

Further guidance on features of NDCs to be discussed in 2026

9 Dec, New Delhi (Radhika Chatterjee) - Parties at the Baku climate talks that ended on Nov 24, agreed to continue discussions on further guidance on features of nationally determined contributions [NDCs] in 2026, which will take place at the eighth Meeting of Parties to the Paris Agreement [CMA 8].

This issue was discussed at CMA 6 in Baku, under the agenda, titled "Further guidance on features of NDCs...". The mandate for the discussion stemmed from paragraphs 19 and 20 of decision 4/CMA.1 [adopted in 2016 in Morocco], which states: "19. Notes that features of NDCs are outlined in the relevant provisions of the Paris Agreement (PA); 20. Decides to continue consideration of further guidance on features of NDCs at its ... session (2024)."

The discussions were controversial, with key areas of divergence amongst Parties including: the question of what constitutes NDC features, what kind of new features may be required for further guidance on NDCs, and timeline of further discussions on this item.

Developing countries like the **Like-minded developing countries (LMDC)**, the **African Group**, **Arab Group**, **Group SUR (Brazil, Ecuador, Paraguay, and Uruguay)**, **India** and

Egypt said, NDC features were provided for in the PA and the nationally determined nature of NDCs was crucial. In terms of new features for NDCs, these groups wanted the following to be considered: guidance for adaptation, finance, technology transfer, capacity building, and impact of developed countries' response measures on developing countries. They also stressed the need for maintaining differentiation between developed and developing country NDCs.

Developed countries like the **United States (US)**, **European Union (EU)**, **United Kingdom (UK)**, **Switzerland**, **Australia**, **Canada**, **Japan** and some developing countries like the **Alliance of Small Island States (AOSIS)**, wanted to consider the following for further guidance on NDC features: quantifiable targets; economy wide absolute emission reduction targets for all countries; following up of the global stocktake [GST] outcomes from Dubai last year [paragraphs like 28,33,38,39,40 were mentioned which relate to mitigation efforts]; aligning NDCs and long term low greenhouse gas (GHG) emission development strategies (LT-LEDS) with 1.5°C goal; clear base lines for emissions and peaking years. Developed countries like the **UK** argued that including quantifiable targets would make NDCs

comparable and accountable.

Regarding the timeline for further discussions on this item, many like the **African Group, India, Egypt, South Africa, Chile, Russia, Norway**, and **South Korea** were not keen on continuing discussions as they felt the features were already provided for by the PA. The **African Group, India, Norway** and **Chile** even suggested concluding the consideration of this item in Baku itself, while the **US, UK, EU, Switzerland, AOSIS** and the **Least Developed Countries [LDCs]** wanted to continue further discussions on this item.

Finally, Parties agreed to discuss this matter again in 2026, with no agreement on new features of NDCs.

HIGHLIGHTS OF INTERVENTIONS

China for **LMDC** said NDC features are a summary of characteristics of NDCs and any discussion on this topic should not prejudice the work of Parties. It further added that not all Parties can include targets in their NDCs; rather they include policies and measures. It added that the mandate for further guidance on NDC features does not imply that Parties should “continuously renegotiate the PA” and that it was also not about a follow up or duplication of the GST [process].

Outlining some key features of NDCs, it said, Article 4 of the Convention and Articles 3, 4.4 [mitigation], 4.5 [support provided to developing countries for their actions], 7 [adaptation], 9 [finance], 10 [technology], and 11 [capacity building] of the PA constitute the features of NDCs. It called the nationally determined nature of NDCs its most crucial feature, according to which it is up to Parties to determine what their actions should be in a bottom-up manner. The scope of NDCs, it said, is laid out in Article 3 of the PA, according to which, NDCs cover aspects relating to mitigation, adaptation, finance, technology development and transfer, capacity building, and support. Together these components make NDCs a holistic document, and that mitigation is not the only focus of NDCs. It stressed that the PA “already provides guidance for NDCs”, and therefore any new features for NDCs “should be rooted in the PA itself” and should not undermine it.

[Article 3 of the PA states: “As nationally determined contributions to the global response to climate change, all Parties are to undertake and communicate ambitious efforts as defined in Articles 4, 7, 9, 10, 11 and 13 with the view to achieving the purpose of this Agreement as set out in Article 2...]. [Article 13 refers to the enhanced transparency framework for action and support.]

China said further that ambition needs to be seen not only in mitigation, but also in the provisioning of finance, technology development and transfer, capacity

building, and support. It added that the principle of common but differentiated responsibility and respective capabilities (CBDR-RC) provided for the significant role of enhanced support for ambitious mitigation and adaptation actions, and that enhanced support would allow for higher ambition and action. Further, it said Article 4.15 of the PA provides that NDCs have to take into “consideration in the implementation of this Agreement the concerns of Parties with economies most affected by the impacts of response measures”.

Stressing the need for differentiation in the NDCs of developed and developing countries, it said that developed countries “shall continue taking the lead” by undertaking “economy wide emission reduction targets” and that their NDCs “shall include...laws, policies and measures” such that they “demonstrate their leadership” and provide support to developing countries. Regarding technology development and transfer, and capacity building components of developed country NDCs, it said they “shall include quantifiable plans” and policies towards these purposes. It added that developed countries’ NDCs “should not include any unilateral measures against goods from developing countries”.

Developing countries’ NDCs should be prepared and communicated in the context of goals of sustainable development and poverty eradication and their different national circumstances, it said further. Highlighting the importance of co-benefits of mitigation, it said, developing countries’ plans for diversifying their economies could accelerate their mitigation plans.

Responding to calls from developed countries for including economy wide absolute emission reduction targets in NDCs of all countries as a feature of NDC, it said, “if one day all Parties could provide economy wide emission reduction targets, then we can have that as a feature. But even if one Party is not able to give that, we cannot have that as a feature.” Related to this was the argument of comparability of NDCs that was advanced by developed countries. To this, the LMDC expressed its reluctance “for a top-down approach”, and stressed that the nationally determined nature of NDCs meant that comparability cannot be pushed.

Zimbabwe for the **African Group** said existing guidance for NDCs is sufficient, and if new features for NDCs are considered, they should “focus on all elements that form NDCs and their enablers [including] mitigation, adaptation, finance features... new guidance [should] be around how NDCs can be supported through finance.” Elaborating further in a later session, it said there is need for guidance for “means of implementation and adaptation”, and that this “will help unlock financing.” Further, it

wanted consideration of loss and damage in the discussion, and how Parties can articulate their technology needs to make the discussion holistic.

Saudi Arabia, for the **Arab Group** outlined several general principles. First it said, “nothing would infringe on nationally determined nature of NDCs” and stressed that “the PA sets the roadmap for what features ought to be”, and that its elements should not be redefined. The second principle it mentioned was that any element that related to information for clarity, transparency and understanding (ICTU) of NDCs, would be addressed in the next few years and was not within the mandate of this session, as most of ICTU is related to mitigation component. [According to paragraph 18 of [decision 4/CMA.1](#), the review of ICTU is scheduled for 2027.]

It said that paragraph 19 of [decision 4/CMA.1](#) provides that the PA “is the original guidance on NDCs” and that “nothing in further guidance can be developed which contradicts the PA”. It stated that Article 4.4 of the PA “indicates that developed countries should take the lead”, and that “this is a clear feature of NDCs of developed countries but not of developing countries”. “Article 3 of the PA represents the roadmap for features of NDCs”, it said adding that “NDCs are not mitigation vehicles solely”, and mentioned Articles 4,7,9,10,11 and 13 of the PA in this context. It said there is a need to discuss “how are we building on Articles 3,7,9,10,11 of the PA in our NDCs” and stressed “a lot of work on adaptation, finance, technology, capacity building” is required, to “ensure we are progressing collectively.” In a later discussion it added that “further guidance will follow from the comprehensive implementation of Article 3 of the PA” and that Article 3 was not “just about refining targets”.

Highlighting the need for including elements regarding adaptation features it said, “elements on how we are adapting consistently with the temperature goal”, including aspects that emerge from the global goal on adaption. It also added that features related to adaptation support could include “specifications of some of the support requirements, costs by region, sector, adaptation needs”. In this context it also mentioned “elements related [to] institutional strengthening requirements... technology elements including

technology transfer needs...[and] potential benchmarks for link with financial support”.

It said “elements related to guidance on finance features of NDCs would apply to developed countries” and these would include “finance targets, pledges, commitments...[and] could also include finance provided for technology access...[and] for accelerating the sharing of best practices” and “could relate to technology, adaptation, mitigation and strengthening institutional arrangements of developing countries”. It also mentioned that NDC features should take into account impacts related to response measures.

India said that the PA mandates that NDCs are voluntary in nature and that there is no “further scope to provide any guidance to NDCs”. It said nothing in decision 1/CP.21 provides for expanding the scope of NDCs and added that role of GST was to inform NDCs. However, “what Parties choose to do with the information is guided by the PA”. It added that the purpose of this discussion should not be “to introduce any top-down element in NDCs”. In response to suggestions by some developed countries, it said that “NDC features is now becoming an entire list of all possible mitigation actions” and that “this is not the space for such guidance”.

Expressing strong inclination for closing discussion on this item at COP29, it said “you would have to be very careful that you do not disturb the nationally / voluntary character [of NDCs].” Said India further, “the moment we open the discussion Parties start dictating targets...If Parties want discussion on top-down restrictions on Parties commitments, that discussion is not about features of NDCs. We would be delighted to have a discussion on how the fair shares of carbon budget is undertaken, issues of historical responsibility, overconsumption of carbon budget, adequacy of net zero emissions etc... but please do not call these features of NDCs.”

Responding to the point made by developed countries about the importance of quantification of mitigation aspects in NDCs, India said further that quantification is related to ICTU, which would be discussed in 2027. It added “if features spill over into ICTU” then “that is not mandate we are

working on.”

Egypt, said the PA is the reference for NDC features guidance and “it clearly defines key features of NDCs.” It said Article 4 of the PA already provides sufficient features on mitigation and that there is now a need for further features on adaptation, finance, issues of means of implementation, and loss and damage.

Chile said the framework and process guiding NDCs is established under the PA and proposed a sunset clause on the discussion because it felt too many agenda items was “getting unmanageable”. It said there is a need to consider “whether we need further guidance on NDC features” and “whether our work is done here”. It asked, “if a system works, then why additional guidance is needed?” Adding further, it said, “we have already done much of that job...we have agreed on common timeframes; the PA establishes that NDCs [are] to be submitted by every country, every five years [as] vehicles for achieving the long-term goals of the PA.” Chile also added that “Parties can enhance their ambition and cooperation [and this] should not be based on new features that everybody would needs to comply with.”

In a later session Chile said that “features of NDCs are defined in the PA and associated decisions...[there is] no need to include definitions of further features of NDCs.” It said “it would be interesting to discuss more about aggregate effects of NDCs and how we can individually contribute to the NDCs, how we can continue contributing to the long-term goals of the PA, [but] that is another discussion.” It also said that “most developing countries have included an adaptation component in their NDCs. It would be of benefit to reflect on what type of voluntary guidance can be developed for adaptation...What type of guidance can we expect for NDCs in terms of provision of funds.” It added that “there has been a discussion around voluntary guidance for ocean components” and that many coastal countries have included ocean components in their NDCs, and stated that it “would be good to include guidance for them.” On the point regarding making NDCs comparable, it said the common ground for making NDCs comparable is the fact that Parties “are producing documents that are common”.

Brazil for Group SUR said that the PA “contains all of the features to NDCs” and that Parties “need to be very clear [that] we are not here to renegotiate the PA,” adding that the “nationally determined nature of NDCs is non-negotiable” and that Article 3 of the PA provides for this. It said that discussion on further guidance for NDCs should integrate aspects related to not only mitigation but also connect 1.5°C goal to adaptation, finance, technology transfer, and capacity building; and added “these are not present in our current NDCs”. Regarding mitigation, it said if there is will amongst Parties then negotiations on how to globally align policies to 1.5°C goal could be started. It said, “we expect developed countries to go first” and mentioned the need for reflecting equity and CBDR-RC. Recalling Article 4.4 of the PA, it said, “developed countries should continue to take the lead by undertaking absolute economy wide absolute emission reduction targets” and that it was a legal obligation for them.

It also said that “the recent increase in global temperatures and various scientific scenarios” show the need for “urgent collective action.” It mentioned that the PA provides for a progression over time “recognizing the need to support developing countries for effective implementation of the PA.”

It said COP29 “could provide an opportunity to include finance from developed to developing countries as a key feature [of NDCs]” and mentioned Article 9.1 of the PA which states that developed countries shall provide developing countries with financial resources with respect to both mitigation and adaptation. It also added that the “GST recommends Parties should cooperate to set up an open international economic system... [and that] measures to taken to combat climate change, including unilateral ones, should not constitute arbitrary... [and] discriminatory measures” and that trade components of Annex I Parties’ climate actions “can have negative cross border impacts.”

Bangladesh for the **LDCs** said more clarification and elaboration is needed for some of the existing features of NDCs. It said there is a need for information around enhanced support for developing countries to allow for progression in their NDCs. It also said that responding to the

outcome of first GST is important, such as the question of how NDCs are informed by the outcome. It asked for alignment between Parties' NDCs and LT-LEDS. It also said there is a need for guidance related to alignment of 1.5°C goal, and also raised the issue of addressing finance gap to address mitigation gap. It also stressed the need to consider the special circumstances of LDCs and SIDS and asked for inclusion of "information related to capacity building support that our countries have got so far" for enhancing their "emission reduction targets". It further added, "there should be some information related to adaptation, loss and damage support components" as well. It encouraged Parties who are "capable of providing" information related to "absolute emission reductions" to do so.

Samoa for **AOSIS** called for "strengthening targets in new NDCs" in alignment with 1.5°C goal and "more ambitious NDCs". Some of the key principles for further guidance for NDC features it said included economy wide emission reduction targets covering all GHG emissions, informed by latest science and in light of national circumstances and so on. It also highlighted the need for discussing how Parties implement GST outcomes. Stating that "it is very important that NDCs remain nationally determined" it added that "NDCs are our contributions towards agreed global targets... the most important feature [of NDCs] is the collective ambition in them." It said that Parties' current NDCs was falling short on the call for achieving net zero by 2050 and stressed additional guidance for NDC features "will not impact submission of NDCs in 2025". It said future NDCs should be informed by the GST outcome, and mentioned the need for tripling renewable energy, doubling energy efficiency, transitioning away from fossil fuels, reducing methane emissions and addressing deforestation in this context. Finally, it said "the ability to provide more detailed existing features and new features would depend on Parties capacity to do so."

Regarding the timeline of NDC features discussion, it supported an early discussion of the issue and asked for continuing consideration of this item at CMA.7 and said "earlier consideration of NDC features is preferable to avoid further delays in this process. AOSIS is concerned if this is pushed to 2026 or 2027, any guidance that comes from them

would be too late for NDC submissions due in 2030." It added that "NDC features is more important for AOSIS because we need more time to ensure capacity building" so that its members can take new guidance into account in the preparation of new NDCs. In the later sessions, while emphasizing the urgency of mitigation action, it said, "such ambition is only possible with support" and that "developing countries need maximum support."

Switzerland said it understands NDC "features to be the boundary conditions" and that "pure national determination does not deliver a coherent international regime." Adding that it has conducted an analysis of potential new ideas, it said "NDCs need to be quantified in terms of CO₂ [carbon dioxide] equivalent" and that there was no guidance for this as of now. It said that "95% of Parties" already provide "quantified targets" and that "this could be a landable feature". Further, it said, "we would like to see Parties put forward economy wide absolute emission reduction targets...[that] would bring significant contribution...". It also said it "would like to see guidance on NDCs being 1.5°C aligned" and "to revisit and strengthen their 2020 target". Highlighting the need for aligning NDCs and LT-LEDS, it said "there is already quite some progress" in this and aspects like "year of peaking of emissions, net zero targets" could also be included. It said that "when formulating mitigation contributions, Parties should follow the most recent IPCC guidance." It said that "there is a small number of Parties who have fully conditional NDCs" and called that "problematic". It was willing to look at potential conditions for LDCs and SIDS.

It said there are some areas where there is a "massive ambition gap" and that "in some places the system is not working" and expressed the need for additional "soft guidance" for "preparation of stronger NDCs". At the same time, it said "when we talk about features or discussions on further guidance of NDCs [it] doesn't have to be legally binding." Highlighting NDCs' relevance as "climate policy planning in many countries" it asked for a discussion on "how NDCs should be underpinned by strong measures" and that "means of implementation can support NDCs".

EU said that "NDC features can increase ambition"

and allow for “displaying highest possible ambition over time.” It said that it “sees value in addressing economy wide absolute emission reduction targets, aligning NDCs with net zero strategy by 2050, to keep 1.5°C within reach...” It also mentioned that the GST outcome “provides us with further information on mitigation elements”, that could be taken up. It said that NDC features “cannot impact nationally determined manner of NDCs...based on our analysis of process as such, and GST of last year, we are convinced that there is space where Parties can provide further guidance to NDCs without impacting bottom-up nature of NDCs.” It said that “guidance on features that we are providing here can help” in a “nationally determined response to implementation of the PA.”

The **UK** said that guidance from the UAE Consensus [decisions taken in Dubai in 2024], asks Parties to “come forward with NDCs which are ambitious” and stressed the need for economy wide absolute emission reduction targets. It said using economy wide emission reduction targets would make NDCs “comparable, transparent... and accountable.” This, it said, would allow for more action. A few elements that it mentioned for being considered as NDC features included “quantifiability, clear base lines, peaking years”. It said there is a need for aligning NDCs and LT-LEDS to ensure “we are all on path to net zero.”

The **US** said the “PA is the basis for all work on

NDCs”, and that the “nationally determined nature of NDCs is of primary consideration.” It said that “NDCs are now in the main quantified, largely unconditional, have base years, economy wide absolute emission reduction targets” and mentioned GST outcome as providing “great guidance” for NDCs. It also mentioned Article 4.4 of the PA and stated that while it mentions that developed countries should take the lead, it also mentions the need for developing countries to progress on their NDCs. Some NDC features the US said it would like to be considered are the quantified nature of NDCs, unconditional aspects of NDCs denominated in terms of GHG emissions, economy wide emission reduction targets and the need for aligning LT-LEDS towards net zero around mid-century. It added that “when we talk about [NDC] features, we are talking about NDC targets.”

Other developed countries like **Australia, Canada** and **Japan** also reflected similar views like that of the US and EU.

Norway and **South Korea** however, were not in favour of providing further guidance for NDC features.

With the wide divergences on the matter, Parties finally agreed to consider this issue further in 2026.

[The next NDCs are supposed to be communicated by Feb. 2025 for the time-frame 2031-2035].