

Submission on gender and climate change: Suggestions regarding the new Gender Action Plan and the format of the SBI 62 session

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This submission answers to decision 7/CP.29, paragraph 15, inviting Parties and observers to submit views on the format and scope of the in-session technical workshop at SBI 62 via the submission portal by 31 March 2025. The submission identifies areas to be strengthened or added in the new Gender Action Plan (GAP), as input to discussions at SBI 62, and gives suggestions related to the workshop format.

We are witnessing an era marked by rising conflict, democratic backsliding and the spread of anti-rights and anti-gender forces and narratives. Now more than ever, it is crucial to seize the opportunity to push for a strong GAP that both safeguards hard-won rights and advances gender-transformative, rights-based solutions in the face of the climate emergency. Intersectionality and diversity must be at the core of the GAP, to ensure that all marginalized groups are meaningfully included in the decision-making and implementation of climate policies, and that their rights are upheld and protected. A robust GAP is essential to ensure that climate action includes a focus on gender equality and justice. It should reflect the voices and recommendations of the most affected communities and uphold and protect environmental defenders. It must also resist the growing influence of regressive forces and anti-gender actors working to derail progress toward green, climate-resilient and just societies.

The GAP should promote gender-transformative action. As such, it would take a holistic approach that focuses on the economic, political, ecological and cultural causes of vulnerability of different groups, aiming to address their root causes related to climate change. The GAP must challenge and aim to transform harmful gender norms, roles and power dynamics. It should strive to achieve long-term structural and social change and engage all genders in efforts to shifting attitudes and behaviours.

1. Aspects of the current GAP to strengthen

The five priority areas of the current GAP should be maintained and built upon. This section describes some suggestions for development.

Priority area A: Capacity building, knowledge management and communications

Activity A1: Capacity-building to mainstream gender

The GAP needs to ensure that gender considerations are fully embedded across all negotiation streams. This requires capacity support for government officials and other stakeholders on gender-responsive and gender-transformative climate action.

The new GAP should also be strengthened through synergies with other UNFCCC work streams. For example, the Action for Climate Empowerment (ACE) framework is important for ensuring climate justice where everyone, regardless of their sex, gender, age, ethnicity, religion, ability or socio-economic status can engage meaningfully in the transition to a low-emission and climate-resilient world. The aims and activities of ACE overlap with those of the GAP, and their implementation can reinforce each other if synchronized. To ensure efficiency and not overburden those involved, the monitoring, evaluation, reporting and implementation of ACE and the GAP must not result in duplication of efforts. As such, there needs to be coherence and coordination of ACE and GAP work at all levels.

The GAP should encourage Parties to integrate gender considerations in the Nationally Determined Contributions (NDCs) and in the National Adaptation Plans (NAPs).

Activity A.2: The role and work of National Gender and Climate Change Focal Points (NGCCFPs)

The new GAP should develop and clarify the role of NGCCFPs. The number of NGCCFPs have increased significantly since the first GAP, but their mandate and portfolios are very different, and some have little to no decision-making and policy-driving power, as well as very little or no financial means. Setting clearer standards for their work, role and expected deliverables/outcome, as well as ensuring sufficient capacity and knowledge across all aspects of the climate negotiations – not least to strengthen relations with financial mechanisms – would help to build the transformative power of the NGCCFPs. Travel funds, or improved mechanisms for online participation, should be promoted as a means of supporting the equal participation of NGCCFPs from low-income countries to participate in all relevant meetings and activities.

Activity A.3: Data and analysis

To support evidence-based and inclusive climate action, the GAP should promote the collection and analysis of gender- and age-disaggregated data. Wherever possible, gender data collection and analysis should adopt an intersectional approach and disaggregate data by multiple dimensions to capture differences based on age, disability, ethnicity, religion, sexual orientation, location (urban/rural), indigenous status, migration status, and other relevant characteristics. An intersectional approach to data collection is essential to identify and address the differentiated impacts of climate change across communities. In the new GAP, a special focus should be given to

gender data gaps that have already been identified¹ in key climate-related areas, including access to clean and renewable energy, climate-induced migration and displacement, participation in climate and environmental decision-making, unpaid care work and GBV. Improving data in these areas is critical for designing gender-transformative and rights-based climate policies.

Priority area B: Gender-balance, participation and women's leadership:

Activity B.1: Capacity-building for women delegates including young women, indigenous women and women from local communities

The full, equal, effective and meaningful representation, participation and leadership of women in all their diversity in all relevant decision-making bodies and processes under the UNFCCC is essential for the development of robust and sustainable outcomes to address climate change. One significant finding in research studies related to gender mainstreaming in climate action is that strong representation of women in leadership positions is a driver of gender responsive climate actions².

Initiatives taken to enhance women's participation have failed to result in any consistent improvement of women's meaningful participation or leadership at the UNFCCC meetings since 2008.³ The new GAP must present more effective and ambitious measures to improve women's full, equal, effective and meaningful participation and leadership across all areas of climate action and throughout UNFCCC processes. This should include substantive steps by Parties towards achieving gender balance in their delegations and appointing women delegates as Heads of Delegation.

The UNFCCC should lead by example and commit to a gender balance on panels, in constituted bodies, etc. To address current gender imbalances between policy areas, the Secretariat and Parties should increase access to capacity strengthening, relevant resources and other opportunities for women in all their diversity to facilitate their participation and leadership, particularly in policy areas that historically have been male dominated.

Achieving gender-balance in decision-making bodies is important, but it will not automatically result in gender transformative climate action. To ensure an intersectional gender transformative approach across all climate action it is critical that gender experts are meaningfully involved in guiding decision-making and implementation at all levels.

Activity B.3: Advancing the leadership and solutions of local communities and indigenous women and enhancing their effective participation in climate policy and action.

¹ Data2X, [Mapping Gender Data Gaps in the Environment and Climate Change](#), 2023.

² The Lutheran World Federation, [Gender Responsiveness Index for Climate Action](#), 2024.

³ WEDO, [Who Decides: Women's Participation in the UN Climate Change Convention](#), 2023.

The GAP should highlight the importance of ensuring civil society participation, with a focus on intersectionally disadvantaged groups. This is essential to operationalize the right to equality and non-discrimination in climate action. Engaging local communities, including women in all their diversity, in policy development, planning and implementation is critical to achieving inclusive, effective and just climate action.

It is essential to ensure the accessibility of the GAP and its related activities, in order to strengthen leadership and participation of women from local communities. Studies on national climate and gender policies have revealed that, in some cases, the GAP and the national contributions to its implementation are available only in English and not translated into the six UN official languages.⁴ To enable meaningful participation, the GAP text should be made available in local languages, and the Parties should be encouraged to promote transparency and accessibility of national climate and gender policies. The GAP should highlight the importance of investing in contextual mapping and identification of gender impacts of climate change and climate actions and ensure that these are acted upon as part of global climate decisions and actions.

We recommend the development of a UNFCCC GAP handbook that contextualizes and provides guidance on how the GAP can be translated into gender-responsive climate action, with a specific focus on women-led actions on grass root level. The handbook should also consider the fact that gendered vulnerabilities can be different depending on the national and local contexts. These differences must be recognized and addressed. The handbook should be made available in at least all UN official languages.

Priority area C: Coherence

Activity C.3: Strengthen coordination with other UN entities and processes

The GAP should encourage and ensure alignment with gender work across the UN system, including the Committee on the Elimination of Discrimination against Women (CEDAW), human rights frameworks, the UN Convention on Biological Diversity (CBD), the UN Convention to Combat Desertification (UNCCD) and the Sendai Framework on Disaster Risk Reduction. It should address the close linkages between climate change, conflict and gender through encouraging alignment with the UN Security Council Women Peace and Security (WPS) agenda and in national action plans on WPS implementation.

Given the strong links between climate change and the loss of biodiversity – and their disproportionate impacts on women and girls – we urge the Secretariat and Parties to further integrate biodiversity and climate action and foster stronger synergies between the two agendas. To recognise women's equal rights to own, access and control land and natural resources is essential for the protection and restoration of biodiversity, as well as for effective climate change mitigation

⁴ ACT Alliance Ethiopia Forum, [Policy recommendations from Ethiopia: Nuances of the UNFCCC Gender Action Plan](#), 2022.

and adaptation. We expect the GAP to support increased integration and synergies with the Convention on Biological Diversity, the Kunming-Montreal Global Biodiversity Framework and its Gender Plan of Action 2023-2030. While synergies and integration are vital, it is important that financial commitments and reporting mechanisms remain separate, in order to avoid double-counting and facilitate monitoring and evaluation.

The GAP needs stronger alignment with human rights frameworks. This could be done by applying a definition of climate justice, based on human rights, in line with the Mitigation, Adaptation, Remediation and Transformation ([MART](#)) framework⁵ proposed by the UN Special Rapporteur for the right to development. State obligations and duties in relation to international Human Rights Law should be assessed as part of climate decisions, plans and action. One step to tie the GAP closer to human rights commitments could be to ensure coherence and alignment with the operationalization of decisions under the CSW and CEDAW, including its general recommendation No.37⁶ on gender-related dimensions of disaster risk reduction in a changing climate.

Parties should be urged to include climate-related health, and in particular SRHR and gender-based violence, considerations in their NAPs and NDCs, with guidance provided by the Secretariat and relevant UN partners, such as UNFPA.⁷

Priority area D: Means of implementation

Activities D1-2: Budgeting and finance

Recognizing that the GAP will not be implemented if it is not properly resourced, we urge all Parties and the Secretariat to explore all possible ways to secure finance for gender transformative climate action. This includes both securing the necessary financial resources to implement all activities under the GAP and advocating for gender-transformative considerations to be included in climate finance negotiations under the UNFCCC.

It is also essential that the Secretariat is fully funded to ensure proper support in the operationalisation of the GAP, and facilitate capacity strengthening and share insights, learnings and opportunities.

The GAP must put forward solid approaches to make climate finance mechanisms under UNFCCC such as the Global Environment Facility, the Green Climate Fund, the Adaptation Fund and the Fund for Responding to Loss and Damage more accessible to human rights, including women rights, organisations, and include a bottom-up approach to not reinforce existing power structures.

⁵ Report of the Special Rapporteur on the right to development, *Climate justice: loss and damage*, [A/79/168](#), 2024.

⁶ Convention on the Elimination of All Forms of Discrimination against Women, *General recommendation No. 37 (2018) on the gender-related dimensions of disaster risk reduction in the context of climate change*, [CEDAW/C/GC/37](#), 2018.

⁷ UNFPA, [Taking Stock: Sexual and Reproductive and Health and Rights in Climate Commitments: A Global Review](#), 2023.

Priority area E: Monitoring and reporting

The new GAP should strengthen the assessment, monitoring and reporting of climate actions, climate finance allocations and NDC's through an agreed set of indicators and benchmarks to facilitate monitoring and accountability, based on OECD-DAC gender markers (GEM). The absence of such indicators in the previous GAP led to unsystematic implementation, reporting and tracking of progress, making it difficult to identify good practices or facilitate learning.

2. Areas to add in the new GAP

Intersectionality

Intersectionality and diversity must be at the core of all priority areas of the new GAP, to ensure that all marginalized groups are meaningfully included in the decision-making and implementation of climate policies, and that their rights are upheld and protected. The GAP should explicitly recognize that gender inequalities intersect with factors including ethnicity, religion, poverty, age, sexual orientation, gender identity, sexual expression and characteristics, ability, indigenous or minority status, socio-economic or health situation, national or social origin, birth or other status.

Activities under the new GAP should strengthen capacity on intersectionality, including practical guidance on how to apply intersectional approaches in climate policies – such as NDCs, NAPs, climate development and finance strategies. The new GAP should reflect the diverse experiences, capacities, vulnerabilities and needs of individuals and groups related to climate change based on their multiple intersecting identities. An intersectional approach should also be applied to data collection, monitoring and analysis. Efforts to enhance intersectionality and inclusivity in climate action must address structural barriers and power imbalances.

Climate and gender-based violence

The linkages between the climate and nature crises and gender-based violence (GBV) must be addressed. The increasing challenges related to SRHR, GBV and other gendered impacts of climate related conflict, displacement and migration, where the legal protection is insufficient at present, must also be addressed.

Data, tools and strategies are needed to understand and address GBV and climate linkages, including the need for protection of women environmental human rights defenders (WEHRD). The GAP must recognize GBV as a barrier to participation in climate processes and include strategies to address and prevent it. Protection mechanisms must be in place for the ones most at risk, such as WEHRDs. To ensure that these mechanisms are fully implemented, Parties should include climate-related SRHR and GBV considerations in their NAPs and NDCs.

When GBV increases as a result of climate change, the need for health care and legal, economic and social support to survivors of GBV increases as well. This support is often provided by

women's rights organisations from the civil society, but they are seldom part of climate negotiations and programmes. Women's rights organisations working to prevent the increase in GBV as a result of the climate and nature crises need to be an integral part of implementing the GAP, and more climate finance should be directed towards them.

Protecting women environmental human rights defenders

Women environmental human rights defenders (WEHRD) play a crucial role in resisting destructive business practices, protecting the environment, and upholding the rights of their communities. Despite this, they face increased pressure, threats, and violence. According to Global Witness, one environmental human rights defender (EHRD) has been killed every other day in the last 11 years, with Indigenous Peoples disproportionately affected⁸. In addition to lethal attacks, defenders increasingly face non-lethal tactics – including threats, displacement, surveillance, digital attacks, legal harassment and criminalisation. WEHRDs face unique, gender-specific risks and reprisals⁹, such as social rejection, stigma, and sexual and gender-based violence.

The new GAP must explicitly promote the voice, agency and leadership of WEHRDs, and protect their rights and fundamental freedoms. The GAP must ensure that these protections are embedded in climate, trade and development cooperation policies. As women, girls and gender-diverse groups are disproportionately impacted by climate decisions and policies, the specific risks and human rights challenges they face must be examined. Efforts to protect EHRDs should have an intersectional approach, to ensure that they also capture the gender-specific forms of threats and violence facing WEHRDs.

The Secretariat and Parties must condemn any state-led effort to restrict civil-society participation, including that of Indigenous Peoples, WEHRDs and youth in UN-led processes and such attacks must be addressed in words and in action by the relevant UN body. Parties must also support the full, equal, effective, meaningful, and informed participation of EHRDs, including WEHRDs, and ensure their full protection. Finally, Parties must improve the protection of the specific rights of Indigenous Peoples, including their rights to free, prior and informed consent (FPIC).

Gender and loss & damage

The GAP should include learning, analysing and acting on the gendered aspects of Loss & Damage (L&D). As L&D is accelerating, it is important to learn and document how L&D occur differently among different groups to identify global and regional trends and ways to address them. One such aspect could be depleted land and desertification linked to climate change, as female farmers often own or inherit less productive land due to limited access to inputs, information and labour but also due to discriminatory norms and practices. This could render female farmers to experience both economic and non-economic L&D, such as lost income and livelihood and forced migration.

⁸ Global Witness, [Missing voices: The violent erasure of land and environmental defenders](#), 2024.

⁹ OHCHR, [Human rights and civic space in the UN system supporting women human rights defenders](#), 2022.

3. Input on the SBI 62 workshop

To ensure an inclusive, effective and productive workshop during the SBI 62, we suggest the following:

- Use the workshop to build trust amongst parties and to increase knowledge on the concrete gendered impacts of the climate and nature crises.
- Use storytelling/interaction between Women Environment Human Rights Defenders, Party representatives and the Secretariat, rather than panels with high-level speakers.
- Strive to show how the GAP can have an impact, leaving participants feeling empowered and with a sense of commitment.
- Aim to create an as safe space as possible for all to feel included.
- Ensure accessibility and the possibility to speak your own language.
- Engage strong and experienced facilitators.
- Where possible, avoid scheduling gender and ACE events at the same time.

We would also encourage for more workshops to be scheduled, also in online formats, to enable broader participation.