

INTERNATIONAL



Facing the Opportunities and Challenges of the Features of NDCs

Discussion Paper

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Features of Nationally Determined Contributions (NDCs) will be raised anew at COP31, though discussions could benefit from a fresh perspective. As Parties prepare for renewed discussions on features of NDCs, there may be an opportunity to improve the effectiveness, transparency, and collective utility of future NDCs if Parties are able to move beyond long-held positions to conversations about how NDCs have changed and evolved.

Parties agreed to continue consideration of features of NDCs in 2026 after earlier efforts did not reach agreement. Rather than viewing the agenda item as a technical burden or a reopening of old debates, Parties could treat the renewed discussion at COP31 as an opportunity to reflect on what has been learned from multiple rounds of NDC development and implementation, and whether NDCs are working as intended. For example, guidance could generate some benefit by bringing about more accurate measures of collective progress, streamlined domestic planning and implementation, and even improved investor signaling through increased detail on sectoral pathways and policy priorities.

NDCs have evolved significantly since 2015. Through three cycles of NDC preparation and implementation, Parties have gained substantial practical experience with target setting under the Paris Agreement. Meanwhile, climate science has provided clearer evidence, the urgency of climate action has increased, and elements of the climate regime's architecture, such as the global stocktake (**GST**) and biennial transparency reports (**BTRs**), have come online and are shaping national climate planning.

Common trends are emerging and strengthening across NDCs 3.0. Analysis of a majority of the most recently submitted NDCs suggests increasing convergence in how Parties structure and design their climate commitments. UN Development Programme (**UNDP**) Climate Promise identifies trends including greater inclusion of economy-wide targets; more attention to adaptation and just transition; strong alignment with GST outcomes and long-term strategies; increased reference to carbon markets; enhancement of national transparency systems; and greater investment signaling.¹

However, challenges remain in defining further guidance for features of NDCs. Open questions persist regarding the appropriate scope and value of further guidance. It is still a significant point of debate whether Parties see it as useful to further define "features" of NDCs and, if so, what common lessons might support future NDC design while preserving their nationally determined nature. With the limited time to discuss NDC features at CMA8, Parties could consider a "light touch" approach to guidance that reflects lessons learned from UNDP's Quality Assurance Checklist while remaining consistent with existing obligations under the Paris Agreement.

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Questions for consideration

- What are features of NDCs?
- How have NDCs evolved over three successive cycles? What trends have emerged?
- In which areas, if any, could further guidance on features be usefully given to inform the design and effectiveness of future NDCs?
- What could enable Parties to move beyond established positions and collectively identify further guidance on features?

A. Context: The Evolution of NDCs

1. In 2015, 195 countries confronted climate change and the collective action problem it presents by doing something no prior climate accord had achieved. The Paris Agreement secured near-universal agreement for countries to act, without requiring universal agreement as to how. This was made possible by the Nationally Determined Contribution (**NDC**), which asks each Party to define its own commitment, taking into account its capacities and circumstances within a shared framework of transparency and review. The result was a coordinated architecture of distinct national commitments, bound together by a shared expectation of ambition over time.
2. The context for these discussions has changed significantly since negotiations on NDC features first began. Before the adoption of the Paris Agreement, Parties were invited to communicate their “intended nationally determined contributions” (**INDCs**) well in advance of COP21—and by the first quarter of 2015 if ready to do so. Many of these INDCs became Parties’ first formal NDCs. The second round of NDCs was due in 2020. The third round of NDCs (**NDCs 3.0**)—with an end date of 2035—was due by February 10, 2025.²
3. Over three successive cycles, Parties have noted they have greater experience with the formulation and implementation of their NDCs. The 2025 NDC Synthesis Report—informed by the 64 Parties that submitted their NDCs 3.0 by September 30, 2025—notes that “new NDCs show a progression in terms of quality, credibility and economic coverage.”³ An updated NDC synthesis report is expected to be published ahead of COP31.
4. The climate science is also clearer. The Intergovernmental Panel on Climate Change (**IPCC**) published the final pieces of the sixth assessment report (**AR6**) in March 2023, which acknowledges that “widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred” leading to widespread impacts to nature and people.⁴
5. The broader Paris Agreement architecture has matured as well. The conclusion of the Paris Agreement’s first GST at COP28 set out further guidance, key signals, and collective targets that should inform Parties’ NDCs and Parties’ first BTRs contain information on tracking NDC progress.
6. These developments may provide reasons for Parties to revisit the discussion of NDC features with an eye to how NDCs have evolved over these three cycles, and how NDCs may change further given these experiences.



Background: Prior NDC Features Discussions

7. While there is no agreed definition of the word “features” in the context of NDCs, it is widely understood to refer to the characteristics of NDCs.
8. Paragraph 26 of Decision 1/CP.21 requested that the Ad Hoc Working Group on the Paris Agreement (**APA**) develop further guidance on features of NDCs for consideration and adoption during the first session of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (**CMA1**).⁵ Despite several rounds of negotiations under the APA, Parties were unable to reach agreement on further guidance.
9. It was subsequently decided that the CMA would “...continue consideration of further guidance on features of [NDCs] at its seventh session (2024).”⁶ Because there was no COP in 2020 due to the COVID pandemic, Parties agreed to consider further guidance at CMA6 in 2024.
10. At CMA6 in Baku, Parties engaged in discussion on “Further guidance on features of nationally determined contributions, referred to in paragraph 26 of decision 1/CP.21”. Parties expressed views with in-session submissions,⁷ but once again were unable to find consensus on features of NDCs and “agreed to continue consideration of this matter” at CMA8 in 2026.⁸

B. Challenges and Opportunities for Further Guidance on NDC Features

11. As Parties approach renewed discussions on NDC features at CMA8 in Antalya, perhaps they could benefit from a fresh perspective. Rather than repeating prior positions, there may be an opportunity to have a simple conversation about how NDCs have changed. Parties could reflect on how NDCs have evolved, particularly in their form and substance. What might this type of discussion surface about the nature of NDCs and their collective utility?

What’s Changed: Developments Relevant to NDC Guidance

12. Since the first negotiations on NDC features in 2016, the Paris Agreement has entered full effect, and the broader climate landscape has evolved considerably, giving rise to developments that could inform NDCs, including:
 - **Scientific developments:** the IPCC has elevated new scientific findings in the AR6.
 - **Temperature goals:** greater emphasis has been placed on achieving net zero emissions by 2050 and on adaptation amid efforts to limit warming to 1.5 degrees C.
 - **Global stocktake:** the first global stocktake (**GST1**) concluded at COP28 in 2023, informing the third round of NDCs. The second GST will commence at COP31.
 - **NDC experience:** 2025 marked the third round of NDC development and implementation, including the provision of the information to facilitate clarity, transparency and understanding (**ICTU**) of NDCs.
 - **Biennial transparency reports:** most Parties have submitted their first biennial transparency reports (**BTRs**), which include provisions for tracking NDC progress. Many are now preparing their second BTRs, which face a deadline of December 31, 2026.

Emerging Trends: The Evolution of NDCs

13. Parties are reflecting the developments in the UN climate regime and the broader landscape in their NDCs. The UNDP Climate Promise *Insight Series* identifies several trends across the 128 NDCs 3.0, representing about 78 percent of GHG emissions, submitted by Parties as of 31 December 2025:⁹
 - **Mitigation:** Parties are increasing the number of sectors covered in NDCs, with 89 percent expanding sectoral mitigation measures. More than 75 percent of NDCs surveyed by Climate Promise include economy-wide emissions reductions targets, some for the first time.¹⁰



- **Adaptation:** NDCs are increasingly aligned with National Adaptation Plans (**NAPs**). More than 80 percent of the new NDCs included in the UNDP study reference NAPs, and 78 percent of these expanded to include adaptation in new sectors.¹¹
- **GST alignment:** 95 percent of NDCs surveyed include at least one policy commitment towards reaching the GST energy goals of tripling renewable energy capacity, doubling energy efficiency gains, or transitioning away from fossil fuels.¹²
- **LT-LEDS alignment:** new NDCs surveyed are largely consistent with their 2030 targets and long-term net-zero targets. However, NDCs face persistent gaps in short- and medium-term ambition, pointing to the need for greater immediate implementation of mitigation measures.¹³
- **Just Transition:** 94 percent of NDCs surveyed introduce measures to achieve just transition.¹⁴
- **Carbon markets:** 71 percent of the NDCs included in the UNDP study reference Party plans to use carbon market mechanisms under Article 6.¹⁵
- **Transparency:** Parties are increasingly institutionalizing reporting provisions. 88 percent of NDCs by developing country Parties establish permanent national transparency systems.¹⁶
- **SDGs alignment:** certain SDGs are well reflected across new NDCs. 99 percent of the NDCs surveyed include measures to address SDG 7 (energy); 87 percent do the same for SDG 11 (cities and communities); 75 percent do so for SDG 15 (forests and land-based ecosystems).¹⁷
- **Investability:** NDCs increasingly include stronger signals for investment. 80 percent of new NDCs assessed in the study incorporate signaling elements for expected outcomes such as quantified targets, sectoral priorities, high-level cost estimates, and policy frameworks.¹⁸

14. The 2026 NDC Synthesis Report, due in October 2026, is expected to further highlight how NDCs 3.0 have evolved and what trends have emerged.

Adding Value: Benefits of Further NDC Guidance

15. As trends emerge across NDCs, further guidance on NDC features from Parties could strengthen the utility of these instruments and deliver diverse benefits, including:

- **Measures of collective progress:** A consistent methodology for target-setting could reduce the technical burden associated with developing quantitative and qualitative goals and enable better data aggregation. The result may be a more comprehensive measure of collective progress that benefits from efficiency gains and informs the next GST.¹⁹
- **Aligned domestic policies and long-term strategies:** NDCs frame domestic policy development and can serve as an entry point for domestic climate action. Parties could consider guidance on features such as economy-wide targets, peaking years, absolute emissions reduction targets against a baseline, and alignment with 1.5°C and LT-LEDS to inform policymaking. This could enable Parties to streamline future climate planning; enhance domestic implementation; and align domestic development and economic policies with climate priorities.
- **Investment in NDC implementation:** NDC features guidance could provide information that improves investors' understanding of domestic policy landscapes, risks and opportunities. Investors have noted that more granular detail on sectoral pathways and quantified investment needs have been helpful in advising their decision-making processes.²⁰
- **Synergies across relevant negotiation processes:** In addition to upcoming NDC features negotiations, Parties are expected to review guidance for the ICTU of NDCs in 2027.²¹ Identifying how best to reflect growing trends across NDCs in negotiated outcomes may improve coherence and coordination ahead of the next NDC cycle.



The Case for Caution: Challenges to Further NDC Guidance

16. Developing further guidance on features of NDCs faces several challenges, including:

- **Defining “features” of NDCs:** To date, no CMA decision has officially defined “features” as it relates to NDCs. Although it is generally understood that “features” refers to components or characteristics of NDCs, when negotiations resume, Parties could establish a common definition of NDC features that maintains their nationally determined nature.²²
- **Clarifying the relationship between guidance on NDC features and guidance on the ICTU of NDCs:** The upcoming review of ICTU guidance could raise overlapping issues. Parties could consider ways to avoid duplicative processes that reduce technical capacity.²³
- **Determining scope of refinement:** NDCs reflect the fact that Parties have increasingly diverse experiences with climate change. Parties could consider what elements, if any, could usefully be included in guidance for NDC features, recognizing the tension between the collective nature of guidance and that not all features will be applicable to all Parties.²⁴
- **Limited time to discuss “features” further:** Parties will face competing priorities for negotiating time at CMA8 and are unlikely to have many opportunities to discuss features. In the limited time available before CMA8, Parties could try to informally exchange ideas where possible. At CMA8, Parties could focus discussions on national experiences of NDC evolution, and how to enhance NDCs as a tool without infringing on their nationally-determined nature.

17. Exploring these developments could help Parties better understand the role of NDC features and whether shared lessons could support future NDC design, while preserving Party ownership.

Moving Forward: How Parties Could Consider Approaching Negotiations

18. As Parties prepare to negotiate further guidance on features at CMA8, they might consider:

- **Taking stock of NDCs’ evolution:** The upcoming 2026 NDC Synthesis Report prepared by the UNFCCC Secretariat and the Climate Promise *Insight Series* from UNDP provide valuable insight into NDC development. A presentation or briefing by these bodies and other relevant organizations could ensure all Parties have access to the latest expert findings to inform negotiations following the third cycle of NDC submissions.
- **Identifying an agreed purpose and boundaries:** Following periodic negotiations on NDC features, Parties could seek to build trust by identifying an agreed direction of discussion. Beginning with an understanding of why NDCs may benefit from guidance if trends are independently emerging (i.e., to recognize progress, stabilize progress, improve capacity, and provide domestic guidance on climate action) could build on the UNFCCC Secretariat’s and UNDP’s findings and lay the groundwork for a productive discussion.
- **Pursuing “light touch” guidance:** Talk about prescriptive guidance is unlikely to yield fruitful negotiation. Instead, Parties could consider a “light touch” approach to features guidance that recognizes the diversity of Party experiences with climate change while reflecting lessons learned in NDC development. The Quality Assurance Checklist for NDCs published by UNDP could serve as a shared framework for features development that is rooted in UNDP’s analysis.²⁵ The latest edition could even be referenced in the CMA8 outcome on features.
- **Addressing upcoming timelines:** Parties may choose to prepare for future discussions on features guidance following COP31. They might also consider how the upcoming review of ICTU guidance in 2027 and NDC features negotiations could be mutually reinforcing. ICTU development could be considered an example of a NDC feature that has benefited Parties and NDC development. Parties could also consider how the design of the post-2030 sustainable development agenda and UN80 Initiative will influence future NDCs.

C. C2ES Resources

- Key Negotiations & Related Outcomes of the UN Climate Conference in Baku (January 2025)
<https://www.c2es.org/wp-content/uploads/2025/01/Key-Negotiations-Related-Outcomes-of-the-UN-Climate-Change-Conference-in-Baku.pdf>
- Features and Normative Requirements for Nationally Determined Contributions (June 2024)
<https://www.c2es.org/wp-content/uploads/2024/06/20240619-C2ES-NDC-Features-Normative-Requirements.pdf>

D. References

¹ United Nations Development Programme [hereinafter UNDP], *A Decade of the Paris Agreement: A Compendium of NDC Insights, Final Issue* (New York City, NY: UNDP, January 2026), https://climatepromise.undp.org/sites/default/files/2026-02/NDC_Insights_9_Final_Issue_Feb_2.pdf.

² UNFCCC, *Report on the 11th meeting of the Paris Agreement Implementation and Compliance Meeting*, PAICC/2024/M11/4, ¶ 19, (April 17-19, 2024), https://unfccc.int/sites/default/files/resource/PAICC_11_meeting_report.pdf.

³ UNFCCC, *Nationally determined contributions under the Paris Agreement synthesis report by the Secretariat*, CMA.7, (October 25, 2025), <https://unfccc.int/documents/650664>.

⁴ Intergovernmental Panel on Climate Change, *Summary for Policymakers. In: Climate Change 2023: Synthesis Report*. (Geneva, Switzerland: IPCC, March 2023), https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf.

⁵ UNFCCC, *Adoption of the Paris Agreement*, Decision 1/CP.21, ¶ 26, (January 29, 2016), <https://unfccc.int/resource/docs/2015/cop21/eng/10a01.pdf>.

⁶ UNFCCC, *Further guidance in relation to the mitigation section of decision 1/CP.21*, Decision 4/CMA.1, ¶ 20, (December 17, 2020), https://unfccc.int/sites/default/files/resource/4-CMA.1_English.pdf.

⁷ UNFCCC, *Compilation of submissions by Parties: Further guidance on features of nationally determined contributions, referred to in paragraph 26 of decision 1/CP.21*, Decision 1/CP.21, (November 18, 2024), <https://unfccc.int/documents/644017>.

⁸ UNFCCC, CMA 6 agenda item 7, status, <https://unfccc.int/event/cma-6>.

⁹ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue.

¹⁰ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 11.

¹¹ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 13.

¹² UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 16.

¹³ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 12.

¹⁴ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 56.

¹⁵ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 62.

¹⁶ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 59.

¹⁷ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 53.

¹⁸ UNDP, *A Decade of the Paris Agreement: A Compendium of NDC Insights*, Final Issue, 62.

¹⁹ Sirini Jeudy-Hugo et al., *Insights for designing mitigation elements in the next round of National Determined Commitments*, 38, 39, the OECD/the International Energy Agency Climate Change Expert Group Papers, (Paris, France: OECD Publishing, 2024), <https://doi.org/10.1787/b70a88ef-en>.

²⁰ Institutional Investors Group on Climate Change, "Making NDCs investable – the investor perspective," (London, UK, June 2024), https://www.iigcc.org/hubfs/POLICY/IIGCC_Making%20NDCs%20investable%20-%20the%20investor%20perspective_June2024.pdf.

²¹ UNFCCC, *Matters Relating to the implementation of the Paris Agreement*, Decision 3/CMA.1, ¶ 18, (March 19, 2019), <https://unfccc.int/documents/193407>; OECD, *Insights for designing mitigation elements in the next round of National Determined Commitments*, 38.

²² Ad-hoc Working Group on the Paris Agreement, *Informal Note to Co-facilitators*, (November 14, 2016), https://unfccc.int/sites/default/files/informal_note_item3_v2.pdf.

²³ OECD, *Insights for designing mitigation elements in the next round of Nationally Determined Contributions*, 38.

²⁴ OECD, *Insights for designing mitigation elements in the next round of Nationally Determined Contributions*, 39.

²⁵ OECD, *Quality Assurance Checklist for Nationally Determined Contributions (NDCs) 3.0*, (New York City, NY: UNDP, February 2025), <https://www.undp.org/publications/quality-assurance-checklist-nationally-determined-contributions-ndcs-30>.

