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# Strengthening Mexico's Climate Law

Policy lessons from subnational  
and international experience

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Policy insight

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# List of abbreviations

## Mexico

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|          |                                                                                                                 |
|----------|-----------------------------------------------------------------------------------------------------------------|
| CICC     | Inter-Secretarial Commission on Climate Change ( <i>Comision Intersecretarial de Cambio Climatico</i> )         |
| Council  | Climate Change Council ( <i>Consejo de Cambio Climatico</i> )                                                   |
| INECC    | National Institute of Ecology and Climate Change ( <i>Instituto Nacional de Ecologia and Cambio Climatico</i> ) |
| LGCC     | General Law on Climate Change ( <i>Ley General de Cambio Climatico</i> )                                        |
| SEMARNAT | Secretariat of Environment and Natural Resources ( <i>Secretaría del Medio Ambiente y Recursos Naturales</i> )  |
| SINACC   | National Climate Change System ( <i>Sistema Nacional de Cambio Climático</i> )                                  |

## General

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|        |                                                       |
|--------|-------------------------------------------------------|
| NDC    | Nationally determined contribution                    |
| UNFCCC | United Nations Framework Convention on Climate Change |

# Summary

Addressing climate change requires effective national climate governance. Research into the design of effective institutional frameworks and processes to meet climate goals has, to date, focused on the experience of advanced economies – predominantly those in Europe. This report fills the gap in analysis on emerging markets by analysing Mexico's climate governance and experience in legislating on climate change. Drawing on the outcomes of public participatory processes on climate change, and the reform to a new generation of nine subnational climate laws, as well as on international experience, we identify opportunities to strengthen Mexico's key national climate governance instrument: the General Law on Climate Change. We analyse the provisions against key 'climate governance functions' that need to be addressed to enable an effective response to the climate crisis.

The report also provides insights for other countries that are revising their nationally determined contributions (NDCs) and looking to strengthen the domestic legal frameworks and institutions that deliver implementation. Conclusions from this study could be of particular interest to countries with a federal structure and those seeking to strengthen subnational leadership on climate change.

## Overview of climate governance in Mexico

Mexico enacted the General Law on Climate Change (LGCC) in 2012, becoming the first large oil-producing emerging market economy to enact a specific law on climate change. However, in the years since passing the law, domestic implementation challenges have persisted, amid a series of political and budgetary obstacles. In this challenging context, subnational climate change policy has played an important role in maintaining ambition and reinforcing climate commitments. Under the LGCC, Mexican States are the main implementers of climate change adaptation and mitigation actions, so subnational governments can issue corresponding legal provisions to comply with their environmental obligations, as long as these are in line with national policy.

By the end of May 2025, nine States had concluded extensive participatory processes in connection with reforms to the State's climate law: the States of Baja California Sur, Chiapas, Mexico City, Guanajuato, Puebla, Yucatan, Quintana Roo, Zacatecas and Jalisco. The input from the participatory processes provides an indication of the aspects that need to be legislated for, which issues are better or less well understood, what citizens' perspectives are, and which innovative solutions can be scaled up to the federal level.

## Key findings and recommendations

A strong climate framework law is one way to respond to the realities of climate change. While Mexico's LGCC addresses the following climate governance functions to some extent, there are opportunities to strengthen design elements of the law across the functions. In identifying these opportunities, we draw on insights from across the reformed Mexican subnational climate laws, as well as climate framework laws in the Ibero-American community and internationally. Detailed recommendations are set out in the report.

### Direction-setting and strategy articulation:

- The LGCC requires the development of a national long-term climate strategy to be reviewed every 10 years in relation to mitigation, and every six years for adaptation. The law also requires preparation of a short-term planning document, the Special Programme on Climate Change, which must be developed at the beginning of each administration.
- All the reformed subnational laws we reviewed establish an obligation to develop a State climate change strategy. However, stakeholders across the different States called for more coherent climate strategies that are aligned with Mexico's national and international climate commitments.

- Although Mexico's General Law on Climate Change sets interim mitigation targets, certain sectoral targets and a long-term goal of reducing emissions by 50% by 2050 relative to 2000 levels, it does not set a carbon neutrality or net zero objective. Seven of the nine subnational laws reviewed included a long-term carbon emission-reduction target.
- Regular timetables for the preparation and implementation of plans are crucial to strengthening the whole-of-government approach to climate action. Long-term and short-term emission-reduction targets are among the most impactful legislative elements of climate framework laws.

**Key recommendation for Mexico's LGCC:** Introduce a legally-binding climate neutrality target and define intermediate targets compatible with this trajectory. Strategy planning processes could be aligned with five-year cycles of nationally determined contributions (NDCs) and more explicitly integrated just transition considerations.

### Coordination and integration

- The law creates the national Inter-Secretarial Commission for Climate Change (CICC) and the National Climate Change System (SINACC), which both serve as permanent mechanisms for horizontal and vertical coordination. Federated entities must incorporate mitigation and adaptation criteria into their environmental policy instruments. However, the law does not explicitly require public authorities to align their decisions with national climate targets or strategies.
- In all States reviewed, stakeholders emphasised through participatory processes the need to address fragmentation, overlapping sectoral mandates and silos between government agencies. They also highlighted that local governments often lack institutional capacity, legal mandate or dedicated financial resources to implement climate measures. In response, several State laws explicitly assign climate responsibilities across government departments and formalise mechanisms to facilitate vertical coordination, particularly in response to climate disasters.
- Giving public bodies a clear mandate to operate in a way that is aligned not only with climate goals but also with specific climate plans and policies can have positive benefits for climate action. Climate legislation, as a signal of legal and policy certainty, can also drive budget decisions and increase resourcing.

**Key recommendation for Mexico's LGCC:** Require, and support, all public authorities to ensure that their decisions are consistent with national targets and strategies. The mandates of the Inter-Secretarial Commission on Climate Change (CICC) and the National Climate Change System (SINACC) could also be strengthened to improve coordination and integration.

### Expert advice

- The LGCC empowers the National Institute of Ecology and Climate Change (INECC) with drafting strategies, plans and nationally determined contributions. It also establishes an Evaluation Coordination body, led by INECC's head and advisors, to oversee assessments of national climate policy. The Government is not obliged to respond to advice provided by the INECC.
- Across subnational laws, the type of expert advisory body varies, including: multi-stakeholder Technical or Scientific Committees or more general civic forums, which bring academic experts directly into their Citizen Councils, blending scientific insight with community voices. Most laws establish that climate plans be developed 'with the advice of' these bodies, though none require the Government to formally respond or implement their recommendations.
- Independent climate change advisory bodies are crucial knowledge brokers that contribute to more evidence-based and ambitious policymaking on climate change. However, their impacts are determined by several factors, including a clear and comprehensive mandate, its

composition (e.g. level of expertise and independence), provisions for the executive branch to formally respond to the advice given, predictable funding and parliamentary oversight.

**Key recommendation for Mexico's LGCC:** Require government to consider independent advice at key stages of the policymaking process and introduce a requirement for government to respond to such advice.

### Stakeholder consultation and engagement

- The national law refers to the responsibilities of government to establish procedures for holding public consultations when formulating the national strategy and programme. However, it does not establish a specific institution for this ongoing process, nor a requirement to respond to the consultation. The Climate Change Council, as a permanent advisory body to the CICC, has a mandate to promote public participation – but it is not explicitly charged with leading public consultations.
- Across States, a clear theme was the call for inclusive and participatory climate governance. Multiple stakeholders supported the formation of formal participation mechanisms that include marginalised and vulnerable communities in planning and decision-making. Education and awareness-raising were also universally highlighted as vital. The majority of States have a specific institution for stakeholder consultation, known as *Consejo Ciudadano* (Citizens' Councils).
- Transforming better public awareness into greater support for climate action requires enhanced public participation. An aspect that is not often emphasised in climate framework laws is that policies should be accompanied upfront by strong communication strategies and plans (and budgets) for outreach and education campaigns.

**Key recommendation for Mexico's LGCC:** Introduce a requirement for the Government to respond to stakeholder input and ensure that Indigenous knowledge and perspectives are integral to policy development. The CICC's mandate could be expanded to include clear requirements to conduct inclusive public participatory processes.

### Finance

- The national climate law originally created a federal Climate Change Fund but this provision was repealed in 2020. The law explicitly states that the federation should design, develop and implement economic instruments that encourage the achievement of the objectives of the national climate change policy, but there is no costing exercise built into the law.
- Across the States, stakeholders repeatedly recognised the need to mobilise more funding, both domestic and international, to meet ambitious climate goals. A majority of the reviewed Mexican subnational laws establish a Climate Change Fund to channel resources into climate action. These funds typically operate as public trusts that collect and disburse climate finance, often with transparency and auditing requirements.
- The law is not a panacea and it can be difficult to disaggregate the impacts of law on spending for climate action. However, laws can strengthen coordination of climate finance, and create legally-binding requirements to allocate minimum budgets towards climate action.

**Key recommendation for Mexico's LGCC:** Introduce a requirement to develop and regularly update a financial strategy and facilitate budgetary processes for sectoral Ministries and subnational governments. Consider additional provisions to facilitate climate-related lending and technical assistance from national and international programmes, to flow towards States and municipalities.

### Accountability

- At the national level, the central accountability mechanism addressing progress on climate action is the 'Evaluation Coordination' body. The National Climate Change Policy is assessed

every two years. However, only one evaluation has been conducted to date, in 2017, focused on evaluating the 2014–2018 strategy.

- Across States, there was a repeated recommendation to strengthen enforcement mechanisms – especially by embedding clear sanctions and compliance checks into law. Most State laws require Environment Ministries or climate commissions to regularly evaluate and publish progress reports on climate measures, but not all laws provide details on consequences in the case of non-compliance.
- The effectiveness of reporting requirements is significantly influenced by the question of who prepares the reports and who is expected to respond to them. Systemic non-compliance with targets and plans may undermine the credibility of climate legislation overall and reduce public trust in the policymaking system.

**Key recommendation for Mexico's LGCC:** Establish regular reporting processes by sectoral Ministers to Congress, and consider introducing annual independent assessments of progress, with clear consequences in cases of non-compliance with the law.

## Conclusion

Effective responses to the climate crisis require that public policies and legislation respond to the national context and address local needs.

States and municipalities are well-placed to incorporate the voices of local communities, ensuring that responses account for the structural inequalities that affect each territory differently. Mexico's experience shows that participatory processes provide a valuable contribution to addressing governance gaps and key priorities for the design of legal and governance frameworks and should be a central, integral part of climate governance.

Legislative reforms on climate change at the subnational level in Mexico offer several governance innovations and, in several ways, go beyond the current General Law on Climate Change. This experience should be considered when designing national legislative reforms. Other countries should also seek to review and learn from the experience of climate governance and law reforms at their subnational levels.

The national participatory process to update Mexico's LGCC is ongoing at the time of writing this report, but priority areas have started to emerge. The process emphasised the role of the agroforestry sector and carbon markets, and stressed the need for clear legislation and effective governance, plus stronger social participation in decision-making. Mexico now faces a crucial opportunity, in parallel to submitting its revised NDC, to respond to public demand, strengthen its national climate legislation, and implement concrete climate action.



# 1. Introduction

## The global context

Over the past decade, much effort in climate advocacy and policymaking has focused on pushing for political commitment for action and adopting targets to reduce greenhouse gas emissions. As implementation of climate commitments is lagging behind the level required (UNEP, 2024), there is an urgent need to establish credible and effective institutional frameworks, processes and capacity to ensure that targets can be reached.

Countries are driven by different considerations and face unique national socioeconomic and political circumstances when considering the feasibility of net zero targets, the political commitments they make and, subsequently, the steps to their implementation. These factors and variations in legal and political systems make it difficult to develop a universal model for national climate governance. Instead, effective tools are needed that can be adapted to each national context to identify gaps and potential governance solutions based on experience internationally. An additional challenge is that much of the current empirical evidence on the specific design elements to ensure effective national climate governance is based on analysis of the experience of advanced economies and predominantly those in Europe. This presents a serious limitation when advising emerging markets and developing economies (EMDEs).

## Focus on Mexico

This report contributes to filling the gap in analysis on emerging markets by reviewing Mexico's climate governance and experience in legislating on climate change. Mexico is the first large oil-producing emerging market economy to enact a specific law on climate change (Averchenkova and Guzman Luna, 2018) and has been an active player in international efforts to tackle climate change for many decades. However, in the years since passing the law, domestic implementation challenges have remained.

Mexico is a federal republic composed of 32 States (*estados*) and has a two-tier system of subnational governance. Under the Constitution, powers not expressly given to the Federation are understood as reserved to the subnational States. Subnational States play a key role in climate action in Mexico and their experience should be taken into consideration for future federal action.

Extensive public participatory processes on climate change have taken place at the subnational level over the past few years, resulting in several reformed subnational climate laws, some of which are now more ambitious than the national-level General Law on Climate Change (LGCC). Civil society organisation POLEA (Environmental Policy and Legislation) has collaborated with 17 States of the Mexican Republic in the development and reform of their climate change laws and conducted participatory processes to feed into the legislative reforms. These States account for 36.51% of national CO<sub>2</sub> emissions and are home to nearly half of the Mexican population (SEMARNAT, 2018). Participatory processes have also been conducted at the national level with a view to input into the reform of the LGCC but at the time of writing this process had not been finalised. Therefore, this report draws on the materials gathered by POLEA from the subnational public participatory processes.

## Structure of the report

**Section 2** provides a brief overview of national climate governance in Mexico and recent reforms to national and subnational climate legislation, and draws lessons from the experience of conducting public participatory processes on climate change.

**Section 3** identifies opportunities to strengthen the country's ability to meet the governance challenges of climate change. It analyses Mexico's LGCC and the experience of recent reforms to a new generation of nine subnational climate laws, which have been amended following a public participation process, against the key 'climate governance functions' that need to be addressed

to enable an effective response to the climate crisis. We build on the approach developed by Sridhar et al. (2022) that identified key climate governance functions: narrative and direction-setting; strategy articulation; expert advice; horizontal coordination; vertical coordination; sectoral integration; subnational integration; stakeholder consultation and engagement; finance; and accountability and transparency.<sup>1</sup>

We combine analysis of how the provisions of the LGCC link to climate governance functions with analysis of how the governance functions have been reflected in the reforms to the new generation of subnational laws and emerging governance innovations; this allows us to draw recommendations for opportunities to strengthen national climate change legislation.

Additionally, analysis of materials from the public participation processes held prior to amendments to the subnational Mexican laws enables us to better understand the perceived governance gaps and the key requests for legislative reforms at the State level as identified by stakeholders and citizens. It also highlights the potential for public participation to shape updates to climate laws, particularly in relation to climate governance functions, and offers lessons for civil society advocating for more inclusive and participatory processes in Mexico and beyond.

The analysis also draws on insights from climate framework laws from outside Mexico in Ibero-America,<sup>2</sup> given the close ties between countries in the region and the many common challenges and interests. We define **framework laws** as laws that establish the strategic direction for national climate change policy and create institutional arrangements and accountability mechanisms to achieve the country's climate objectives (Averchenkova et al., 2017; Muinzer, 2020). Our recommendations also incorporate findings from empirical studies on the impacts of framework climate laws from outside Ibero-America, and the specific design elements within them. We draw particularly on the more recent impacts found in studies of the UK, Germany, Ireland and New Zealand (Averchenkova et al., 2021a; 2024a; 2024b).

For each climate governance function, we provide: (a) an overview of how Mexico's national law addresses the governance function; (b) key feedback from subnational participatory processes on climate laws; (c) learning from governance functions in subnational climate framework laws; and (d) insights from Ibero-America and international research.

**Section 4** presents key conclusions from the ongoing national participatory process and our recommendations for reforming the national climate law/LGCC.

## Applicability beyond Mexico

Beyond supporting Mexico's climate governance, the report provides timely insights for other countries that are revising their nationally determined contributions (NDCs) for submission to the United Nations Framework Convention on Climate Change (UNFCCC) ahead of the 30th annual meeting of the Conference of the Parties of the UNFCCC (COP30) taking place in November 2025, 10 years after the Paris Agreement was adopted. This round of NDCs will need to urgently address both ambition and credibility gaps: revising national climate goals and plans but also, importantly, strengthening the domestic legal frameworks and institutions that deliver implementation. Conclusions from this study could be of particular interest to countries with a federal structure and those seeking to strengthen subnational leadership on climate change.

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<sup>1</sup> Although Sridhar et al. (2022) identified integration and mainstreaming as two separate functions, we view these functions as interchangeable with significant overlap in practice and thus choose to merge them. However, we distinguish between horizontal (sectoral) and vertical (subnational) integration and apply the same logic to coordination.

<sup>2</sup> In this report we use this term for the group of 19 Spanish- and Portuguese-speaking Latin American countries, plus the Iberian peninsula countries: Spain, Portugal and Andorra.

## 2. Climate governance in Mexico: an overview

Climate change has been treated as a topic of utmost importance in Mexico in recent decades, as the country's geographical conditions, socioeconomic context and vulnerability to extreme weather events mean that climate change represents a political, economic and social challenge. Research has revealed that Mexico is warming faster than the global average (Estrada et al., 2023).

National climate policy in Mexico is therefore not a new issue. Prior to COP16 in Cancún, held at the end of 2010, the country already had initiatives focused on contributing to the global fight against climate change, such as the Special Climate Change Programme developed in 2009 and an initiative to create a federal climate change law.<sup>3</sup> From the outset, lawmakers aimed to create a non-partisan and lasting legal framework to provide certainty on Mexico's goals in addressing climate change.

### The General Law and the National Climate Change System

In 2012, Mexico enacted a dedicated law on climate change. The General Law on Climate Change (LGCC) was the result of the legislative leadership of multiple representatives of the Chamber of Deputies<sup>4</sup> and civil society organisations, as well as a positive political climate at the national and international level which catapulted Mexico into the role of an international leader and made its legislative work a regional benchmark (Avila, 2023). The LGCC became the guiding instrument of national climate policy and led to the creation of the National Climate Change System (SINACC) as a mechanism for convening, communication and coordination on climate change.

The SINACC is composed of other bodies such as the Inter-Secretarial Commission on Climate Change (CICC), Climate Change Council, National Institute of Ecology and Climate Change (INECC), subnational governments and representatives of the Congress of the Union. The joint work of these actors has proven essential in addressing the dynamic and changing challenges of climate change. For example, in 2015, following the signing and ratification of the Paris Agreement, Mexico proposed an NDC to reduce its emissions by 22% by 2030 (from 2000 levels) under a business-as-usual scenario. The push for legislative action resulted in the incorporation of national targets into the LGCC by 2018.

The 2018 reform of the LGCC, which laid the foundations for Mexico to contribute to the fulfilment of the Paris Agreement, was also accompanied by the establishment of an Adaptation Programme and the development of an early warning system to reduce social vulnerability to extreme weather events, as well as the recognition of the importance of considering scientific information when modifying, adding to or reorienting national climate change policy. The country remained at the forefront of climate governance also by mandating the progressive and gradual establishment of an emissions trading system and developing a transparency framework on climate change action, so that it would be possible to report and monitor national progress towards compliance with the NDC (SEMARNAT, 2018).

Unfortunately, in subsequent years, Mexican climate action would face a series of political and budgetary obstacles to meeting its main objectives. Despite the country reiterating its commitment to the Paris Agreement, Mexico's NDC of November 2022 failed to reflect progression in ambition compared with its previous NDC. In 2023, Mexico announced a new (unconditional) political commitment to reduce emissions from 2000 levels by 35% by 2030,<sup>5</sup>

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<sup>3</sup> At the beginning of 2010, four bills were presented to the Senate. However, none of them could be approved before COP16.

<sup>4</sup> In Mexico, for a federal law to be passed, several stages are required: presentation of the bill, discussion and voting in both houses of Congress (Chamber of Deputies and Senate) and, finally, enactment and publication by the Executive Branch.

<sup>5</sup> This commitment was announced at COP27 by Mexican federal representatives in response to the multiple demands facing the country for failing to comply with its commitments under the Paris Agreement.

although its components lacked detail and were not included in the LGCC, despite multiple initiatives to incorporate them and reinforce the law's binding nature.

However, despite the context of political uncertainty, and the economic crisis that resulted from the COVID-19 pandemic, subnational climate change policy played a crucial role in continuing and reinforcing national climate change objectives and targets. In some cases, subnational climate change laws adopted by Mexican States include their own ambitious targets for reducing emissions or achieving carbon neutrality.

## **Reform of subnational climate laws**

Under the LGCC, Mexican States are the main implementers of climate change adaptation and mitigation actions, so subnational governments can issue corresponding legal provisions to comply with their environmental obligations, as long as these are in line with national policy. The subnational regulatory framework on climate change includes 17 legal instruments, the main one being each entity's climate framework law (INECC, n.d.). Currently, 30 of the 32 States have a climate framework law. The LGCC is also explicit that States have a mandate to promote societal participation in adaptation and mitigation (under Article 8).

Working with States, POLEA developed a methodology for carrying out participatory processes<sup>6</sup> ahead of legislative reforms on climate change. These processes promote the inclusion of as many relevant actors as possible, from multiple sectors (public, private, academia, civil society, etc.). POLEA applies a climate justice perspective to support the development of legal instruments to ensure that they take on board inputs from the participatory processes, recognise the context and diversity of each State and seek to set realistic goals, objectives and regulations to enable implementation.

By the end of May 2025, the work on both the reform of the laws and the accompanying participatory processes based on POLEA's methodology had resulted in the approval of eight climate change laws: in the States of Baja California Sur, Chiapas, Mexico City, Guanajuato, Puebla, Yucatan, Quintana Roo and Zacatecas. Further, two climate change regulations were approved for the States of Quintana Roo and Yucatan, along with the Circular Economy Law of Mexico City and the Sustainable Forestry Development Law of the State of Quintana Roo.<sup>7</sup> Jalisco ran a participatory process to reform its climate change law but the law was not reformed due to political circumstances. In our analysis in Section 3, we nevertheless incorporate Jalisco's participatory process and its existing (unamended) climate change law, as it remains relevant for understanding key public demands at the subnational level.

## **Lessons learned from subnational participatory processes: national-level opportunities**

At the national level, according to data presented in the journal *Nature* (2024), in 2023, 91% of the Mexican population believed that climate change is a threat to humanity, 76% supported the creation of laws to address the issue and 96% believed that the Government should do more to tackle the climate crisis (Andre et al., 2024). The European Investment Bank obtained similar results in its climate survey conducted in May 2023, finding that 93% of Mexicans surveyed were in favour of the Government implementing stricter measures to address climate change (European Investment Bank, 2023). These findings are consistent with data collected by POLEA during 13 participatory processes at the State level that showed a strong demand from the workshop participants, interviewees and survey respondents for the legal frameworks to regulate core aspects of the climate change response.

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<sup>6</sup> Due to time constraints, funding and travel, POLEA does not carry out 'public consultations' which, according to the provisions of the Federal Law on Popular Consultation, art. 5, must correspond to at least 50% of the citizens of the corresponding entity.

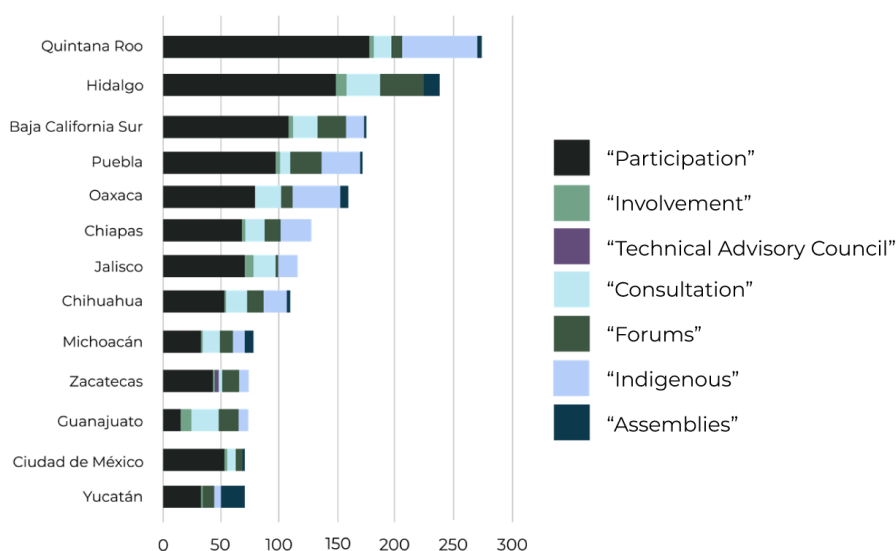
<sup>7</sup> The remaining States continue to work on the initiatives through their local congresses. POLEA provides technical support and assistance during this stage but does not influence the legislative process of any federal entity.

Since 2024, POLEA has also developed a participatory process at the national level to update the LGCC, through which 144 online questionnaires and 114 interviews with experts have been conducted. In addition, several regional forums, thematic roundtables and bilateral meetings with federal authorities and stakeholders (including the private sector, civil society, academia and international cooperation agencies) have been held. Although public participatory processes are ongoing at the national level, preliminary findings about the needs and priorities can be identified, building on the experience from the participatory processes conducted at the subnational level.

A key finding from the subnational processes is that public perception of climate change issues and the laws that follow reflect the diverse climatic conditions and realities faced across Mexico. Including social perspectives in the decision-making process allows policies to generate a sense of shared responsibility and have a greater impact on climate change adaptation and mitigation. For example, while Chihuahua, Sonora and Nuevo León in the North of the country suffer increasingly from severe droughts each year, it is flooding that causes significant losses in the centre of the country, while the South is vulnerable to hurricanes that hit the coast. In South-Southeast Mexico, citizens are mostly aware of forestry and coastal issues (e.g. illegal logging, the use of forest land for carbon market projects, sea level rise and mangrove conservation) and request measures to address these issues while in the Northwest, citizens are more concerned about prolonged droughts and water stress. Furthermore, as a result of political division and land use planning, States demand greater citizen participation in differing ways: Quintana Roo prefers assemblies, Hidalgo forums and Baja California Sur more consultations.

Figure 2.1 provides an overview of the emphasis stakeholders across different States placed on the need for citizen participation in climate policy during interviews conducted by POLEA in subnational Mexican States over the period 2020 to May 2025.

**Figure 2.1. Number of interviewees pointing to the need for various forms of citizen participation during interviews conducted by POLEA in subnational Mexican States**



Source: Authors, adapted from Figure 5 in POLEA (2025)

The input from the participatory processes provides an indication of the aspects that need to be legislated, which issues are better or less well understood, what the citizens' perspectives are, and which innovative solutions can be scaled up to the federal level. The goal of carbon neutrality (also referred to as 'net zero'), which has already been incorporated by some States in Mexico into their subnational laws, was being considered at the time of writing for inclusion in Mexico's NDC 3.0 and the LGCC. The role of the States and their ambitious legislation can be understood as a key component of national climate change policy and provides lessons for legal and governance innovation to inform governance reforms at the national level. This finding is applicable beyond Mexico and is particularly important for countries with a federal governance structure.

### 3. Insights for reforming Mexico's national climate law

Creating climate framework legislation is one way to respond to the governance demands of climate change. As mentioned in the Introduction, these are laws that establish strategic direction for national climate change policy and create institutional arrangements and accountability mechanisms to achieve the country's climate objectives. They may be used to create institutional structures and processes to enable governments to address strategic challenges in implementing climate policy (Zwar et al., 2023). They can also create obligations for or provide signalling functions for actions on climate change at the subnational level.

Mexico's national law – the General Law on Climate Change or LGCC – is thus the starting point for analysis. In this section, we provide an overview of the core climate governance functions as addressed in the LGCC: direction-setting and strategy articulation; coordination and integration; expert advice; stakeholder consultation and engagement; finance; and accountability. Within these subsections we also summarise key feedback from the subnational public participatory processes and learning from how amended subnational laws have addressed the same climate governance functions; and provide insights from selected countries in Ibero-America, and studies on impacts of climate framework laws, to identify opportunities for reform at the national level in Mexico.<sup>8</sup> (Our detailed recommendations are provided in Section 4.)

**Stakeholders:** Where we draw on learning from the subnational participatory processes, we refer collectively to the outputs from convening public servant participants in workshops organised by the State Secretariats of Environment; interviews conducted by POLEA with representatives across academia, business and government; and input from citizens who responded to online surveys. We refer to all actors that provided input into the above participatory processes as 'stakeholders'. See Appendix 1 for details of the three-staged participatory processes.

#### Direction-setting and strategy articulation

These governance functions refer to the role of the law in constructing a narrative that frames climate change in the domestic context, sets a clear direction for climate change policy and outlines processes for the preparation and implementation of strategies, plans and policies to address climate change.

##### Direction-setting and strategy articulation in the General Law on Climate Change

The national law or LGCC outlines a process to establish and implement a national climate strategy. The Secretariat of Environment and Natural Resources is required to develop the strategy, with input from the National Institute of Ecology and Climate Change and the Climate Change Council. The strategy also requires the approval of the Inter-Secretarial Commission on Climate Change (CICC), which is a permanent body for horizontal coordination between Ministries. The Council is a permanent advisory body to the CICC, composed of climate change experts from the social, private and academic sectors and its role is to advise the CICC, recommend studies and policies, promote public participation, and monitor climate policies and targets. The strategy must include mitigation and adaptation goals, with projections and timelines to 2050. However, importantly, it only requires the strategy to be reviewed at least every 10 years in relation to mitigation, and every six years for adaptation. The law also requires preparation of a Special Programme on Climate Change (PECC), which must be developed at the beginning of each administration. This is the main instrument for short-term planning, while the

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<sup>8</sup> This report provides illustrative examples throughout (including in tables); note that these are non-exhaustive.



strategy is mid-/long-term. Under the law, the PECC must be consistent with the national strategy and the law.

### **Key feedback from subnational participatory processes on direction-setting and strategy articulation**

Stakeholders across the different States called for more coherent climate strategies that are aligned with Mexico's national and international climate commitments. For example, some stakeholders suggested linking and aligning State programmes to Mexico's NDC and other relevant international frameworks like the 2030 Agenda for Sustainable Development. It was also clear that stakeholders felt that strategy articulation should be tied closely to provisions on accountability and transparency. Citizens (e.g. in Puebla and Zacatecas) noted that existing climate laws and instruments lack either updated targets or enforcement. As a result, respondents suggested setting measurable goals and building monitoring systems to track progress. Several States (e.g. Baja California Sur) proposed revising climate laws to require periodic updates to emission inventories, plans or programmes, and incorporating compliance mechanisms when progress falls short. To implement these processes, governmental coordination also surfaced as an area for improvement, either through the law creating a lead coordinating body or clarifying inter-agency responsibilities to ensure that strategies are implemented effectively.

### **Lessons from subnational climate framework laws on direction-setting and strategy articulation**

All the reformed subnational laws we reviewed establish an obligation to develop a State climate change strategy (named as either the *Estrategia Estatal de Cambio Climático* or *Programa Estatal de Cambio Climático*). The Executive, and often explicitly the Secretariat of Environment and Natural Resources, is assigned the role of formulating, implementing, coordinating and evaluating the strategy. In some cases, the programme must be also approved by the Inter-secretarial Climate Change Commission, such as in Yucatan and Puebla.

Some of the reviewed subnational laws specify that both a State climate strategy, focused on long-term goals, and a State climate programme, focused on short-term goals, should be prepared (e.g. Puebla; Ciudad de Mexico). Zacatecas's law stands out as the only law that explicitly states that revisions shall in no case undermine previously established targets, which is in line with the principle of progressive ambition under the Paris Agreement. In addition, the laws of Guanajuato and Jalisco hint at this indirectly, stating that target updates may be approved when new national or international commitments are adopted or when new relevant scientific or technological knowledge is developed.

The level of detail provided when strategies are revised, and what the strategy must include, vary across subnational laws. Chiapas's law, for example, is clear that the State strategy must include clear objectives, targets and indicators and that the strategy must be revised regularly. However, Chiapas does not specify the exact timeframe for these updates. Other States, e.g. Zacatecas, provide that the strategy must be revised every six years. Moreover, several State laws, such as those of Guanajuato and Puebla, specify that the subnational climate strategy should align with Mexico's NDC. The lack of explicit references in most cases to the need to align the State climate strategies and programmes to the national ones (and their revisions), presents a governance challenge of achieving consistency of climate action across governance scales, and to ensure that actions across the constituencies add up to fulfilling national objectives.

Seven of the nine subnational laws reviewed included a long-term carbon emission-reduction target. Among these seven, we identified two distinct approaches: four States (Baja California Sur, Mexico City, Quintana Roo and Zacatecas) establish legally-binding goals to achieve carbon neutrality by 2050; and three States (Guanajuato, Jalisco and Puebla) set goals to achieve carbon neutrality or net zero emissions in the long term but do not specify a year.

**Table 3.1. Key provisions in the LGCC on **strategy articulation**, plus feedback and learning from participatory processes and subnational climate framework laws across Mexico**

|                                                                  |                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance function: strategy articulation</b>                | Processes for regular preparation and implementation of strategies to address climate change, which are responsive to the urgency and evolving nature of the transition                                                                                                                                                    |
| <b>Overview of Mexico's General Law on Climate Change (LGCC)</b> | National Climate Change Strategy is prepared by the Ministry of Environment, with participation from INECC, and updated every 10 years for mitigation aspects and every six years for adaptation.                                                                                                                          |
| <b>Key feedback from subnational participatory processes</b>     | Stakeholders called for climate laws to set measurable and ambitious goals, with formal timelines for regular updates, clear roles and responsibilities across State agencies, and compliance mechanisms. They also emphasised the need to align subnational plans with national and international climate commitments.    |
| <b>Lessons from subnational climate framework laws</b>           | All reviewed subnational laws require Mexican States to formulate a State Climate Change Strategy covering both mitigation and adaptation. In most cases, this is updated every six years (often coinciding with a new administration). Guanajuato and Puebla require that climate strategy be aligned with Mexico's NDCs. |

**Table 3.2. Climate targets set in the LGCC and subnational States' climate framework laws**

|                               | <b>Economy-wide mitigation targets</b>                                                                                                                                                                                                                                        |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Mexico (federal level)</b> | 22% greenhouse gas emissions reduction by 2030 compared with 2000 levels; peak national emissions by 2026; 50% emissions reduction by 2050 compared with 2000 levels. The law also set an 'aspirational' emissions reduction target of 30% by 2020 compared with 2000 levels. |
| <b>Baja California Sur</b>    | Carbon neutrality by 2050                                                                                                                                                                                                                                                     |
| <b>Chiapas</b>                | None set in the law                                                                                                                                                                                                                                                           |
| <b>Guanajuato</b>             | Carbon neutrality without a timeframe                                                                                                                                                                                                                                         |
| <b>Jalisco</b>                | Carbon neutrality without a timeframe                                                                                                                                                                                                                                         |
| <b>Mexico City</b>            | Carbon neutrality by 2050                                                                                                                                                                                                                                                     |
| <b>Puebla</b>                 | Carbon neutrality without a timeframe                                                                                                                                                                                                                                         |
| <b>Quintana Roo</b>           | Carbon neutrality by 2050                                                                                                                                                                                                                                                     |
| <b>Yucatan</b>                | None set in the law                                                                                                                                                                                                                                                           |
| <b>Zacatecas</b>              | Carbon neutrality by 2050                                                                                                                                                                                                                                                     |

Unlike many subnational laws, although Mexico's General Law on Climate Change sets interim mitigation targets, certain sectoral targets and a long-term goal of reducing emissions by 50% by 2050 relative to 2000 levels, it does not set a carbon neutrality or net zero objective. It sets a medium-term unconditional goal of reducing emissions by 22% by 2030, which could rise to 36% were a global agreement adopted that includes measures such as an international carbon price, carbon-based tariff adjustments, technical cooperation, access to low-cost financing and technology transfer (see Appendix 2 for details). In the lead-up to the adoption of the General Law, environmental NGOs had advocated strongly for concrete emission reduction targets, while the private sector (particularly the petroleum, steel and energy sectors) had strongly opposed



such objectives (Averchenkova, 2020). Crucially, Mexico's General Law mandates the CICC to revise its mitigation strategy at least every 10 years. It also allows adjustments to the targets when new international commitments are adopted, or relevant scientific or technological advances emerge. Finally, it prohibits reducing ambition from the established targets.

### Insights from Ibero-America on direction-setting and strategy articulation

It is common for climate framework laws in the region to include provisions on strategy articulation. However, some laws include novel provisions, such as special arrangements for strategic oversight and requirements for addressing just transition, which may be useful to draw on. We highlight several examples below:

- **Institutional frameworks – Chile.** In Chile, under Article 18 of the Framework Law on Climate Change (Law 21,455), in addition to the Ministry of the Environment acting as the lead agency to update the long-term climate strategy and coordinating its implementation, the Council of Ministers is mandated to issue a reasoned opinion on the strategy, the NDC and the sectoral mitigation and adaptation plans. This opinion also comments on the coherence between them. The involvement of the Council of Ministers provides an additional level of executive oversight and potentially elevates the importance of the strategy politically. To ensure alignment between the NDC and the strategy, Chile's law also includes a 'fast-track' procedure for amending the strategy, where emissions targets or carbon budgets are updated as part of Chile's NDC submission process.
- **Just transition – Spain and Colombia.** Policies to meet emission-reduction targets will impact economic and social agents differently, including consumers, workers, communities and businesses (Green and Gambhir, 2020), highlighting the importance of designing policies for a just transition. Spain's law recognises the need for the transition to be just, equitable and inclusive. In addition to requiring the development of National Energy and Climate Plans and a 2050 Decarbonisation Strategy, the law requires the Government to prepare a [Just Transition Strategy](#) that is renewed every five years. Colombia's law specifically requires the Ministry of Labour, with the support of the inter-ministerial body (the Inter-Sectoral Commission on Climate Change) to establish a strategy and actions for a just transition of the workforce. These actions should generate training and job opportunities, reducing barriers to accessing green jobs and prioritising the needs of vulnerable groups and regions in transition.
- **Targets and timeframes – Chile, Colombia and Peru.** Chile and Colombia set carbon neutrality targets to 2050, while Chile's law also specifies that the objectives need to be updated every five years to be progressively more ambitious over time, ensuring cost-effectiveness and fairness in the distribution of effort. Peru's law also establishes that its NDCs should include mitigation and adaptation goals, which must grow more ambitious over time and align with national and regional climate strategies. Colombia sets a target of reaching zero net deforestation of natural forest by 2030 using policy tools and cooperative or market-based measures. Its law also includes adaptation targets. Although there is no specified time-interval to update the overall Implementation and Monitoring Plan (actions towards meeting the country's carbon neutrality and climate resilience goals), the law specifies that every two years, the Inter-Sectoral Commission on Climate Change will be informed of the status of compliance with the Plan, and with the NDC. The Commission may then provide guidance for adopting new measures.

**Table 3.3. Climate framework laws across Ibero-America with climate neutrality targets**

| Country  | Economy-wide mitigation targets                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chile    | Climate neutrality by 2050                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Colombia | Climate neutrality by 2050                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Portugal | Climate neutrality by 2050<br>Intermediate targets (excluding land use and forestry): <ul style="list-style-type: none"> <li>o 55% reduction of GHG emissions by 2030 compared with 2005 levels</li> <li>o 65–75% reduction of GHG emissions by 2030 compared with 2005 levels</li> <li>o 90% reduction of GHG emissions by 2030 compared with 2005 levels</li> </ul> <i>Note: Also sets a sectoral land use and forestry target of net removal of at least 13 megatons between 2045 and 2050.</i> |
| Spain    | Climate neutrality by 2050<br>23% reduction of GHG emissions by 2030 compared with 1990 levels<br><i>Note: The emission reduction goal enshrined in the law has been updated to 32% reduction by 2030 vs. 1990 in the NECP-2023 alongside an update to other targets. See: <a href="http://www.miteco.gob.es/es/energia/estrategia-normativa/pniec-23-30.html">www.miteco.gob.es/es/energia/estrategia-normativa/pniec-23-30.html</a></i>                                                          |

### Lessons from research on the impact of climate framework laws for direction-setting and strategy articulation

As shown above, provisions establishing processes for strategy articulation are common features in climate framework legislation. However, variation exists in the level of detail, particularly around timeframes for revision and publication. This has implications for implementation in practice.

A study on the impact of climate laws in Ireland and New Zealand found setting regular timetables for the preparation and implementation of plans is crucial to strengthening the whole-of-government approach to climate action. It can also facilitate better coordination, as Ministries have prescribed and regular deadlines to work towards (Averchenkova et al., 2024a). This is also important for accountability, as delays to the publication of medium- and long-term plans may become excuses to delay policy action in the short term. Laws that include time periods (e.g. number of months) within which the plans need to be finalised after the emission-reduction targets or carbon budget levels are agreed may mitigate such risk (ibid.). Ensuring that there are complementary, more frequent, reports that provide progress updates on the implementation of the medium- to long-term strategy (as in Colombia, for example) provides time to course-correct and adopt additional measures.

Long-term and short-term emission-reduction targets, carbon budgets and sectoral targets were seen as being among the most impactful legislative elements in a study of Ireland, New Zealand, Germany and the UK (Averchenkova et al., 2024a; and Averchenkova et al., 2021a). In Ireland, the introduction of such targets impacted on coordination, political debate and accountability. In New Zealand, the introduction of long-term (2050) targets in 2019 was noted as creating a step change in levels of engagement with climate action across government. In the UK, a combination of long-term targets (the 2050 objectives) and medium-term carbon budgets that are set 12 years ahead of time has strengthened policy certainty.

**Direction-setting and strategy articulation in Mexico's LGCC could be strengthened by introducing a legally-binding climate neutrality target and defining intermediate targets compatible with this trajectory. Strategy planning processes could be aligned with five-year NDC cycles and more explicitly integrated just transition considerations. Reforms to national and subnational climate laws should consider introducing and/or strengthening provisions**

requiring consistency between short- and long-term planning instruments such as climate change strategies and programmes within and between the national and State levels.

## **Coordination and integration**

Coordination and integration are distinct but highly related climate governance challenges. Coordination consists of ensuring planning and implementation of climate change responses are aligned and coordinated across sectors (horizontally) and between levels of government (vertically). Integration consists of mainstreaming climate considerations into the daily consciousness and decision-making of public actors.

### **Coordination and integration in the General Law on Climate Change**

The subnational approach is reflective of the structure created at the national level. The law creates the national Inter-Secretarial Commission for Climate Change (CICCC) and the National Climate Change System (SINACC), both serving as permanent mechanisms for horizontal and vertical coordination. It also requires each participating Ministry to designate an administrative unit to be responsible for coordination.

On horizontal integration, the law requires that federated entities incorporate mitigation and adaptation criteria into their environmental policy instruments. For some sectors, including energy, transport, agriculture and industry, the law also specifies concrete emission-reduction policies.

Similarly, the law requires States and municipalities to implement measures on water and sanitation, urban planning, environmental protection, civil protection, waste management and sustainable public transport. However, the law does not explicitly require public authorities to align their decisions with national climate targets or strategies.

### **Key feedback from subnational participatory processes on coordination and integration**

Across the participatory processes, stakeholders consistently highlighted that horizontal coordination is essential for effective climate governance. They reported persistent fragmentation (e.g. in Jalisco), and overlapping sectoral mandates (e.g. in Guanajuato), with some noting that agencies operate in silos or duplicate the efforts of others. They repeatedly called for clear institutional frameworks and formalised collaboration mechanisms across sectors. Citizens from many States also proposed strengthening or establishing cross-sectoral climate commissions and working groups to align strategies and share information, for example on methodologies for target-setting. In Quintana Roo, stakeholders also highlighted regional cooperation as an area for improvement, particularly across the States of the Yucatán Peninsula (Campeche, Quintana Roo and Yucatán), which share many climate challenges.

On sectoral integration, stakeholders urged States to link climate laws to urban planning (infrastructure), land use, transport, energy, water and forestry regulations. They recommended 'transversal' approaches so that each sector's planning processes account for climate impacts. For example, in the Quintana Roo workshop, public servants recommended incorporating climate change within the State Environmental Education Plan, including tools like ecological zoning plans and urban development programmes. In Yucatan, stakeholders recommended working with industry to ensure that government bodies 'internalise' climate mandates. For example, public institutions could incorporate climate change into their procurement negotiations.

In all States, stakeholders emphasised that local governments often lack institutional capacity, legal mandate or dedicated financial resources to implement climate measures, despite the role of municipalities being crucial to combat climate change. They recommended building technical support and giving municipalities clear powers to act. In Zacatecas one suggestion was to strengthen the State environmental prosecutor's office so that it could act as a coordinator between the Environment Secretariat and municipalities.

## Lessons from across subnational climate framework laws on coordination and integration

All reviewed laws establish an **Inter-Secretarial Commission on Climate Change**, bringing together different sectoral Ministries in a permanent coordination forum. Their duties include facilitating inter-ministerial collaboration, integrating climate considerations into sectoral planning and ensuring the consistent execution of the State's climate strategy. In Quintana Roo, this mechanism goes further by inviting representatives from municipalities, the State legislature and public institutions to participate alongside government secretariats.

In terms of sectoral integration, several laws have strengthened sectoral mandates by explicitly **assigning climate responsibilities** across government departments. Yucatán's law, for example, delineates tasks for Health, Agriculture, Energy and other Ministries, holding each accountable for integrating mitigation and adaptation into their programmes. Chiapas builds on this idea by requiring every State agency and municipality to embed climate policies into their development plans and programmes, ensuring that climate change is addressed beyond the Environment Secretary.

To enhance **vertical coordination** and the emergency response to climate disasters, Baja California Sur and Chiapas each establishes a State System on Climate Emergencies. In Chiapas, the law also explicitly authorises neighbouring municipalities to form inter-municipal alliances for regional climate initiatives (*Juntas Intermunicipales*). Yucatán, Zacatecas and Guanajuato also stand out for enabling the creation of coordination agreements (*convenios de coordinación*) to operationalise collaboration between the State and municipalities. In Guanajuato, these agreements can provide mechanisms to support subnational bodies. Quintana Roo also provides support to municipalities by establishing a municipal climate fund.

**Table 3.4. Key provisions in the LGCC on horizontal coordination and integration, plus feedback and learning from participatory processes and subnational climate framework laws across Mexico**

|                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance function: horizontal coordination and integration</b> | Processes for coordination across sectors, and mechanisms to bring climate considerations into the daily consciousness and decision-making of public actors in traditionally non-climate sectors                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Overview of Mexico's General Law on Climate Change (LGCC)</b>    | <p>Established the Inter-Secretarial Commission on Climate Change (CICC), a high-level body chaired by the President and composed of 15 federal Ministries to approve the national strategy, oversee the NDC, integrate climate policy across sectors and publish an annual progress report.</p> <p>The law integrates climate change considerations into some sectors, e.g. it calls for the use of climate risk data to inform urban development plans and land-use regulations.</p>                                                                                                                                                                              |
| <b>Key feedback from subnational participatory processes</b>        | <p>Some stakeholders noted that public agencies still operate in silos or duplicate efforts despite existing plans. Similarly, State stakeholders suggested multi-sector working groups to align and share information.</p> <p>Stakeholders urged linking of climate laws with planning, land use, transport, energy, water and forestry regulations. They recommended 'transversal' approaches so that each sector's planning accounts for climate impacts.</p>                                                                                                                                                                                                    |
| <b>Lessons from subnational climate framework laws</b>              | <p>Each of the State laws creates an Inter-Secretarial Commission on Climate Change, typically led by the Governor or Environment Secretary. Some Commissions are broader in scope, e.g. Quintana Roo's law also invites representatives of municipalities and the State legislature.</p> <p>States including Puebla and Yucatan specify that the State Climate Change Programme is binding for all government agencies, meaning every department must comply with the climate strategy's provisions in their own plans and budgets. Yucatán's law explicitly assigns climate change obligations to each sectoral Ministry (Health, Agriculture, Energy, etc.).</p> |

The reviewed laws also frequently reference vertical integration. Most laws obligate municipal authorities to design, lead and monitor their own climate action plans in alignment with State and national policies. For example, Zacatecas's law requires that local policies include specific objectives, projects and indicators aligned with its State Programme. Chiapas takes this alignment further by requiring that municipalities' local Climate Action Programme (PAMACC) also fulfils national and international commitments.

**Table 3.5. Key provisions in the LGCC on vertical coordination and integration, plus key feedback and learning from participatory processes and subnational climate framework laws across Mexico**

|                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance function: vertical coordination and integration</b> | Processes for coordination between national, subnational and/or local actors, and mechanisms to bring climate considerations into the daily consciousness and decision-making of local public actors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Overview of Mexico's General Law on Climate Change (LGCC)</b>  | <p>The National Climate Change System (SINACC) was created to coordinate efforts across the federation, States and municipalities. The law also enables the Government to enter into cooperation agreements with States, which may include financial contributions. The SINACC has representation from each State and one representative from every municipality.</p> <p>Local authorities are required to integrate climate criteria into water supply and sanitation services, urban development and land-use plans, municipal waste management, and public transport, among other areas.</p>                                                                                                                                                                                                                                                                   |
| <b>Key feedback from subnational participatory processes</b>      | <p>Stakeholders felt that local governments often lack capacity, legal mandate or resources to implement climate action. They also suggested forming inter-municipal and regional bodies to coordinate local action.</p> <p>They called for clarification of municipal roles, and recommended that municipal governments develop local climate regulations, especially for land use, and participate in inter-municipal committees.</p>                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Lessons from subnational climate framework laws</b>            | <p>Guanajuato's law empowers the State to use coordination agreements to provide technical and financial assistance to municipalities, helping them carry out actions that meet the State Climate Change Programme's goals.</p> <p>Quintana Roo's law explicitly includes municipal mayors in the State Climate Change Commission and Climate Council, to give local authorities a direct role in State-level decision-making. Chiapas's law allows neighbouring municipalities to form inter-municipal alliances for climate action, encouraging regional cooperation.</p> <p>Most State laws oblige local governments to develop and align Municipal Climate Action Plans with the State's strategy and goals. Jalisco's law requires that the State Climate Change Programme is incorporated into municipal urban development plans and land-use planning.</p> |

### Insights from Ibero-America on coordination and integration

- **Whole-of-government approach – Spain.** The Climate Change Law in Spain provides enabling conditions to operationalise a whole-of-government approach to climate action and places just transition at its core (see Box 3.1). Spain's law clarifies that it works with other sectoral laws to operationalise horizontal (sectoral) integration. For example, Law 50/1997 is modified by the Climate Change Law (*Disposición final quinta*) in that since the law was published, all regulations must include climate change in their impact analysis report. Similarly, Article 31 of the Climate Change Law indicates that all climate-relevant public procurement shall include environmental and sustainable energy criteria, which will be made public in the terms of reference of public tenders.
- **Integration of climate concerns – Peru and Colombia.** To ensure integration of climate concerns into the decision-making of the public sector, Peru's law requires all Ministries to incorporate mitigation and adaptation measures into their sector plans, institutional strategic

plans, operational plans, budget programmes and management instruments. In Colombia, Law no. 1931 requires sectoral Ministries to not only formulate and implement the Sectoral Comprehensive Climate Change Management Plans, and ensure sectoral emission-reduction and adaptation goals are met but also to report annually to Congress on implementation. The law (Article 23) also requires that formulation of any public investment projects must integrate climate change considerations.

- **Support to regional authorities – Chile.** To enhance capacity and technical support to regional authorities, Chile's law establishes Regional Environmental Secretariats (SEREMIs) which act as regional arms of the national Ministry of the Environment. The Secretariats must advise regional government on incorporating environmental criteria into the preparation of Regional Development Plans and collaborate with respective municipalities on environmental management. The law also creates Regional Committees for Climate Change (CORECC) whose main function is to coordinate the preparation of instruments for climate change management at the regional and local level and to identify synergies with national policies.

### **Box 3.1. Mainstreaming just transition into national climate change legislation and policymaking**

Decisions made about how we address climate change have justice and human rights implications. Climate policies will affect a range of stakeholders, including consumers, workers, especially affected communities and businesses (Green and Gambhir, 2020). Without proactive planning, the pathway to a low-carbon and resilient economy carries disproportionate impacts for those already most vulnerable to the impacts of climate change (Schipper et al., 2022). The importance of a 'just transition' has gained momentum at the international and domestic level in response to this challenge. At the international level, its meaning has evolved from simply minimising the impacts on workers (as first set out in the Paris Agreement) into considering a wide range of affected stakeholders.

Last year, the UNFCCC found that 34% of State parties plan to address social and economic impacts in their overall NDC implementation (UNFCCC, 2024). Several developing and emerging economies (e.g. South Africa, Indonesia, Vietnam and Senegal) are also involved in multilateral agreements with advanced economies, known as Just Energy Transition Partnerships (JETPs) to facilitate climate finance and technical assistance and accelerate implementation of just decarbonisation efforts. Similarly, some countries are setting up country climate and development platforms that set out a strategic vision and priorities for climate action, and aim to bring together different sources of finance at the country level to invest in economy-wide transformations (Robinson and Olver, 2025).

However, despite the just transition gaining momentum in international climate negotiations, there remains an implementation gap in domestic laws and policies (Chan et al., 2024). Affected groups are not homogenous and require tailored policy interventions, accounting for contextual demographic characteristics and development priorities (ibid.). To secure public support and buy-in for the transition, policymakers first need to understand where and how injustices exist and may be exacerbated (Savaresi et al., 2024).

Enshrining just transition into climate framework laws is one way to operationalise the concept in practice (Johansson, 2025). For example, Spain's law establishes key strategy articulation and horizontal coordination functions. Article 27 of Spain's climate framework law indicates that a Just Transition Strategy (JTS) will be adopted by the Government every five years via an agreement by the Council of Ministers, in accordance with a joint proposal made by the Ministry for Ecological Transition and the Demographic Challenge (MITECO), the Ministry of Labour and Social Economy, the Ministry of Industry, Trade and Tourism, the Ministry of Agriculture, Fisheries and Food, the Ministry of Transport, Mobility and Urban Agenda and the Ministry of Science and Innovation, with regional governments and civil society participating in the process. The law also facilitates the creation of 'just transition agreements', which are co-governance tools engaging national, regional and local stakeholders to develop economic opportunities for regions in transition.



## Lessons from research on the impact of climate framework laws for coordination and integration

Giving public bodies a **clear mandate** to operate in a way that is aligned not only with climate goals but also with specific climate plans and policies can have positive benefits for climate action (Averchenkova et al., 2024a, 2024b). A 2024 study of Ireland's regulatory framework found that strong legally binding language requiring decisions by public bodies to be 'consistent with' the climate action plan was associated with impacts on strengthening accountability and engagement from key sectors (Averchenkova et al., 2024a). In contrast, a study of Mexico's General Law on Climate Change found that the law does not set sufficiently clear mandates or implementation guidelines for responsible government institutions – contributing to a gap between what is set out in the law and actual policy processes (Averchenkova and Guzman, 2018). Research on climate policy integration in Mexico based on an empirical evaluation of the functioning of coordination mechanisms has also highlighted an uneven interest from Mexican States towards SINACC participation: the majority of States show insufficient interest and commitment, failing to attend meetings and delegating attendance to lower ranks of government (Solorio, 2021). A central issue is SINACC's lack of authority and the perception that it is more a forum for exchanging views (ibid.). This research concluded that there is a need for greater policy integration, vertically and horizontally, and to reform the functioning and mandates of both the CICC and the SINACC, through improving precision and removing ambiguities in the LGCC's mandates on coordination, policy development and implementation (ibid.).

Climate legislation, as a signal of legal and policy certainty, can also drive budget decisions and increase resourcing. A case study of New Zealand found that new legal obligations on Ministers contributed to the expansion of public departments in the Ministry of Environment and the Ministry of Transport (Averchenkova et al., 2024a). However, although the addition of legal responsibilities on local authorities (e.g. the need to prepare a climate adaptation plan) can provide justification for the need to increase budget allocations to initially build out teams, continued support from national government is crucial to retaining expertise and improving internal capacity in the long term (ibid.).

**Coordination and integration in Mexico's LGCC could be strengthened by requiring all public authorities to ensure that their decisions are consistent with national targets and strategies and by introducing more regular reporting requirements. Support should be provided to subnational and local authorities to implement these new obligations. The mandates of both the CICC and SINACC could also be strengthened, including through strengthening the role of subnational authorities.**

## Expert advice

Expert advice is a governance function that encompasses knowledge production, assessment and sharing in the process of developing, implementing and evaluating the climate change response. Expert advice provides enabling conditions for climate policymaking to be evidence-based, informed by scientific knowledge. This governance function can overlap with stakeholder engagement, as part of soliciting expert advice involves consultation and deliberation.

### Expert advice in the General Law on Climate Change

The national law strengthens the scientific role in national climate policy by formally charging the National Institute of Ecology and Climate Change (INECC) with drafting strategies, plans and NDCs. It also establishes an Evaluation Coordination body, led by INECC's head and advisors (from academia, industry and research), to oversee the evaluation of national climate policy; this body also includes external experts. The national law also permits evaluations by independent bodies like universities or research centres. Evaluation coordination is the process of evaluating the effectiveness and impact of the national climate change policy – see further in the section on



‘Accountability’ below. The Government is required to take these evaluations into account when revising the national strategy. However, it is not obliged to respond to the advice provided.

As mentioned under ‘Direction-setting and strategy articulation’, the law also established the Council, which acts as a permanent advisory body to the CICC, composed of climate change experts from the social, private and academic sectors. In 2023–2024 reforms to the Statute of the INECC added new sections that strengthen functions related to transparency and institutional coordination. Notably, the INECC now has the explicit authority to prepare, update, publish and disseminate the National Atlas of Climate Change Vulnerability; and to coordinate implementation of the Evaluation Coordination agreements, including coordination with the key departments and entities at the three levels of government with the social, academic and private sector, to ensure compliance with the agreements and recommendations issued.

### Key feedback from subnational participatory processes on expert advice

In general, stakeholders called for strengthening collaboration between government, academia, the private sector and civil society, to collectively share knowledge and assess effectiveness of climate policy. Specific examples were given in Yucatán, where stakeholders called for academic involvement in the implementation of climate projects, while in Chiapas there were calls to make the granting of responsibility to universities explicit in climate legislation.

### Lessons from subnational climate framework laws on expert advice

Two subnational laws, in Puebla and Jalisco, have created formal expert advisory bodies to strengthen climate governance. The core function of these institutions is to advise on the design of the States’ climate strategies, review proposed policies and evaluate progress against targets. Most laws establish that climate plans be developed ‘with the advice of’ these bodies, though none require the Government to formally respond or implement their recommendations.

The type of advisory body varies across subnational law. For example, Puebla and Jalisco mandate the creation of multi-stakeholder Technical or Scientific Committees. These committees must include representatives from educational institutions or academia with proven expertise in climate change. Other Mexican States incorporate expertise within more general civic forums: Quintana Roo, Baja California Sur, Yucatán and Chiapas bring academic experts directly into their Citizen Councils, blending scientific insight with community voices.

**Table 3.6. Key provisions in the LGCC on expert advice, plus feedback and learning from participatory processes and subnational climate framework laws across Mexico**

|                                                                  |                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance function: expert advice</b>                        | Processes for knowledge production, assessment and sharing on climate change, to ensure that policymaking is informed by scientific knowledge and credible expert advice                                                                                                                                                   |
| <b>Overview of Mexico’s General Law on Climate Change (LGCC)</b> | Assigns the National Institute of Ecology and Climate Change (INECC) a key role in developing climate strategies, plans and NDCs. The law permits independent bodies like universities to provide evaluations of national climate policy.                                                                                  |
| <b>Key feedback from subnational participatory processes</b>     | Several participatory processes called for the strengthening of knowledge-sharing. Yucatán’s participatory processes emphasised the importance of fostering collaboration between municipal governments and academia in managing climate-related projects.                                                                 |
| <b>Lessons from subnational climate framework laws</b>           | Most State laws require that climate plans be developed ‘with the advice of’ expert councils. Puebla’s and Jalisco’s laws mandate dedicated scientific advisory committees, while other States include academic experts in Citizen Climate Councils or allow the Inter-Secretarial Commission to consult external experts. |

## Insights from Ibero-America on expert advice

- **Government response to advice – Argentina and Spain.** Several laws create independent expert committees or councils and include a requirement for the Government to respond to the advice. Argentina's law requires the National Climate Change Cabinet to explain how it considered the Advisory Council's recommendations or to justify any decision not to adopt them. Similarly, Spain's law mandates the creation of an expert advisory committee to evaluate and make recommendations regarding climate policies, measures and regulations. Spain's Expert Committee on Climate Change and Energy Transition is mandated to produce an annual report to which the Government must respond (and which will be debated in Parliament). The law requires the Government to respond to the expert committee 15 days before the debate in Parliament. However, to date the expert advisory committee has not been formalised.
- **Independence of advice – Chile.** A requirement for expert advice to be independent is incorporated into the law of Chile, which creates a Scientific Advisory Committee on Climate Change to inform policy development and the setting of goals and targets, and to contribute to goal setting and performance evaluation. The law sets strict conditions for the independence and impartiality of committee members to ensure that the members do not have conflicts of interest, requiring them to file a declaration of assets and interests and to recuse themselves from deliberations where conflicts exist.

## Lessons from research on the impact of climate framework laws on expert advice

Independent advisory bodies, tasked with either proposing carbon budgets, undertaking assessments of policies and/or conducting independent reviews of progress, were cited as being among the most important institutions created by the legislation across country case studies on the impact of climate laws. Independent climate change advisory bodies are crucial knowledge brokers that contribute to more evidence-based and ambitious policymaking on climate change (Averchenkova et al., 2021a; 2021b). They can provide depoliticised and timely information to policymakers, to push for more ambitious yet fair action. A review of parliamentary records from 2008 to 2018 in the UK, for example, found that the Climate Change Committee's recommendations have been widely used by politicians across the political spectrum (Averchenkova et al., 2021b).

Requirements on reporting, assessment and review, such as annual government progress reports on emissions in Germany and Ireland, and the requirements for an assessment of progress by independent advisory bodies, were seen by policy stakeholders in those countries as critical to increasing transparency for climate action (Averchenkova et al., 2024a). In New Zealand, in the absence of an obligation for the Government to prepare its own report on progress, the requirement to respond to the assessment of progress made by the Climate Change Commission prevents such reports from simply being ignored and is therefore crucial for accountability (ibid.).

Previous studies have shown that there are several factors that determine the relative success of independent advisory bodies, including a clear and comprehensive mandate, composition and membership, to ensure a high level of expertise and independence, provisions for the executive branch to formally respond to the advice given, and predictable funding and parliamentary oversight (Averchenkova, 2019).

**Expert advice and knowledge production in Mexico's LGCC could be strengthened by requiring government to consider independent advice at key stages of the policymaking process, and in particular, introducing a requirement for government to respond to such advice.**

## Stakeholder consultation and engagement

This governance function encompasses the need for inclusive climate action, with thorough processes that consult, engage and incorporate a plurality of voices and perspectives into planning and implementation of climate policy.

### Stakeholder consultation in the General Law on Climate Change

The national law refers to the responsibilities of government to establish procedures for holding public consultations when formulating the national strategy and programme. However, it does not establish a specific institution for this ongoing process, nor a requirement to respond to the consultation. The Council, as the advisory body to the CICC, is mentioned as having a mandate to promote public participation but it is not explicitly charged with leading public consultations.

### Key feedback from subnational participatory processes on stakeholder consultation

Across States, a clear theme was the call for inclusive and participatory climate governance. Multiple stakeholders supported the formation of formal participation mechanisms (e.g. citizens' councils, observatories and forums) that bring together diverse groups, including marginalised and vulnerable communities (Indigenous peoples, women and youth), civil society, academia and the private sector, in planning and decision-making. Stakeholders in Quintana Roo, Yucatán, Jalisco and Guanajuato highlighted the particular importance of involving Indigenous communities in decision-making, with those in Quintana Roo stressing their right to self-determination over their territories. Education and awareness-raising were universally highlighted as vital: respondents pointed to the need for environmental/climate literacy in schools, public campaigns and accessible information platforms (digital tools, community workshops) to engage the broader population and build a 'local climate culture'. Stakeholders in Baja California Sur recommended incentivising community organisation at the municipal and state levels, e.g. through campaigns (using traditional media and social networks) to involve people and tourism in conversations about the environment.

### Lessons from subnational climate framework laws on stakeholder consultation

**Table 3.7. Key provisions in the LGCC on stakeholder consultation and engagement, plus feedback and learning from participatory processes and subnational climate framework laws across Mexico**

|                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance function: stakeholder consultation and engagement</b> | Processes to foster inclusive dialogue and deliberation on climate change, to engage and incorporate a plurality of voices and perspectives and build consensus on climate policy                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Overview of Mexico's General Law on Climate Change (LGCC)</b>    | Directs the Government to establish procedures for public consultations when formulating the National Climate Change Strategy. There is no requirement to respond to or incorporate stakeholder inputs.                                                                                                                                                                                                                                                                                                                                                   |
| <b>Key feedback from subnational participatory processes</b>        | Stakeholders supported formal participation mechanisms that bring together diverse stakeholders, including marginalised groups. They also emphasised the need for increased climate literacy in schools and information platforms, to engage the broader population.                                                                                                                                                                                                                                                                                      |
| <b>Lessons from subnational climate framework laws</b>              | Citizens' Councils have been established in Baja California Sur, Chiapas, Guanajuato, Puebla, Quintana Roo and Yucatán. Consultations with Indigenous communities is specified in Chiapas and Puebla.<br><br>Jalisco sets out a comprehensive consultation process: it requires online publication of the draft State Climate Change Programme with at least 20 days for public comment, and a minimum of four public forums held across different regions of the State. The Government is required to issue a written response to each comment received. |

The majority of States have a specific institution for stakeholder consultation, known as *Consejo Ciudadano* (Citizens' Councils). However, from the reviewed laws, only Jalisco includes detailed requirements for authorities to respond to stakeholder input. Quintana Roo and Puebla mention the need to consider and respond to public input but there is a lack of clarity on what this involves in practice. Jalisco's law, on the contrary, specifies that after public consultations on State Climate Change Programmes, authorities have 60 days to review and respond to feedback, explaining whether it was incorporated and why. At least four in-person forums to seek stakeholder feedback must then be held, one in the State capital and at least three in other regions. Finally, authorities have 40 days to integrate accepted contributions into the final version of the programme.

### Insights from Ibero-America on stakeholder consultation

- **Legal requirement for stakeholder consultation and public participation.** Many countries have this requirement at key stages of policy development, including:
  - In **Peru** the law explicitly emphasises the importance of participatory climate governance at all levels and establishes the National Climate Change Commission as a permanent forum for civil society and government to monitor policy implementation and make recommendations.
  - In **Colombia** the National Council on Climate Change combines the functions of expert advice and stakeholder consultation. As a permanent advisory body to the Intersectoral Commission on Climate Change its purpose is also to ensure articulation between the Government and business associations, civil society and academia.
  - **Spain's** law recognises that legal protections for public participation may also exist outside of the climate framework law. It specifies that engagement should be conducted in accordance with the law regarding access to information and justice, and with public participation (Ley 27/2006).
- **Government response – Chile and Spain.** An explicit requirement for the Government to respond to stakeholder input is included in Chile's Climate Change Law, which creates a National System of Access to Information and Citizen Participation on Climate Change, to facilitate public involvement in preparing, updating and tracking climate management instruments. Under Article 34, the law states that participation must include mechanisms to make observations and obtain a reasoned response to them, considering criteria of legal feasibility, technical relevance and timing. Such a requirement is important for strengthening transparency, trust and accountability. Although Spain's law does not contain a requirement for the Government to respond to the input received during the stakeholder consultation process, the report and recommendations developed by [Spain's Citizen Assembly \(CA\)](#) held in 2021–2022 were discussed in Parliament and delivered to the Prime Minister, as stated in the [Ministerial Decree](#) that established Spain's CA.
- **Indigenous input – Peru.** Some laws explicitly recognise that Indigenous knowledge and perspectives must also be integrated into climate policy. For example, the implementing decree of Peru's framework law mandates that Indigenous knowledge, customs and practices be respected and incorporated into all stages of climate governance: formulation, implementation, monitoring and evaluation. This links strongly to the function on expert advice (discussed above), as Indigenous communities, and their knowledge and practices, have long been key custodians of natural resources.

### Lessons from research on the impact of climate framework laws on stakeholder consultation

Transforming better public awareness into greater support for climate action requires enhanced public participation. Previous research has highlighted that participatory processes need to engage citizens from an early stage in policy design, and before a decision on the course of action has been determined (Averchenkova et al., 2024a). An aspect that is not often emphasised in

climate framework laws is that policies should be accompanied upfront by strong communication strategies and plans (and budgets) for outreach and education campaigns (ibid.).

The Irish framework law has enabled public engagement at the subnational level, around the preparation of local authority climate action plans mandated under the law. When developing these plans, local authorities must engage with the public through the Public Participation Networks that are comprised of different members of business, society and community groups. Local authorities must also publicise their planning process via local media, publish draft plans and invite feedback from the public via open submissions, and then respond to that feedback (Averchenkova et al., 2024a).

Peru conducted an extensive public participation process when developing a regulation operationalising its Climate Change Law, which has led to several improvements in the design of the regulation (Averchenkova, 2025). It led to the creation of a national Indigenous Peoples' Platform against Climate Change and enabled Indigenous communities to participate in the National Climate Change Commission, institutionalising their role in climate governance. It also modified the National Commission on Climate Change to strengthen voting power for civil society, empowering civil society to influence the policy agenda. The regulation acknowledged ancestral wisdom as a valid form of knowledge alongside academic research, an idea advocated by civil society.

**Stakeholder consultation and engagement in Mexico's LGCC could be strengthened by introducing a requirement for the Government to respond to stakeholder input and ensuring that Indigenous knowledge and perspectives are integral to policy development. Specifically, it could be useful to consider whether the CICC's mandate could be expanded to include an explicit requirement to conduct public participation and consultation processes.**

## **Finance**

**This governance function refers to creating the enabling conditions to mobilise, allocate and disburse financial flows to climate action.**

### **Finance in the General Law on Climate Change**

The national climate law originally created a federal Climate Change Fund but this provision was repealed in 2020. The law retains provisions outlining where funding may be sourced, including from the federal budget, donations, international contributions and revenues from emissions reductions. Articles 91–93 explicitly state that the federation should design, develop and implement economic instruments that encourage the achievement of the objectives of the national climate change policy. It also specifies that resources should be allocated to mitigation, adaptation, renewable energy, education, research and other 'strategic' climate projects. However, there is no costing exercise built into the law.

### **Key feedback from subnational participatory processes on finance**

Across the States, stakeholders repeatedly recognised the need to mobilise more funding, both domestic and international, to meet ambitious climate goals. Proposals including diversifying types of funding sources, e.g. tapping into private investment, using public–private partnerships and issuing green bonds. Some stakeholders also referred to newer and innovative financial instruments: e.g. carbon and hydrological bonds and parametric insurance (a type of insurance that covers the likelihood of a loss-causing event such as a flood).

Stakeholders also frequently mentioned pricing and fiscal instruments. A carbon tax was proposed in multiple regions (e.g. Puebla, Jalisco, Guanajuato, Zacatecas and Yucatan) as a tool to both raise revenue and internalise climate costs. Similarly, environmental taxes or fees (on pollution, resource use or tourism) were suggested to fund mitigation and adaptation projects. Expert interviewees noted that effective tax or pricing schemes require clear legal frameworks and transparency. There were also calls from stakeholders to remove fossil fuel subsidies in many States.

Another common theme that emerged from participatory process related to mainstreaming climate change in budget decisions and building institutional capacity to implement these decisions. Several States recommended mandatory climate budget lines within agencies or increased municipal ecology budgets (e.g. Jalisco and Yucatán). Similarly, stakeholders were in favour of creating or strengthening administrative units to manage climate funds (national and international) and coordinate finance efforts.

### Lessons from subnational climate framework laws on finance

A majority of the reviewed Mexican subnational laws establish a Climate Change Fund to channel resources into climate action. These funds typically operate as public trusts that collect and disburse climate finance, often with transparency and auditing requirements. They aggregate State budget allocations with other sources (e.g. private investments, federal grants and international climate finance). Baja California Sur contains an explicit provision to integrate climate action into its budgeting process. The law requires that climate change programmes be costed and reflected in the State budget. Article 14.I then outlines how the State must allocate the necessary resources, as provided in the expenditure budget of the corresponding fiscal year, for the implementation of the projects and actions that the State public administration plans for the fulfilment of this law.

The laws also serve as a mandate to empower governments to use economic and market-based instruments to mobilise private finance. All State laws include clauses enabling fiscal incentives. Some go further by specifying market-based mechanisms such as the creation of carbon credits and insurance (Chiapas) and the creation of an emissions trading systems (Puebla, Mexico City). Other states mention alliances with the private sector (Guanajuato) or donations (Zacatecas, Baja California Sur) from individuals and companies as sources of climate finance.

**Table 3.8. Key provisions in the LGCC on finance, plus feedback and learning from participatory processes and subnational climate framework laws across Mexico**

| <b>Governance function: finance</b>                       | Processes to mobilise and align financial flows to climate action                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Overview of Mexico's General Law on Climate Change (LGCC) | Funding mechanisms (e.g. budget allocations, revenue from carbon markets, bonds) are referenced. However, the provision establishing the National Climate Change Fund was repealed in 2020.                                                                                                                                                                                                                                                                                                                           |
| Key feedback from subnational participatory processes     | <p>Across the States, stakeholders consistently recognised the need to mobilise more funding. The proposals emphasised diverse funding sources and innovative financial instruments: leveraging international climate funds, tapping private investment, using public-private partnerships, issuing green bonds, carbon and hydrological bonds and parametric insurance.</p> <p>Several States recommended mandatory climate budget lines within agencies or increased municipal ecology budgets.</p>                 |
| Lessons from subnational climate framework laws           | <p>Many of the State laws created dedicated climate change funds, operating as public trusts with mandated transparency and audits, pooling State budget money with private sector contributions, federal grants and/or international climate finance.</p> <p>Baja California Sur's law explicitly requires climate measures be integrated into the budgeting process. The law mandates that the state climate programmes are costed and reflected in the annual budget, guaranteeing funding for implementation.</p> |

### Insights from Ibero-America on finance

- **Minimum budget requirements – Colombia and Spain.** Some laws allocate minimum budget requirements for climate action.



- Colombia's law specifies that 50% of carbon tax revenues must go to climate measures (e.g. erosion control, forest protection and climate change mitigation).
- Spain's law specified that part of the National Budget (a percentage equal to that allocated in the Multiannual Financial Framework of the European Union), must have a positive impact in terms of climate change, although devolved administrations and expenditures that are not relevant to climate (e.g. civil servant salaries, pensions, unemployment benefits, public debt services) are not subject to that requirement. Under the law, the Ministry for Ecological Transition and the Demographic Challenge (MITECO) and the Ministry of Finance (the Treasury) was expected to ratchet up this percentage before 2025. This update is currently expected to materialise when the upcoming Multiannual Financial Framework (2028–2034) is adopted. The exact amount that will be allocated to implement the law will be determined annually in the National Budget. References are also made in the Spanish climate law regarding the allocation of finance (National Budget and the revenues from the Emissions Trading System), which are to contribute to energy and climate goals.
- **Funding priorities – Peru.** In Peru, the law defines that priority funding must target vulnerable populations, including women and Indigenous peoples.
- **Financing strategy requirements – Chile.** Some laws impose requirements for financing strategies and introduce fiscal tools and budgetary management practices. In Chile, the law establishes a requirement to produce a Climate Change Financial Strategy to steer public and private contributions towards the transition. It is stipulated that this strategy should include a methodology that sectoral authorities must follow to identify sources of financing for each climate change management instrument. The law also incentivises innovative economic tools such as green taxes and sovereign bonds and required municipalities to prepare climate change adaptation and mitigation plans linked to financial tracking by 2025, with fines for non-compliance.

### **Lessons from research on the impact of climate framework laws on finance**

The law is not a panacea and it can be difficult to disaggregate the impacts of law on spending for climate action. However, in Germany, Ireland and New Zealand, interviewees close to climate policy said that more financial resources were being committed to climate change, including through the creation of new funds and changes to the fiscal system, which were motivated by and closely linked to the need to implement climate legislation (Averchenkova et al., 2024b). As one public sector interviewee in New Zealand said, because of the Climate Change Response (Zero Carbon) Amendment Act 2019, “a lot more was required of government or a lot more expected from the civil service, and so a lot more funding ... was delivered to them” (ibid.).

Chile's Framework Law on Climate Change has effectively embedded climate finance into policymaking, engaging the Ministry of Finance in shaping climate policies. The law has strengthened financial coordination, led to the development of the country's first Environmentally Sustainable Finance Strategy and fostered a shared understanding of climate-related financial and developmental impacts (Averchenkova, 2025).

Additional requirements to prepare and implement climate change-related strategies and plans imposed by climate change laws on subnational and municipal authorities create additional financial needs and should be accompanied by clear financial mechanisms and technical support to ensure they can be implemented (ibid.).

**Enabling conditions for finance in Mexico's LGCC could be strengthened by introducing a requirement to develop and regularly update a financial strategy and facilitate budgetary processes for sectoral Ministries and subnational governments, as well as considering provisions for facilitating climate-related lending and technical assistance from national and international programmes to States and municipalities.**



## Accountability

This governance function encompasses political and legal accountability, oversight, transparency and enforcement in relation to the implementation of climate action.

### Accountability in the General Law on Climate Change

At the national level, the central accountability mechanism addressing progress on climate action is the 'Evaluation Coordination' body. Under Article 98, the National Climate Change Policy is assessed every two years. In collaboration with the Council of Ministers, the Inter-Secretarial Commission, and the National Institute of Statistics and Geography, the Evaluation Coordination body develops the guidelines, criteria and indicators that guide how the Policy is evaluated (under Article 100). The results of these evaluations must be used to create, review or update the National Climate Change Strategy and Programme and can also be adopted by States and municipalities in their own plans. Additionally, the results must be submitted to both chambers of Congress. However, only one evaluation has been conducted to date, in 2017, focused on evaluating the 2014–2018 strategy (Coordinación de Evaluación, 2017).

### Key feedback from subnational participatory processes on accountability

Across all regions, many stakeholders called for clearly defined oversight: for example, establishing or empowering dedicated agencies or independent bodies to monitor implementation and enforce laws. There was a repeated recommendation to strengthen enforcement mechanisms – especially by embedding clear sanctions and compliance checks into law. Stakeholders noted that without effective inspection and penalties, even well-designed laws will remain 'under-implemented'. In Jalisco's participatory process, stakeholders referred specifically to how key accountability institutions (e.g. a public data system and State Climate Institute) were not included in the final version, contributing to a lack of systematic monitoring of the State climate programme. In Baja California Sur, information systems emerged as a popular topic to strengthen transparency. For example, stakeholders suggested creating a State-wide climate data platform with monitoring stations to generate indicators and track progress on climate plans. Interviewees were also in favour of creating an Environmental Protection Prosecutor's Office, strengthening the Consultative Committee by law, and setting up community monitoring committees to raise awareness.

### Lessons from subnational climate framework laws on accountability

Most States require Environment Ministries or climate commissions to regularly evaluate and publish progress reports on climate measures (e.g. annual monitoring, reporting and verification [MRV] reports in Quintana Roo, Zacatecas and Jalisco). However, not all laws provide detail on what the consequences would be in the case of non-compliance. The laws in Puebla, Guanajuato, Quintana Roo, Zacatecas, Yucatán and Chiapas refer to administrative sanctions on public officials or institutions who fail to fulfil climate duties. In doing so, they cross-refer to the Law of Administrative Responsibilities – non-compliance with the climate law is incorporated into the broader legal regime of administrative liability. The laws of Zacatecas, Yucatan and Chiapas, similarly to Mexico's national law, explicitly state that sanctions can also be civil and penal. As an additional avenue of oversight, Chiapas's law establishes a mechanism for public complaint (*denuncia popular*) that allows any person, social group or non-governmental organisation (NGO) to report climate-related harm or non-compliance.

**Table 3.9. Key provisions in the LGCC on **accountability**, plus feedback and learning from participatory processes and subnational climate framework laws across Mexico**

|                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance function: accountability</b>                       | Processes that provide oversight and transparency over implementation of the law and climate action, and mechanisms for enforcement where progress is lacking                                                                                                                                                                                                                                                                                                                                                       |
| <b>Overview of Mexico's General Law on Climate Change (LGCC)</b> | Requires a comprehensive review of national climate policy every two years. Evaluation results must inform updates to the national strategy and be reported to Congress. This is known as 'Evaluation Coordination'.<br><br>The Law also empowers the federal environmental enforcement agency (PROFEPA) to inspect greenhouse gas reports.                                                                                                                                                                         |
| <b>Key feedback from subnational participatory processes</b>     | Stakeholders called for clearly defined oversight, e.g. establishing dedicated agencies or independent bodies to monitor implementation and enforcement. They noted that without effective inspection and penalties, even well-designed laws will remain 'under-implemented'.                                                                                                                                                                                                                                       |
| <b>Lessons from subnational climate framework laws</b>           | Mexico City's law uses external evaluators to review its Climate Plan for transparency. Chiapas's law creates a public complaint mechanism ( <i>denuncia popular</i> ) allowing any citizen or NGO to report climate-related harm or non-compliance, ensuring government accountability through civic oversight.<br><br>Several States also establish sanctions for officials or entities that fail to meet climate obligations, with some explicitly allowing civil or even criminal penalties for non-compliance. |

### Insights from Ibero-America on accountability

- **Consequences for non-compliance – Chile.** Some laws specify consequences for failing to comply with their provisions. Chile's law sets out clear financial consequences for Ministers in the case of non-compliance. Article 10 provides that where sectoral climate measures or plans are lacking, the responsible Minister must appear before Congress to explain, while Article 17 mandates sanctions equivalent to half a monthly salary to be imposed on the head or senior official after a summary investigation and six months' grace period.
- **Oversight arrangements – Colombia.** Colombia's law establishes an 'Accidental Commission' to evaluate whether a new oversight body is needed to monitor mitigation efforts and drive the country towards carbon neutrality. The Commission may instruct the environmental authority to demand the adoption of any necessary measures to reach the desired goal. However, this is not a judicial body, and no legal action or court pathway is established in the law.
- **Sectoral reporting – Spain, Chile and Peru.** In addition to progress reporting against the overall climate change strategy, laws may set sector-specific reporting obligations. For example:
  - In Spain the Treasury is obliged to provide a report on the tax regime applicable to fossil fuels and a suggested fossil fuel phase-out calendar; and listed companies, banks and insurance companies are required to produce reports on climate risks and decarbonisation goals; the Bank of Spain, among other institutions, is to produce a biannual report on climate-related financial risks; Spain's Transmission System Operator (TSO) and hydrocarbon logistics company (CLH) also have to present a biannual report on the opportunities and risks of decarbonisation.
  - In Chile there is an annual process whereby climate-related public investment is tracked and reported by the Budget Directorate to Congress. The Ministry of the Environment is required to produce a National Climate Change Action Report every two years, detailing progress on policies, plans and measures, which must be formally presented to both chambers of Congress.

- Similarly, in Peru the law assigns explicit accountability duties to the Ministry of Environment as the national authority on climate change and requires it to report annually to Congress on progress towards climate targets.

### **Learning from research on the impact of climate framework laws on accountability**

Through requirements for regular reporting on performance against carbon budgets and emission-reduction targets, as well as through clarifying institutional mandates, climate laws in Ireland, Germany, New Zealand and the UK were seen by stakeholders as strengthening accountability for climate action (Averchenkova et al., 2024b; 2021a). Making sectoral line ministries responsible for delivering action can also increase transparency. The effectiveness of reporting requirements is significantly influenced by the question of who prepares the reports and who is expected to respond to them (Averchenkova et al., 2024b). While Mexico's federal climate framework law, the LGCC, requires the results of the evaluation to be reported to Congress, there is no explicit requirement for government or specific Ministries to respond, or fines for non-compliance.

Systemic non-compliance with targets and plans may undermine the credibility of climate legislation overall and reduce public trust in the policymaking system. In a study on the impact of laws in Germany, Ireland and New Zealand, interviewees highlighted that besides public shaming and civil society-initiated litigation, there is a lack of clear and immediate consequences for missing climate targets (Averchenkova et al., 2024b). Compliance and progress thus rest heavily on sustained political will. Chile's example above stands out as an exception in the region.

Accountability can be strengthened by ensuring that bodies with an oversight role, such as parliamentary committees and independent advisory bodies, have sufficient expertise and capacity to provide a detailed and authoritative assessment of evidence presented to them.

**Accountability in Mexico's LGCC could be strengthened by establishing regular reporting processes by Ministers to Congress, introducing annual independent assessments of progress and outlining clear consequences in cases of non-compliance with the law.**

## 4. Conclusions and recommendations

This report has demonstrated that climate justice and effective responses to the climate crisis require that public policies and legislation respond to the national context and address local needs. Clear, structured and participatory legislation can help facilitate broad understanding, effective implementation and the translation of legal provisions into concrete action.

Mexico's political and governance systems place key sectors for climate mitigation and adaptation under the direct competency of State and municipal governments. State and municipal climate policies are often well placed to incorporate the voices of Indigenous, rural and urban communities, ensuring that no one is left behind on the path to a just transition, while addressing the structural inequalities that affect each territory differently. Developing and strengthening their own legislation encourages States to build technical capacity, access national and international financing, and improve climate governance frameworks and institutions.

Thanks to subnational climate leadership, more than one-third of Mexico's States have robust and strengthened regulatory frameworks, with local goals that directly impact the national climate scenario of the country (e.g. most of these States have incorporated a subnational goal to achieve carbon neutrality into their laws). Applying learning from the State level to Mexico's federal policy has aided the development of a national participatory process for the LGCC, taking into account the local and regional realities that must be regulated and supported by federal legislation. Box 4.1 sums up the main lessons learnt.

### **Box 4.1. Emerging findings from the National Participatory Process to Update Mexico's General Law on Climate Change (LGCC)**

Since 2023, the participatory information-gathering process to reform the LGCC has enabled identification of the priority areas and development of concrete proposals to strengthen the Law. Inputs were gathered from all 32 federal entities, ensuring the reform proposal was built through a 'bottom-up' approach.

The process underscored the role of the agroforestry sector in sustainability and community development; examined the challenges and opportunities around carbon markets, stressing the need for clear legislation and effective governance; emphasised the importance of aligning the law with international agreements; highlighted climate justice, particularly its impact on women and Indigenous communities; and called for stronger social participation in decision-making. It also recognised the role of States in achieving national climate goals, requiring robust regulatory frameworks, environmental education and financing for a low-carbon economy.

The areas for proposed reforms of the LGCC included:

- Supporting legislation with comprehensive regulatory instruments and public policies
- Strengthening institutional capacity
- Clearly defining the responsibilities of States and municipalities
- Developing strategies, such as roadmaps, for entities to contribute to achieving the Nationally Determined Contribution (NDC) and promote related financing
- Mandating the Emissions Trading System and establishing safeguards for the Voluntary Carbon Market, including instruments that ensure transaction transparency and provide certainty to participating communities
- Strengthening coordination between the federation, States and municipalities; monitoring federal actions; decentralising responsibilities and resources; and establishing INECC State delegations to provide direct support

- Reinforcing joint responsibility between government and society to address climate change, strengthening the National Climate Change System
- Establishing climate justice as a core pillar for mitigation and adaptation action, and identifying territorial needs and engaging communities to design strategies that advance climate justice
- Enforcing stronger sanctions for non-compliance, both for authorities and regulated facilities
- Improving information systems and mechanisms for participation and access to information to promote co-responsible engagement
- Enhancing transparency in emissions quantification and progress monitoring
- Mainstreaming a gender perspective in climate policies

## Recommendations

Drawing on learning from across the subnational laws of Mexico, the countries of Ibero-America and globally, we identify the following opportunities to strengthen Mexico's General Law on Climate Change, many of which are relevant for the reforms of framework climate laws in other countries:

- Mexico's experience shows that participatory processes provide a valuable contribution to addressing governance gaps and key priorities for the design of legal and governance frameworks and should be a central, integral part of climate governance.
- Legislative reforms on climate change at the subnational level in Mexico offer several governance innovations and, in several ways, go beyond the current General Law on Climate Change (see Figure 4.1 below). This experience should be considered when designing national legislative reforms. Other countries should also seek to review and learn from the experience of climate governance and law reforms at their subnational levels.
- Direction-setting and strategy articulation for climate change response can be strengthened by:
  - Introducing a legally-binding target for carbon neutrality in line with the principle of progression under the Paris Agreement, the best international practice. Aiming for carbon neutrality by 2050 or a similar target would place Mexico's national climate change law on a par with leading emerging economies in Latin America and beyond. This would also align with the ambitious subnational Mexican laws.
  - Defining intermediate targets compatible with the longer-term trajectory to the 2050 target in the law or a clear process for establishing intermediate targets, similar to carbon budgeting used in many countries around the world.
  - Aligning updates to the national mitigation strategy to a five-year cycle with the NDC update cycles under the Paris Agreement. This should be complemented with more regular progress updates and flexibility to update more regularly, if targets set in the NDC are updated more quickly.
  - Ensuring that strategy planning processes consider the need for a just transition and institutions are in place to implement this agenda, including through formalising mechanisms for public participation and social dialogue. This can also include requirements to set a distinct just transition-specific strategy or to explicitly integrate such considerations into existing national climate change mitigation and adaptation strategies.

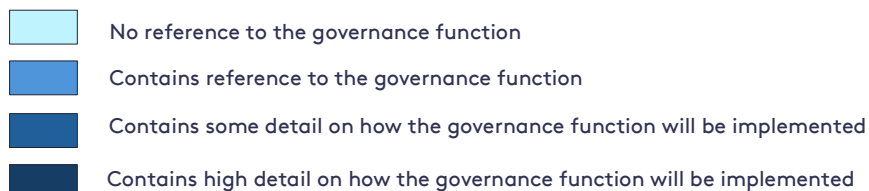
- To strengthen horizontal and vertical coordination and policy integration, consider:
  - Strengthening the need for public authorities to incorporate climate change criteria into policymaking by requiring all public authorities to ensure that their decisions are consistent with the National Climate Change Strategy and targets set out in the law and related regulations.
  - Introducing requirements for sectoral Ministries to establish sectoral climate change targets and report on their implementation regularly.
  - Putting in place mechanisms to support vertical coordination and integration of climate change considerations, including technical regulatory and financial support to subnational and local authorities in preparation and implementation of their climate change strategies.
- Ensure stronger arrangements for knowledge production, assessment and sharing in the process of developing, implementing and evaluating climate change responses by:
  - Strengthening the requirements for the Government to incorporate expert advice into the key stages of the policymaking process, e.g. by requiring the Government to consider expert advice when setting targets, deciding on policies to reach them and assessing independent progress. Parliamentary oversight with an expert body submitting its reports on progress with implementation would create stronger accountability for implementation.
  - Strengthening the mandate of the expert advisory body (INECC or similar), by specifying in the law or related regulations the key outputs they are expected to provide on the development and evaluation of climate policy. This may include advice on the level of targets, independent assessment of proposed policies to implement the targets and a regular independent assessment of progress on implementation.
  - Introducing a requirement for the Government to respond to the expert advice and to explain the reasons when the advice is not followed.
  - Introducing a requirement for the expert advice to be independent, including provisions for budgetary security and independence.
  - Formally recognising and integrating a requirement for Indigenous knowledge to be included among the key inputs into the expert advice and knowledge base for the development of the climate change response.
- Improve inclusivity of climate action through specifying processes that consult, engage and incorporate a plurality of voices and perspectives into planning and implementation of climate policy. This can be done through:
  - Further clarifying key stages in the climate change policy cycle where stakeholder and citizens' input must be sought and through which channels.
  - Introducing a requirement for the Government to report back on how stakeholder input has been considered and provide an explanation when it is not being followed.
  - Ensuring Indigenous perspectives form an integral part of consultation, engagement and other participatory processes.
- Strengthen enabling conditions for finance and investment to support implementation of the climate change law by introducing:
  - A requirement for the Government to develop financial strategy on climate change.
  - A requirement for sectoral Ministries and subnational governments to outline expenses related to climate action in their budget submissions, and adopting climate budget tagging to enhance capacity to estimate spending and track data and budget approvals.



- Designated financial mechanisms for supporting subnational entities and municipalities in designing and implementing climate change strategies and policies.
- Improve political and legal accountability, oversight, transparency and enforcement over implementation of climate action by including:
  - A requirement for regular reporting on the part of all agencies responsible for delivery and implementation of climate change policy, and for the Ministers in charge of these reports to appear and respond to Congress.
  - A requirement for annual independent assessment of progress with implementation by an independent expert advisory body (e.g. INECC), accompanied by a requirement for the Government to respond to this independent assessment of progress.
  - Provisions on judicial oversight, and consequences for failing to comply with targets.

**Figure 4.1. Level of detail on how each governance function is addressed across the national (LGCC) and subnational climate framework laws in Mexico**

| Governance function     | State               |         |            |         |             |        |              |         |           | LGCC (federal) |
|-------------------------|---------------------|---------|------------|---------|-------------|--------|--------------|---------|-----------|----------------|
|                         | Baja California Sur | Chiapas | Guanajuato | Jalisco | Mexico City | Puebla | Quintana Roo | Yucatan | Zacatecas |                |
| Strategy articulation   |                     |         |            |         |             |        |              |         |           |                |
| Horizontal coordination |                     |         |            |         |             |        |              |         |           |                |
| Vertical coordination   |                     |         |            |         |             |        |              |         |           |                |
| Sectoral integration    |                     |         |            |         |             |        |              |         |           |                |
| Vertical integration    |                     |         |            |         |             |        |              |         |           |                |
| Expert advice           |                     |         |            |         |             |        |              |         |           |                |
| Stakeholder engagement  |                     |         |            |         |             |        |              |         |           |                |
| Finance                 |                     |         |            |         |             |        |              |         |           |                |
| Accountability          |                     |         |            |         |             |        |              |         |           |                |



# Appendix 1. Summary of methodology

## Scope of laws reviewed

We focused on the nine subnational climate laws in Mexico that underwent a formal public participatory process as part of their amendment procedures over the period 2020 to May 2025. POLEA, contributors to this report, facilitated the participatory process. Eight of the States have completed their reforms, creating a new generation of State-level climate laws and offering valuable insights into governance innovations for updating Mexico's General Law on Climate Change.

## Review process and limitations

First, we examined the outputs of each participatory process to extract the public's main demands. All nine States followed the same three steps: (1) a workshop with public servants from the Secretariat of Environment (or another climate-related agency); (2) in-depth interviews with climate experts from academia, business and government; and (3) an online survey open to the public. By May 2025, as part of these participatory processes, POLEA had conducted more than 600 interviews with experts and collected more than 1,600 online questionnaires. Due to the relatively small survey sample for each State, full stratified sampling by socioeconomic characteristics of the population was not applied. POLEA sought to ensure gender equity through the interviews, achieving a breakdown of approximately 50.91% of interviewees being men, 47.62% women, and 1.47% identifying with another gender. POLEA summarised the workshop and interview inputs into written reports, while survey results were presented as graphs. We then tagged each comment or suggestion according to whether they addressed any of the governance functions. This gave us a clear list of public demands organised by function for each State and each stage of the participatory process.

Next, to analyse how each State law and Mexico's General Law on Climate Change addresses different climate governance challenges, we applied the 'governance functions' framework developed by [Sridhar et al. \(2022\)](#), recording whether each law references the need for such a function. All the initial assessments were conducted by the same report author, with answers then cross-checked by another author. This produced a consistent mapping of the existence of each function in each law and how detailed the law is on their operationalisation. The analysis was then further reviewed by experts from POLEA who have deep knowledge of Mexico's legal landscape.

We recognise that assessing the presence and strength of a governance function in each law involves interpretation. While we aim to make the review of each law as uniform as possible, determining the presence (or absence) of linkage to a governance function remains a subjective exercise. Furthermore, the authors acknowledge that each country or State may choose to establish the legal framework for a governance function in laws or regulations beyond the reviewed climate framework acts.

## Appendix 2. Targets and target-setting processes across laws in Mexico

Table A2.1. Comparison of targets and target-setting processes across subnational State laws and Mexico's General Law on Climate Change

| <i>Country or State</i>       | <i>Legally mandated process to set mitigation targets</i>                                                                                                                                                                                                                                        | <i>Economy-wide mitigation targets</i>                                                                                                                                                                                                                                                                                        | <i>Sectoral mitigation targets</i>                                                                                                                                                                                                                                      |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Mexico (federal level)</i> | The emission targets will be updated when the next National Strategy is published. The National Strategy is created by the Environmental Secretary with the participation of the National Institute of Ecology and Climate Change and the approval of the Inter-Secretarial Commission.          | 22% reduction of greenhouse gas emissions by 2030 compared with 2000 levels.<br>Peak national emissions by 2026.<br>50% reduction of greenhouse gas emissions by 2050 compared with 2000 levels.<br>The law also set an "aspirational" target of 30% reduction of greenhouse gas emissions by 2020 compared with 2000 levels. | 51% reduction of black carbon emissions on 2000 levels by 2030.<br>Reductions by sector by 2030:<br>18% in transport<br>31% in electricity generation<br>18% in commercial and residential<br>14% in oil and gas<br>5% in industry<br>8% in agriculture<br>28% in waste |
| <i>Baja California Sur</i>    | The State Climate Change Policy will be developed by the Secretariat at the start of each administration of the State Executive Branch, with the participation and approval of the Commission. The programme must include gradual and specific emission-reduction targets for different sectors. | Carbon neutrality by 2050.                                                                                                                                                                                                                                                                                                    | None set in the law. The State Climate Change Policy to set targets by sector.                                                                                                                                                                                          |
| <i>Chiapas</i>                | The Inter-Secretarial Commission, through the State Programme, must establish emission-reduction targets, although no timeframe is specified for this in the law                                                                                                                                 | None set in the law.                                                                                                                                                                                                                                                                                                          | None set in the law.                                                                                                                                                                                                                                                    |
| <i>Guanajuato</i>             | The State Climate Change Programme must include mitigation and adaptation targets. The Commission has the responsibility to adopt targets, and the Citizen Observatory has the role of recommending targets to the Commission.                                                                   | Carbon neutrality without a timeframe.                                                                                                                                                                                                                                                                                        | None set in the law. Sector-specific decarbonisation pathways aligned with national and international goals are mandated.                                                                                                                                               |
| <i>Jalisco</i>                | The State Programme must define specific targets for climate change mitigation and adaptation. The State Programme is a six-year <i>programa especial</i> that is updated with each administration, ensuring that                                                                                | Carbon neutrality without a timeframe.                                                                                                                                                                                                                                                                                        | None set in the law. The law requires the State Climate Change Programme to include sectoral targets or benchmarks for reducing emissions in key sectors.                                                                                                               |

|              |                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                        |                                                                                                                                                                                                                                                                                          |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | targets and measures are revisited at least every six years. The draft State Programme must go through a public consultation process to collect feedback and recommendations.                                                                                                                                                                                                                                                             |                                        |                                                                                                                                                                                                                                                                                          |
| Mexico City  | The Local Strategy is the main planning tool for long-term climate policy. It sets goals for sustainability, resilience and carbon neutrality. It must be developed and published by the Environmental Secretariat, in coordination with the Commission, and with participation from boroughs or municipal districts ( <i>Alcaldías</i> ) and civil society. It is reviewed and updated every six years based on progress and deviations. | Carbon neutrality by 2050.             | None set in the law.                                                                                                                                                                                                                                                                     |
| Puebla       | The State Climate Change Programme (developed by the Secretariat and approved by the Inter-Secretarial Commission) defines the indicators, goals and binding actions related to mitigation and adaptation.                                                                                                                                                                                                                                | Carbon neutrality without a timeframe. | None set in the law. The law specifies that the State's climate change mitigation policy must achieve gradual carbon neutrality. This neutrality will be specifically targeted by sector and activity, using established baseline scenarios and sector-specific baselines as benchmarks. |
| Quintana Roo | The State Climate Change Commission is tasked with formulating targets for the State, considering national and international commitments. The State Climate Change Programme sets specific mitigation and adaptation objectives.                                                                                                                                                                                                          | Carbon neutrality by 2050.             | Achieve a net zero deforestation rate.                                                                                                                                                                                                                                                   |
| Yucatan      | The State Climate Change Policy must include gradual and specific emission-reduction targets for different sectors.                                                                                                                                                                                                                                                                                                                       | None set in the law.                   | None set in the law.                                                                                                                                                                                                                                                                     |
| Zacatecas    | The State Climate Change Programme sets six-year mitigation and adaptation goals, consistent with national commitments. It is developed by the Secretariat in coordination with the Planning Unit.                                                                                                                                                                                                                                        | Carbon neutrality by 2050.             | None set in the law.                                                                                                                                                                                                                                                                     |

## Appendix 3. Laws referenced in this report

| Country or subnational State     | Law(s) reviewed and referenced (with links)                                                                                                                                                                                                                                                    |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Mexico</b>                    |                                                                                                                                                                                                                                                                                                |
| Baja California Sur              | Climate Change Law ( <i>Ley de Cambio Climático del Estado de Baja California Sur</i> )                                                                                                                                                                                                        |
| Chiapas                          | Climate Change Adaptation and Mitigation Law ( <i>Ley para la Adaptación y Mitigación ante el Cambio Climático en el Estado de Chiapas</i> )                                                                                                                                                   |
| Guanajuato                       | Climate Change Law ( <i>Ley de Cambio Climático para el Estado de Guanajuato y sus Municipios</i> )                                                                                                                                                                                            |
| Jalisco                          | Climate Change Action Law ( <i>Ley para la Acción ante el Cambio Climático del Estado de Jalisco</i> )                                                                                                                                                                                         |
| Mexico (national/ federal level) | General Law on Climate Change ( <i>Ley General de Cambio Climático</i> )                                                                                                                                                                                                                       |
| Mexico City                      | Climate Change Mitigation and Adaptation and Sustainable Development Law ( <i>Ley de Mitigación y Adaptación al Cambio Climático y Desarrollo Sustentable de la Ciudad de México</i> )                                                                                                         |
| Puebla                           | Climate Change Law ( <i>Ley de Cambio Climático del Estado de Puebla</i> )                                                                                                                                                                                                                     |
| Quintana Roo                     | Climate Change Action Law ( <i>Ley de Acción de Cambio Climático del Estado de Quintana Roo</i> )                                                                                                                                                                                              |
| Yucatan                          | Climate Change Law ( <i>Ley de Cambio Climático del Estado de Yucatán</i> )                                                                                                                                                                                                                    |
| Zacatecas                        | Climate Change Law ( <i>Ley de Cambio Climático para el Estado de Zacatecas y Municipios</i> )                                                                                                                                                                                                 |
| <b>Ibero-America</b>             |                                                                                                                                                                                                                                                                                                |
| Argentina                        | Law on Minimum Budgets for Adaptation and Mitigation of Global Climate Change ( <i>Ley de presupuestos mínimos de adaptación y mitigación al cambio climático global</i> )                                                                                                                     |
| Chile                            | Framework Law on Climate Change, Law 21,455 ( <i>Ley marco de Cambio Climático, Ley 21,455</i> )                                                                                                                                                                                               |
| Colombia                         | Law 2169/2021 promoting low-carbon development ( <i>Ley de Acción Climática y Desarrollo Bajo en Carbono</i> )<br>Law 1931 establishing guidelines for the management of climate change ( <i>Ley 1931 de 2018 por la cual se establecen directrices para la gestión del cambio climático</i> ) |
| Peru                             | Framework Law on Climate Change, Law 30754 ( <i>Ley Marco sobre Cambio Climático, Ley N ° 30754</i> )<br><br>Supreme Decree 013-2019-MINAM ( <i>Decreto Supremo que aprueba el Reglamento de la Ley N° 30754, Ley Marco sobre Cambio Climático</i> )                                           |
| Portugal                         | Law 98/2021 Climate Framework Law ( <i>Lei de Bases do Clima, Lei n.º 98/2021</i> )                                                                                                                                                                                                            |
| Spain                            | Law 7/2021 Climate Change and Energy Transition Law ( <i>Ley 7/2021, de 20 de mayo, de cambio climático y transición energética</i> )                                                                                                                                                          |

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