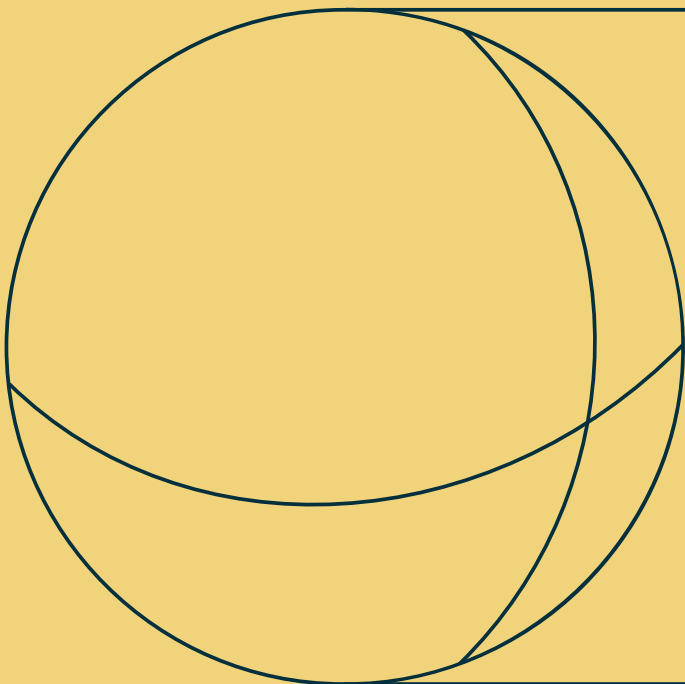


policy brief

Rethinking Climate Governance? Evaluating Brazil's Proposal for a Climate Change Council

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Abstract

Every day, tackling the climate crisis becomes more urgent. Yet climate action still falls woefully short of what is needed to slow the global temperature increase in line with the Paris Agreement's targets. This raises questions about the formats within which the international community takes climate action, namely whether there are more effective alternatives to the United Nations Convention on Climate Change (UNFCCC) process. This policy brief discusses Brazil's 2024 proposal for a new Climate Change Council, highlighting both its potential strengths and weaknesses. We argue that while the proposal could provide impetus for out-of-the box thinking about UNFCCC reform, this momentum should instead be used to advance the UNFCCC process itself – as a new forum could risk further fragmenting global climate governance and overstretching already limited resources.

Citation Recommendation

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Introduction

Climate action lags behind what is needed to limit global warming in line with the Paris Agreement's 1.5- and 2-degree targets. The lack of progress raises questions about whether the United Nations Convention on Climate Change (UNFCCC) suffices as the main governance framework for climate action or whether the UNFCCC process should be reimagined for greater effectiveness. Such a strategic re-think includes considering alternative forums alongside the UNFCCC as spaces for developing ambitious climate action.

In November 2025, Brazil will host the 30th Conference of the Parties (COP30) in Belém. In the leadup to the conference, Brazil has advocated for new ideas towards climate action: During the 2024 G20 meeting in Rio de Janeiro, Brazilian President Luiz Inácio Lula da Silva proposed establishing a new UN Climate Change Council. In this proposal, Lula da Silva argued: “We need stronger climate governance. There is no point in negotiating new commitments if we don’t have an effective mechanism to accelerate the implementation of the Paris Agreement.” As such, the Brazilian President sees the Climate Change Council as a space to bring together “different actors, processes, and mechanisms that are currently fragmented.” Importantly, the Council would not replace the UNFCCC, but provide support and assistance to advance its decision-making.

This policy brief reflects on the advantages and disadvantages of a potential Climate Change Council in combination with the UNFCCC. On the one hand, the Council may advance knowledge and best-practice sharing across different sectors and provide new pathways for meaningful engagement. On the other, the proposal would require allocating more (already-limited) resources for climate action, risks further fragmenting global climate governance, and raises questions concerning buy-in for setting up a new Council. Importantly, the current momentum to discuss improvements to climate governance could instead be used to improve the way the UNFCCC itself works.

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Why the Council Could Be a Good Idea

Considering the pressing need to overcome hurdles in the UNFCCC decision-making process, this section considers how a new Climate Change Council could assist current climate governance.

Advancing Sectoral Governance and Knowledge Sharing

The process of agenda-setting has been one of the biggest obstacles for UNFCCC negotiations. At the latest June Climate Meetings (SB62), the chairs of the Subsidiary Bodies spent hours trying to “defuse a protracted agenda fight.” UNFCCC parties held vastly different opinions on how to make COP agendas more efficient through various measures, including agenda item clustering, multi-year and thematic programming,

and sunseting certain issues. For example, in their submissions ahead of the SB meetings, parties like the EU called for diverse measures towards agenda streamlining, whereas others – such as Saudi Arabia on behalf of the Arab Group – emphasised the importance of “maintaining a party-driven process” (including for agenda setting). The current fragmentation of the UNFCCC agenda also relates to concerns about the UNFCCC’s limitations in advancing effective sectoral governance.

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As a centralised institution, the Climate Change Council could act as a forum to enhance peer-review, knowledge sharing, and the implementation of best practices in specific policy areas (such as energy, infrastructure, and transportation). Drawing on, for example, the regularly updated Nationally Determined Contributions (NDCs),

Council members could share concerns and successes in domestic policies that aim to implement the Paris Agreement. As such, the Council would not duplicate the existing UNFCCC mechanisms (such as the Global Stocktake), but rather enhance their potential for mutual learning. Depending on the Council’s membership, such exchanges could also bring together UNFCCC parties and non-party stakeholders who hold relevant expertise in climate mitigation and adaptation.

Opportunities for Meaningful Participation

In recent years, the UNFCCC Secretariat has witnessed a dramatic increase in COP participation and the number of observer organisations admitted to the UNFCCC. The ballooning of the negotiation process raises relevant questions about how to ensure everyone’s effective and meaningful participation. Furthermore, greater COP participation comes with increased budgetary needs – both for the UNFCCC Secretariat, whose budget is already under strain, and for financially vulnerable state and non-state delegations, which struggle to find affordable and accessible accommodation even under the current conditions. This points to major concerns regarding adequate representation at COPs.

Parties have debated how to enhance observer engagement in the UNFCCC process, especially for those from underrepresented regions. Attendees from rich, industrialised countries have historically formed the largest contingent of observers at COPs. To address this, the UNFCCC Secretariat has aimed to re-distribute observer badges more equitably across the world regions. However, badge reallocation has prompted backlash from some parties and observers, and has led to unintended consequences – namely the increase in party overflow badges. At the SB62 meetings in Bonn, the question of a possible cap on overflow badges also sparked debate among developing and developed country delegates.

With so many barriers to meaningful participation in the UNFCCC, the Council could be seen as a way to streamline an increasingly unwieldy process. By establishing a permanent forum – with permanent

representations, a clear mandate, and regular meetings – the Council could open doors for more inclusive and consistent participation of non-party and party stakeholders alike. For UNFCCC parties, this could allow for regular diplomatic interactions beyond the intense COP and SB meetings. In addition, it would likely put parties on more equal footing, as participation would not be limited by their country's ability to fund delegates to attend the COPs. For non-party stakeholders, the establishment of formal participation channels and informal interaction opportunities could provide new avenues for influencing the intergovernmental process.

Why the Council Could Be a Bad Idea

While there are up-sides, various aspects cast doubt on the added value of a new Climate Change Council. Many concerns understandably stem from the lack of clarity around the Council's exact design and function: however, this section discusses more fundamental issues, including resource constraints, questionable mandates alongside the UNFCCC process, and the need to find consensus for a new forum to work effectively.

Stretching (Already) Limited Resources?

Within the context of the UN's current financial struggles, creating a new forum for climate diplomats may seem unlikely. Recently, UN Secretary-General António Guterres launched the establishment of a Task Force (TF80) dedicated to boosting the UN's cost-effectiveness. One of the main tasks of TF80 is to reduce the UN budget by 20 percent – a target that also applies to the UNFCCC.

The UNFCCC Executive Secretary also voiced concern over the Secretariat's "budget challenges" and proposed budget increases at the SB62 meetings. The final negotiation outcome reached a 10 percent increase, which – while significant – did not meet the UNFCCC Secretariat's need assessment. This shows that the international community is not prepared to invest significantly more into climate governance support structures.

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Moreover, depending on the concrete location and regularity of meetings, the new Council would require additional resources for parties and non-party stakeholders. This could range from providing more staff to existing Permanent Representations in New York or Nairobi, setting up new Representations at a new location, or covering the travel budgets for more diplomats to attend Council meetings. This would put a strain on all countries participating, and especially on those with already limited resources, such as least developed countries. It also risks exacerbating inequalities in participation, as limited budgets and a growing number of climate meetings increases a country's needs for costly measures like additional staff, training, and institutional coordination.

A Parallel Process – For What?

Already, the UNFCCC is an institution with a plethora of bodies, mandates, and agenda items. Next to its formal mandates, COPs have served as a space for Presidency or Coalition initiatives beyond the existing UNFCCC mandates as well as for informal policy debates during side events. As a result, there is little governance space for a new Council outside the UNFCCC framework to take on a role that adds value rather than duplicating existing efforts in global climate governance. Next to duplication, there is also the risk that a new Council would “divert attention” away from reaching existing targets and timelines within the UNFCCC. This risk seems particularly threatening as debates surrounding

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the “efficiency of the UNFCCC process” within the Subsidiary Body for Implementation (SBI) intensify. The effort that would go into debates ahead of the new Climate Change Council might be better invested in reforming the established forum instead.

On top of that, the UNFCCC has established itself as “the overarching umbrella of international governance,” including the Secretariat’s work to orchestrate global climate action outside of the formal UNFCCC (such as non-state actor commitments). The international climate regime complex is already fragmented. Different organisations therefore need to coordinate and promote synergies (such as on biodiversity and international shipping), yet effective coordination is a persistent challenge. Within this already dense landscape, a new Climate Change Council risks “creating yet another potentially conflicting site of governance of climate.”

How to Create a New Council?

Since the original announcement by President Lula da Silva, the Brazilian government has offered little clarity on the characteristics of the proposed new Council. The COP30 Presidency has provided no further information about the idea, and the proposal has been absent from the Presidency’s letters published ahead of the COP. In fact, informal conversations at the June 2025 SB62 meetings revealed that many participants at the SB meetings were unaware of the proposal’s existence. During formal interventions of the COP30 Presidency in Bonn (such as during the COP30 vision and expectations informal consultations event), the proposal was also not mentioned.

This silence also raises a relevant question regarding the type of process that would lead to the adoption of a new Climate Change Council: Would the proposal have the support and ownership of the climate community? If the Brazilian leadership aims to promote the measure but the COP30 Presidency team is not involved, it risks leading to ambiguous Brazilian leadership in establishing the new Council. Furthermore, excluding climate experts and proceeding through a decision-making process within the UN General Assembly – i.e., fully outside of the UNFCCC – risks creating a Council whose structure is misaligned with existing UNFCCC mandates.

Outlook and Conclusions

Not much is known about Brazil's Climate Change Council idea. The proposal's absence from debates at the SB62 and in the COP30 Presidency's communications sends mixed signals about whether Brazil really intends to get the new Council off the ground. However, this could change in the months leading up to Belém – or at the COP itself. Lula da Silva might use COP30 to present a concrete vision for the Council and to gather initial support among world leaders during the High-Level Segment.

As such, it is crucial for policymakers to consider the arguments in favour and against such a Climate Change Council. This also includes reflecting on possible enabling conditions for such a proposal, including the scope of the Council's mandate (complementing, not duplicating, the UNFCCC), the regularity of its meetings and its integration into existing UN headquarters (such as in New York or Nairobi, which would make use of existing permanent representation structures), and channels for participation of non-party stakeholders (learning from existing barriers in the UNFCCC process).

Overall, our assessment leads to a more skeptical take on establishing this new forum, as it risks diverting both budgetary and time resources needed within the UNFCCC process itself. At the same time, looking at the slow pace of reform debates within the UNFCCC, we acknowledge the impetus that the Brazilian proposal can give for more out-of-the-box thinking on how to build collective efforts for ambitious climate action. However, the question remains as to whether this momentum would not better serve advancing the UNFCCC process itself rather than investing efforts into a new forum. Parties could use the occasion of their 30th COP to critically take stock of the biggest political and technical barriers within the 30+ year process. Such a 'process stocktake' could help to build political willingness to address long-standing disagreements on COP organisation, agendas, observer engagement, and the broader efficiency of the UNFCCC process.

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ENSURED focuses on key policy domains that by their very nature pose complex transnational challenges. Our research assesses the state of play in these different areas and investigates the EU's strengths and weaknesses as an actor working to defend and transform multilateralism. Embracing the ethos of multilateral cooperation, the ENSURED consortium comprises universities, think tanks, and civil society groups from across Europe, Brazil, India, South Africa, China, and the United States. We aim to equip policymakers in the EU with evidence-based insights, actionable recommendations, and practical tools to promote better global governance for a world in transition.

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