



Priorities for climate justice at COP29

RECOMMENDATIONS TO THE DUTCH GOVERNMENT

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Internationale Klimaatcoalitie

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This position paper has been endorsed by:



About the *Internationale Klimaatcoalitie*

The *Internationale Klimaatcoalitie* is an informal collaboration of civil society organizations in the Netherlands. Together, we strive for climate justice through fair and ambitious Dutch climate policy, as well as strong commitments by the Dutch government in international climate negotiations, such as in the context of the UN Framework Convention on Climate Change (UNFCCC).

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Introduction

This year has underscored the urgency of the escalating climate crisis, with record-breaking temperatures and devastating economic impacts becoming the norm rather than the exception.¹ Severe weather events are no longer just environmental concerns; they pose profound human and economic threats, costing billions in damages while disrupting lives, livelihoods, ecosystems, and markets worldwide. The imperative for immediate and effective action is clearer than ever.

The 2023 KNMI climate scenarios serve as a clear warning for the Netherlands, predicting more severe weather conditions due to climate change, including heat waves and rising sea levels.² They also indicate that many impacts can still be mitigated if decisive action is taken now. With a large part of the country below sea level, it is in our national interest to address climate change head-on.

Climate action must be coupled with climate justice. As the recent AIV report highlights, communities in the Global South – those least responsible for the climate crisis – are disproportionately affected.³ Women and girls in all their diversity, Indigenous Peoples, local communities, children, youth, workers, and other vulnerable groups lack the resources to adapt and recover, threatening their livelihoods and economies. As a trade-dependent country, the Netherlands is directly impacted by global disruptions, making it vital to address these injustices in UNFCCC negotiations.

Meanwhile, major fossil fuel companies – Shell, BP, TotalEnergies and Eni alongside ExxonMobil, Chevron, and ConocoPhillips – reported a staggering \$31.65 billion in combined profits in the second quarter of 2024. Alarmingly, some of these companies are now backpedaling on their green and renewable energy commitments.⁴ This underscores the urgent need for global accountability and reinforces the necessity of a just transition to ensure that those most responsible for the climate crisis are held accountable, while those on the frontlines of the climate crisis are meaningfully involved and receive the support they need.

As the 'Internationale Klimaatcoalitie' - an informal network of Dutch NGOs - we present this position paper to inform and guide the Dutch government in shaping its position ahead of COP29 in Baku, Azerbaijan, in November 2024. We believe that it is key for the Netherlands to demonstrate its continued leadership and commitment to addressing the climate crisis. We advocate for an inclusive approach that prioritizes the needs and voices of the most affected communities, ensuring that climate policies are equitable and effective. In the following sections, we outline our recommendations to the Netherlands and the European Union to guide their positions and ensure they lead to an ambitious outcome at COP29.

¹ Copernicus (2024). [Copernicus: 2023 is the hottest year on record, with global temperatures close to the 1.5°C limit.](#)

² KNMI (2023). [KNMI'23-klimaatscenario's.](#)

³ Adviesraad Internationale Vraagstukken (2023). [Klimaatrechtvaardigheid als noodzaak.](#)

⁴ Offshore Energy (2024). [Shell, BP, TotalEnergies, Eni, ExxonMobil, Chevron, and ConocoPhillips ride oil & gas demand wave, cashing in close to \\$32 billion in total profit.](#)

I. Ensuring effective and inclusive negotiations

As we approach COP29, it is essential to address the challenges that have hindered previous negotiations. The Netherlands, with its longstanding commitment to global climate action, should continue to take a leadership role to ensure that COP29 negotiations are effective, inclusive, transparent, and just.

The SB60 sessions in Bonn revealed deepening divisions across negotiations, including on adaptation, finance, mitigation, and gender. These divisions threaten to undermine progress and erode trust among parties. Given the urgency of the climate crisis, bridging these gaps is essential for meaningful climate action at COP29.

A major barrier to effective climate action is the undue influence of the fossil fuel industry and other large polluters. At COP28, there was an unprecedented presence of 2,456 fossil fuel lobbyists —more than seven times the number of official Indigenous representatives.⁵ Restricting the influence of these polluters is critical to ensuring the focus remains on genuine climate solutions rather than on the interests of those most responsible for the crisis. In 2023, the Netherlands declared to support efforts to strengthen accountability within the UNFCCC, including the establishment of a conflict-of-interest policy. We call on the Netherlands to maintain this stance to ensure the legitimacy of the negotiation processes and take meaningful climate action.

Furthermore, the persistent lack of adequate financing for UNFCCC processes continues to hinder progress. The Netherlands has been a reliable contributor and a unifying force within the UN and should continue to fulfill its leadership role and urge other member states to follow suit to ensure the UNFCCC is able to fulfill its mandate.

The upcoming negotiations in Baku also raise concerns about civic space. Azerbaijan's restrictive environment for civil society poses significant risks for activists, organizations advocating for climate justice and independent journalists. According to Human Rights Watch, a crackdown on independent voices over the past year has led to the arrest or sentencing of at least 25 independent journalists and civil society activists.⁶ This raises questions about whether independent civil society members, activists, human rights defenders, trade union members, and journalists will be able to participate safely and meaningfully at COP29, especially as civil society organizations have received an exceedingly low number of badges to attend COP29. The Netherlands should address these issues with the Presidency to ensure that civil society's voices are central to the discussions and that the rights to freedom and peaceful assembly is safeguarded.

Moreover, we urge the Netherlands to continue to advocate for integrating gender justice in all COP29 negotiation streams and policies. Women in all their diversity, as well as women-led, feminist and women's rights organizations, must therefore be recognized as key stakeholders in climate action, as they are at the frontline of climate impacts and the forefront of climate solutions. Ultimately, integrating intersectional gender approaches is essential for addressing the needs and harnessing the strengths of all people in society.

⁵ Kick Big Polluters Out (2023). [Release: Record number of fossil fuel lobbyists at COP28.](#)

⁶ See The Guardian (2024) [Azerbaijan accused of media crackdown before hosting Cop29](#), and Schiffers (2024) [COP29: Azerbaijan's Quest for International Legitimacy and Funding.](#)

Finally, it is essential that the negotiations at COP29 consider the connection between climate change and conflict, as the countries that are hardest hit by climate emergencies are also the worst affected by conflict. In fact, more than half of the 25 countries most vulnerable and least ready to adapt to climate change are affected by conflict.⁷ Climate change indirectly increases the risk of armed conflict by exacerbating existing drivers of instability. Conversely, armed conflict exacerbates the climate crisis, both directly—through environmental destruction and military greenhouse gas emissions—and indirectly, by undermining environmental governance, protection, and sustainable resource use, which hinders societies’ abilities to adapt to climate change. Moreover, while these countries have significant climate finance needs, they receive minimal funding; the ten most fragile countries received less than 1% of total climate adaptation finance in 2022.⁸ The finance they do receive is often in the form of loans, further exacerbating these countries’ debt burdens,⁹ and projects funded through climate finance do not always take conflict sensitivity into account.

The link between climate and conflict was recognized by the IPCC’s Sixth Assessment Report in 2022¹⁰ and underscored in the Declaration on Climate, Relief, Recovery, and Peace, which was adopted at COP28.¹¹ While the Netherlands has signed this Declaration, it has not yet proposed any solutions in its ‘package of contributions’, which was originally a requirement for sign-on. With discussions on the implementation of the Declaration being a focus of the COP29 Presidency, we look forward to seeing strong action from the Netherlands to move this agenda forward, including proposing solutions, to ensure that those threatened or affected by fragility or conflict are able to build their climate resilience at scale.

⁷ ICRC (2022) [Embracing Discomfort: A call to enable finance for climate-change adaptation in conflict settings.](#)

⁸ As per an analysis of OECD (2023) [Climate Finance Provided and Mobilised by Developed Countries in 2013-2022.](#)

⁹ Oxfam International (2023) [Forgotten frontlines: looking at the climate finance going to fragile and conflict affected states in 2019-20.](#)

¹⁰ IPCC (2022) [Sixth Assessment Report: Impacts, Adaptation and Vulnerability.](#)

¹¹ COP28 UAE (2023) [COP28 Declaration on climate, relief, recovery and peace.](#)

II. Creating an equitable climate finance goal

Delivering on and scaling up international climate finance is crucial to achieving climate objectives. The failure of the Global North to meet its climate finance commitments has severely impacted communities in the Global South, deepening inequalities, and eroding trust between developing and developed countries in UNFCCC negotiations. The Netherlands and the EU have a key role to play in shaping the post-2025 climate finance goal. To support ambitious action across mitigation, adaptation and loss and damage, while rebuilding the trust required for collective climate action, the New Collective Quantified Goal (NCQG) must prioritize the following six areas:

1. A needs- and science-based quantum

The NCQG must go beyond the \$100 billion goal by being rooted in the evolving needs of Global South countries, with regular reviews to adjust targets accordingly. Estimates show that trillions of U.S. dollars are required annually for climate action¹² across mitigation, adaptation, and loss and damage, not to mention the broader cumulative climate debt owed by the Global North.¹³ Therefore, the NCQG should focus on a core goal of public finance from developed to developing countries, which must be at least \$1 trillion per year on a grant-equivalent basis. This is achievable through innovative sources of (public) finance mentioned below. To ensure effectiveness, the NCQG should integrate transparency and accountability measures, preventing the double- or triple-counting of finance.

2. Sub-targets for mitigation, adaptation, and loss and damage

Climate finance has disproportionately focused on mitigation over adaptation, leading to the COP26 commitment to double adaptation finance and strive for a more balanced allocation.¹⁴ The Netherlands should continue to advocate for strengthening the role of adaptation within the NCQG. To ensure an adequate balance and respond to the priorities in the Global South, clear, quantified sub-targets are needed, for adaptation as well as for Loss and Damage. With the adoption of the Loss and Damage Fund, it is crucial to include this as a separate goal within the NCQG to ensure the fund is adequately filled and responsive to the needs of those who need it most. We also urge the Netherlands to move discussions on Loss and Damage forward in other processes, including by providing guidance to the Loss and Damage Fund, creating an inclusive High-Level Dialogue, and operationalizing Loss and Damage Finance Gap reports, as per Article 134 of the Global Stocktake.

3. Sufficient grants-based finance and non-debt inducing instruments

The majority of the NCQG should consist of public finance provided as grants. The 2024 OECD report on climate finance highlights that most current climate finance is delivered in the form of loans, many of which are non-concessional, further exacerbating the debt burden of Global South countries.¹⁵ With debt service payments already

¹² See Falduto, C., J. Noels and R. Jachnik (2024) [The New Collective Quantified Goal on climate finance: Options for reflecting the role of different sources, actors, and qualitative considerations](#), OECD/IEA Climate Change Expert Group Papers, No. 2024/02.

¹³ Fanning and Hickel (2023) [Compensation for atmospheric appropriation](#). *Nature Sustainability*, 6, pp. 1077–1086.

¹⁴ CARE International (2023) [Long-awaited balance for adaptation climate finance still out of sight, new analysis from CARE shows](#).

¹⁵ OECD (2024) [Climate Finance Provided and Mobilised by Developed Countries in 2013-2022](#).

twelve times higher than adaptation spending alone,¹⁶ prioritizing grant-based finance is essential to prevent worsening debt crises. Grant-based finance is also key for a gender-just and rights-based NCQG, as the gendered impacts of debt often stem from inadequate public investment when funds are diverted to loan repayments.¹⁷ Furthermore, grant-based finance is particularly important for funding action on adaptation and loss and damage, where private investment has a limited role to play (see section IV on adaptation). To address these challenges, NCQG should adopt a multi-layered structure with a clear core goal of grant-equivalent public finance, distinctly separate from a broader mobilization goal. This public finance must be truly new and additional to Official Development Assistance (ODA) so as not to divert scarce funds from other pressing humanitarian and development needs.

4. New sources of public finance, embedded in equity and the polluters pay principle

New sources of funding are needed to respond to the growing demand for grant-based, public finance. Currently, public finance is poorly sourced and distributed, but developed countries can raise trillions through new sources of finance, rooted in the principles of equity, tax justice and ‘the polluter pays’ principle. To unlock them, the NCQG should signal the need for these sources and call on relevant institutions to implement them. The Netherlands should promote these new and innovative sources, both within existing mechanisms and by identifying new sources that are fair, predictable, based on the ‘polluter pays’ principle, and avoid exacerbating inequalities. For example, a Climate Damages Tax levied in OECD countries on fossil fuel companies extracting oil, gas and coal could raise \$900 billion within a decade.¹⁸ Additionally, developed countries should redirect public spending and harmful subsidies for fossil fuels and other harmful sectors towards climate finance. As the co-chair of the Coalition of Finance Ministers for Climate Action, the Netherlands should put these new sources of public finance on the agenda.

5. Encouraging all Parties to contribute, with an obligation of developed countries to deliver

The new goal should encourage all Parties to contribute (as per Paris Agreement Art. 9.2), while linking this to the obligation of developed country Parties to meet the financial targets (as per UNFCCC Art. 4 and Paris Agreement Art. 9.1). The principle of common but differentiated responsibilities and respective capabilities (CBDR-RC) should be clearly reinforced within the NCQG context. The NCQG decision must initiate a process towards developing a burden-sharing framework detailing the respective minimum fair share contribution of each developed country to enhance transparency and accountability in climate finance obligations and reporting.

6. Embedding gender equality and ensuring accessibility for local communities

Climate finance must be made accessible to local communities and local organizations, particularly those led by women and Indigenous Peoples. The Netherlands should therefore continue to advocate for gender-responsive and human-rights based approaches in the NCQG, emphasizing the importance of a just transition. To achieve this, it is crucial that women and girls in all their diversity, workers, Indigenous Peoples, local communities, youth, workers, smallholder farmers, urban poor and other marginalized groups are meaningfully included in all processes. Best practices such as implementing gender assessments, gender action plans, and gender-responsive budgeting can help ensure that finance promotes gender equality. Reporting through gender-disaggregated and intersectional data, as well as gender markers, is needed to further enhance the gender-responsive nature of the NCQG.

¹⁶ Oil Change International (2024) [Response to the outcome of the June UN climate talks \(SB 60\)](#)

¹⁷ Fresnillo Sallan, I. (2020) [Debt and climate: entangled emergencies derailing women’s rights and gender justice](#). *Gender & Development*, 28(3), 499–513.

¹⁸ Sharma S & Hillman D (2024) [The Climate Damages Tax: A guide to what it is and how it works](#).

III. Accelerating mitigation to stay below 1.5°C, while ensuring a just transition

Current policies are projected to lead to a devastating 2.7°C of warming, far above the Paris Agreement's target, assuming full and undelayed implementation.¹⁹ COP28 marked a critical moment with the adoption of an energy package to transition away from fossil fuels, triple renewable electricity capacity, and double energy efficiency by 2030. To turn these commitments into reality, the Netherlands and the EU should lead by example, establish an ambitious National Determined Contribution (NDC) and advance the implementation via the UAE Dialogue and Mitigation Work Program (MWP). Furthermore, the transition away from fossil fuels must be fair and inclusive. The Netherlands and the EU should advance the Just Transition Work Programme (JTWP) including its funding, moving beyond merely procedural discussions.

The MWP and the UAE Dialogue on implementing the outcomes of the Global Stocktake are key mechanisms under the UNFCCC to implement the COP28 energy package and correct the current trajectory. However, despite the urgency, the SB60 negotiations in Bonn yielded no tangible outcomes. The Netherlands and the EU need to step up on climate finance to unlock much needed conversations about mitigation and start taking their responsibility by developing national plans that are 1.5°C aligned based on best available science and fair share principle. Underscoring the need for significant progress, the EU should advocate for the following key aspects:

Lead by example: Establish ambitious Dutch NCEP and EU NDC

As countries with historically high emissions, the EU—and the Netherlands as a member—should set ambitious NDCs that align with the outcomes of COP28. The Netherlands has signed a joint call for the European Council to translate these outcomes into concrete and ambitious action,²⁰ and we urge the Netherlands to push the EU to lead by example. Swift negotiations are essential to establish a robust EU NDC, with the Netherlands improving its own National Climate and Energy Plan (NCEP) as soon as possible. Efforts and resources should be fully mobilized before COP29 in Baku in order to foster a constructive space for advancing MWP discussions and implementing the COP28 energy package. Additionally, the Netherlands should support binding international legislation for the Fossil Fuel Non-Proliferation Treaty and other initiatives like the Beyond Oil and Gas Alliance.

The NDC and the NCEP must be science-based and adhere to fair share principles. To align with the 1.5°C target, they should include the following elements:²¹

- **Net-zero by 2040:** Developed countries must ensure a rapid and time-bound phase out of all fossil in line with pathways that limit global warming below 1.5 degrees. The "net" component should be reserved for residual CO₂- emissions in sectors other than the fossil fuel sector.
- **Enhanced 2030 and 2035 targets:** To limit global warming below 1.5 degrees, enhanced action this critical decade is essential. Enhanced targets should reflect the highest possible ambition and common but differentiated responsibilities and respective capabilities (CBDR-RC).

¹⁹ Climate Action Tracker (2024) [Temperatures](#).

²⁰ Ministerio para la Transición Ecológica y el Reto Demográfico (2023) [Joint call for an ambitious EU 2040 climate target](#).

²¹ For further reference we also refer to the guideline developed by the CAN network: [CAN Guidelines for NDCs 3.0: Delivering on the GST Outcome and Beyond](#)

- **Time-bound, rapid phase out fossil fuels:** the new NDC and NCEP should ban the exploration and development of new fossil fuel projects and stop all fossil fuel subsidies.
- **Prioritize energy efficiency and sustainable lifestyles for a just transition:** To prevent a new intensive energy system being created at the expense of people and the planet, measures to drastically reduce energy consumption and negative spillover effects²² must be prioritized. The NDC and NCEP should enable this through - among others – stronger regulation of business (including scope 1, 2, and 3 emissions), polluter pays policies, conservation, circular economy solutions, and binding energy efficiency legislation, contributing to at least 25% reduction in total energy consumption by 2050 compared to today.
- **Action on nature:** NDCs should include actions to halt and reverse deforestation, align with the Kunming-Montreal Global Biodiversity Framework, and protect oceans while banning harmful interventions like marine geoengineering and deep-sea mining.
- **Due diligence regulations and climate transition plans:** in line with state responsibilities to regulate private actors, the NDC and NCEP should include references to mandatory human rights and environmental due diligence regulations and sustainability (reporting) standards with a specific reference to private sector obligations on climate transition planning and reporting.

Provide financial assurance for developing countries

Progress in global climate action hinges on the financial commitments of wealthy countries to support developing countries. The EU should use key COP-mandate setting meetings, such as ECOFIN and ENVI Council meetings, to develop a credible financial package that can unlock negotiations on mitigation ambition in Baku. The Netherlands should push the EU on this, ensuring the package includes details on how the EU plans to deliver urgently needed climate finance, as outlined in paragraph 67 of the GST outcome. This finance should be new, additional, and primarily public grant-based, acknowledging the increasing needs of developing countries (also see section II).

Ensure a just and inclusive transition

While a swift transition away from fossil fuels is essential, it must also be just and inclusive, ensuring that workers across all sectors are supported, protected, and able to adapt to climate impacts. Given the urgency of the climate crisis, the Netherlands and the EU should move beyond procedural discussions and focus on delivering tangible outcomes, in close cooperation with partner countries worldwide through enhanced multilateralism and global action. More concretely, the Netherlands and the EU should support the JTWP, pushing for concrete commitments to implement the full scope of the Programme, and providing dedicated funding for just transition efforts. This should also include the establishment of reporting mechanisms to ensure the creation of decent jobs and social protection for all workers in the green transition. The EU must align its actions with its Council conclusions on green diplomacy, reinforcing its commitment to a fair and inclusive green transition.²³ In addition, the following key aspects should be emphasized in the JTWP:

1. An inclusive and just transition

The transition must leave no one behind and prioritize local decision-making, social dialogue, human rights, labor rights, and healthy ecosystems. It should address not just economic transitions, but adopt a holistic approach,

²² See the Sustainable Development Report's [Spillover Ranking](#). The Netherlands ranks 162 out of 166 countries, meaning the country has relatively high levels of negative environmental and social spillover effects.

²³ See European Council (2024) [Green diplomacy: Council conclusions reaffirm the EU's commitment to work closely with partners to accelerate a global just and inclusive green transition](#).

ensuring that the needs and rights of workers, as well as women, Indigenous Peoples, local communities, children, youth, and other marginalized groups, are fully respected and centralized. The transition should align with just transition principles as defined by the Paris Agreement, the JTWP, and ILO's 2023 resolution and 2015 guidelines on Just Transition, referencing labor rights.²⁴

2. The sustainable and fair use of resources

The growing demand for transition metals and minerals, often found in the Global South and on Indigenous lands, risks trapping many resource-rich countries once again in a cycle of extractive industries and low-value exports. Large-scale renewable energy projects are often associated with land dispossession, resource depletion, and violations of human rights and women's rights. Instead, these projects should be climate-resilient, locally appropriate, low-impact, and as small-scale and decentralized as possible. In addition, all local communities should have access to the necessary technology and skills, with support and financing provided through international cooperation.

3. Due diligence

Mining for the energy transition must be guided by clear objectives that consider the status and significance of local resources to communities and ecosystems. This includes adhering to Do-No-Harm principles, respecting labor rights, and ensuring Free, Prior, and Informed Consent. Compliance with corporate due diligence legislation and international frameworks on business and human rights, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, is also essential.

4. Fair and inclusive employment

The Netherlands and the EU should commit to establishing fair and inclusive employment practices within the sectors that face transition due to climate change, as well as in the local economies depending on those sectors. The needs, goals, and aspirations of workers and communities regarding decent work and dignified livelihoods must be central to this transition. Achieving a just transition requires social dialogue, robust social protection, recognition of labor rights, and the meaningful participation of women, Indigenous Peoples, local communities, children, youth, and marginalized groups. Social dialogue with workers and engagement with affected communities must be funded and integrated into the JTWP. Additionally, securing funding for training, redeployment, and upskilling workers to adapt to climate impacts is essential. Workers should also be compensated for irreversible losses and damages to their livelihoods, and be supported in adapting to new conditions, with a focus on safe and healthy workplaces and comprehensive social protection.

²⁴ See International Labour Organization (ILO) (2023) [Resolution concerning a just transition towards environmentally sustainable economies and societies for all](#) and ILO (2015) [Guidelines for a just transition towards environmentally sustainable economies and societies for all](#).

IV. Advancing global efforts on adaptation

As climate change impacts escalate, the need for robust frameworks and coordinated action on adaptation is more urgent than ever. Key processes, such as the UAE-Belém Work Programme, National Adaptation Plans (NAPs), and their alignment with NDCs and National Biodiversity Strategies and Action Plans (NBSAPs), are crucial for ensuring effective climate resilience and adaptation, as well as allocating public finance to adaptation action.

Advancing the UAE-Belém work programme.

The UAE-Belém work programme on indicators is essential for operationalizing the UAE Framework for Global Climate Resilience. Achieving adaptation goals, building adaptive capacity and resilience and reducing vulnerabilities, requires clear targets and indicators to track progress on the Global Goal on Adaptation. Without these, adaptation efforts remain fragmented, and their impact remains invisible.

Several indicators from existing frameworks, such as the Kunming-Montreal Global Biodiversity Framework and the Sendai Framework for Disaster Risk Reduction and the Sustainable Development Goals, align with the targets outlined of the UAE-Belém work programme, and should be considered. The indicators must be accessible and not overly complex to facilitate data collection and baseline comparisons for monitoring progress. Supporting the operationalization of the framework urgently requires finance to strengthen the capacity of national statistical bureaus, as developing countries face significant challenges related to data collection, analysis, and reporting.

Moreover, the creation of the indicator framework should include the balanced participation of experts from developing countries in line with appropriate geographical, gender, Indigenous Peoples and local communities' representation. This balanced representation of knowledge must be fully integrated in the process. Given the urgency of accelerating adaptation action, significant progress is needed at COP29 to ensure the UAE Framework for Global Climate Resilience can be operationalized at COP30 in 2025 in Belém, Brazil.

Enabling the creation and implementation of robust National Adaptation Plans

Building climate resilience requires assessing, planning, and budgeting for adaptation. With NAPs due for submission in 2025, many developing country Parties are falling behind schedule due to limited financial resources and capacity. These countries, which are among the most vulnerable to climate impacts despite contributing the least to the crisis, face an urgent need to advance their NAP planning and implementation, and should therefore be provided with adequate support. At COP29, negotiations on NAPs should proceed using the informal note²⁵ as its starting point, rather than reopening the discussions. Adaptation planning should further be informed by the assessment of progress on NAPs, which will conclude at COP29. In line with the recent Synthesis Report²⁶ and Progress Report²⁷ on NAPs, the COP29 outcome should highlight achievements, barriers and challenges to NAP

²⁵ UNFCCC (2024) [National adaptation plans: informal note by the co-facilitators](#).

²⁶ UNFCCC (2024) [Progress towards the achievement of the objectives of the process to formulate and implement national adaptation plans, as well as experience, best practices, lessons learned, gaps and needs, and support provided and received: Synthesis report by the secretariat](#).

²⁷ UNFCCC (2024) [Progress in the process to formulate and implement national adaptation plans. Report by the Least Developed Countries Expert Group in collaboration with the Adaptation Committee](#).

formulation and implementation, which are needed to transition from adaptation planning into action. It should also address ecosystem and biodiversity considerations, alongside gender equality and social inclusion, monitoring and evaluation, adaptation mainstreaming, and the integration of Indigenous and local knowledge.

Linking frameworks and fostering healthy ecosystems

Our ability to combat climate change is inherently connected with our ability to maintain healthy ecosystems. Therefore, the three instruments under the climate and biodiversity policy discourse - NDCs, NAPs and NBSAPs - need to be integrated to build coherence, enabling effective implementation and efficient use of resources. The assessment should therefore call for linking NAPs to NBSAPs, which are due this year, and for integrating NAPs into the NDCs²⁸, due in 2025, which will allow countries to better communicate their adaptation plans internationally. This is important to elevate political support for NAPs and monitor progress on adaptation needs and commitments. The NAPs themselves should also consider nature and biodiversity issues to prevent maladaptation that may lead to degradation of natural ecosystems, reinforcing climate change and its impacts.

To improve efficiency, NAPs and NDCs should synchronize their review and update cycles, ideally every five years, in line with the review period of NDCs, and this approach should be extended to NBSAPs. The simultaneous review and updates of NAPs, NDCs, and NBSAPs in 2024 and 2025 presents a strategic opportunity for countries to coordinate their national climate and biodiversity plans and commitments, ensuring synergies, streamlining reporting, and avoiding duplicative efforts.

Funding adaptation through public finance

Public, grant-based finance is critical for adaptation, especially in highly vulnerable countries (see section II). The private sector is generally not well-suited to address the broad and long-term needs of adaptation, often prioritizing short-term economic gains over cultural, social, and ecological progress. Without adequate public, grant-based finance, adaptation efforts risk being limited to merely protecting economic interests rather than promoting comprehensive societal and ecological well-being. Private finance tends to focus on large-scale, short-term projects, which contrasts with the need for long-term resilience building that reaches local communities; as noted in a recent OECD report, it is challenging “to mobilise private finance for activities that increase the resilience of smaller actors, e.g. small enterprises, and farmers.”²⁹. Private finance has also proven to be ill-suited for certain other sectors. For example, according to the World Bank, attracting such funding for interventions in the water sector has been problematic, due to its “high fixed capital costs, long payback periods and low profit margins”³⁰, while enhanced climate-resilient water and sanitation is a key indicator of the UAE Framework for Global Climate Resilience. In addition, private finance often includes loans, which exacerbates the debt crisis in climate-vulnerable countries. Thus, adaptation finance must be non-debt inducing and overseen by public institutions committed to long-term thinking and inclusive governance.

²⁸ As is stated in the Informal Note under ‘Best Practices and Recommendations in the Future’.

²⁹ OECD (2022) [Aggregate trends of climate finance provided and mobilised by developed countries in 2013-2020](#).

³⁰ World Bank (2023) [Scaling up finance for water](#).

V. Anchoring gender equality in climate policy

The pivotal role of women and girls in addressing climate change cannot be overstated. Their unique insights, leadership, and local knowledge are crucial for creating effective climate solutions and for sustainable resource management. The adoption of the Enhanced Lima Work Programme and its five-year Gender Action Plan (GAP) at COP25 marked a significant step forward by aiming to integrate gender equality into climate policies and action. However, to fully achieve these objectives, addressing their shortcomings and developing a more ambitious GAP at COP29 is essential.

The Enhanced Lima Work Programme on Gender and its five-year GAP focusses on five priority areas: capacity-building, gender balance, coherence, gender-responsive implementation, and monitoring and reporting. Since the adoption of the Programme, some progress has been made. The number of National Gender and Climate Change Focal Points (NGCCFPs) has risen from 38 to 140³¹, and the UNFCCC secretariat has started to actively track women's participation. Additionally, several governments have developed their own national GAPs. The Netherlands has yet to establish its own ambitious Gender Action Plan, which they should urgently create.

Unfortunately, the implementation of the GAP has encountered several challenges, including the compartmentalization of gender issues, rather than their mainstreaming and integration across UNFCCC tracks. Furthermore, focal points face capacity and financial constraints to meaningfully participate, and the GAP does not sufficiently address intersecting identities and the varied ways in which they are impacted by the climate crisis.

In line with the recommendations from the Women and Gender Constituency,³² we urge the Netherlands to advocate for an enhanced Lima Work Programme and Gender Action Plan that is more progressive, transformative and inclusive, with the necessary climate finance provisions for its implementation:

- **Coherence:** ensure that the GAP integrates gender equality goals across all negotiation tracks and strengthens coherence through process-oriented activities to make GAP efforts responsive and effective.
- **Clarity:** include clear indicators and timeframes for tracking progress, using both collective and disaggregated data. Support and outline national-level actions that align with existing processes and resources.
- **Intersectionality:** adopt an intersectional, feminist perspective to recognize and act upon gender-differentiated experiences and impacts, incorporating integrate gender-disaggregated data by age, race, ethnicity, geography, indigeneity, migration status, disability, and other intersecting identities.
- **Finance:** allocate sufficient resources to operationalize the next GAP and develop strategies for mobilizing and applying resources to gender-just climate actions.

³¹ Women & Gender Constituency (2024). [Submission to the Gender Action Plan Review](#).

³² See Women & Gender Constituency (2024)