

WOMEN & GENDER CONSTITUENCY

Submission to the Gender Action Plan Review

Submission Request: Parties, United Nations entities, the UNFCCC constituted bodies and relevant organizations, in accordance with their respective mandates and priorities, to submit their inputs on progress, challenges, gaps and priorities in implementing the gender action plan, categorized by deliverable or output for each activity under the gender action plan, and on future work to be undertaken on gender and climate change. **Mandate:** FCCC/SBI/2023/L.17, para. 2

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1. Introduction and context of the submission

For the past five years since the adoption of the Enhanced Lima Work Program on gender (ELWPG) and its Gender Action Plan (GAP), the world has witnessed an intensification of planetary crises. Extreme climate events are becoming more frequent and intense, biodiversity loss is occurring at an unprecedented rate, and land degradation and pollution are reaching alarming levels. Economic inequalities, conflicts, and crises are hindering progress towards achieving the Sustainable Development Goals (SDGs). Gender discrimination and inequalities, including gender-based violence, persist, particularly in the face of rising opposition and escalating climate crisis. It is evident that the world is in a state of structural crisis.

During the midterm review of the Enhanced Lima Work Program on Gender, the Women and Gender Constituency (WGC) submitted a detailed assessment of progress per activity ([2022 WGC submission](#)) which should be read alongside this submission. Therefore, this submission will focus on two main aspects: firstly, reviewing and reflecting on the performance of the

Gender Action Plan , highlighting successes and challenges; and secondly, outlining key considerations for the next GAP within the new work program.

2. Review of the existing GAP

What has proven effective

Building from the initial Lima Work Program on gender, the Enhanced Lima Work Program exhibits a greater specificity and intentionality in its activities. The heightened awareness generated around the GAP has brought both positive visibility and consequential outcomes. Here are selected examples or notable progressions of what has worked well during the 5 years of implementation of the ELWPG:

- **Acceleration of the appointment of National Gender and Climate Change Focal Points:** At the time of the adoption of the first Gender Action Plan (GAP) there were **38** National Gender and Climate Change Focal Points (NGCCFP). As of the end of February 2024, the number of NGCCFPs has increased significantly, spanning 140 NFCCFPs and Alternates across 110 countries . Most governments and stakeholders have undertaken the mandate to appoint NGCCFPs, recognizing the importance of their role in advancing gender equality in the context of changing climate. This substantial rise, despite the challenges faced by NGCCFPs highlighted below, signifies a crucial step forward. The emerging community of NGCCFPs has the potential to become a formidable asset towards gender-transformative climate action, particularly at the country level.
- **Progress in tracking participation:** Meaningful and equitable participation of women in UNFCCC policy processes is a cornerstone of the GAP . Although the UNFCCC lacks specific targets for participation beyond the mandate of “*gradual but significant increase*”, the UNFCCC secretariat has been persistent in tracking women's [participation](#) in the UNFCCC, including through the identification of new data points. This is coupled with historical and ongoing tracking by organizations like the Women’s Environment and Development Organization (WEDO). Tools such as the [Gender Climate Tracker](#) and annual participation reports have been invaluable in assessing gender disparities in participation. The secretariat's [gender composition assessment of 2021](#) and [2022](#) and speaking time case study was instrumental in highlighting the dimension of meaningful participation beyond mere attendance.
- **National Gender Action Plans:** Despite not being explicitly mandated or anticipated, several governments have developed their own national Gender Action Plans inspired by the global GAP. Countries such as Nigeria, Zambia, Colombia, and Mexico have formulated [national gender and climate change action plans](#). In fact, some countries like Mexico have developed two GAPs—one aligned with the Nationally Determined Contributions (NDCs) and the other with the UNFCCC GAP. These national plans have fostered context-specific gender-responsive climate actions. It has been observed, particularly in countries like Colombia, that the GAP has catalyzed political will. Previously, gender advocates faced numerous challenges in persuading politicians and decision-makers to address climate change through a gender lens.

- **Capacity-building programs for women from grassroots organizations and indigenous communities:** Building on the above, a majority of national gender and climate action plans have included specific actions to support grassroots women and their organizations. This cascading effect is a significant outcome of the GAP.

What has not worked

As part of the development of this submission, the Women and Gender Constituency hosted a series of consultations with diverse stakeholders to assess the current Enhanced Lima Work Program on Gender (ELWPG) and outline the envisioned new work program on gender. The insights garnered from these consultations centered these challenges and shortcomings in order to pave the way for envisioned improvements.

- **Siloing of Gender:** One of the most referenced critiques revolves around the perceived siloing of gender within the negotiations. Despite commendable achievements over the past five years, there is a prevailing sentiment that the work program and its gender action plan have not managed to overcome compartmentalization of the gender agenda. A significant number of Parties and stakeholders assert that gender issues have been confined within the Gender Action Plan, leading to a limited understanding of the broader gender dimensions across negotiation tracks. This manifested in negotiations where gender negotiators predominantly focused on gender-specific agenda items, with insufficient integration or follow-up across other negotiation strands, as well as challenges to implementation with contradictory mandates across tracks (i.e. a demand for finance under the GAP not met with equivalent mandates on gender under finance tracks). The important capacity-building sessions mandated through the GAP increased pressure on all stakeholders and thus should be considered to be organized prio/after SB and COPs. Further to this, some stakeholders shared that this was a backtracking on progress in integrating gender issues in the negotiations prior to the GAP, where more work was done to assess the negotiating tracks which would be most impactful for the integration of gender considerations, including around finance and reporting.
- **NGCCFP Challenges:** The role of National Gender and Climate Change Focal Points, entrusted with supporting their delegations in advocating for gender transformative positions across various negotiation tracks, has been fraught with challenges. These challenges span from capacity and financial constraints to uncertainties surrounding their perceived roles within their delegations to the lack of appointment of NGCCFPs by many countries. As such, there is a pressing need to address these systemic barriers to ensure the effective integration of gender considerations across all facets of climate negotiations.
- **Event-based Coherence Activities:** While coherence was prominently emphasized within the Gender Action Plan (GAP), the implementation has primarily manifested through workshops and events organized jointly, rather than fostering genuine complementarities that yield tangible outcomes. As a result, there is a discernible gap between the vision of coherence and its substantive realization in practice. This

disparity underscores the need for a more concerted effort to translate the ideals of coherence into meaningful action, wherein collaborative initiatives yield synergistic outcomes that advance gender equality within the broader framework of climate action.

- **Lack of intersectionality:** despite initial efforts to integrate intersectionality, the ELWPG and GAP have no explicit reference to the impacts, needs, or experiences in relation to climate change based on people's intersecting identities such as but not limited to race, ethnicity, class, sexual orientation, gender identity, sexual expression and characteristics, education, disability, and Indigeneity. As such, Parties to the Convention are not compelled to report activities pertaining to this important intersection besides any self-voluntary effort. Furthermore, due to the lack of a mandate, the UNFCCC Secretariat cannot directly collect information or organize related events that address the issue—leaving it up again to Parties and other relevant organizations to self-coordinate without the product or output necessarily being reported as a result of GAP implementation efforts.

The current GAP is rightfully centered on the actions that the secretariat and constituted bodies can undertake, yet it falls short in adequately addressing the roles and responsibilities of governments. There exists a notable lack of bridges between these entities, with the bulk of responsibilities disproportionately resting on the secretariat. Consequently, the current GAP functions more as a procedural framework, focused on supporting the operational mechanisms of the process, rather than prioritizing, resourcing, and outlining steps toward the actual delivery of gender justice to communities and countries.

Despite its implementation, with only a few exceptions where countries have utilized it to underpin their national gender and climate change plans, its tangible impact at the country level remains largely unfelt. This is compounded by the fact that beyond climate change negotiators, many public officials are unaware of the existence of the GAP. Significant number of organizations working to support communities in adapting to climate change may lack awareness of its existence. This information gap between global and national processes has hindered the GAP's ability to effectively elevate countries' ambitions in addressing the intersection of gender and climate.

Even in Global North countries, the GAP has not been fully embraced as a tool to address internal gender disparities. While several governments have nominated NGCCFPs, many lack the necessary budgetary resources and empowerment to effectively address gender equality within their respective contexts. This underscores the urgent need for a paradigm shift towards a more inclusive and participatory approach, where governments are not only aware of the GAP's existence but are actively engaged in its implementation, with adequate resources and authority to effect meaningful change.

The vast majority of NGCCFPs find themselves severely limited in their capacity to effect change at the national level, primarily due to insufficient funding. Their participation in relevant activities is hampered by financial constraints, as there is often no allocated budget at the country level to support their work. Even in countries with national gender and climate

change action plans, financing the implementation of these plans poses significant challenges. Without adequate financial resources, key actions such as training more women negotiators to assume leadership roles within delegations or enabling their participation in negotiations, as well as supporting women's involvement in just transitions and access to adaptive technologies, remain unattainable.

Ensuring meaningful implementation necessitates a robust component focused on financing the GAP. Presently, the GAP falls short in this regard, exhibiting a glaring weakness in addressing financial considerations. It is imperative that we apply deliberate approaches to guide entities such as the Global Environment Facility (GEF) and the Green Climate Fund (GCF) in providing financial support for gender-responsive actions, thereby ensuring the mainstreaming of gender considerations at all levels of climate action. With Azerbaijan's forthcoming focus on finance, it becomes paramount to bolster efforts aimed at supporting finance negotiators to champion gender financing within finance discussions. This will enable them to recognize the pivotal importance of gender considerations and to advocate for decisions that bolster gender-responsive finance mechanisms.

3. Structure of the next GAP

Timeline: The WGC proposes the next Work Program on Gender to be at least a 10 year commitment with the five year action plan so as to provide time for implementation, monitoring, and adaptation.

Indicators: Indicators are a necessary component of any future GAP, ensuring there is a clear activity timeframe with indicators that enable the tracking of progress over time. The suite of indicators should include both collective indicators and those able to be disaggregated by Parties or constituted bodies so there can be detailed tracking of who is fulfilling obligations and where challenges and barriers are encountered. This fundamental structural approach will promote greater attention to the extent of progress on activities, and coupled with a longer timeframe, will ensure there is data available to adapt approaches and adjust priorities on areas of work that are lagging behind in achievement. Careful crafting could capture indicators that are process-oriented as well, such as indicators that capture 'target for funding' with clear baselines and benchmarks.

Participation: The structure of any future GAP should prioritize processes that ensure the participation of groups that are usually marginalized in these processes, recognizing the significance of groups at every level of climate action feeling a sense of inclusion, contribution, and even ownership of the GAP. Particular attention should be given to Indigenous women, girls, and gender-diverse people.

Party-level actions: Any future GAP must provide support to and outline national level actions, in ways that are detailed, specific, and connected to existing processes and resources. For example, the next GAP should support the integration of gender considerations in the NDCs and integrate gender considerations and activate country engagement on gender-responsive climate policy and action, and this could be achieved in part through stronger provision of UNFCCC guidance on NDC design, implementation, and monitoring as related to gender. The

design, implementation, and monitoring functions could be supported through the promotion of the integration of gender, including through gender machineries, gender negotiators, and/or NGCCFPs, into the coordination and development mechanisms of all national-level climate policy, including NDCs as well as National Adaptation Plans (NAPs) and other governance structures. One avenue from the previous GAP for this work is to continue supporting NGCCFPs towards greater institutionalization of their roles, including ensuring capacity and knowledge building across all aspects of the climate negotiations so that they can coordinate more closely within their Parties and negotiation blocs on related issues.

Consideration of a Technical Body: Given the importance of establishing and tracking appropriate indicators across activities that have proven to be multifaceted, the WGC recognizes the potential of a technical committee that could serve to support and guide implementation, while being cautious that such a body, if poorly designed, could concentrate discussions in a restricted or overly technical space, limit participation and engagement, and skew the sharing of best practices toward certain institutional actors rather than ensuring the broad contributions of grassroots groups, women's rights organizations, and Indigenous groups alongside NGOs and Parties.

4. Principles for the next gender and climate change activities

The following are principles that are critical for the next iteration of the Work Programme on Gender and its Gender Action Plan, whatever form(s) that may take. These principles could be reflected in priority areas of activities, as some have previously been integrated into GAPs in this way, but what is most necessary is inclusion of their fundamental framework and content to strengthen the vision of advancing gender equality and gender-transformative climate action, as well as its means of implementation.

Intersectionality to advance gender equality

This next iteration must have a more intersectional approach to fully embrace the goal of advancing gender equality through climate action. Women, girls, and gender-diverse people must be recognized in full, including through intersecting identities such as but not limited to race, ethnicity, class, sexual orientation, gender identity, sexual expression and characteristics, education, disability, and Indigeneity. Without an intersectional approach, gender equality will not be advanced.

- Include activities that cover a variety of topics that are cross-cutting with climate and reflect the diversity of gendered experiences, expertise, perspectives, and impacts, with particular attention to health, including sexual and reproductive health and rights; agriculture and land use; care, including unpaid care work; and access to justice, including for environmental human rights defenders and those who experience harm from climate action.
- Ensure safety and security of delegates attending UNFCCC meetings with deliberate efforts to make [COP venues gender responsive and accessible](#).
- Focus activities on recognizing and acting upon gender-differentiated experiences, opportunities, perspectives, and impacts across all genders and remove references to binary conceptions of gender.

- Integrate gender disaggregated data, considering disaggregated data by age, race, ethnicity, geography, Indigeneity, migration status, disability, and other relevant intersectionalities, while ensuring data privacy and protection.

Coherence

Coherence must be strengthened by activities that are substantial and process-oriented, ultimately ensuring activities of the GAP are responsive to related activities, processes, procedures, and frameworks and thus enriched to be more effective and sustainable in advancing gender equality and gender-transformative climate action. Coherence is weakened when singular events are substituted for ongoing dialogue, when there is a failure to consider key interlinkages, or when coherence is limited to the UNFCCC process and overlooks other conventions and frameworks.

- Promote coherence with negotiators in other negotiation tracks through country and regional bloc-level coordination mechanisms. Enhance the secretariat's capacity to support regional coordination as should the NGCCFPs.
- Provide for gender integration and consideration through other negotiation processes, particularly multi-year processes (such as the next global stocktake), and through specific dialogues, engagement of the gender Secretariat, etc.
- Outline mechanisms for strengthening coherence with other frameworks and instruments for effective coordination and implementation.
- Prioritize engagement with mechanisms supporting technology transfer to support women's access to adaptive technologies.
- Enhance the collection of gender-disaggregated data as well as its application in policymaking, recognizing the increasing body of evidence on how gender is related to climate change. Consider developing voluntary guidelines on gender data for reporting on Biennial Transparency Reports (BTRs)

Finance

Finance must be considered as essential to delivering gender-transformative climate action at every level. The next GAP cannot be operationalized without being resourced, and the GAP itself should outline the ways in which resources can be continually mobilized and applied toward gender-transformative climate action.

- Ensure better knowledge and information sharing about available resources internationally that can be applied toward gender-responsive climate action.
- Support country-level processes to outline available resources and resource needs within other planning processes, including but not limited to national budgeting, Nationally Determined Contributions (NDCs), and National Adaptation Plans.
- Work more strategically with the GEF, Adaptation Fund, and GCF on their existing mechanisms and potential to support developing countries in building capacity for and implementing gender-responsive climate policy and finance.
- Outline specific mandates for institutions that support gender-responsive climate action, such as UN Women and UNDP, to provide resources, capacity-strengthening, and programs, preferably with geographical balance, toward the implementation of mandated activities.

- Encourage the engagement of NGCCFPs and/or gender negotiators in country-driven planning processes.
- Link with the Just Transition work programme to further support financing efforts.

These principles should also be reflected in any further iteration of the Lima Work Programme on Gender. Strong recognition of the evidence on intersectional experiences and impacts, as well as the importance of resourcing gender-disaggregated data collection and using it in policymaking, can point to the importance of coherence addressing multi-faceted and multi-dimensional phenomena. Appreciating the cross-cutting relevance of the climate crisis should also promote more specified interlinkages with other processes and frameworks, including but not limited to the Commission on the Status of Women and the Kunming-Montreal Global Biodiversity Framework. Considerations of care in particular can be raised as work on just transition, recognized in the Enhanced Lima Work Programme on Gender, has accelerated under the UNFCCC. Additionally and relatedly, given the announcement of the Gender-Responsive Just Transitions and Climate Action Partnership, where gendered inequalities such as access to sexual and reproductive health services were raised, as well as the widespread recognition at COP28 of health as crucial to climate action, health and sexual and reproductive health and rights must be recognized as key elements to be promoted and protected to advance gender-responsive climate action. Parties can be called to support and resource gender-responsive climate action in specific ways, considering the climate finance commitments anticipated with the New Collective Quantified Goal and the continued obligation to double adaptation finance.