

GENDER INTEGRATION IN NDC 3.0

PROGRESS, GAPS,
& PATH FORWARD



POLICY BRIEF
NOVEMBER 2025



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CLIMATE
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EXECUTIVE SUMMARY

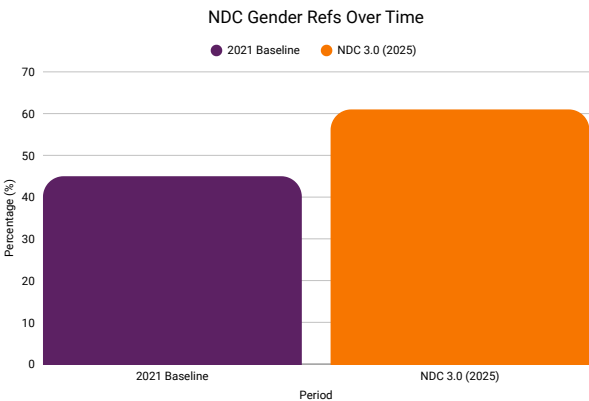
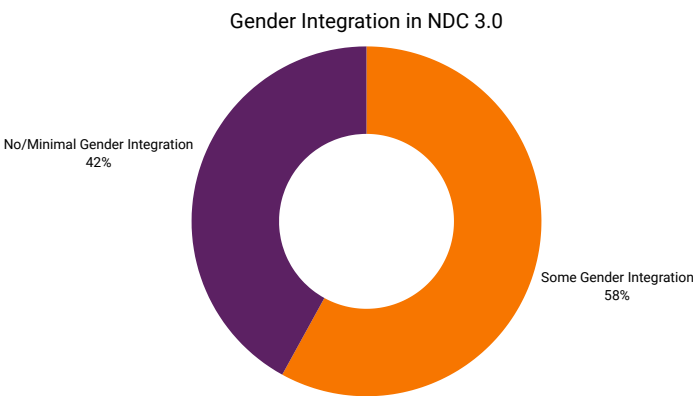
The third generation of Nationally Determined Contributions (NDC 3.0) marks a pivotal moment for advancing gender-responsive climate action. This policy brief presents an analysis of NDC 3.0 submissions from 36 countries submitted between December 2024 and September 16, 2025 (Cut-off date), revealing a landscape marked by both notable progress and persistent gaps. This assessment builds on baseline recommendations set out in CARE's 2021 NDC Report Card¹, providing a timely evaluation of how gender considerations are being integrated four years later.

Key Findings on Gender Integration

A comprehensive review of the NDC 3.0 submissions highlights a mixed picture of gender integration:

- QUANTITATIVE PROGRESS**

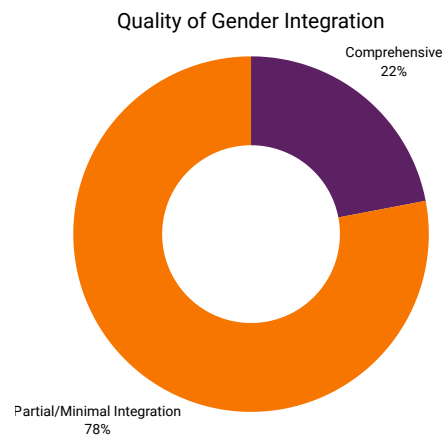
About 58% of NDC 3.0 submissions (21 out of 36 countries) show some degree of gender integration. This represents a modest improvement compared to 2021, when only 45% of NDCs meaningfully addressed gender issues.



Progress in gender references has increased from 45% in 2021 to 61% in NDC 3.0, showing growing awareness of gender-climate linkages.

- QUALITY CONCERNS**

Only eight countries (22%) demonstrate comprehensive integration of gender considerations across governance, planning, and implementation frameworks. This falls short of the level needed to fulfil the objectives of the Enhanced Lima Work Programme on Gender and its Gender Action Plan.



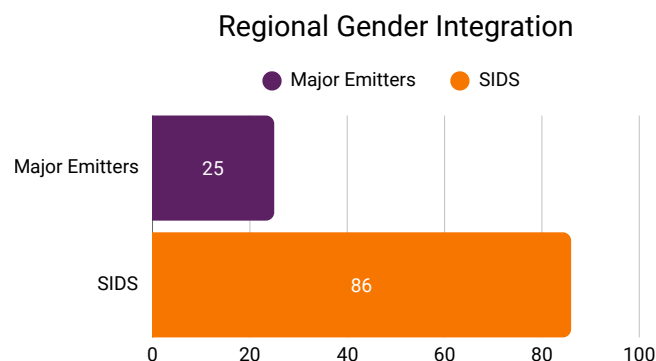
This means 78% of countries still lack the thorough integration necessary for meaningful impact—representing not merely a policy shortcoming but a fundamental failure to harness the full potential of humanity in addressing our greatest collective challenge in a manner that is effective, inclusive, and rooted in reality.

¹ [CARE-Gender-Quality-and-NDCs-v1.4.pdf](#)

- **REGIONAL DISPARITIES**

The analysis reveals stark regional differences in commitment to gender integration.

Small Island Developing States continue to lead in this area, with 86% including gender considerations. In contrast, major emitting countries exhibit significant gaps. Of the developed country Parties that submitted their NDC within our cut-off time of September 16th (United States, Japan, Canada, United Kingdom), only Canada demonstrates comprehensive gender mainstreaming.



While there is an improvement in the NDCs that reference gender, only 19% demonstrate the comprehensive integration necessary for meaningful impact.

This gap between rhetoric and implementation represents not merely a policy shortcoming but a fundamental failure to harness the full potential of humanity in addressing our greatest collective challenge in a manner that is effective, inclusive, and rooted in reality. The consequences of this failure extend far beyond abstract policy considerations, affecting the lives and livelihoods of billions of people, particularly the women who constitute half the world's population yet remain systematically excluded from climate decision-making processes.

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INTRODUCTION

The submission of third-generation Nationally Determined Contributions (NDC 3.0) marks a pivotal moment in the implementation of the Paris Agreement². As of September 16, 2025, 36 countries had submitted their updated NDCs, initiating what should be the most ambitious phase of climate commitments to date. This new generation of NDCs emerges at a critical juncture: scientific evidence confirms the acceleration of climate impacts and shows that climate change affects women and men differently. Furthermore, climate impacts intersect with existing gender inequalities, compounded by intersecting identities such as, but not limited to, race, disability, ethnicity, class, age, sexual orientation, gender identity, sexual expression and characteristics, education, and Indigeneity, creating differentiated vulnerabilities and capacities across diverse groups of women and men. Evidence, however, suggests that women often hold key solutions, as their involvement enhances the effectiveness and efficiency of technical assistance and development funding, promotes social justice, alleviates poverty, increases global sustainability, and improves the impact of disbursed climate finance³.

The Paris Agreement, notably as a preamble principle, acknowledges that climate action must respect, promote, and consider gender equality and the empowerment of women. Article 7.5 explicitly calls for gender-responsive adaptation actions, and Article 11 emphasises the need for gender-responsive capacity-building. These provisions establish not only aspirational goals but also a binding framework that requires Parties to integrate gender considerations into their climate commitments. The NDC 3.0 cycle, covering implementation periods from 2031 to 2035 and beyond, is the first complete revision cycle following the comprehensive gender mandates established at COP27 and COP28.

The timing of these submissions coincides with the tenth anniversary of the adoption of the 2030 Agenda for Sustainable Development⁴. Gender equality is critical if Parties are to implement the Paris Agreement in the context of sustainable development and efforts to eradicate poverty. This underscores the need for an intersectional gender approach, particularly linking the Sustainable Development Goals (SDGs) and the Paris Agreement, as emphasized in CARE's position paper on fostering gender justice in climate action⁵. The links between SDG 5 (Gender Equality) and SDG 13 (Climate Action) are more evident than ever. However, translating these synergies into concrete national climate policies remains both inconsistent and inadequate.

² <https://unfccc.int/NDCREG>

³ https://wedo.org/wp-content/uploads/2019/06/WomensOrgsClimateFinance_EngaginginProcesses.pdf

⁴ <https://sustainabledevelopment.un.org/content/documents/21252030%20Agenda%20for%20Sustainable%20Development%20web.pdf>

⁵ <https://careclimatechange.org/wp-content/uploads/2025/02/CARE-Position-Paper-Fostering-Gender-Justice-in-Climate-Action.pdf>

Policy Framework: Enhanced Lima Work Programme on Gender and Gender Action Plan

As part of efforts to advance gender balance and integrate gender considerations into the work of Parties and the UNFCCC Secretariat in implementing the Convention and its Paris Agreement, the Lima Work Programme on Gender (LWPG) was established in 2014 to achieve gender-responsive climate policy action⁶. Two years later, in 2016 (COP22)⁷, Parties decided to extend the LWPG for three years, with a review at COP25. Following a mandate from COP22, Parties adopted a two-year Gender Action Plan (GAP) at COP23⁸. At COP25, with both the work programme and Gender Action Plan poised for review, Parties agreed on a five-year enhanced Lima Work Programme on Gender and its Gender Action Plan⁹, which was amended as a result of the intermediate review at COP27. This history shows that, for about a decade, the LWPG and its GAP have been key to the UNFCCC's gender-responsive climate action.

The enhanced LWPG and its GAP, as amended by Decision 24/CP.27¹⁰, provide the overarching framework for gender integration in climate policy. While gender references in UNFCCC communications have risen, with 85% of Parties including gender in their latest reports¹¹, only 36 of 106 countries supported by the Climate Promise have incorporated gender considerations into energy sector mitigation measures in their NDCs¹². This gap between recognition and implementation underscores the need to closely examine how NDC 3.0 submissions are bridging—or failing to bridge—the divide between policy commitments and practical action.

At COP29, countries agreed to extend the enhanced LWPG for ten years. At COP30, countries are expected to decide on a new GAP. The workshop during the SB62 meeting in June 2025 resulted in an informal note (a draft GAP), which was further discussed and refined during the second technical workshop in Addis Ababa in September 2025. During both workshops, it was clear that there are still contentious issues which highlight deeper systemic challenges, setting the stage for a pivotal COP30 in Belém. The GAP to be decided in Belém should further enhance coherence across the UNFCCC system. A stronger GAP should better support Parties in translating commitments into action – leading to more transformative NDCs.

Methodology

This policy brief adopts a comprehensive approach to evaluate gender integration in the 36 NDC 3.0 submissions received between December 2024 and September 16, 2025. The cut-off date was set based on the time required to analyze the NDC and publish the policy brief before COP30. The analysis offers nuanced insights into both the extent and quality of gender integration and adapts the WEDO Gender Climate Tracker methodology¹³. The Gender Climate Tracker tracks gender-responsive climate action globally, particularly in relation to the implementation of the United Nations climate policy.

The analysis further incorporates the renewed LWP from COP29, the amendments to the Gender Action Plan and emerging best practices. Each NDC is scored across three dimensions: governance integration, planning processes, and implementation mechanisms. The pie chart highlights an equal emphasis—each at 33.3%—on the three foundational pillars of gender integration in climate policy assessment:

⁶ <https://unfccc.int/topics/gender/workstreams/the-enhanced-lima-work-programme-on-gender>

⁷ <https://unfccc.int/documents/9674>

⁸ <https://unfccc.int/resource/docs/2017/cop23/eng/11a01.pdf#page=13>

⁹ <https://unfccc.int/documents/210471>

¹⁰ <https://unfccc.int/documents/626564>

¹¹ <https://www.seforall.org/news/gender-responsive-climate-action-the-path-to-cop30>

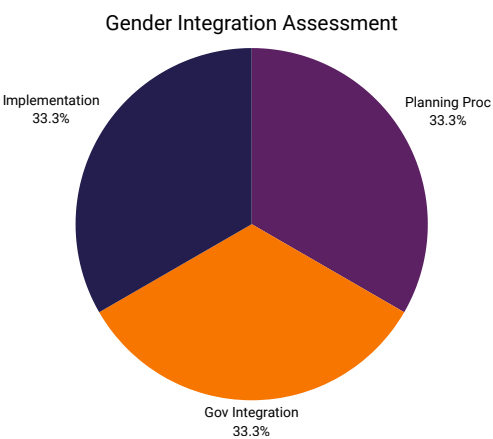
¹² <https://unfccc.int/news/new-un-climate-change-report-climate-policies-and-actions-around-the-world-are-increasingly-gender>

¹³ <https://genderclimatetracker.org/>

Governance Integration focuses on embedding gender considerations in vision statements, treating women as agents of change rather than only vulnerable groups, aligning climate strategies with national gender policies, and ensuring supportive institutional frameworks.

Planning Processes gives equal weight to genuine participation of women and consultation with women's organizations, applying gender analysis, and recognizing the expertise of indigenous and local women throughout NDC development.

Implementation Mechanisms ensures that action matches intent, spotlighting gender-responsive budgeting, sex-disaggregated indicators, monitoring and capacity-building, and well-defined implementation timelines.



The 36 countries analysed span all UN regional groups and major negotiating blocs.

Besides scoring, the analysis uses CARE’s traffic light method and reviews progress on 2021 CARE recommendations.

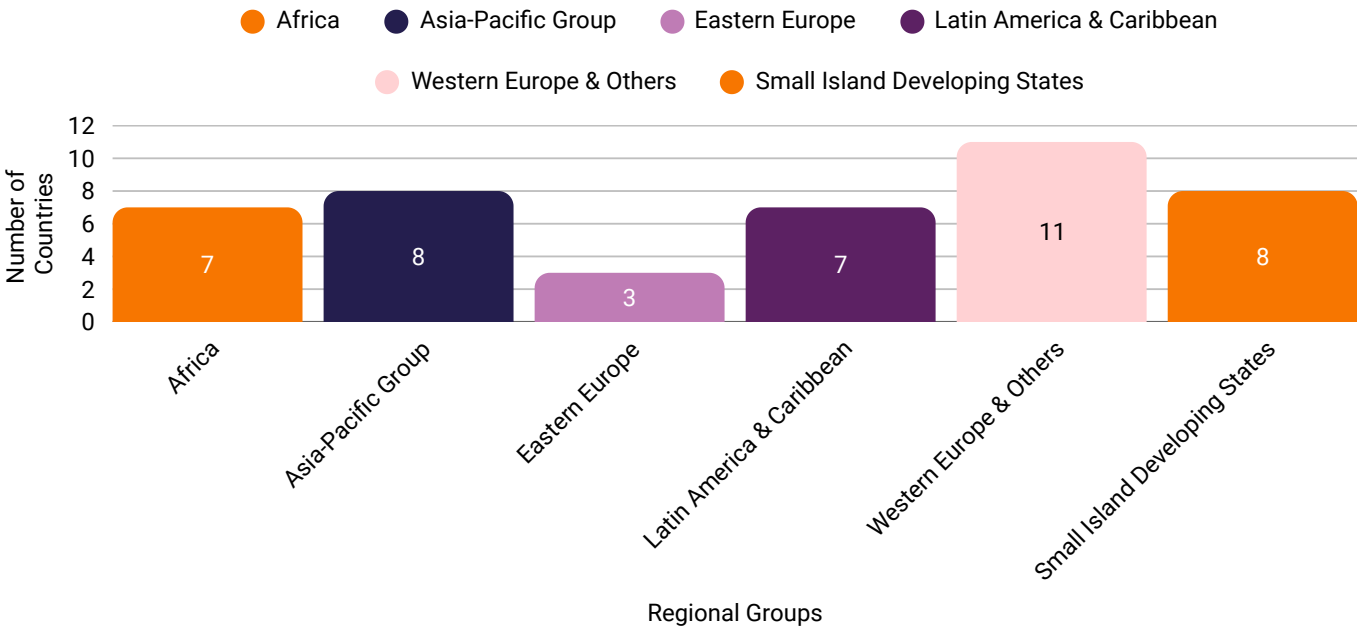


Figure 1: Countries Assessed by UN Regional Groups.

- African Group: Angola, Botswana, Kenya, Lesotho, Somalia, Zambia, Zimbabwe.
- Asia-Pacific: Cambodia, Japan, Maldives, Marshall Islands, Nepal, Singapore, Solomon Islands, UAE.
- Eastern Europe: Moldova, Montenegro, Serbia.
- Latin America and Caribbean: Barbados, Belize, Cuba, Ecuador, Saint Lucia, Uruguay.
- Western Europe and Others: Andorra, Canada, Holy See, Iceland, Liechtenstein, Monaco, New Zealand, Norway, Switzerland, United Kingdom, United States of America.
- Small Island Developing States: Barbados, Belize, Cuba, Maldives, Marshall Islands, Niue, Saint Lucia, Solomon Islands.

KEY FINDINGS FROM CARE'S 2021 NDC REPORT CARD

CARE International's 2021 "Breaking Barriers" NDC Report Card set a baseline for gender integration in climate commitments, revealing limited progress among 193 NDCs: only 45% referenced gender or women, 23% showed women's participation, 17% included Sex, Age and Disability Disaggregated Data (SADDD), 13% allocated resources for gender-responsive actions, and just 8% had gender-specific monitoring indicators. Assessment against CARE's five key recommendations shows uneven progress:

Table 1: Assessment of gender integration against CARE's 2021 recommendations

CARE'S RECOMMENDATIONS	ASSESSMENT
Capacity Development	Only 19.4% of countries have robust gender-climate capacity strategies, with Nepal and Cambodia leading. Most countries lack concrete plans.
Participatory Planning	Women's participation in NDC development rose to 39%, but only a few countries provided evidence of meaningful influence, and indigenous and rural women remained underrepresented.
Gender-Responsive Budgeting	Small improvement from 13% to 16.7%, hampered by limited guidelines, tracking, and competing priorities.
Sex, Age and Disability Disaggregated Data	Still weak, with only 13.9% offering comprehensive data, mostly in health and agriculture sectors.
Women's Organizations	While consultation increased (38.9%), only a few countries formalized ongoing participation or roles in implementation.

CARE's traffic-light analysis of NDC 3.0 shows progress: more countries now reference gender (61%), and comprehensive integration rose to 19.4%; however, 80.6% still lack thorough integration. Gender-responsive budgeting and monitoring mechanisms saw only marginal gains.

CURRENT STATE OF GENDER INTEGRATION IN NDC 3.0

Overview

OVERALL INTEGRATION RATES AND REGIONAL DISTRIBUTION

An analysis of 36 NDC 3.0 submissions demonstrates that gender integration within national climate strategies presents a nuanced and multifaceted picture. Among the countries assessed, 22—accounting for 61% of the total—include explicit references to gender or women within their climate commitments. This marks a modest improvement when compared to the baseline established in 2021.

Despite this progress, there remains significant variation in how countries operationalize gender references. While some submissions offer detailed plans and mechanisms for integrating gender considerations, others provide only brief mentions without concrete strategies or measurable actions. This disparity highlights the need for continued efforts to ensure that gender integration moves beyond symbolic references and becomes embedded in meaningful policies and practices across national climate agendas.

Table 2: Gender Integration by Level of Comprehensiveness

INTEGRATION LEVEL	NUMBER OF COUNTRIES	PERCENTAGE	COUNTRIES
Comprehensive (Green)	7	19.4%	Canada, Kenya, Marshall Islands, Nepal, Cambodia, Maldives, Solomon Islands
Moderate (Yellow)	15	41.7%	Barbados, Belize, Ecuador, Iceland, Moldova, Montenegro, New Zealand, Somalia, Zambia, Zimbabwe, Marshall Islands, Uruguay, Cuba, and Saint Lucia
Minimal (Red)	14	38.9%	United States, Japan, Singapore, Switzerland, United Kingdom, Angola, Serbia, Norway, Botswana, Lesotho, United Arab Emirates, Andorra, Holy See and Monaco

Regional and Thematic Analysis of Gender Integration in NDC 3.0 Submissions

GEOGRAPHIC DISTRIBUTION AND REGIONAL DISPARITIES

The geographic distribution of gender integration in NDC 3.0 submissions reveals significant regional disparities. Small Island Developing States (SIDS) demonstrate the highest rate of gender integration, with 87.5% (seven out of eight SIDS) achieving substantial mainstreaming of gender considerations. In contrast, major emitters show concerning gaps. Among the developed country Parties that have submitted updated NDCs, only Canada has achieved comprehensive gender integration.

REGIONAL PERFORMANCE ANALYSIS

The analysis of gender integration in NDC 3.0 submissions reveals considerable regional differences. In Africa, Kenya leads with comprehensive gender integration, while Zimbabwe and Zambia show moderate progress, and other countries demonstrate minimal efforts. The Asia-Pacific region displays the widest variation, with Nepal, Cambodia, and the Maldives excelling, but countries like Japan and Singapore lacking substantive measures. In Latin America and the Caribbean, most countries have moderate integration, with Belize and Saint Lucia adopting notable disaster risk reduction strategies, though some, like Cuba, lack specific implementation mechanisms. In Western Europe and other developed countries, only Canada exhibits comprehensive integration, whereas major economies such as the United States, the United Kingdom, and Switzerland offer minimal gender considerations, and some states include none at all.



Quality of Gender Integration Assessment

The assessment of gender integration in NDC 3.0 submissions reveals significant disparities across governance, planning, and implementation, as shown in the figure below.

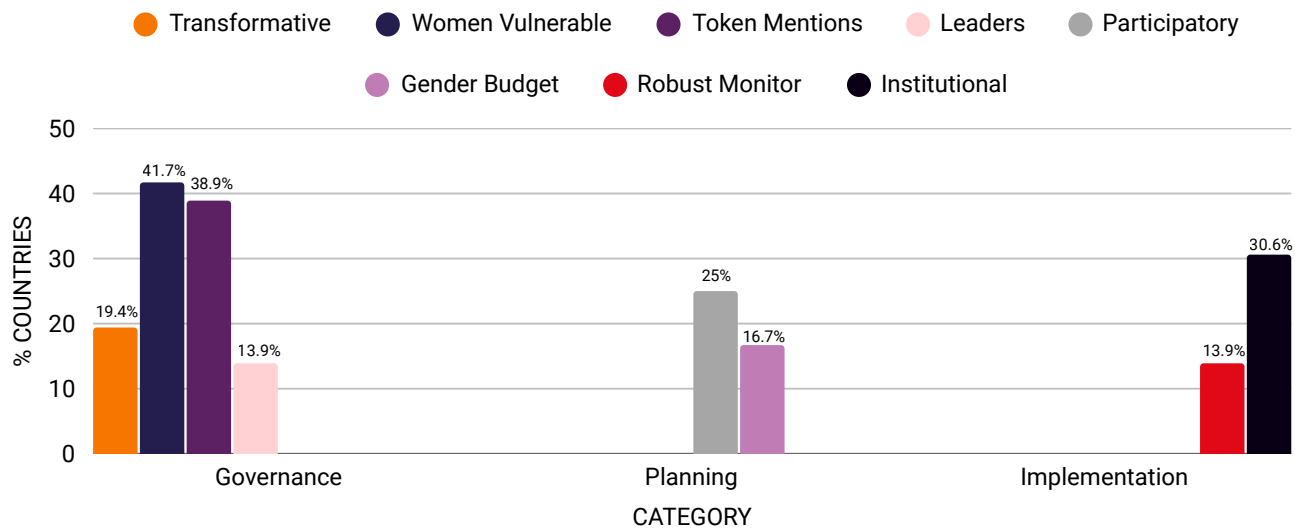


Figure 2: Gender Integration in NDC 3.0 Submissions by Governance, Planning, and Implementation (% of Countries)

Governance: Only 19.4% of countries center gender equality (transformative), while 41.7% frame women as vulnerable, and 38.9% offer only token mentions. Just 13.9% recognize women as climate leaders.

Planning: Meaningful participatory processes occur in 25% of countries, and only 16.7% have gender-responsive budgeting.

Implementation: Only 13.9% have robust monitoring, and 30.6% include institutional mechanisms for gender-responsive implementation. Over two-thirds lack sufficient baseline data, gender targets, or plans.

Overall, while a few countries provide strong models for integrating gender in climate policy, most fall short, with limited or tokenistic approaches and significant gaps in implementation and accountability.

Systemic Challenges

Systemic challenges persist, including inconsistent political will (especially among major emitters), technical capacity constraints, finance mechanisms that sideline gender considerations, and weak monitoring and accountability systems. This could also be the result of the patriarchal, imperialistic structure that is replicated within our economic models and other structures/systems.

Furthermore, recent negotiations on the LWP and the GAP have highlighted challenges in making substantial and ambitious progress, as well as in setting clear targets and accountability systems. While awareness of gender integration in climate policy has increased since 2021, translation into concrete, measurable, and funded action remains critically inadequate. Without significant improvement in future NDC submissions, there is a risk of perpetuating climate responses that fail to address the needs and potential of half the world’s population.

ANALYSIS OF NDC 3.0 AGAINST ENHANCED GENDER ACTION PLAN

The enhanced Lima Work Programme on Gender and its Gender Action Plan, amended by Decision 24/CP.27, sets out five priority areas with specific activities to guide national climate action. While it is not possible to assess the NDCs against every priority area, as the NDC outline is not aligned with the GAP Priority Areas, a general assessment of 36 NDC 3.0 submissions against these priorities reveals significant gaps between international commitments and actual national implementation. Most countries fail to address the GAP framework in a systematic manner.

The Enhanced GAP contains activities across five priority areas:

- Capacity-building activities include strengthening efforts to mainstream gender in national climate policies and plans, discussing the role of national gender focal points through workshops and peer learning, enhancing capacity to collect Sex, Age and Disability Disaggregated Data, strengthening evidence on differentiated climate impacts on men and women, and promoting social media communication
- Gender-balance activities promote leadership training for women delegates including young and indigenous women, mobilizing travel funds for women's participation, and facilitating dialogues on advancing indigenous women's leadership
- Coherence activities ensure constituted body members are introduced to gender mandates, facilitate exchanges on best practices among constituted body chairs, strengthen coordination with UN entities, and encourage support for implementing the plan
- Gender-responsive implementation activities include sharing experience on gender budgeting, raising awareness of financial support for women's organizations, promoting gender-responsive technological solutions, supporting information collection on gender and climate expertise, engaging women's groups in policy development, exchanging lessons learned among Parties, and enhancing the availability of Sex, Age and Disability Disaggregated Data
- Monitoring activities strengthen reporting on women in leadership positions, monitor gender-responsive climate policies in Party reports, support reviews of the plan through submissions and synthesis reports, and raise awareness of reporting support for developing countries.

The review identifies a consistent lack of implementation of the enhanced Gender Action Plan within NDC 3.0 submissions. The percentages provided indicate the degree to which countries have incorporated priority areas into their NDCs, as determined by an analysis of how these areas are integrated.

Table 3: Status of implementation for GAP priority areas in NDC 3.0

PRIORITY AREA	STATUS OF IMPLEMENTATION
Priority Area A (Capacity-building)	18% average implementation
Priority Area B (Participation/Leadership)	19% average implementation
Priority Area C (Coherence)	24% average implementation
Priority Area D (Implementation/Finance)	15% average implementation
Priority Area E (Monitoring/Reporting)	16% average implementation

Critical findings include near-zero implementation of new COP27 activities (Support from Constituted Bodies (C.4), Improve Gender Data Collection (E.3), Support for Reporting and Data Collection (E.4)), a disconnect between finance and implementation (15% for Priority Area D), and a monitoring void (only 13.9% have tracking systems). Major emitters show the weakest alignment with the GAP, undermining global progress. Countries performing best—such as Kenya, Nepal, Canada, and the Marshall Islands—take systematic approaches across multiple priority areas, while most others have scattered, uncoordinated efforts.

Overall, the Enhanced Gender Action Plan has not been effectively translated into national climate commitments. Without urgent improvements in future NDC submissions, and revisions to those already submitted, the GAP risks remaining an unfulfilled mandate rather than serving as a driver for transformative, gender-responsive climate action. The gap between COP decisions and country-level implementation has widened, requiring immediate intervention. The upcoming review at COP30 should strengthen the GAP and develop concrete activities to deliver actual impact, including a stronger provision for UNFCCC guidance on the NDC design, implementation, and monitoring as related to gender.

CASE STUDIES: A MODEL FOR COMPREHENSIVE GENDER INTEGRATION



Kenya's 2031–2035 Nationally Determined Contribution (NDC) is highlighted as a leading example of gender integration in climate policy among developing countries. Facing severe climate challenges, Kenya has institutionalized gender-responsive action by establishing a dedicated department within the Ministry of Gender, mandating gender-balanced representation in climate governance, and legally requiring gender-responsive budgeting. The NDC's planning process included detailed gender analysis and vulnerability assessments across all 47 counties in Kenya, resulting in targeted adaptation strategies. Implementation is structured through clear pathways, designated responsibilities, and specific resource allocations for women-led initiatives. Accountability is ensured through annual reports to Parliament, community monitoring, and biennial public evaluations. Kenya's model is notable for its political will, legal backing, inclusive planning, dedicated funding, and robust monitoring—offering practical lessons for other countries aiming to achieve comprehensive gender integration in climate action.



Canada's 2035 NDC represents a major transformation in gender integration, shifting from generic mentions in its 2021 document to a comprehensive, operational approach. This change was driven by advocacy from Indigenous women's organizations, a national inquiry highlighting the climate vulnerability of Indigenous women, and youth climate activism. The centrepiece is the CAD 85 million Indigenous Women's Climate Leadership Initiative¹⁴, developed in partnership with Indigenous women's groups, positioning them as leaders and decision-makers. The NDC applies an intersectional lens, addressing the unique climate impacts faced by different Indigenous women's communities, and establishes co-management structures that grant real power to Indigenous women's organizations. Monitoring includes Indigenous-defined indicators, ensuring that programmes reflect their priorities. Canada's approach demonstrates that political will, inclusive partnerships, and respect for Indigenous knowledge can enable rapid, meaningful progress in gender-responsive climate action.

¹⁴ <https://www.canada.ca/en/environment-climate-change/services/climate-change/indigenous-partnership.html>



The Maldives' Third NDC (February 2025) stands out as a leading example of gender integration in climate policy for Small Island Developing States. It explicitly addresses how climate change disproportionately affects women due to existing inequalities and establishes a policy mandate to mainstream gender across all climate sectors. The NDC is based on data-driven gender analysis, recognizing challenges such as women's health vulnerabilities and barriers in agriculture and fisheries. It outlines specific empowerment strategies, including support for women's entrepreneurship, decision-making, and livelihoods, with dedicated funding and gender-responsive technologies. The plan also emphasizes capacity-building, ongoing research, and monitoring to ensure accountability. The Maldives' whole-of-government, resource-backed, and sectoral approach serves as a model for other climate-vulnerable nations seeking comprehensive gender integration in their climate frameworks.

REGIONAL AND GROUP ANALYSIS OF GENDER INTEGRATION IN NDC 3.0

The regional and group analysis of gender integration in NDC 3.0 reveals significant variation and persistent gaps across countries and negotiation blocs:

Table 4: Regional analysis of gender integration in NDC 3.0

GROUP	ANALYSIS
African Group	Shows strong rhetorical commitments to gender, with 71% of submissions referencing gender (above the global average). However, only Kenya achieves comprehensive integration due to mandatory gender-responsive budgeting. The rest face challenges such as limited budgets, weak institutional capacity, poor data systems, and fragmented donor-driven strategies.
Asia-Pacific Group	Displays the widest variation—Pacific SIDS excel due to cultural and survival imperatives, while major economies like Singapore lag, treating gender as optional. South Asian countries (Nepal, Maldives) benefit from strong civil society engagement.
Latin America and Caribbean	Integration is moderate and procedural, guided by regional frameworks. Gender considerations often inform vulnerability assessments but rarely shape solutions, and implementation lacks resources and monitoring. Caribbean SIDS outperform in disaster preparedness, while countries like Cuba lack climate-specific gender mechanisms.
Western Europe and Others Group (WEOG)	Despite high capacity, most underperform on gender integration, with only Canada demonstrating comprehensive approaches. Barriers include assumptions of achieved equality, technical focus in governance, and weak advocacy.
Eastern Europe	Shows emerging but fragmented attention. No country has comprehensive integration, with most efforts being moderate or minimal, reflecting policy adoption without adequate resources or institutional reform.

Negotiation Groups (The regional groups that operate as negotiation groups have been discussed above):

Table 5: Analysis of gender integration in NDC 3.0 by negotiating groups

NEGOTIATION GROUPS	ANALYSIS OF GENDER INTEGRATION
G77 and China	G77 members exhibit wide variation in gender integration despite shared negotiation stances. While 65% reference gender, quality ranges from Kenya's comprehensive model to minimal inclusion in Angola and Lesotho. This diversity is driven by different national priorities, the varying influence of women's movements, disparate technical and financial resources, and tension between sovereignty and international norms.
AOSIS	Leads with 87.5% including substantive gender provisions, driven by lived climate impacts and community-based governance.
LDCs	High ambition, (80% reference gender) but weak implementation due to resource and capacity constraints.
Umbrella Group	Only Canada achieves comprehensive integration; others (Japan, USA, New Zealand, Norway) underperform due to ideological and structural barriers.

Developed vs. Developing Countries: Developing countries are more likely to have substantive gender provisions (68% vs. 45%), driven by lived experience and integrated policy approaches, but face resource and capacity challenges. Developed countries lag due to technical governance, perceptions of achieved equality, and lack of accountability, among other factors.

Key Findings: Strong gender integration correlates with high NDC ambition (e.g., Kenya, Nepal, Marshall Islands, Canada). Vulnerability to climate impacts, not capacity, drives integration. Major emitters' weak performance undermines global progress, and Small Island States lead by example. Political will and lived experience are more decisive than financial or technical resources in advancing gender-responsive climate action.

KEY FINDINGS AND GAPS IN GENDER INTEGRATION WITHIN NDC 3.0

Since 2021, there has been a noticeable increase in the mention of gender in national climate policies, with 61% of NDCs now referencing gender compared to 45% previously. This growth is reflected in advances such as more countries conducting gender-differentiated vulnerability assessments, increased women's participation in NDC development, and the establishment of gender institutional mechanisms. Seven countries (including Kenya, Nepal, and Canada) have adopted more transformative approaches, characterized by legal mandates, inclusive governance, and effective monitoring.

Despite these improvements, significant challenges remain. The gap between policy rhetoric and actual implementation persists, with only 19.4% of NDCs showing comprehensive gender integration. NDCs that reference gender often treat women as a monolithic category. Even NDCs considered "comprehensive" rarely recognize intersecting identities that increase vulnerabilities, resulting in ineffective climate action that does not reflect the lived experiences of communities.

Financial allocations for gender-responsive climate action are limited, and there is a critical lack of Sex, Age and Disability Disaggregated Data, especially in sectors like energy and transport. Institutional silos between climate and gender governance hinder coordination, and capacity constraints at technical, institutional, financial, and political levels are prevalent.

Emerging issues include a lack of intersectional analyzes, and insufficient international support structures such as dedicated finance windows and capacity-building programmes. There are also underutilized opportunities for peer learning and cross-country cooperation.

Overall, while there is greater awareness of gender-climate linkages, progress remains largely superficial. Vulnerable developing countries often lead in gender integration, challenging assumptions about climate leadership, but systemic change is lacking. **Strong gender integration is linked to higher NDC ambition, and without a shift from voluntary, incremental approaches to mandatory, resourced, and accountable strategies, gender-responsive climate action will remain inadequate, undermining both equality and effective climate solutions.**

Recommendations for Advancing Gender Integration in Climate Action

The review of 36 NDC 3.0 submissions highlights that voluntary gender integration has been insufficient and calls for strengthened frameworks with clear targets, dedicated resources, and accountability mechanisms. Concrete recommendations are provided for countries, the UNFCCC process, support organizations, and multi-stakeholder coalitions.

FOR COUNTRIES

- **Strengthened Frameworks for Gender Integration:** Legislate gender-responsive climate budgeting with intersectional analysis, ensure at least 40% women's representation with diversity quotas in climate decision-making, and formalize co-leadership roles for women's organizations, particularly from Global South and marginalized communities. Countries should refrain from removing language on gender and intersectionality from their future NDCs, as NDCs need to be more comprehensive and stronger on gender to demonstrate progress on gender integration.
- **Comprehensive Implementation:** Allocate a minimum of 2% of climate budgets to gender-transformative activities prioritising Women-led Organizations (WLOs)/Women's Rights Organizations (WROs), simplify direct-access funding for grassroots women's groups, and partner with diverse women's organizations to co-design and co-manage climate programmes addressing intersecting vulnerabilities.
- **Monitoring Systems:** Track gender-specific indicators using Sex, Age, and Disability Disaggregated Data, require annual parliamentary reporting linking NDCs with SDGs and the Convention on Biological Diversity (CBD) Gender Action Plan, and establish community-based monitoring led by women's organizations. There should also be clear monitoring frameworks to track progress and the achievement of the GAP.
- **For countries with weak NDCs:** Revise NDCs to ensure robust gender strategies, partner with successful countries for peer learning, seek technical support from international organizations, and engage domestic women's organizations as technical partners.
- **Systemic Barriers:** Strengthen the role of the National Gender and Climate Change Focal Points by ensuring the appointment of full-time senior gender focal points across ministries, require gender-transformative criteria for all climate funding including carbon markets, invest in SADD systems, and build capacity for intersectional gender-responsive budgeting.
- **Emerging Opportunities:** Integrate gender into carbon market mechanisms; ensure just transitions address women's unpaid care work and create green jobs for women; integrate intersectional gender analysis into nature-based solutions; and bridge digital divides affecting marginalised women's access to climate technology.

FOR THE UNFCCC PROCESS

- **Enhanced Gender Action Plan:** Shift to strengthened gender -transformative measures, with clear measurable indicators, institutionalization, and adequate seniority for gender climate change focal points, establish regional capacity hubs prioritizing Global South, and fully resource GAP implementation beyond negotiations.
- **Participation and Leadership:** Set a minimum 40% women's representation in delegations, fund and support the full, equal and meaningful participation for women from developing countries, and protect women environmental and human rights defenders.
- **Coherence and Monitoring:** Institutionalize national gender climate change focal points at a level that allows communication and coherence across negotiation streams integrate gender goals throughout multi-year processes like the Global Stocktake, require marked bilateral climate finance targeting gender to 88% per the 2021 Global Acceleration Plan¹⁵, and develop SADDD guidelines for BTRs. For impact, the gender focal points should be persons in senior decision-making positions to manage the risk of tokenism.
- **Institutional Reform:** Establish a dedicated Gender and Climate Change Unit within the UNFCCC secretariat and require certification for gender-responsive NDCs. The Unit should also implement the UN Gender Equality Acceleration Plan¹⁶, resist regressive language prioritizing "gender equality" over "gender balance," leverage CSW68 conclusions and CBD intersectional definitions, and ensure direct funding access for Global South WLOs/WROs.

FOR ORGANIZATIONS SUPPORTING COUNTRIES IN THE NDC DEVELOPMENT AND REPORTING PROCESSES

- **Technical Assistance:** Provide technical support to countries yet to submit NDCs to integrate gender by providing intersectional gender-integration templates, prioritizing LDCs/SIDS, providing multilingual help desks, and training gender-climate specialists from the Global South as lead experts.
- **Knowledge Management:** Create open-source platforms documenting intersectional best practices, build SADDD indicator repositories, establish real-time tracking of gender-responsive climate finance, and amplify marginalized women's climate solutions.
- **Financial Support:** Simplify application procedures for funding, provide capacity-building grants, develop gender bonds, and create crowdfunding and microfinance products for women's climate initiatives.
- **Private Sector Engagement:** Implement gender criteria in Environmental, Social and Governance (ESG) investments, certify gender-responsive businesses, and prioritize women-owned enterprises in procurement.
- **Coalition Building:** Strengthen regional networks centering marginalized women's voices, support intergenerational dialogue including youth movements, document transformative practices challenging power dynamics, and establish awards recognizing intersectional climate leadership.

Critical Actions Before COP30



Mobilize resources ensuring WLOs/WROs from underrepresented communities receive simplified direct access to NDC development support.



Publish assessments using intersectional analysis revealing compounded vulnerabilities based on race, class, disability, indigeneity, and sexual orientation.



Establish accountability frameworks with diverse women's organizations as co-monitors tracking gender-transformative progress beyond representation metrics.

¹⁵ <https://forum.generationequality.org/sites/default/files/2021-06/UNW%20-%20GAP%20Report%20-%20EN.pdf>

¹⁶ <https://press.un.org/en/2024/dsqsm1895.doc.htm>



Implementation Pathway

1. **Immediate Intervention (2025–2026):** Focus on NDC submissions, finalize the Gender Action Plan, and mobilize resources.
2. **Systematic Integration (2027–2030):** Scale up capacity-building, funding, and monitoring.
3. **Transformation (2031–2035):** Achieve full gender integration and measurable impacts globally.

These recommendations emphasize that only a coordinated, mandatory, and fully resourced approach—supported by robust accountability—will deliver gender-responsive climate action at the necessary scale. Incremental progress is no longer sufficient; transformative measures must begin now to avoid perpetuating exclusion and inequality in climate solutions.

CONCLUSION

A comprehensive analysis of 36 NDC 3.0 submissions submitted by September 16, 2025, reveals a significant gap in the integration of gender considerations within global climate action. Despite clear mandates, ample evidence, and years of advocacy, only 19.4% of NDCs fully address gender, mainly due to insufficient political will rather than a lack of capacity. Developing countries, especially those most affected by climate change, such as Small Island Developing States, show higher rates of gender integration compared to developed nations, underscoring that the urgency of impact drives action more than resources. Without urgent improvements in future NDC submissions, and revisions to those already submitted, the GAP risks remaining an unfulfilled mandate rather than serving as a driver for transformative, gender-responsive climate action.

Persisting with gender-blind climate policies not only undermines climate effectiveness and perpetuates inequality but also misses out on the vast economic benefits of gender equality, estimated at \$12 trillion in potential GDP gains¹⁷. Excluding women from climate solutions is seen as both a moral and practical failure, given their disproportionate vulnerability to climate impacts and the necessity of their participation for just and democratic climate governance.

Still, a window of opportunity remains. With many countries yet to submit their NDCs and the upcoming review of the Gender Action Plan at COP30, there is a pivotal chance to embed gender-responsive approaches into climate policy. Recent successes in diverse countries show that effective integration is possible; what is needed now is strong political will to adopt proven solutions at scale.

¹⁷ <https://www.tandfonline.com/doi/full/10.1080/17565529.2017.1372266#d1e225>

A CALL TO ACTION: PATHWAYS FOR GENDER-RESPONSIVE CLIMATE TRANSFORMATION

This section issues an urgent call for transformative, gender-responsive climate action, outlining clear roles and responsibilities for key stakeholders:

- **Heads of State and Government:** Mandate specific budget allocations for gender-responsive activities, ensure balanced representation in climate leadership, and champion gender integration at major climate summits.
- **Climate Negotiators:** Move from voluntary to mandatory gender integration in policies, set concrete targets with accountability, secure financing, and facilitate direct funding access for women's organizations.
- **Women's Organizations and Movements:** Continue advocacy, hold governments accountable, demand direct access to climate finance, build coalitions, and share grassroots solutions.
- **Climate Finance Institutions:** Make gender-responsive allocations mandatory, create direct access for women's organizations, apply gender criteria across investments, and report transparently on outcomes.
- **Private Sector:** Embed women's leadership in governance, develop products and services for women, invest in women-led solutions, and publicly report on gender impacts.
- **Youth and Future Generations:** Demand inclusive governance, challenge gender-blind approaches, build intersectional movements, and push for bold transformation.

The document stresses that immediate and systemic reform is required - moving from rhetoric and voluntary measures to mandatory, well-resourced, and accountable gender-responsive climate action. Gender equality is not optional but essential for effective climate solutions. The legacy of this generation will be defined by its commitment to inclusion and justice in addressing climate change. **The time to act is now.**

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