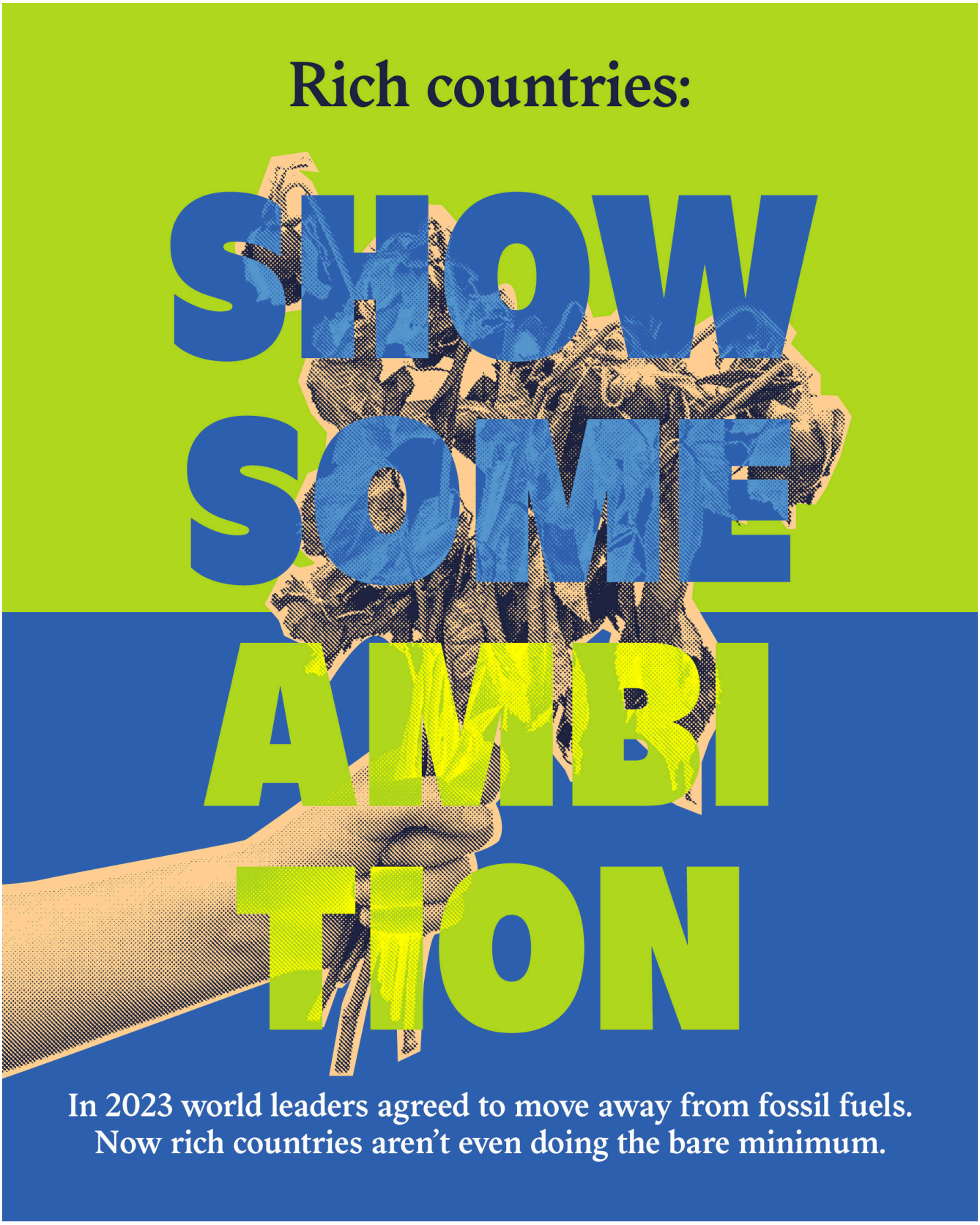
NDCs 3.0: Missing the Mark on Ambition and Equity

An assessment of ambition gaps by developed countries and G20 countries in the new round of NDCs



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Executive Summary

Climate disasters are the new normal. From floods to megafires, extreme weather now costs hundreds of billions annually, with losses disproportionately borne by the poor. In a historic decision, the International Court of Justice has ruled that achieving 1.5°C is a legal obligation for all countries, as well as submitting enhanced nationally determined contributions (NDCs) every five years. As per the ambition cycle of the Paris Agreement, these NDCs must be informed by the outcomes of the Global Stocktake, including notably transitioning away from fossil fuels in a just, orderly and equitable manner.

Despite these clear mandates, the ambition gap of the new round of NDCs is clear, as exposed in this briefing, which focuses on developed countries - given their historical responsibilities -, and G20 countries, which collectively account for 80% of GDP and current global GHG emissions.[1]

The analysis focuses on three pillars: 1) commitments to deliver on international public grant-based climate finance by developed countries; 2) commitments to reduce emissions through a fossil fuel phase-out in line with CBDR-RC; and 3) commitments to advance just transition and adaptive resilience-building.[2]

When assessed in accordance with their historic responsibilities and capabilities, **the failure of developed countries to act in line with their obligations becomes glaringly clear**: not only do they fail to commit to provide international climate finance, but they also fail to commit to phase out fossil fuels. The absence of new NDCs by ten G20 countries (including the EU) is also deeply problematic.

Missing NDCs

Among developed countries, the EU failed to submit its NDC by the end of September 2025, the deadline set by the United Nations Framework Convention on Climate Change. The U.S. submitted their NDC before withdrawing from the Paris Agreement. The EU and the U.S. together account for over 40% of historical CO2 emissions.

Among G20 countries, and in addition to the EU, nine countries did not submit their NDCs on time: Argentina, China, India, Indonesia, Mexico, Saudi Arabia, South Africa, South Korea, and Turkey. **The EU and these nine countries together account for half of current GHG emissions.**[3]

The failure to submit NDCs is a breach of countries' obligations under the Paris Agreement.

The countries analysed in this brief therefore include:

- Australia, Canada, Japan, the UK (developed G20 countries)
- Norway, New Zealand, Iceland, Switzerland (developed non-G20 countries)
- Brazil, Russia (other G20 countries)

[1] Developed countries are defined as Annex II Parties to the UNFCCC. Although the G20 now includes the African Union, the African Union does not have a collective NDC as the EU does.

[2] A more detailed analysis of several G202 NDCs is available here.

[3] China did not submit its NDC but announced its 2035 target at the UN General Assembly Climate Summit. The EU only indicated a range for its 2035 target, and explicitly stated that this range cannot be included in the NDC synthesis report.

Developed country NDCs do not address the finance gap

1. **Only two developed country NDCs (Canada and the UK) specify the volume of climate finance they will provide beyond 2025.** None of these acknowledge or meet their fair share obligations, nor do they outline the amounts in grant-equivalent terms.

2. **Several developed countries (Australia, Japan, Norway, Switzerland, and New Zealand) reference the provision of climate finance to developing countries, but do not specify how much support they will deliver.** Iceland does not mention international climate finance in its NDC.

3. **No developed country NDC clearly outlines how climate finance will prioritise most affected countries or communities.**

4. **No developed country NDC commits to increasing international adaptation finance beyond 2025.** Japan and the UK note plans to respectively double and triple adaptation finance by 2025, but neither commits to further increases. In fact, Japan and the UK are the only developed countries to mention international adaptation finance at all.

NDCs do not address the emissions gap

1. **Despite their responsibility to take the lead, every fossil fuel-producing developed country has failed to include a timeline to phase out oil, coal, or gas production in their NDC**. In fact, as illustrated by plans outside of their NDCs, Australia, Canada, the U.S. and Norway all plan to expand fossil fuel production. In addition to developed countries, Brazil and Russia did not commit to phase out fossil fuels, and also have plans to expand their production of fossil fuels.

2. **None of the countries that currently provide fossil fuel subsidies have committed to phasing them out completely.** Iceland, Japan, New Zealand, Norway, Brazil and Russia do not mention fossil fuel subsidies in their NDC at all. Three countries focus only on the phase-out of "inefficient" fossil fuel subsidies (Australia, Canada, the UK).

3. **Despite the UN Secretary General's call for developed countries to set deadlines to achieve net-zero by 2040, only Iceland's NDC adheres to such a timeline.** Australia, Canada, Japan, Switzerland, and the UK all set a net-zero deadline of 2050. New Zealand's 2050 deadline excludes methane emissions, which make up half of the country's emissions. Norway fails to set one even by 2050. Brazil sets a net-zero deadline for 2050, in line with the UNSGs's call for emerging economies, while Russia fails to do so with a net-zero envisaged only in 2060.

4. **Every country NDC, except New Zealand - which explicitly relies instead on international carbon markets and offsets - plans to use carbon capture, utilisation, and storage (CCUS) as part of their mitigation strategies.** This approach allows countries to focus on reducing emissions from fossil fuel production rather than phasing out production itself.

5. **Of the eight developed countries that have submitted NDCs, six—Norway, Japan, Switzerland, Canada, New Zealand, and Iceland—plan to or are considering using international carbon markets under Article 6.** The UK and Australia state they do not currently intend to use Internationally Transferred Mitigation Outcomes (ITMOs) under Article 6, but explicitly keep the option open, meaning none fully exclude their use.

6. Countries' plans to meet other Global Stocktake mandates—tripling renewable energy capacity and halting and reversing deforestation by 2030—remain insufficient, further widening the emissions gap.

NDCs do not centre people and communities

1. **Across the G20 and developed country NDCs, 7 in 10 mention "just transition," though to varying degrees.** For developed countries, just transition measures are too narrow, focusing on skills training and green jobs mainly (e.g. Canada and the UK).

2. **Only two countries analysed link just transition measures to social protection programmes/policies and/or public services: Brazil and Norway.** In most cases, just transition is mentioned only once and not accompanied by implementation measures or essential concepts such as social protection, social dialogue, or decent work.

3. **Only two countries analysed (Brazil and Canada) reference inequalities.** Brazil is the only NDC that comprehensively links the just transition to inequalities within and between countries.

4. **None of the NDCs analysed make reference to care economies, labour rights, or economic, social and cultural rights.** Some do, however, acknowledge intergenerational rights, the right to health, human rights, or women's rights.

5. **Indigenous rights are weakly addressed across the analysed NDCs.** While several note consultations with Indigenous Peoples, none explicitly commit to upholding Free, Prior and Informed Consent (FPIC) or implementing the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

6. **Only three countries analysed reference the Global Goal on Adaptation (Brazil, Switzerland, the UK), and only one (the UK) references the UAE Framework for Global Climate Resilience.** Even in these examples, these terms are mentioned only once and not elaborated upon with specific actions, targets, or financial allocations.

7. **Only two countries analysed mention loss and damage in their NDCs (Canada and Brazil), and each only once.** None of the NDCs reference contributing to the UNFCCC Fund for responding to Loss and Damage (FrLD).

Our Demands

Aligned with the UN Secretary General, CAN asks countries to conclude COP30 with a strong global response plan to the glaring ambition and implementation gap, built on the principles of equity and CBDR-RC.

This response plan must include the following elements:

- COP30 must highlight the glaring ambition and implementation gap that lead to loss of lives, a perpetuation of injustice and destruction of ecosystems, even as it acknowledges the progress made under the Paris Agreement in terms of global trajectory of emissions and warming. Any political response to these gaps would be incomplete if planned climate action fails to center people, communities, and nature in order to deliver a just transition rooted in respect of human rights.

- COP30 must discuss, either in a formal dedicated space or through ministerial roundtables, the NDC and BTR synthesis reports.Given the critical urgency, Parties – especially those representing

developed countries and G20 member states, must agree to **fix NDCs that are not in line with countries' fair shares responsibilities**. As with the entirety of climate action, this must be in accordance with the principles of CBDR-RC and equity, alongside scale-up climate finance to enable greater ambition. These revised NDCs are to be submitted before COP31.

- **The revised NDCs need to implement the guidance from the first Global Stocktake and the International Court of Justice Advisory Opinion in good faith** and include plans and timelines to phase out fossil fuels. They must also outline contributions to the global goals on renewable energy and energy efficiency, and measures to halt deforestation and reverse ecosystem destruction by 2030, in line with equity and the fair shares of each country. Developed countries should include information on their public grants-based finance for developing countries in their NDCs.

- Parties must agree a **process to develop a schedule for transitioning away from fossil fuels** in line with CBDR-RC and equity. This could be done by mandating COP30 and COP31 Presidencies to lead a process to set up a global fossil fuel phase-out roadmap.

- Parties, especially those representing developed countries and G20 member states, should enhance their national climate frameworks, including laws and policies, in accordance with the principles of CBDR-RC, equity and human rights in order to speed up implementation and go beyond current NDC pledges.

- Just transition forms an important part of the architecture for enabling climate ambition. The JTWP must **reach agreement on the principles of a just transition and establish the Belém Action Mechanism for Just Transition (BAM)** to support the implementation of NDCs, among other measures.

- Climate finance is a key enabler for implementation. COP30 must bring clarity on provision of quality climate finance at scale.

- The Action Agenda at COP30 should build momentum and help close the implementation gaps, presenting concrete and implementable global actions/ initiatives, including those from credible actors and non-party stakeholders, that can strengthen climate action in a measurable and accountable manner.

NDCs 3.0s provided countries with the opportunity to demonstrate their commitment to the Paris Agreement. Yet, across these NDCs, they have failed to do so.

Without ambitious climate plans, climate disasters will continue to be the new normal. The impacts of climate change, including extreme weather, are consistently worse than previously projected. From floods to megafires, extreme weather now costs hundreds of billions annually, with losses disproportionately borne by the poor. Behind every statistic and poorly designed climate plan are shattered lives and ecosystems: death tolls, livelihoods ruined, families displaced, and generations condemned to instability.

By September 2025, all Parties to the United Nations Framework Convention on Climate Change (UNFCCC) were due to submit nationally determined contributions (NDCs) with targets and commitments to 2035. This year's round of NDCs (referred to as NDCs 3.0) is crucial to achieving the ambition needed to rapidly reduce emissions and build resilience against climate impacts, in line with a 1.5°C pathway aligned with climate justice.

NDCs released this year also come with a clear legal mandate: the International Court of Justice (ICJ) has ruled that limiting warming to 1.5°C is an obligation, not an aspiration, and must be pursued in line with equity and the principle of Common but Differentiated Responsibilities and Respective Capabilities (CBDR-RC). As recognised by the first Global Stocktake (GST), the world is extremely off track in keeping to a 1.5°C warming limit—and the window of opportunity to act is rapidly closing. NDCs from the previous cycle left us on track for a catastrophic 2.5-3°C of warming—a death knell for frontline communities—and NDCs 3.0 so far have barely put us on the path to change this.

The submissions provide a critical measure of how countries are committed to the Paris Agreement and responding to the first set of GST decisions agreed at Dubai's COP28 in 2023. Yet, many NDCs are still pending, despite the UNFCCC extending the deadline from February 2025 to September 2025 and the Paris Agreement requiring Parties to submit their NDCs 9-12 months before the relevant session of COP. **Countries that did not submit their NDCs by September 2025—breaching their obligations under the Paris Agreement—include the European Union (EU) and nine G20 countries (Argentina, China, India, Indonesia, Mexico, Saudi Arabia, South Africa, South Korea, and Turkey), which together account for 50% of present GHG emissions**. Meanwhile, the U.S. NDC released last year will fail to be implemented due to the US withdrawal from the Paris Agreement. Consequently, as of 1 October 2025, NDC submissions covered only 31% of global emissions.

Our analysis focuses on the NDCs of developed countries (defined as Annex II Parties to the UNFCCC), and the G20 club of the most economically powerful countries—representing around 80% of GDP and 75% of current GHG global emissions.[4] This is because we recognise the ambition gap in NDCs as a power gap. **When assessed in accordance with the historic responsibility and current capabilities of countries and their required fair shares,[5] the failure of developed countries to act in line with their obligations becomes glaringly clear.** Developed countries have the responsibility to take the lead in climate action, but they have failed to deliver promised climate finance and fossil fuel phase-out commitments.

[4] In our analysis of developed country NDCs, we focus on NDCs of countries classified as Annex II under the UNFCCC. The Annex II country NDCs include: Australia, Canada, the EU (which has not been released), Iceland, Japan, New Zealand, Norway, Switzerland, and the UK. The U.S. has withdrawn from the Paris Agreement and so is not included here.

[5] Fair shares in mitigation and finance refers to the effort or support a country should provide, based on its historical responsibility and current capacity. As framed by the Civil Society Equity Review, developed country NDCs must reflect equitable 1.5°C pathways, commit grant-based climate finance to fulfil their fair share, and include plans to rapidly and fairly phase out fossil fuel extraction. **The Climate Equity Reference Project holds that a fair share mitigation target for developed countries must include both a domestic and international component, with the latter to be achieved through international mitigation cooperation and support, including financing.**

This failure is not a matter of technical capacity: rich countries could slash emissions faster and deeper, but their ambition is hindered by a determination to preserve the extractive, unjust economic system that underpins their wealth and power, and a failure to centre people in climate action. Their NDCs remain embedded in this order—one that drives war, corporate exploitation, and deepening inequality—and cannot be viewed separately from the structures they serve or the systems they uphold. **Tellingly, not a single developed country NDC has committed to phasing out fossil fuels,** despite the clear mandate of the ICJ ruling on climate action and the COP28 GST decision.

A. Developed country NDCs do not address the finance gap

Developed country NDCs must commit to fair, accessible, and quality public climate finance for developing countries. Instead, they do not even outline their commitments to providing climate finance.

Rich, Global North countries continue to woefully underdeliver on their fair share of international climate finance, leaving the Global South to shoulder the costs of a climate crisis they did not create.[6] Instead of receiving the public, grant-based climate finance they are owed, many developing countries are trapped in a climate-debt cycle: forced to borrow on onerous terms to finance their transition and rebuild after major climatic events, only to see debt service drain scarce resources away from climate action and back to creditors in the Global North.[7] Against this backdrop, developing countries have questioned the purpose of submitting new NDCs when current ones remain unfunded and higher ambition is unfeasible without adequate support from the Global North. For many developing countries, the mitigation and adaptation targets outlined in their NDCs are explicitly conditional on receiving international support. Without predictable, accessible public finance—and the institutional reforms to deliver them—the implementation of NDCs will be compromised.

Climate finance within developed country NDCs currently fails on two fronts. First, most developed countries do not outline their commitments to providing climate finance. Second, climate finance is not responding to the urgent needs of people-centred mitigation, adaptation, loss and damage, and just transition. This impasse underscores the need for a global climate finance goal that is backed by a transformed financial architecture that mobilises large-scale public, grant-based resources and frees up fiscal space in developing countries (see box under section A.2.).

A.1. Developed countries are not committing to deliver climate finance

CAN Guidelines: Developed country NDCs must include plans to provide new, additional, and public grant-based financial resources as international climate finance to assist with mitigation, adaptation, loss and damage and just transition in developing countries. This must be measured in grant-equivalent terms and be in line with their fair shares.

Only two developed country NDCs (Canada and the UK) specify the volume of climate finance they will provide beyond 2025. All limit their commitments to 2027 or earlier. This lack of predictability—also observed in countries' biennial communications—goes against Article 9.5 of the Paris Agreement, which underscores the needs for transparent and forward-looking climate finance. **Canada**, for example, states that "up to 60% of its $5.3 billion International Climate Finance envelope (2021-2026)" (p.11) will support mitigation in developing countries—without mentioning any finance for adaptation. The **UK** "reaffirm[s] the existing commitment to spend £11.6bn in International Climate Finance by 2025/2026" (p.2). In all of these cases, no future commitments (beyond the stated years) are provided, although the UK notes that its climate finance budget is determined during its Spending Reviews. Notably, a Carbon Brief investigation reveals that while official figures report record-high **UK** climate finance for FY2024-2025, £528 million (approximately 18%) came from accounting adjustments that inflated totals without delivering new or additional funding.

[6] See footnote 3.

[7] Over 2021–22, two-thirds of public climate finance consisted of loans, the majority of which were offered on non-concessional terms.

Several developed countries (Australia, Japan, Norway, Switzerland, New Zealand) reference the provision of climate finance to developing countries, but do not specify how much support they will deliver. **New Zealand** defers its finance commitments to other climate plans or reporting.[8] Iceland does not mention international climate finance in its NDC entirely. Australia only notes finance already committed up to 2025; **Japan** pledges to "sincerely deliver its obligation to provide climate finance" (p.115) but does not elaborate;[9] **Norway** states it "provides significant [financial] support" (p.15) to developing countries, without further detail; and Switzerland affirms that it "takes seriously its commitment to provide and mobilise financial support… in developing countries" (p.11). In fact, an analysis of developed countries' latest biennial communications showed that only **Australia** and **Switzerland** presented new or updated climate finance targets.

In its NDC, **Switzerland** does add that it "intends to continue to contribute its fair share in the context of the new collective quantified goal" (p.11)—making it the only developed country to mention fair shares in the context of climate finance, though it gives no indication of how this is calculated and the Federal Council has postponed several times the decision. Even in their biennial communications, none of the developed countries "provides a clear explanation of how its targets align with what would constitute an equitable contribution".

Some NDCs also blur the distinction between ITMOs and climate finance obligations, effectively double-counting by presenting carbon market investments as climate finance. ITMOs cannot be considered toward climate finance obligations, as they are utilized by countries to meet their own emission reduction targets, whereas climate finance is intended to support mitigation and adaptation in developing countries. A Carbon Brief investigation found that within the UK's pledge to channel £11.6 billion over five years to climate action in developing countries by 2026, the single largest allocation (worth £153.9 million) went to a World Bank programme aimed at helping developing countries sell carbon offsets.

A.2. Climate finance prioritises profit over quality finance for mitigation, adaptation, loss and damage, and just transition

CAN Guidelines: Developed country NDCs must indicate how they plan to provide public, grant-based support for real mitigation, adaptation, and loss and damage that centres the needs of marginalised communities and the most climate-vulnerable countries.

Climate finance must prioritise funding in developing countries, particularly Least Developed Countries (LDCs), Small Island Developing States (SIDS), and other countries on the frontlines of climate impacts. It **should provide adequate support for mitigation, adaptation, and loss and damage through inclusive and rights-based just transition pathways,** including secure and affordable alternative livelihoods for those most affected. This must centre the needs of marginalised and disproportionately impacted communities, including Indigenous Peoples, women and gender-diverse people, children and youth, older people, and persons with disabilities. **Yet, no developed country NDC signals that such priorities will be addressed in the delivery of climate finance.** The closest approximation to this would be Japan's acknowledgement that "adequate financial resources" are needed by "vulnerable regions, sectors, and

[8] The NDC states, "New Zealand intends to separately report and communicate its climate finance as part of its obligations under the Paris Agreement. This includes its biennial communications under Article 9, Paragraph 5 of the Paris Agreement, and as part of its Biennial Transparency Report. New Zealand's Biennial Transparency Reports will serve as its Adaptation Communications, unless otherwise specified." (p2)

[9] Quote based on the provisional translation published by the Japanese government. Note that we use Japan's Plan for Global Warming Countermeasures, the accompanying implementation plan for its NDC, as Japan's NDC lacks detail and points to the Plan for further information.

populations.", albeit this is to be taken with caution given Japan's emphasis on private finance in its NDC.

This gap is reflected in the thematic breakdown of climate finance delivery, with profitable investments prioritised over genuine mitigation, adaptation or loss and damage finance. Adaptation in particular remains significantly underfunded, despite the Paris Agreement's call to balance it with mitigation finance.[10] Yet, **no developed country NDC commits to increasing adaptation finance beyond 2025**. **Japan** at least notes its announcement in 2021 to double adaptation finance up to 2025, while the **UK** mentions that it will triple its adaptation finance to £1.5 billion in 2025, but neither commit to future increases for adaptation finance. **In fact, Japan and the UK are the only developed countries to reference adaptation finance at all** in their NDCs.

Adaptation measures such as strengthening food and water security or protecting communities from extreme weather rarely generate financial returns, which is precisely why they are underfunded and require grant-based public finance. Just transition approaches also require public finance, especially (and at minimum) in the following five areas: robust consultation mechanisms and institutions, social protection, skills, economic diversification, and socio-ecological restoration. Despite those clear needs, **no developed country NDC commits to providing a greater share of climate finance as grants, and no country recognises the need for climate finance to be public (rather than private investment-led).** In their biennial communications, Australia, New Zealand and the UK however commit to prioritise grand-based support, but New Zealand only plans to provide the majority of their climate finance as grants.

As a matter of justice, developed countries—rich, historical emitters that continue to resist phasing out fossil fuels—bear responsibility for supporting developing countries in addressing loss and damage. This makes it especially egregious that **none of the NDCs reference contributing to the UNFCCC Fund for responding to Loss and Damage (FrLD).**

[10] In their biennial communications, only three developed countries ensure that at least 50% of future public climate finance will go toward adaptation.

INTERNATIONAL COOPERATION AND SUPPORT FOR A JUST TRANSITION

Keeping justice at the heart of a just transition requires recognising that **a majority of developing countries lack the fiscal space** to absorb shocks to labour markets, government revenues, or foreign exchange flows, or to finance the economic diversification and social support needed to phase out polluting industries. Fiscal space is the budgetary room governments have to fund priorities without worsening debt or instability. In a context of diminishing fiscal space (e.g. due to debt crises), governments cannot fund just transition measures such as social protection or economic diversification. **Yet, NDCs largely ignore these structural constraints.**

Developed country NDCs must respond to the following demands:

- **Deliver public grant-based, new, and additional climate finance** to fund (among others) social protection, skills training, economic diversification, and ecological restoration, so that countries are not reliant on debt-creating private investments or loans.
- **Overhaul the current creditor-led debt architecture** and move towards a system where developing countries are not systematically penalised (e.g. through International Monetary Fund surcharges, credit rating agencies) and support the establishment of a UN Convention on Sovereign Debt.
- **Cancel debt** across all creditors for all countries that need it, free from conditions, and create a fair, transparent mechanism to address illegitimate debts and free up resources.
- **Raise public revenues through fair levies on fossil fuel industries** and other high emitters to fund the just transition within and between countries, with recognition of this in the UN Framework Convention on International Tax Cooperation.

The Belem Action Mechanism for Just Transition (BAM) must be established at COP30 to coordinate global support for a just transition, linking finance, technology, and capacity building. The BAM will notably include a dedicated component to provide direct support through a helpdesk or facilitative platform for countries, matchmaking between projects and funders, and work to mobilise and channel non-debt-inducing finance and technology transfer, particularly for the Global South.

B. NDCs do not address the emissions gap

By failing to commit to a just and equitable fossil fuel phase-out, developed countries and major emitters are putting us on track for a devastating 2.5–3°C of warming, a death knell for frontline communities.

Fossil fuel dependence is the single largest driver of emissions, locking the world into overshooting 1.5°C and worsening global inequalities. Decades of inaction by developed countries and deliberate obstruction by the fossil fuel industry have left the world with soaring emissions and a shrinking carbon budget. Five private oil companies alone cumulatively made over USD 120 billion in profits in 2023, while funnelling exorbitant sums back into oil and gas expansion, lobbying, and the enrichment of already-wealthy individuals. This profiteering, enabled by political capture, has entrenched lifestyles of excessive consumption for the wealthy, at the cost of increased vulnerability for the working class and global poor. Structurally marginalised communities—those least responsible for the crisis—are thus left to shoulder escalating harms to rights, livelihoods, and ecosystems.

The ICJ has confirmed that states are legally obliged to phase out fossil fuels in line with the Paris Agreement. No expansion or continuation of fossil fuels is compatible with a 1.5°C pathway. Every new NDC must therefore set clear, time-bound commitments for a full fossil fuel phase-out—led by developed countries—while ensuring that transition costs are not shifted onto those already most vulnerable and that developing countries are assisted in their energy transition and industrial decarbonisation through the provision of means of implementation. Yet current NDCs fall far short: most omit explicit phase-out timelines and permit continued coal, oil, and gas production and use. Countries also do not commit to phasing out fossil fuel subsidies, and plan on relying on risky technologies and offsetting mechanisms to avoid real emissions cuts.

B.1. Developed and G20 countries do not commit to phasing out fossil fuels

CAN Guidelines: All NDCs should include fossil fuel production phase-out trajectories, with production ending in the early 2030s for countries in the Global North. They must also set economy-wide timelines to phase out the use of coal, oil, and gas by 2040 at the latest for developed countries and by 2050 at the latest for developing countries. Developed countries must commit to phasing out coal power by 2030 and gas by 2035 at the latest. Finally, they should include clear deadlines to end fossil fuel subsidies.

Fossil fuel production

Without exception, every fossil fuel-producing country analysed has failed to include a timeline to phase out oil and gas production in their NDC (**Table 1**). That list includes **Australia**, **Canada**, **Japan**, **New Zealand**, **Norway**, the **UK**, **Brazil** and **Russia**.[11] Only the **UK** even references efforts to potentially phase down production, but this is limited to a mention to "consult on not issuing new oil and gas licenses," (p.2) which falls well short of a concrete plan for a managed phase-out.

The developed countries that produce coal include **Australia**, **Canada**, **New Zealand**, and **Norway**.[12] **None provide plans to phase out coal production.** **Switzerland** is not a coal-producing country, but it is

[11] Switzerland and Iceland are the only developed countries analysed that do not produce fossil fuels.

[12] The UK and Japan also produce coal, but in minor quantities: in 2024, 1TWh for the UK, and 4TWh for Japan.

a global hub for coal-trading: a Public Eye investigation in 2022 found that 245 companies active in the coal sector are registered in Switzerland, a fact not acknowledged in the NDC, despite illustrating how wealthy economies can sustain global coal value chains, even without domestic production.

In fact, as seen in plans outside of their NDCs, many developed countries are set to increase their fossil fuel production. **Australia** will expand coal and gas production; **Canada** will increase oil production; and Germany will increase gas production.[13] **Canada**'s NDC notes plans to cap and reduce emissions from the production of oil and gas, but notably does not include plans to actually reduce production. In any case, Canadian Prime Minister Mark Carney—who took office after the NDC was submitted—has since been noncommittal about meeting 2030 climate goals, especially in light of his new industrial strategy. The U.S. NDC is unlikely to be implemented following the country's withdrawal from the Paris Agreement; however, it is also set to increase its production of oil and gas. The U.S., Canada, Australia, Norway, and the UK are responsible for a majority of planned expansion from new oil and gas fields through 2050.

Fossil fuel subsidies

Collectively, G20 countries spent USD 1.3 trillion on fossil fuel subsidies in 2022. While the COP28 GST Decision called upon countries to end inefficient fossil fuel subsidies, n**one of the countries analysed that currently provide fossil fuel subsidies have committed to phasing them out completely.** Six countries (**Iceland**, **Japan**, **New Zealand**, **Norway**, **Brazil** and **Russia**) do not mention fossil fuel subsidies in their NDC at all, despite providing them either as production or consumption subsidies. Two countries support phasing out inefficient fossil fuel subsidies: **Canada** commits to domestic reforms without a specified timeline; the UK mentions its support for international efforts to reform inefficient fossil fuel subsidies. However, by only referring to inefficient fossil fuel subsidies, they leave the door open to continued support for the fossil fuel industry. **Australia** similarly states that they no longer provide inefficient fossil fuel subsidies, but continues to subsidise fossil fuel companies through indirect means. Switzerland indicates it is reviewing its remaining fossil fuel subsidies and supports "a global deadline for the elimination of fossil fuel subsidies,"[14] (p.4) but provides no firm commitments.

Economy-wide fossil fuel phase-out

The United Nations Secretary-General (UNSG) has called on developed countries to "bring forward net-zero deadlines as close as possible" to 2040, which will require phasing out fossil fuels and phasing in renewables. Yet, all developed countries except one (Iceland) fail to do so in their NDCs. **Australia**, **Canada**, **Japan**, **Switzerland**, and the **UK** all set a net-zero deadline of 2050. New Zealand's 2050 target excludes biogenic methane emissions, which make up roughly half of the country's emissions. **Norway** fails to set a target even by 2050, committing only to "transition to a low-emission society by 2050." (p.1) **Iceland** is the only country that has committed to net-zero emissions by 2040—and as a country that has achieved over 99% renewable energy generation, it demonstrates the importance of phasing out fossil fuels to meet the 2040 commitment. **Brazil** sets a net-zero deadline for 2050, in line with the UNSGs's call for emerging economies, while **Russia** fails to do so, with an objective of achieving carbon neutrality by 2060 only.

No country NDC sets a target or timeline to phase out fossil fuel consumption in end-use sectors (transport, industry, buildings). Even if their trajectories tend towards net zero, countries rely on false solutions (see Section A.2 and A.3) to cut emissions, rather than phasing out fossil fuels.

Developed countries have shown relatively more progress in phasing out coal use in the power sector, but the reliance on unproven technologies leaves the door open for continued use of coal-fired power,

[13] All figures are based on planned change in national fossil fuel production in 2030 relative to 2023 (EJ).

[14] This statement comes from the Annex to Switzerland's NDC, which is a separate document from the NDC itself.

such as by relying on ammonia co-firing and carbon capture, utilisation, and storage (CCUS). **Canada** commits to phasing out "unabated" coal power by 2030,[15] while **Australia** pledges not to build new "unabated" coal-fired power plants and suggests it could (but does not commit to) close its entire coal fleet by 2040.[16] **Japan** only mentions that it will phase out "inefficient" coal-fired thermal power generation. **New Zealand** and **Norway**, despite being members of the Powering Past Coal Alliance (PPCA), have not included any plans to phase out coal production or consumption in their NDCs. As mentioned in its NDC, the UK has already phased out coal power, though it maintains limited use of coal for industrial uses and residential heating.[17] Russia only mentions "emission reduction technologies" (p.23) for coal power generation.

Developed countries that are not major fossil fuel producers are still embedded in fossil fuel value chains, making it critical for countries to take a whole-of-economy approach to phasing out fossil fuels. **Japan** ranks among the world's top five importers of crude oil, gas, and coal, while the **UK** is among the top 15 for crude oil and gas imports.[18] Both maintain significant refining capacity, enabling the global consumption of fossil fuels, but do not address this in their NDCs. Over 2021 to 2024, Canada and Japan were the 1st and 3rd largest G20 providers of international public finance for fossil fuels. **Switzerland** also invests in fossil fuel companies, including through the Swiss National Bank, but only includes vague provisions in its NDC to make the country "a center of sustainable finance."[19] (p.8)

Table 1 below highlights some of the major fossil fuel producers that have not established a phase-out timeline in their NDCs, as well as those who did not submit their NDC.[20]

Table 1: **Major fossil fuel producers and GHG emitters that fail to outline measures to phase out fossil fuels in their NDCs**

Country		Role in fossil fuels*	Phase-out measures in NDC
Developed countries	**Australia**	• 5th largest coal producer; • 7th largest gas producer and 2nd largest exporter; • 12th largest emissions per capita.	No commitments to phase out coal, oil, and gas production. Insufficient net-zero deadline (2050). No new unabated coal-fired power plants and notes "entire coal fleet [could be closed] before 2040." (p.26).
	Canada	• 4th largest crude oil producer and oil exporter; • 5th largest gas producer; • 13th largest emissions per capita; • 10th largest GHG total emissions.	No commitments to phase out coal, oil, and gas production. Insufficient net-zero deadline (2050). Coal-fired electricity to be phased out by 2030. Plans to phase out inefficient fossil fuel subsidies mentioned, but with no timelines.

[15] "In 2016, Canada became the first country in the world to introduce regulations on coal-fired powerplants and announced a phase-out of coal-fired electricity by 2030."

[16] "Modelling by the Australian Energy Market Operator indicates that under a net zero scenario, 90% of today's coal capacity could be closed by 2035, and the entire coal fleet before 2040." (p26) "At COP29, Australia joined a Call to Action calling for countries to not build any new unabated coalfired power plants in domestic energy systems." (p26)

[17] "In September 2024 the UK was the first G7 economy to achieve coal power phase out…" (p2)

[18] Specifically, Japan is the world's fifth-largest crude oil importer (2023), second-largest natural gas importer (2023), and fifth-largest coal importer (2023). The UK is the 11th largest crude oil importer (2023) and 10th largest nfuelsatural gas importer (2023).

[19] This statement comes from the Annex to Switzerland's NDC, which is a separate document from the NDC itself.

[20] Noting that outside of the G20, several major fossil fuel producers have not submitted their NDCs (Iran, Iraq, and Qatar), or have submitted it without committing to phase out fossil fuels (the UAE).

(Table 1 continued)

Country		Role in fossil fuels*	Phase-out measures in NDC
Developed countries	**Norway**	• 8th largest gas producer; • 7th largest oil exporter;	No commitments to phase out coal, oil, and gas production or fossil fuel subsidies. No mention of fossil fuels. Does not provide net-zero deadline.
	United States	• Largest crude oil producer and 2nd largest oil exporter; • Largest gas producer and exporter; • 4th largest coal producer; • 2nd largest GHG total emissions.	NDC considered void after withdrawal from Paris Agreement.
	European Union (aggregate)	• 4th largest GHG emitter (top 5: Germany, France, Italy, Poland and Spain).	Did not submit their NDC on time.
Other G20 countries (Non-Annex II countries)	**Russia**	• 2nd largest gas producer and 4th largest exporter; • 3rd largest crude oil producer and 3rd largest oil exporter; • 6th largest coal producer; • 4th largest GHG total emissions.	No commitments to phase out coal, oil, and gas production or fossil fuel subsidies. Insufficient net-zero deadline (only notes that its NDC puts it on a 2060 net-zero trajectory).
	Brazil	• 8th largest crude oil producer and oil exporter; • 6th largest GHG total emissions	No commitments to phase out oil and gas production or fossil fuel subsidies.
	China	• Largest coal producer; • 6th largest crude oil producer; • 4th largest gas production; • Largest GHG total emissions.	Did not submit their NDC on time.
	Saudi Arabia	• 2nd largest crude oil producer and top exporter; • 10th largest gas producer; • 9th largest GHG total emissions.	Did not submit their NDC on time.
	India	• 2nd largest coal producer.	Did not submit their NDC on time.
	Indonesia	• 6th largest coal producer.	Did not submit their NDC on time.
	South Africa	• 7th largest coal producer.	Did not submit their NDC on time.

**All coal, gas, and oil figures based on 2023 and sourced from IEA. All GHG emissions (absolute and per capita) figures based on 2024 and sourced from EDGAR. Gas exports from Elgas. Oil exports from Investopedia.*

B.2. Plans rely on reducing emissions through risky and unproven technologies rather than phasing out fossil fuels

CAN Guidelines: NDCs must prioritise phasing out fossil fuels, not just reducing production emissions by betting on risky and unproven technologies. That means excluding CCUS from plans for decarbonising the fossil fuel industry.

Many NDCs continue to centre their climate strategies on **reducing production emissions rather than ending fossil fuel extraction itself**, enabling governments to claim progress while maintaining, or even expanding, oil and gas production. As outlined above, **Australia**, **Canada**, and the **U.S.** are among the countries set to increase fossil fuel production.

The use of CCUS is promoted as a key way for countries to cut production emissions without reducing fossil fuel output, but it remains unproven at scale, prohibitively costly, and primarily serves to legitimise continued extraction rather than deliver real emission cuts. **Despite CCUS being a false climate solution, every developed country NDC except New Zealand references how they will scale the use of CCUS as part of their mitigation plans.** That list includes **Australia**, **Canada**, **Iceland**, **Japan**, **Switzerland**, and the **UK**. For instance, **Australia** views the use of CCUS as "critical to reaching net zero by 2050" (p.28), **Japan** plans to use CCUS to reduce its emissions from thermal power generation, and the **UK** mentions that the government will invest £21.7 billion into the private sector for CCUS and hydrogen industries.

Among the other G20 countries, **Brazil** references "biofuel technology routes associated with CCS to produce negative emissions," (p.30) which also bears significant risks given its impact on land and biodiversity. **Russia** also references CCS and "emission reduction technologies," (p.23) albeit without detailed plans.

BEYOND FOSSIL FUELS: MISSED MITIGATION MANDATES FROM THE GLOBAL STOCKTAKE

Though our focus is on fossil fuels, the response to other key Global Stocktake mitigation mandates has also been insufficient across the G20 and developed countries.

Halting and reversing deforestation and forest degradation by 2030: Despite being the first and third largest countries for tree cover loss, **Russia** and **Canada**'s NDCs remain insufficient—Russia fails to reference the 2030 forest goal, and Canada does not outline specific measures to achieve it. **Brazil** is a major deforestation driver through cattle ranching and soy, yet its NDC does not explicitly formalize the 2030 zero-deforestation goal. The NDC highlights that it is carrying out "coordinated and continuous efforts to achieve zero deforestation, by eliminating illegal deforestation and compensating for the legal suppression of native vegetation and the greenhouse gas emissions resulting from it," (p.15 and 32) implying that it will allow for legal deforestation well beyond 2030. reducing [21] **Indonesia**, another major contributor via palm oil and logging, missed the September 2025 NDC deadline. Other G20 members indirectly fuel deforestation through their demand for

[21] Nothing that, in recent years, Brazil has seen much success in deforestation levels—in 2023, deforestation in the Amazon halved from the previous year, decreasing to its lowest rate since 2018

commodities like soy, beef, palm oil, and timber, but none commit to halting and reversing deforestation by 2030, whether in production or supply chains. Globally, the world is off track to halt deforestation by 2030.

Tripling renewable energy capacity by 2030: Out of the six G20 countries that have submitted their NDCs on time, only **Australia** included a specific target for renewable energy (82% by 2030). While the **UK** commendably aims to achieve 95% of "clean" power by 2030 (including nuclear), and **Canada** will be "working towards achieving a fully decarbonized power system in 2035," none of their NDCs include specific renewable energy targets. Brazil already has a high share of renewable electricity, but electricity represented only 20% of its energy mix in 2024, meaning it will have to significantly scale up its renewable capacities to meet electrification needs. The same applies to **New Zealand**[22] and **Switzerland**, which, despite their relatively high shares of renewables in the power sector, are still mainly relying on fossil fuels for their economy-wide energy consumption.[23] **Japan** and **Russia** did not include a renewable energy target, despite their current low share of renewable energy (23% and 18% respectively). Globally, the world is not on track to achieve a tripling of renewables by 2030.

However, increasing renewable capacity and energy efficiency and reducing deforestation will be insufficient if unsustainable demand is not also addressed. Continued reliance on imports from the Global South, extractivist supply chains, and unchecked overconsumption may result in new renewable and efficiency gains being channelled into fuelling ever-greater production and consumption, rather than reducing overall emissions.

Moreover, NDCs overlook the disproportionate impact of the wealthiest, whose lifestyles account for the majority of emissions. Some NDCs (**Canada**, **New Zealand**, **Switzerland**) highlight that they have begun to decouple economic growth from emissions, but ecological economists have argued that decoupling in high-income countries falls well short of compliance with the Paris Agreement.

B.3. Developed countries are betting on carbon offsets to achieve their targets.

CAN Guidelines: CAN rejects the practice of offsetting to tackle the climate crisis, which includes the use of carbon credits under Article 6 to achieve NDCs. New NDCs must prioritise ambitious, absolute domestic emission reductions.

At COP29 in 2024, governments adopted a decision on Article 6 of the Paris Agreement, covering both Article 6.2—the rules for trading Internationally Transferred Mitigation Outcomes (ITMOs) between countries—and Article 6.4, a UN-supervised carbon crediting mechanism. The decision has paved the way for many of this year's NDCs to rely on carbon markets, whether to support developed countries in meeting their domestic emissions reduction targets or for developing countries to raise the revenue needed to meet their own targets. This is despite mounting evidence that such schemes fail to deliver real emissions cuts and instead deepen inequalities, facilitate land grabs, and harm frontline communities and ecosystems.

[22] New Zealand's energy package (October 2025) removed "the previous Government's target of 100% renewable electricity by 2030."
[23] Fossil fuels represent 69% of New Zealand's energy mix, and 58% of Switzerland's energy mix.

Of the ten countries analysed, seven either plan to use ITMOs or are considering doing so, and none rule them out entirely. **Norway**, **Japan**, and **Switzerland** explicitly highlight the role of ITMOs in meeting their targets, but none clarify the balance between domestic reductions and offsets. **Switzerland** only notes that the share of reductions achieved abroad will decline after 2030 (p.18). These three countries have also signed numerous bilateral agreements to secure ITMOs—six for **Norway** (despite saying it will use ITMOs only "if deemed necessary" (p.14), 31 for **Japan**, and 17 for **Switzerland**.[24] Among others, **Canada** is still exploring the use of ITMOs; **Iceland** has yet to make a decision; and **New Zealand** states that they will prioritise domestic reductions but may turn to Article 6 mechanisms if needed. **The UK and Australia, meanwhile, state that they do not currently intend to use ITMOs, although both explicitly leave the option open.**[25]

Brazil's NDC estimates that ambition beyond its lower-bound emission reduction target could be raised through the generation of ITMOs. That approach is concerning for various reasons, including that as recently as late 2024, Indigenous communities in the Amazon have criticised the Brazilian government for failing to consult them in lucrative state deals to sell carbon credits to multinational companies. **Russia** also leaves the door open to using Article 6, albeit without specifying which mechanisms.

[24] Information updated as of 16 October 2025. Other buying parties that have signed bilateral agreements to use ITMOs include Australia (2), Kuwait (1), Liechtenstein (1), Monaco (2), Singapore (25), South Korea (11), Sweden (6), and the UAE (1).

[25] **Australia**: "Australia has no plans or policy to count internationally transferred mitigation outcomes for use towards NDCs. Should the Australian Government authorise any internationally transferred mitigation outcomes for use towards NDCs, Australia will make corresponding adjustments, consistent with guidance adopted under Article 6 of the Paris Agreement." (p.22) **UK**: "While the UK intends to meet its NDC through domestic emissions reductions and removals, it reserves the right to use cooperative approaches under Article 6 of the Paris Agreement. Such cooperative approaches may include international emissions reductions or removals, such as Article 6.4 Emissions Reductions or those which result from linking the UK Emissions Trading System to another emissions trading scheme." (p.62)

C. NDCs do not centre people and communities

NDCs do not prioritise measures needed to build resilience and ensure climate justice. Instead of systematically tackling the root causes of inequalities—which exacerbate climate vulnerabilities—they provide rhetorical nods to a just transition and the need for adaptation, without whole-of-society implementation measures.

To drive the scale of transformation needed to achieve the Paris Agreement while advancing social progress and tackling inequality, countries must commit to just transition pathways that are whole-of-economy and whole-of-society in scope. These must span all sectors and be supported by coherent domestic and international efforts working hand-in-hand. Although recognition of the just transition as a central framework for climate action has grown, the proliferation of competing principles and guidance has watered down its fundamental elements. At its worst, this has enabled the use of "just transition" as a superficial label for initiatives that are neither just nor transformative. This dilution is reflected in the many NDCs that reference a just transition without specifying implementation measures or mentioning essential concepts such as social protection, social dialogue, or decent work. Instead, most NDCs simply use the term "just transition" once in their NDC, or focus narrowly on skills development and green jobs—overlooking that job creation alone is insufficient in contexts marked by inequality, corporate capture, and exploitative labour conditions.

Adaptation must also be understood as integral to a just transition, given that climate impacts disproportionately affect structurally marginalised communities—including but not limited to people living in LDCs and SIDS, women and girls, Indigenous Peoples, and persons with disabilities—who already have the least adaptive capacity. Building resilience therefore requires robust social protection systems and quality public services such as healthcare, education, and housing, which address the structural inequalities underpinning climate vulnerability. **Yet, most NDCs continue to frame adaptation in narrow, technocratic terms, neglecting deeper social and economic dimensions.** In NDCs, this gap is evident in the limited attention to the full range of thematic areas outlined under the UAE Framework for Global Climate Resilience: water and sanitation, food and agriculture, ecosystems, infrastructure, health, livelihoods, and cultural heritage. As discussed in Section A, this also reflects a persistent global justice gap, as developed countries continue to fall short of their obligations to scale up adaptation finance for developing countries.

C.1. Countries are insufficiently centring the need to reduce inequalities, promote social protection, and fulfil economic, social, and cultural rights as part of their transitions

CAN Guidelines: NDCs must promote a just transition by committing to advance decent work, social protection systems, public services, and income support to protect communities from insecurity and exclusion during the transition. They must explicitly address domestic and global inequalities, uphold rights, and commit to measures to reverse the lack of fiscal and policy space in developing countries.

At COP30, Parties must institutionalise efforts in this direction through a joint affirmation of the Principles of Just Transition and by agreeing to the proposed implementation mechanism—the Belém Action Mechanism (BAM) for a Global Just Transition.

Table 2: **Just transition keyword analysis of G20 and developed country NDCs**

KEYWORD	Australia	Brazil	Canada	Iceland	Japan	New Zealand	Norway	Russia	China	UK
Just transition										
Decent work										
Social protection										
Social dialogue										
Inequality										
Gender										
Youth										
Right[s]										
Justice										

Across the G20 and developed country NDCs, 7 in 10 mention "just transition" in their NDC, although to varying degrees. For developed countries, just transition measures appear to focus on skills training and green jobs. **Canada** and the **UK** appear to be the most comprehensive in this regard. **Canada**'s NDC highlights the Sustainable Jobs Act, which aims to create sustainable jobs, equip workers with skills and training, and support Indigenous Peoples, racialised groups, "skilled" newcomers, youth, women, LGBT+ people, and persons with disabilities in overcoming barriers in the workplace. The **UK** notes that its Office for Clean Energy Jobs will create jobs that are "of high quality, focusing on fair pay, favourable terms, and good working conditions" (p.29)—a welcome statement given that **out of all NDCs analysed, only Brazil and Japan mention "decent work."** However, a just transition approach that only focuses on jobs risks reproducing inequalities, especially in contexts like the **UK** and **Canada**, where the working class is burdened by rising living costs driven by the corporate concentration of wealth, power, and profit. A more comprehensive approach should embed social protection, public services, and income support to safeguard communities from insecurity and exclusion during the transition, as well as address corporate concentration and wealth inequality.

Indeed, only two countries link just transition measures to social protection programmes/policies and/or public services: Brazil and Norway. Norway notes that it has an "extensive system for social protection and institutionalised tripartite dialogue between the government, trade unions and employer organisations," (p.9) which will support a domestic just transition. Brazil's approach is more comprehensive, with a dedicated section (p.22-23) titled "Just transitions and climate justice: Common but differentiated responsibilities within and among countries" that links the just transition to fighting hunger and poverty, implementing social protection measures, and valuing traditional knowledge.

Brazil's is also the only NDC that comprehensively links the just transition to inequalities within and between countries. Interestingly, **Russia** also frames the just transition in terms of inequalities between countries, arguing against "unilateral restrictive measures and trade barriers that undermine the countries' efforts to achieve global climate goals" (p.23)— ostensibly a masked reference to the sanctions imposed following its invasion of Ukraine, which it claims hinder its climate ambitions. However, **Russia**'s NDC makes no connection between a just transition and domestic inequalities, nor does it address the latter at all. In fact, only Brazil and Canada reference inequality in their NDC.

None of the NDCs analysed make reference to care economies, labour rights, or economic, social, and cultural rights. Some do, however, acknowledge specific rights: intergenerational rights (**Brazil**), the right to health (the **UK**), and human rights more broadly (**Brazil**, **Canada**, **Iceland**, **Japan**, **Norway**, **Switzerland**).[26] Among these, **women's rights and gender equality receive the most consistent attention, recognised across seven NDCs: Australia, Brazil, Canada, Iceland, Norway, Switzerland,** and the **UK.** Yet this is largely framed in narrow terms—treating gender as an axis of vulnerability, positioning women as beneficiaries of climate initiatives, or noting their consultation in NDC processes. A gender-transformative approach would go further by (among others) embedding recognition of care economies and mandating the collection of gender-disaggregated data.

Intergenerational justice, via youth inclusion, is addressed in five out of ten NDCs: **Australia**, **Canada**, **Japan**, **Norway**, and the **UK**.[27] Youth are most commonly referenced as stakeholders to be engaged, or beneficiaries of education, employment, or capacity-building opportunities in the just transition. However, these references often lack depth, with only broad commitments to institutionalise youth participation in decision-making and ensure equitable access to green jobs and skills. For example, **Japan** only mentions "the creation of opportunities for the government to take on the views of younger generations."[28] (p.97) A justice-centered approach would move beyond symbolic engagement and education, detailing specific youth co-governance strategies, commitments to financing and collaborating on youth-led climate action, and addressing structural barriers to their full participation in shaping transition pathways.

Indigenous rights are also weakly addressed in the NDCs. Most of the countries with Indigenous Peoples (including **Australia**, **Brazil**, **Canada**, **New Zealand** and **Norway**) note that their NDC were prepared through consultations with Indigenous Peoples—although **Japan** and **Russia** do not mention any such process. Many NDCs also make a rhetorical nod to the need to respect certain Indigenous rights, or outline specific programs designed to enable Indigenous peoples to lead or participate in climate action.[29] **However, none make explicit reference to the right to Free, Prior and Informed Consent (FPIC) or to the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)**. **Canada** even includes an annex of submissions from Indigenous Peoples, many of which call for FPIC and UNDRIP, yet the NDC itself fails to reflect these demands. The NDCs also do not reference the importance of indigenous territorial protection and land rights for mitigation, adaptation and the fulfillment of their human rights and cultures.

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[26] This analysis does not consider rights safeguards mentioned in the context of Article 6 carbon market mechanisms, as CAN International rejects the use of carbon markets.

[27] It is worth noting that the UK is the only G20 country that has adopted the NDC Youth Clause.

[28] Quote based on the provisional translation published by the Japanese government. Note that we use Japan's Plan for Global Warming Countermeasures, the accompanying implementation plan for its NDC, as Japan's NDC lacks detail and points to the Plan for further information.

[29] **Australia**: "Australia's First Nations Clean Energy Strategy… addresses the intersection between First Nations' rights and interests and the renewable-energy transition..." (p.18) **Brazil**: "Articulation between sectoral mitigation policies and other public policies to generate co-benefits, such as... guarantee of the rights of traditional peoples and communities and indigenous peoples." (p.14) **Canada**: "The stewardship of First Nations, Inuit, and Métis communities, waters, and lands, the exercise of constitutionally protected Aboriginal and Treaty Rights… projects all position Indigenous Peoples as indispensable contributors to climate policy and action." (p.9) **New Zealand**: õIn determining the second NDC, the New Zealand Government considered how the NDC may impact MÕori rights and interests.ö (p.15) **Norway**: "...consultation processes between the central government and the Sámediggi, established in 2005, constitute a crucial framework for ensuring Sámi rights under international law to participate in processes that may affect them." (p.7)

JUST TRANSITION CHAMPIONS

Nigeria

Nigeria's NDC commits to developing a Just Transition Action Plan based on International Labour Organization (ILO) guidelines, emphasising social dialogue, broad stakeholder engagement, respect for rights at work, and alignment with international labour standards. The plan will be informed by sector-specific evaluations and prioritise gender equality and women's empowerment. Proposed measures include unemployment protection, reskilling, support for women- and youth-led enterprises, and job creation in clean energy, agro-processing, and circular economy sectors. It also pledges to channel funds to frontline groups, including MSMEs, women, youth, and local communities.

Colombia

Colombia's NDC integrates just transition principles throughout its climate strategy, linking labour, education, and social justice. It promotes skills training in renewable energy and sustainable agriculture, and ensures differentiated support for women, Indigenous and Afro-descendant communities, and rural populations. It also emphasises the need for environmental democracy and rights-based climate governance, particularly to protect environmental defenders and respect FPIC.

C.2. Countries are insufficiently prioritising adaptive capacity and resilience

CAN Demand: NDCs must embed the Global Goal on Adaptation and the UAE Framework for Global Climate Resilience with concrete, multi-sectoral targets aligned with National Adaptation Plans. They should also map and assess losses and damages, quantify economic and non-economic impacts, and set out explicit L&D measures, with developed countries committing support for developing countries' adaptation and contributing to the UNFCCC Fund for responding to Loss and Damage (FrLD).

Table 3: **Adaptation/Loss & Damage keyword analysis of G20 and developed country NDCs**

KEYWORD	Australia	Brazil	Canada	Iceland[30]	Japan[31]	New Zealand	Norway	Russia	China	UK
National Adaptation Plan or Strategy										
Global Goal on Adaptation										
UAE Framework for Global Climate Resilience										
Loss and Damage										

[30] Note that Iceland only includes references to the "Regulation No. 786/2024 on the standing inter-ministerial climate change committee further defines the arrangement for the work on the Climate Action Plan and Iceland's National Adaptation Plan. Regulation No. 334/2024 on Iceland's Climate Council further defines its governance and role as an advisory body to the development and implementation of climate policy in Iceland" in the context of listing relevant governance instruments for climate action.

[31] Note that Japan only includes references to "the Climate Change Adaptation Act [...] and the Climate Change Adaptation Plan [...], in coordination with GX policies that aim for the simultaneous achievement of energy security, economic growth, and decarbonization."

Besides the fact that developed countries have not committed to increasing their share of adaptation finance for developing countries (see Section A.2 on finance), they are also failing to build global adaptive capacity and resilience by implementing the Global Goal on Adaptation and UAE Framework for Global Climate Resilience. The GGA was established under the 2015 Paris Agreement in Article 7, with the aim of "strengthening resilience and reducing vulnerability to climate change." Later, at COP28, Parties adopted the UAE Framework for Global Climate Resilience, which included a "range of thematic and dimensional targets for climate adaptation and resilience."

To support the operationalisation of the GGA and the UAE Framework, countries must at the very least recognise these in their NDCs—and yet, **only three countries reference the GGA in their NDCs (Brazil, Switzerland, the UK) and only one (the UK) references the UAE Framework for Global Climate Resilience**. Even in these examples, the GGA or UAE Framework is mentioned only once in the NDC and not elaborated upon with specific actions, targets, or financial allocations. Most countries fail to mention them entirely. **More positively, more countries appear to reference National Adaptation Plans (NAPs) or Strategies in their NDCs** (see **Table 3**).

The poorest and most marginalised countries and communities are also paying the price of climate change through escalating and irreversible economic and non-economic losses that adaptation alone cannot prevent. **Yet, of all the NDCs analysed, only two even mention loss and damage**—and each only once. **Canada** is the sole developed country to do so, referencing Indigenous Peoples' recommendations to account for the "irreplaceable loss and damage of Indigenous lands, livelihoods, and the erosion of rights and title caused by unabated emissions," (p.36) though the NDC stops short of clarifying whether it will act on this. **Brazil** only notes that it looks forward to "multilateral progress and international cooperation" (p.35) on loss and damage.

ADAPTATION CHAMPIONS

Kenya

Kenya's NDC places strong emphasis on adaptation and loss and damage, closely aligning its adaptation commitments with the National Adaptation Plan (2015-2030), which assesses the economic and social implications of proposed measures. It outlines a wide range of adaptation actions, including in disaster risk management, agriculture and food security, climate-resilient infrastructure, and locally led and innovative livelihood strategies. The NDC also pledges to improve data collection on loss and damage. However, it notes that 81% of adaptation costs depend on international finance, technology, or capacity-building, highlighting that without adequate grant-based support from developed countries,[32] developing countries cannot realise their climate action ambitions.

Vanuatu

Noting that it is already a net negative emissions country, Vanuatu has extensively prioritised adaptation and loss and damage in its NDC. It sets out 66 pages of adaptation actions and 12 pages of loss and damage actions, covering a range of themes that includes, but is not limited to, oceans; health and nutrition; people with disabilities; gender and social inclusion; Indigenous Peoples; and decentralisation and locally led adaptation. For each of the 132 adaptation actions and 52 loss and damage actions, it provides specific policies, their relevance to the SDGs, the required finance, the extent to which the action is conditional on international support, and the progress made on that action since its previous NDC.

[32] Grant-equivalent calculations will be especially important in Kenya's case, as Kenya counts loan-based climate finance as part of its domestic contribution.

What must come next?

Delivering on the goals of the Paris Agreement and the findings of the first Global Stocktake requires a structural, whole-of-economy transformation. Yet, developed country NDCs continue to reproduce the same extractive, profit-driven systems that created the crisis—expanding or maintaining fossil fuel production, outsourcing transition costs by failing to deliver on their climate finance obligations, and ignoring the just transition and resilience-building measures that are needed to protect those who are most affected by the climate crisis. Failing to confront these structural inequities undermines trust in multilateralism, erodes the principle of CBDR-RC that lies at the heart of climate cooperation, and allows the continuation of climate disasters that are already devastating lives and ecosystems.

Our Demands

Aligned with the UN Secretary General, CAN asks countries to conclude COP30 with a strong global response plan to the glaring ambition and implementation gap, built on the principles of equity and CBDR-RC.

This response plan must include the following elements:

- COP30 must highlight the glaring ambition and implementation gap that lead to loss of lives, a perpetuation of injustice and destruction of ecosystems, even as it acknowledges the progress made under the Paris Agreement in terms of global trajectory of emissions and warming. Any political response to these gaps would be incomplete if planned climate action fails to center people, communities, and nature in order to deliver a just transition rooted in respect of human rights.

- COP30 must discuss, either in a formal dedicated space or through ministerial roundtables, the NDC and BTR synthesis reports. Given the critical urgency, Parties – especially those representing developed countries and G20 member states, must agree to **fix NDCs that are not in line with countries' fair shares responsibilities**. As with the entirety of climate action, this must be in accordance with the principles of CBDR-RC and equity, alongside scale-up climate finance to enable greater ambition. These revised NDCs are to be submitted before COP31.

- **The revised NDCs need to implement the guidance from the first Global Stocktake and the International Court of Justice Advisory Opinion in good faith** and include plans and timelines to phase out fossil fuels. They must also outline contributions to the global goals on renewable energy and energy efficiency, and measures to halt deforestation and reverse ecosystem destruction by 2030, in line with equity and the fair shares of each country. Developed countries should include information on their public grants-based finance for developing countries in their NDCs.

- Parties must agree a **process to develop a schedule for transitioning away from fossil fuels** in line with CBDR-RC and equity. This could be done by mandating COP30 and COP31 Presidencies to lead a process to set up a global fossil fuel phase-out roadmap.

- Parties, especially those representing developed countries and G20 member states, should enhance their national climate frameworks, including laws and policies, in accordance with the principles of CBDR-RC, equity and human rights in order to speed up implementation and go beyond current NDC pledges.

- Just transition forms an important part of the architecture for enabling climate ambition. The JTWP must **reach agreement on the principles of a just transition and establish the Belém Action Mechanism for Just Transition (BAM)** to support the implementation of NDCs, among other measures.

- Climate finance is a key enabler for implementation. COP30 must bring clarity on provision of quality climate finance at scale.

- The Action Agenda at COP30 should build momentum and help close the implementation gaps, presenting concrete and implementable global actions/initiatives, including those from credible actors and non-party stakeholders, that can strengthen climate action in a measurable and accountable manner.