



October 15, 2015

Mr. Todd Stern
Special Envoy for Climate Change
U.S. Department of State
2501 C Street, NW
Washington, DC

Re: Business engagement in the Paris outcomes and next steps in UNFCCC: draft ADP Basis Agreement and Decision text (October 5)

Dear Mr. Stern,

The U.S. government has been a champion for stakeholder and private sector involvement across the UN system, and in the international community's efforts to address climate change. Nowhere is this more important or urgent than in the UNFCCC and the Paris outcomes, which will set a new course for society. Doing this depends on consulting with and animating all stakeholders, including business.

Therefore the deletion in the October 5 draft ADP Basis text of almost all innovative and concrete options for stakeholder engagement reflected in previous ADP drafts is a lost opportunity, and seems out of step with both the continuous progress of interaction with stakeholders in the UNFCCC as well as the recent UN 2030 Development Agenda outcomes.

Business routinely interacts with domestic governments in the formulation and implementation of domestic climate policy, and in this regard, USCIB appreciates opportunities for dialogue and cooperation with the Administration. In an increasingly globalized economy, we also have much to contribute to the development and implementation of international policy. Therefore, we welcomed numerous references to involving business and other stakeholders in the previous ADP "tool" draft. Those diverse government proposals included options to work with business and other stakeholders in INDCs, capacity building, adaptation, finance and investment, mitigation and other areas – including but not limited to Work Stream 2 and voluntary actions under the Lima Paris Action Plan. Businesses around the world have already committed to numerous actions that support a comprehensive climate agreement and seek to provide the necessary solutions and innovations to address climate change. These actions are not limited to Workstream 2.

USCIB, as a member of the Major Economies Business Forum (BizMEF), has consistently advocated for business and other stakeholder engagement to be anchored in the Paris outcomes, with relevance to all aspects of the UNFCCC's work and at every step of the process, including agenda setting, expert workshops, policy deliberations and implementation. In our view, this is indispensable to achieving the ambition and scale of action that will be required. Yet, the current draft ADP basis text includes no reference to the involvement of business or any other stakeholder in the Agreement section, and limits reference to stakeholder engagement only to Work Stream 2 related efforts in the draft Decision text.

We ask you to support inclusion of text:

- in the Agreement that recognizes the importance of substantive engagement by business and other stakeholders in the UNFCCC as a whole, rather than confined to Work Stream 2 alone;
- in the Decision calling on the IPC to cooperate with stakeholders including business in preparing for the entry into force of the Paris outcomes;
- inviting comments from business and other stakeholders in discussions relating to the review of INDCS in the UNFCCC.

Limiting business efforts to Work Stream 2 risks discouraging the wholesale and long term response that is needed to rise to the challenge and opportunity of COP21.

We look forward to working with you and the Administration to frame Paris outcomes that animate the U.S. business community's innovation and leadership. Please don't hesitate to contact us with any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Norine Kennedy".

Norine Kennedy
Vice President, Strategic International Engagement,
Energy and Environmental Affairs

Cc: Trigg Talley, Deputy Special Envoy for Climate Change, U.S. Department of State
Karen Florini, Deputy Special Envoy for Climate Change, U.S. Department of State