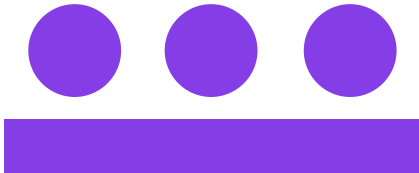
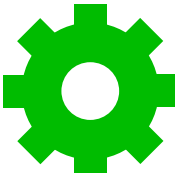


COP30

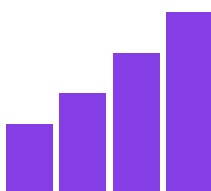
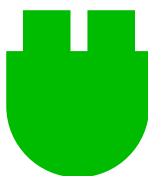
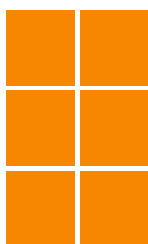
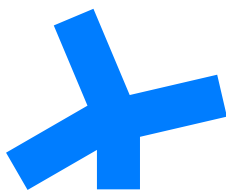
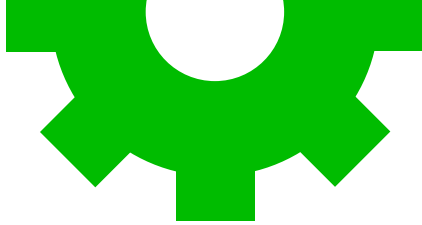
CALL TO ACTION

ANTITRUST
 **FOR**  
CLIMATE 
  **ACTION**

iccwbo.org/TheBusinessOfClimate

International
Chamber
of Commerce





Addressing climate change and accelerating the transition to a more sustainable economy are among the most pressing global challenges of our time. While governments have a central role in setting the direction, businesses and regulators are equally essential actors in the shift to greener markets. Increasingly, businesses are exploring collaborative models to scale up sustainability-driven innovation and decarbonisation, including forms of cooperation among competitors. Nevertheless, many companies still face uncertainty over how such cooperation aligns with existing competition laws and enforcement practices.

In parallel, competition authorities in a growing number of jurisdictions have begun to reflect on how antitrust frameworks can support legitimate sustainability efforts. Several have launched public consultations, developed guidance documents and hosted “open-door” discussions to examine the intersection between competition law and environmental goals for specific business cases. These initiatives demonstrate a shared recognition of the importance of legal certainty and regulatory coherence in unlocking pro-competitive sustainability initiatives.

The United Nations Framework Convention on Climate Change (UNFCCC) Conference of the Parties (COP) has long served as the premier global forum for addressing climate change challenges and coordinating international efforts to combat climate change. Over the years, it has brought together governments, businesses, civil society and international organisations to develop strategies for reducing greenhouse gas emissions and other sustainability objectives whilst fostering economic growth. With the urgency of climate action increasing, the role of competition policy in supporting sustainability objectives has gained more and more prominence as well, necessitating greater legal certainty and regulatory coordination.

In response to this growing recognition, certain competition authorities have thus begun developing guidelines on sustainability cooperation agreements, while others are to date actively engaging in discussions on how competition frameworks can support the green transition. Regardless of the approach taken, there is a shared understanding that competition policy should not create unnecessary barriers to legitimate sustainability efforts.

The **International Chamber of Commerce** (ICC), the institutional representative of over 45 million businesses in more than 170 countries, has been at the forefront of this emerging dialogue, facilitating structured engagement between the private sector and public authorities.

Accordingly, in its capacity as the official focal point for business and industry in the UN climate process (UNFCCC), ICC seeks to build on this momentum at COP30 by reaffirming the shared commitment to fostering competitive markets that can support sustainability goals.

Preamble



We, ICC, recognising the importance of sustainability in global markets and the role of competition in fostering innovation and efficiency, commit to supporting a policy environment that balances competition objectives with sustainability considerations.

As a matter of fact, competition enforcement is a key enabler of sustainability and growth. By tackling anti-competitive conducts, such as cartels that harm the environment, abuse of dominance that restricts green innovation or misleading claims that distort market signals, competition policy helps create markets where sustainability initiatives can thrive. At the same time, competition authorities recognise the need for clear guidance to ensure that legitimate cooperation on sustainability is not unduly hindered.

Building on this, we outline the following key guiding principles that will orient us in continuing to foster well-functioning and sustainable markets:

1

Competition as a driver for innovation

Competitive markets encourage innovation and efficiency, which are inherently indispensable for sustainability-driven advancements. Competition enforcement will thus continue to play its role to support innovation and investment in sustainable solutions.



2

Ensuring legal clarity and early guidance

Regulatory clarity is crucial for businesses which are considering cooperating on sustainability initiatives. Authorities recognise the value of early guidance mechanisms, such as open-door policies or no-enforcement action letters or even formal decisions, to provide businesses with confidence in pursuing legitimate sustainability initiatives that do not raise competition concerns.



3

Assessing sustainability agreements based on recognised benefits

While we acknowledge the existence of different approaches to assessing sustainability benefits, including those that focus on direct consumer advantages and those considering broader societal impacts, we will carefully continue to evaluate agreements for sustainability purposes to ensure that competition concerns are proportionate to the environmental and economic gains they deliver.



4

Competition as a sword to prevent harm to the green transition

Competition enforcement is key to preventing any conduct that may harm sustainability efforts, ranging from cartels that raise prices for products with sustainable characteristics to exclusionary practices that hinder environmental innovation, and unsustainable conduct by dominant companies. Authorities will thus ensure that markets remain open and fair, allowing sustainability-focused businesses to compete on the merits.



5

Encouraging international cooperation

Given the inherent global nature of sustainability challenges, cooperation across jurisdictions is required to ensure effective competition policies that can support sustainability objectives. We will thus engage in continued dialogue, share knowledge, and promote best practices so that regulatory coherence will be enhanced and sustainable market developments will be facilitated.

