil fuel use in 2030 will exceed the level compatible with limiting warming to 1.5°C by 120%.<sup>1</sup> Addressing the supply side, namely the continued production of fossil fuels, must therefore be a primary focus of the transition away from fossil fuels. To illustrate measures already being taken at the subnational level, our forthcoming report in collaboration with IISD, provides one of the first empirical accounts.

Despite some encouraging progress, our findings highlight several key blockers:

- (i) *Economic dependence and limited incentives to transition:* For subnationals with dependency on existing fossil fuel assets a central impact is decreasing fiscal intake, including loss of tax revenues to local councils and municipalities who rely on the

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<sup>1</sup> SEI, Climate Analytics, & IISD. 2025. *The Production Gap Report 2025*. Stockholm Environment Institute, Climate Analytics, and International Institute for Sustainable Development. <http://productiongap.org/2025report>

fossil fuel sector for income. This challenge also encompasses tensions regarding redirecting investment and job losses.

In Alberta, for example, oil and gas royalties account for roughly 25% of provincial government revenue, creating strong fiscal incentives to maintain the sector.<sup>2</sup> Although Alberta's phase-out of coal-fired electricity includes notable transition programmes to support communities, broader challenges remain in diversifying the economy beyond fossil fuels.

- (ii) *Community trust building and capacitating:* Levels of trust between all governments and potentially impacted communities often remain fragile. As the fossil fuel extraction sector contracts, a challenge more consistently highlighted to our level of government is that affected communities are concerned about job losses and economic decline. We are expected to address these concerns in a more unique and urgent fashion than other levels of government. Which is important context for successfully adopting and implementing policies that enable the transition away from fossil fuels in a just, orderly, and equitable manner.

Failure to do so can result in political backlash against climate policies more broadly, not only against supply-side measures. Few examples illustrate this more clearly than the Yellow Vest protests in France, which were triggered in part by fuel tax increases perceived as socially unfair, or the coal miner protests in Poland, where communities dependent on coal employment have resisted decarbonisation policies that threaten local livelihoods.

- (iii) *Industry pushback, legal challenges:* TAFF can face significant pushback from industry, including legal challenges that may delay or discourage policy implementation. In particular, international trade and investment agreements can expose governments to Investor–State Dispute Settlement (ISDS) claims, where companies seek compensation for policies that affect the value of their fossil fuel assets.

These disputes can create substantial financial risks and political pressure for subnational governments attempting to adopt policies. In Quebec, for example, which had no significant commercial oil and gas production, legislation was adopted in 2022 to shut down existing oil and gas exploration and production, reflecting a planned transition towards a low-carbon economy. This included the cancellation of existing rights, which has led to legal challenges from a group of companies.

## **2. Just Transition and differentiated pathways**

Since fossil fuel production and reserves are often geographically concentrated, the impacts of transition are unevenly distributed across regions. Subnational governments in fossil fuel–producing areas therefore face heightened risks of job losses, declining public revenues, and

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<sup>2</sup> Business Council of Alberta. 2026. *How resource royalties shape Alberta's budget*, Business Council of Alberta, 25 February, available at: <https://businesscouncilab.com/insights-category/econminute/alberta-resource-royalties-budget-impact/>

broader economic disruption if transition policies are not accompanied by credible plans for economic diversification and workforce support.

These dynamics differ significantly between developed and developing economies: while many developed countries have greater fiscal capacity and institutional resources to support transition measures, developing and resource-dependent regions often face tighter fiscal constraints and competing development priorities.

This creates a case for developed fossil-fuel-producing economies to lead in phasing down production, helping ease adjustment pressures on developing economies. At the same time, investment in TAFF must equitably support developing economies, enabling them to embed and accelerate non-fossil economic pathways. This is essential to avoid stranded assets in these regions and prevent long-term fossil-fuel dependency.

Where transitions away from fossil fuel production take place, it is crucial that state and regional governments are empowered to help deliver a just economic and social transition. States and regions operate closest to affected workers and communities and therefore play a critical role in translating national commitments into locally grounded transition strategies that are aligned with just transition principles.

### **3. Institutional and governance frameworks**

Institutional arrangements and governance structures can significantly shape the pace and feasibility of fossil fuel phase-out. In many jurisdictions, subnational governments operate within broader national frameworks where authority over energy systems or resource extraction may be shared or primarily held at the national level. Differences in mandates, evolving institutional arrangements, and coordination challenges across levels of government can influence the pace of implementation. In addition, managing the transition requires coordination across multiple sectors and stakeholders – including industry, internal departments, labour unions, local governments, and civil society – which can be challenging without clear governance frameworks and dedicated transition institutions.

To that extent, it is very helpful when legislature paves the way to allow for different parts of the transition ecosystem to be more transparent. For example, in California, the state legislature gave a broad mandate to the State Water Resource Control Boards (SWRCB). This mandate has allowed SWRCB to develop three codes and one resolution that gives it the ability to investigate, clean-up, and enforce site clean-ups related to, for example, refinery closure.

Currently there is also no international governance to enable a planned phase-out, fossil fuel production will decline in a disorderly fashion — imposing disproportionate costs on workers, communities, and fossil fuel-dependent nations. There is no international framework to ensure transition burdens are shared equitably or that decommissioning is financed and planned, especially at the local level.

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**(b) What potential levers, whether economic, financial, institutional, social or technological, exist for accelerating the implementation of the transitioning away commitment?**

**1. Strong policy mandates.**

Robust and enforceable policy mandates is foundational to accelerating the implementation of a transition commitment. This includes adopting legally binding net-zero targets, developing comprehensive state or regional climate strategies, and implementing concrete measures such as phasing out extraction licensing, methane regulations, and direct bans on new fossil fuel exploration. In addition, subnational governments can operationalise climate targets through the adoption of sectoral carbon budgets, which define binding emissions pathways by sector over time. This approach provides regulatory certainty, supports investment planning, and enables alignment between climate objectives and economic policy, particularly in hard-to-abate sectors. In 2025, the Parliament of Catalonia approved one of the first regional carbon budgets, setting a reduction pathway to 2030 within a broader framework of emissions neutrality by 2050.

Successful mandates pair regulatory pressure with economic incentives, using both “push” and “pull” policy approaches. Crucially, such mandates must be backed by efforts to grow alternative industries, invest in social and economic infrastructure, and reduce structural dependence on fossil fuels. For “push” examples, Québec has committed to phasing out existing oil and gas activities under its 2022 legislation; New South Wales has banned offshore oil and gas drilling; Alberta, Saskatchewan, British Columbia, and California have adopted oil and gas methane regulations; and New Brunswick, Nova Scotia, Yukon, New York, Maryland, Vermont, Tasmania, Paraná, and Santa Catarina have moratoria on fracking.

A “pull” example is Chhattisgarh, one of India’s major coal-producing states, where the PM Janman Yojana programme focused on strengthening the social foundations for a just transition. By improving housing, water access, electrification, education, health services, and digital and road connectivity for Particularly Vulnerable Tribal Groups, the state demonstrates how social protection can underpin economic diversification.<sup>3</sup>

## **2. Take a community-centred and transparent approach.**

A community-centred approach is critical to a successful transition, as it helps build while ensuring transition plans reflect the priorities and needs of local people. Clear communication and open social dialogue can reduce resistance and foster a shared understanding of the changes ahead. However, coordinating the many stakeholders involved in a transition is often an institutional challenge. This can be addressed by establishing clear leadership responsibilities – such as appointing ministers responsible for just transition – and creating structured partnerships that bring together government, employers, unions, civil society, and researchers. These arrangements help align goals and guide the use of available resources.

A useful example comes from East Kalimantan, a coal producing province in Indonesia. The province created a Regional Consultation Forum to Accelerate Economic Transformation. The Forum brings together local government, trade unions, companies, the media, universities and community organisations. Its role is to recommend practical measures for a just transition.<sup>4</sup> Another example is the Task Force on Sustainable Just Transition established by the Government of Jharkhand, India, where 26% of India’s coal lies. The taskforce is an internal, multi-department team who also host external consultations, and are mandated to assess and recommend steps to the state government for transitioning to a non-fossil-fuel-based economy.<sup>5</sup>

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<sup>3</sup> International Institute for Sustainable Development. IISD. 2025. *Mapping India’s state-level energy transition: Chhattisgarh*. <https://www.iisd.org/publications/report/mapping-india-energy-transition-chhattisgarh>

<sup>4</sup> Bappeda Kaltim. 2024. *Bappeda Kaltim holds meeting to formulate regional consultation forum in facing East Kalimantan’s economic transformation*. <https://bappeda.kaltimprov.go.id/beranda/berita/bappeda-kaltim-gelar-pertemuan-untuk-formulasikan-forum-konsultasi-daerah-dalam-menghadapi-transformasi-ekonomi-kalimantan-timur/detail?lang=en>

<sup>5</sup> Government of Jharkhand. (n.d.) Task Force-Sustainable Just Transition. <https://www.justtransition-jharkhand.in/about-us/>

Decision-makers need to maintain regular dialogue with communities, particularly those most likely to be affected by future developments. This requires close coordination across different levels of government within the relevant geographies.

### 3. Economic planning.

Economic planning and specialised financial mechanisms are among the most effective accelerators of transition implementation. Key levers under this umbrella include:

- *Just transition funds and diversification mechanisms.*
  - Examples include the sovereign fund created in 2019 by Espírito Santo, an oil producing state in Brazil, which is financed through oil revenues. The state is also preparing to launch a decarbonisation fund.<sup>6</sup>
- *Regulatory tools to mobilise revenue.*
  - These include royalties or levies linked to extraction. Since 2012, Queensland has allocated a portion of coal and gas royalties to the Royalties for the Regions fund. This fund co finances infrastructure and economic diversification in mining dependent communities and has supported road upgrades, digital connectivity and tourism development.<sup>7</sup>
- *Leverage international finance partnerships.*
  - Subnational governments can benefit from establishing subnational transition platforms to enable direct access to international climate finance on this topic. These would function similarly to national country platforms, which bring together multiple sources of finance and coordinate development partners around shared priorities.<sup>8</sup> While Just Energy Transition Partnerships exist in South Africa, Indonesia, Vietnam and Senegal, there are no dedicated platforms yet at the state or regional level. The South African JETP is a partial exception, as subnational governments participate in its national commission.
- *Use public procurement to create markets for clean sectors.*
  - Governments control significant procurement for buildings, transport, energy and public services. Strategic procurement can stimulate new local industries and attract private investment. California and British Columbia, for instance, used public fleet procurement to expand electric buses and charging infrastructure, which supported growth in local manufacturing and supply chains. In Catalonia, the Catalan Rail Strategy 2025-2050 was approved in December 2025, to help develop integrated freight rail and intermodal logistic networks. Subnational governments can accelerate the shift from road to rail through strategic investments in rail infrastructure, intermodal hubs, and logistics coordination. In turn reducing fossil fuel demand in freight transport.
- *Redirect fossil fuel subsidies into transition funding.*
  - Some subnational states and regions provide significant volumes of subsidies for fossil fuel extraction. States and provinces in Canada, the United States and

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<sup>6</sup> Netto, V. 2025. *Espírito Santo leads Brazil in investment as share of revenue, Casagrande says*. Valor International. <https://valorinternational.globo.com/summit-valor-brazil-usa/news/2025/05/14/espírito-santo-leads-brazil-in-investment-as-share-of-revenue-casagrande-says.ghtml>

<sup>7</sup> Queensland Government. 2019. Royalties for the Regions grants data [Dataset]. Queensland Government Open Data Portal. <https://www.data.qld.gov.au/dataset/royalties-for-the-regions-grants-data>

<sup>8</sup> Robinson, M., & Olver, C. 2025. *Are 'Country Platforms' the Key to Delivering Green Growth at Scale?* World Resources Institute. <https://www.wri.org/technical-perspectives/country-platforms-delivering-green-growth-scale>

Australia alone provided a total of USD 3.4 billion in producer subsidies in 2023.<sup>9</sup> This means removal of subsidies can be a powerful tool. For instance, British Columbia in 2022 eliminated its Deep Well Royalty Program, which had provided USD 1.1 billion in fossil fuel production subsidies for deep horizontal drilling and hydraulic fracturing in 2022 alone.<sup>10</sup>

- *Introduce community energy funding programmes.*
  - In North Rhine Westphalia, Germany, a regional programme supports community energy initiatives by reducing the financial risks of early planning. Launched in January 2025, the Community Energy Fund provides subsidies of up to €300,000 for activities such as technical assessments, environmental reviews, site surveys, grid connection studies and permit preparation. Seventeen applications have already been approved, representing approximately €3.8 million in funding and around 340 MW of wind and solar capacity under development.<sup>11</sup>

#### 4. Stronger International Governance

International alliances and cooperative platforms play an important role in supporting coordination, knowledge sharing, and capacity building across jurisdictions. Initiatives such as the Beyond Oil and Gas Alliance, which includes a growing number of subnational governments among its members, and the work of the Fossil Fuel Non-Proliferation Treaty Initiative, which has been endorsed by over 190 subnational governments worldwide, provide important spaces for dialogue, the exchange of best practices, and the development of approaches to support a managed transition away from fossil fuel production.

A Treaty could establish commitments to phase out existing production and create cooperative mechanisms, including partnerships between producing and consuming nations, a debt resolution facility, and increased international climate finance flows.

In this context, Québec, as co-chair of the Beyond Oil and Gas Alliance, plays a key role in advancing collaborative efforts and fostering alignment between climate, energy, and economic policies across different levels of governance.

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#### (c) What country, regional or sector roadmap experiences, best practices, and lessons learned can be shared?

Approximately 73% of the nearly 200 Under2 Coalition governments have a subnational transition plan outlining a climate action roadmap or strategy that addresses mitigation, adaptation (resilience), and/or energy-related issues. These plans offer a more agile and responsive approach to national climate action plans, allowing local and regional governments to act on data, community needs, and emerging policy trends – contextualising national ambitions

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<sup>9</sup> OECD. 2024. *OECD Data Explorer: Fossil Fuel Support – Detailed Indicators*. [https://data-explorer.oecd.org/vis?fs\[0\]=Topic%2C1%7CTrade%23TRD%23%7CTrade%20policy%23TRD\\_POL%23&pg=0&fc=Topic&bp=tr ue&snb=53&df\[ds\]=dsDisseminateFinalDMZ&df\[id\]=DSD\\_FFS%40DF\\_FFS\\_IND\\_DETAIL&df\[ag\]=OECD.TAD.ADM&df\[vs\]=2.0 &dq=A... T. T....USD&pd=2010%2C&to\[TIME\\_PERIOD\]=false](https://data-explorer.oecd.org/vis?fs[0]=Topic%2C1%7CTrade%23TRD%23%7CTrade%20policy%23TRD_POL%23&pg=0&fc=Topic&bp=tr ue&snb=53&df[ds]=dsDisseminateFinalDMZ&df[id]=DSD_FFS%40DF_FFS_IND_DETAIL&df[ag]=OECD.TAD.ADM&df[vs]=2.0 &dq=A... T. T....USD&pd=2010%2C&to[TIME_PERIOD]=false)

<sup>10</sup> Government of British Columbia. 2022. *New oil and gas royalty system ending inefficient subsidies*. <https://news.gov.bc.ca/releases/2022EMLI0034-000787>

<sup>11</sup> The Climate Group. (n.d.). *Community Energy Fund: How North Rhine-Westphalia is unlocking community energy*. Retrieved March 9, 2026, from <https://www.theclimategroup.org/our-work/case-studies/community-energy-fund-how-north-rhine-westphalia-unlocking-community-energy>

into local realities. In many cases, national governments are crucial partners in carrying out this work. For truly effective multilevel governance, regulatory and financial alignment is key.

State and regional governments often use their proximity to affected communities and industries to align economic diversification efforts, mine or plant closure management, and social protection mechanisms within a coherent transition strategy. However, comprehensive just transition frameworks remain the exception rather than the rule. Many policy successes in this field operate as individual components and are not yet embedded within an overarching strategy.

Regardless, a few noteworthy examples and lessons learned can be shared:

- **South Australia** represents a state that went from 1% to 74% renewable electricity generation in just over 16 years, with an aspiration to reach 100% by 2027. Coal, gas, and diesel previously represented just over 71% of electricity generation, which fell to 26% by 2023–2024.<sup>12</sup> The transition was enabled via political commitments and proactive policy support. A comprehensive energy development plan focussed on grid integration, large-scale battery storage, and market reforms that allowed variable renewables to scale rapidly while maintaining system reliability.
- **Chungcheongnam-do** is the province in South Korea that hosts over half of the domestic coal-fired plants (as of 2022, 29 out of the 57). On 29 December 2020, the province announced a comprehensive plan in response to the two-year early retirement of Boryeong-1 and 2 coal plant. The plan aimed to resolve issues around employment and tax revenues. The provincial government signed an agreement with Midland Power Corporation for the job retention of the 326 workers of Boryeong-1 and 2, and set up a special account for the continued support for local communities which was financed by the KRW 1.7 billion tax revenue freed up from the early power plant closure.<sup>13</sup>
- **Eastern Wielkopolska** represents one of the most advanced coal transition regions in Central and Eastern Europe. The region has set a target to phase out coal in the power and heating sector by 2030 and aims to become climate-neutral by 2040, significantly ahead of Poland's national trajectory.<sup>14</sup> Eastern Wielkopolska is further notable for its bottom-up approach to engage stakeholders in the development of a regional transition plan under the EU's Just Transition Mechanism.<sup>15</sup>
- One example that combines several aspects of just transition is the region of **Mpumalanga**, South Africa, which is building a provincial Green Economy / Just Transition delivery architecture with flagship initiatives like the Mpumalanga Green Economy Development Plan (MGEDP) and the Mpumalanga Green Cluster Agency (MGCA). The MGEDP lays the regional strategy (2025-2030) to pivot from a coal-dependent economy toward renewables, green manufacturing, water/land restoration and services.<sup>16</sup> The MGCA on its side is a provincial delivery/implementation body created to incubate green SMEs, package projects, provide market intelligence, and act as a one-stop secretariat for JET implementation in the province.

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<sup>12</sup> Government of South Australia. 2024. *Energy development plan 2024*. Department for Energy and Mining. [https://www.energymining.sa.gov.au/\\_data/assets/pdf\\_file/0010/1100215/2024-Energy-Development-Plan.pdf](https://www.energymining.sa.gov.au/_data/assets/pdf_file/0010/1100215/2024-Energy-Development-Plan.pdf)

<sup>13</sup> OECD. 2023. *Strategies for Coal Transition in Korea*. Paris: OECD Publishing. Available: [https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/03/strategies-for-coal-transition-in-korea\\_74c4f239/00c54873-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/03/strategies-for-coal-transition-in-korea_74c4f239/00c54873-en.pdf)

<sup>14</sup> Wielkopolska Voivodeship, *Strategy for Climate Neutrality – Eastern Wielkopolska 2040*. LIFE After Coal Project, 2023. Available: <https://lifeaftercoal.pl/wp-content/uploads/2023/10/SCNEW2040-1.pdf>.

<sup>15</sup> Agencja Rozwoju Regionalnego S.A. w Koninie. 2021. *Concept of just transition of Eastern Wielkopolska*. ARR Transformacja. [https://arrtransformacja.org.pl/wp-content/uploads/2021/10/21\\_10\\_2021-EN.pdf](https://arrtransformacja.org.pl/wp-content/uploads/2021/10/21_10_2021-EN.pdf)

<sup>16</sup> Mpumalanga Department of Economic Development and Tourism. 2025. *Strategic plan 2025–2030*. Mpumalanga Provincial Government. <https://www.mpg.gov.za/sites/default/files/resources/DEDT-FIVE-YEAR-STRATEGIC-PLAN-2025-2030.pdf>

- **California's** 2006 AB32 law titled California Global Warming Solutions Act requires the California Air Resources Board to develop a Scoping Plan that describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by the Board in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan. Each of the Scoping Plans have included a suite of policies to help the State achieve its GHG targets, in large part leveraging existing programs whose primary goal is to reduce harmful air pollution. The Scoping Plan and its associated updating process are helpful in charting California's course towards its goals, highlighting policy tools available, and creating regular checkpoints to review and revise California's plans.

From researching into these plans, we draw out the following principles of what constitutes a good roadmap:

**1. Time-bound.** Roadmaps should contain time-bound targets or objectives for transitioning away from fossil fuel production, with intermediate milestones. For instance, a roadmap could contain timelines to completely phase out production of the fossil fuels that are produced in the subnational state or region, with intermediate milestones such as ending new exploration licenses and introducing emissions mitigation measures.

**2. Sequenced.** Roadmaps should contain a prioritisation or sequencing of the types of fuel production to be phased out. For instance, it may be sensible to phase out coal production first, since it is the most polluting fossil fuel. On the other hand, a state or region may wish to first phase out the type of fuel production that the government is least reliant on for revenue. Another type of sequencing may exist between the type of measures to be pursued. For instance, depending on the context, it may make sense to apply financial measures first, such as removing fossil fuel subsidies, before taking a regulatory approach.

**3. Financed.** Roadmaps should identify clear financing/investment pathways for implementing the policies and measures that are contained within them. In the case of subnational governments in the Global South, they may also identify financing needs and investment opportunities for donor governments. An example of this is Odisha State in its State Action Plan on Climate Change, where it estimated the amount of finance needed to implement climate actions over five years.<sup>17</sup>

**4. Intersectional.** Roadmaps should take a gender, race and social equality perspective into account. For instance, women are disproportionately represented in jobs supporting fossil fuel workers, such as accommodation and food services, while men are disproportionately represented among fossil fuel workers themselves, thus women are often not covered by worker compensation and retraining policies.<sup>18</sup> A roadmap that does not address such realities risks an unjust transition.

**5. Whole-of-government.** A roadmap should be owned by the whole government, not only one department or agency, meaning there is maximum buy-in from across ministries or their subnational equivalent (secretariats, departments, agencies, etc.). Or in relation to national government roadmaps, representative of subnational counterparts.

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<sup>17</sup> Dubash, N.K., & Jogesh, A. 2014. *An analysis of the Odisha Climate Change Action Plan*. Centre for Policy Research. <https://cprindia.org/briefsreports/an-analysis-of-the-odisha-climate-change-action-plan/>

<sup>18</sup> Piggot, G., Boyland, M., Down, A., & Raluca Torre, A. 2019. *Realizing a just and equitable transition away from fossil fuels*. Stockholm Environment Institute. <https://www.sei.org/wp-content/uploads/2019/01/realizing-a-just-and-equitable-transition-away-from-fossil-fuels.pdf>

**6. Whole-of-society.** In developing roadmaps, governments should extensively consult with relevant stakeholders. Roadmaps should be formulated, implemented and evaluated in close collaboration with workers, employers, unions, municipalities, environmental organisations, and economic development organisations. Here, particularly, states and regions can leverage their ability to work with cities or municipalities at scale, taking a more granular approach to a roadmaps design compared to a national government.

Across the above principles it is best that a dedicated taskforce or committee is convened to develop a roadmap. Taskforces should have a direct mandate to engage with those affected by the transition. Taskforces should be composed of a range of members from varied backgrounds, including labour, industry, environmental groups and national and subnational government.

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**(d) How can a just, orderly and equitable transition best reflect the diverse realities of countries at different stages of development and with different degrees of dependence on fossil fuels?**

In developing our policy toolkit, in collaboration with IISD, on the powers of state and regional governments in phasing out fossil fuel production, a categorisation that focussed on fossil fuel reserves was used. A focus on assets is recommended to tackle the nuance of TAFF. See:

1. States and regions with no fossil fuel production and no known significant reserves;
2. States and regions with no fossil fuel production but significant discovered reserves;
3. States and regions that have fossil fuel production, but this is in structural decline; and
4. States and regions that have fossil fuel production that is stable or increasing, with considerable reserves existing.

This approach reflected where each jurisdiction is in their journey whilst naturally encompassing development and dependency dynamics. However, we recognise that this simplification was largely possible due to the fact that we focussed solely on production.

Another key consideration when addressing this aspect of the global TAFF roadmap is on jurisdictions ability to raise domestic revenue to support the transition or ability to quickly build new infrastructure. As shown, we see that many key transition measures orientate around finance. Many of the subnational examples raised have the autonomy to directly introduce fiscal or regulatory measures. Other examples outline financial support from national governments, regional bodies (EU Just Transition Mechanism) or international programmes (JET-P).

When it comes to climate finance at the subnational level, 80% is raised domestically, but in sub-Saharan Africa this falls to 23%.<sup>19</sup> Mapping these conditions, against fossil fuel assets or growth potential, is an effective means to inform where external support measures are needed. For a truly global TAFF roadmap, analysis must therefore be undertaken through a global lens while recognising the highly local nature of transition challenges.

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<sup>19</sup> Climate Policy Initiative. 2025. *Global Landscape of Climate Finance 2025*. San Francisco: Climate Policy Initiative. Available at: <https://www.climatepolicyinitiative.org/publication/global-landscape-of-climate-finance-2025/>

In conclusion, the transition away from fossil fuels will only be just, orderly and equitable if it reflects the realities of implementation on the ground. States and regions are where fossil fuel production is experienced most directly, but also where many of the practical levers for change already exist, including economic planning, workforce support, land use governance, and community engagement.

The COP30 Presidency Roadmap therefore represents an important opportunity to recognise the role of subnational governments as essential partners in delivering the transition away from fossil fuels. A roadmap that supports multilevel coordination, differentiated pathways, and place-based economic transformation will be better positioned to accelerate implementation while maintaining social legitimacy and economic stability.

The Under2 Coalition and its member governments stand ready to support the development and delivery of this roadmap, including through continued knowledge sharing, policy innovation, and collaboration across levels of government.