



ADAPTATION • JUST TRANSITION • LOSS AND DAMAGE
 • SCIENCE BASED • EVIDENCE BASED • EQUITY

UNCONDITIONAL

GENDER RESPONSIVE • INTERGENERATIONAL • F

Submission by Philippine civil society, peoples', and non-government organizations and networks of positions and recommendations for the updating of the Nationally Determined Contribution (NDC)

1 September 2025



Background

2025 is the most critical year for global and Philippine climate action, culminating in the conduct of the 30th Conference of Parties (COP30) to the United Nations Framework Convention on Climate Change (UNFCCC). The world faces the difficult challenge of urgently addressing multiple climate issues with relatively limited available finance and other resources.

Nationally Determined Contributions (NDCs) are at the heart of global climate action. It is not for mere compliance. It is not just another indicator of resilience in the "new normal". It must reflect a nation's highest possible ambition and vision for a low-emissions, climate-resilient future and how aligned these are with the goals of the Paris Agreement. The success of COP30 would be partially determined by how all NDCs cumulatively measure up to this climate imperative.

While the Paris Agreement loosely indicates as a goal limiting global warming to 2°C, this should not be an option for an industrializing yet highly-vulnerable country like the Philippines. Whether through the recommendations of the Intergovernmental Panel on Climate Change, the July 2025 Advisory Opinion of the International Court of Justice, the words inscribed in the *Laudato Si'*, or the demands of the most vulnerable communities, it is the duty of all governments to pursue all efforts to limit warming to at most 1.5°C above pre-industrial temperatures, within their respective capacities and with respect to human rights, especially the right to a clean, healthy, and sustainable environment.

Since December 2024, the Philippine government has been formally conducting the process of updating its NDC, with an intended submission to the UNFCCC before COP30. The country is expected to have a higher ambition in the succeeding iteration of its 2021 pledge to mitigate greenhouse gas (GHG) emissions by 75% within the current decade (2020-2030), relative to a "business-as-usual" scenario, while maintaining a "whole-of-society" approach to its formulation.

We, as civil society groups and networks in the Philippines, remain committed to participating in the NDC updating process as we collectively have during the 2020/2021 cycle. During that time, we played a pivotal role in championing the call for our country to have as high of an ambition in its national commitment as possible, while ensuring that key principles such as peoples-centered development, accounting for ecological integrity, acknowledging the rights and contexts of Indigenous Peoples, and emphasizing climate education are enshrined in its text.

This paper contains the joint positions of Philippine non-government stakeholders, specifically the groups undersigned to this document, on our specific calls for the principles, policies, measures, and other key messages for the updated Philippine NDC.

Signed,

- Aksyon Klima Pilipinas (AKP)
- Alyansa Tigil Mina (ATM)
- Assistance and Cooperation for Community Resilience and Development (ACCORD)
- Bantay Kita, Inc.
- Center for Renewable Energy and Sustainable Technology (CREST)
- Community Organizers Multiversity (COM)
- Disaster Risk Reduction Network Philippines (DRRNetPhils)
- Ecosystems Work for Essential Benefits Inc. (ECOWEB)
- EcoWaste Coalition
- Environmental Science for Social Change (ESSC)
- Federation of Free Workers
- Firefly Brigade, Inc.
- Foundation for the Development of the Urban Poor, Inc.
- Green Forum Panay Guimaras, Inc.
- Green Convergence for Safe Food, Healthy Environment and Sustainable Economy
- Greenpeace Philippines
- Haribon Foundation for the Conservation of Natural Resources Inc.
- Health Care Without Harm – Southeast Asia (HCWH SEA)
- Institute for Climate and Sustainable Cities (ICSC)
- Life Haven Center for Independent Living (LHCIL)
- Living Laudato Si' Philippines (LLS)
- Mother Earth Foundation
- Non-Timber Forest Products Exchange Programme (NTFP-EP)
- NGOs for Fisheries Reform (NFR)
- Oxfam Pilipinas
- Philippine Initiative for Conservation of the Environment and Empowerment of the People (PhilinCon)
- Pagtambayayong - A Foundation for Mutual Aid Inc.
- Partnership of Philippine Support Service Agencies (PHILSSA), Inc.
- Philippine Misereor Partnership, Inc. (PMPI)
- Plan International Pilipinas
- Reboot Philippines Renewable Energy Transition Institute (RebootPH)
- Roman Catholic Archdiocese of Manila Integral Ecology Ministry
- Save the Children Philippines
- Southeast Asia Regional Initiatives for Community Empowerment (SEARICE)
- Tebtebba Foundation, Inc.
- Wetlands International Philippines
- World Vision Development Foundation, Inc.
- World Wide Fund for Nature (WWF) Philippines

OVERARCHING CALLS

➤ **The Philippines must have a higher unconditional commitment than 2.71% in its next NDC.**

The Philippines' ambition in its succeeding NDC will be higher, as expected for every Party to the Paris Agreement. While its current conditional target of 72.29% emissions avoidance and reduction is rated as 1.5°C-compatible with a "global least cost" caveat¹, its implementation remains hindered by the lack of sufficient means of implementation secured. Only one percent of the necessary USD72 million has been received by the country during the initial years of the current NDC².

Yet the higher ambition and an increased likelihood of improved implementation of the next Philippine NDC rests just as much on increasing its unconditional target from 2.71%. However, with the understanding that their definitions can be to a limited extent nationally-determined, **the Philippine government must provide a formal, clear definition of which policies and measures (PAMS) are regarded as "conditional" and "unconditional"** for a clearer multistakeholder understanding that is necessary for NDC planning and implementation³.

Nonetheless, aside from the information provided by government agencies through their preliminary list of PAMS⁴, there is evidence indicating the Philippines' capacity for a higher unconditional target:

- The *current* NDC Implementation Plan presents that only 9.26% of the national climate budget, as marked through Climate Change Expenditure Tagging (CCET), is aligned with current NDC policies and measures (PAMS)⁵. Improving the alignment of domestic public finance with current and future NDC PAMS would aid in enhancing its own capacity to enforce mitigation solutions.
- Some of the listed PAMS in the current NDC are already listed under the recent national budgets but not formally classified as unconditional. These include measures for active travel (transport), knowledge sharing and learning (energy), and promoting the use of renewable energy in technologies, facilities, and practices (agriculture), some of which may not be specifically indicated in the line agenda items under the national budget.
- The pending implementation of agricultural PAMS starting in 2026 and the potential addition of PAMS under the forestry and other land use (FOLU) sector indicates additional capacity within the Philippines for achieving NDC objectives and targets.

A higher NDC unconditional target, which does not need to be greater than the conditional target, is recommended, based on a better alignment of the national climate budget with the identified NDC PAMS until 2035, and a more efficient use of allotted domestic public finance that would result in an improvement in the attainment of climate and development-related objectives. It should reflect the highest ambition possible that would define and guide the Philippines' just transition to low-emissions, climate-resilient development.

➤ **The updated NDC should present comprehensive, economy and society-wide decarbonization pathways up to 2050, aligned with the goals of the Paris Agreement, especially with limiting global warming to 1.5°C above pre-industrial levels.**

These pathways must be indicative and/or reflective of the following: phaseout for coal and gas; prioritization of emission reductions and removal, the latter through natural sinks; reduction of methane emissions and other short-lived climate pollutants; quantitative and qualitative co-benefits for addressing adaptation and loss and damage; the country's needs for means of implementation; and the

¹ Climate Action Tracker (2023) *Philippines*. <https://climateactiontracker.org/countries/philippines/>

² *Philippines' Biennial Transparency Report*, p. 93.

³ For the purposes of this submission, we refer to the stated definition of "conditional" and "unconditional" in the NDC Implementation Plan.

⁴ As of 15 August 2025, based on the files accessible to Aksyon Klima Pilipinas

⁵ *The Philippines' NDC Implementation Plan*, p. 49.

socioeconomic dimensions expected to be brought by the Just Transition Framework (JTF). They should also include scenarios for the potential attainment of net-zero by 2050, with the understanding that drastic emission reductions and enhancing natural sinks are both necessary for this to be achieved, and that net-zero is interpreted as the earliest point for net-reductions to begin in the Philippine context. These pathways are necessary to set emissions caps that would hasten emission reductions, renewable energy development, and hold polluters accountable.

- **The updated NDC must be coherent with national policies, programs, and activities and other global commitments relevant to achieving national targets on climate change mitigation.**

Aside from higher ambition, policy coherence is key to the effective development and pending implementation of the updated NDC. This is necessary to maximize available resources for executing PAMS, especially those that can provide urgent benefits for different sectors and stakeholders, while providing a more coordinated inter-agency approach that is necessary for both a “whole-of-government” approach to climate action and long-term planning and decision-making.

An example of this synergy is between the updated NDC and the JTF, as specified in the current NDC Implementation Plan (NDCIP). During the ongoing development of the JTF and from previous dialogues between the Philippine government and civil society groups, it was communicated to us that the development of the first NDC was unable to fully capture the socioeconomic dimensions in setting quantitative targets. With the synergy between the next NDC and the JTF, the potential strategies under the latter can provide the social and economic benefits, needs, and concerns to make the next NDC targets more complete. Nonetheless, we must emphasize that the updated NDC itself and its accompanying Implementation Plan must already include environmental and social safeguards and not be completely reliant on the resulting JTF to provide them, including on the creation of green jobs.

Aside from all policy instruments listed in Annex A of the NDCIP, the updated NDC must also be coherent with the following national climate and environmental plans:

- **National Adaptation Plan (NAP)**, which should serve as the basis for determining the adaptation co-benefits of both current and updated NDC PAMS;
- **Philippine Biodiversity Strategy and Action Plan (PBSAP)**, which would serve as the basis for several updated NDC PAMS, most notably under the FOLU sector;
- **The proposed Article 6 engagement strategy**, with the emphasis on avoiding transactions only intended for offsetting, strict enforcement of environmental and social safeguards, and defining and promoting non-market approaches in multistakeholder cooperation throughout the NDC process; and
- **The National ACE Strategy and Framework**, as cross-cutting enablers of national and local climate action and aligned with the principles of open governance.

Nonetheless, with the acknowledgment of the need for increasing current capacities for a more comprehensive approach to climate policymaking, the Philippine government must provide updates during the upcoming multistakeholder consultations on the following studies and reports that would inevitably inform and influence the implementation of the current and updated NDC:

- The development of the country’s long-term pathways towards a net-zero and climate-resilient economy through the Asian Development Bank (ADB)⁶;

⁶ ADB (2024). *Philippines: Supporting Long-Term Planning for Climate Action*. <https://www.adb.org/projects/57269-001/main>

- The overall climate financing strategy for the Philippines, led by the Department of Finance (DOF) with the support of the United Nations Development Programme (UNDP)⁷;
- The establishment of a national carbon pricing framework and system, with the support of the World Bank⁸; and
- The development of the country's Climate Prosperity Plan, an initiative under the CVF-V20, involving the DOF⁹.

➤ **The Philippine government must present the quantifiable progress of implementing the current NDC since 2020, aligned with the NDCIP.**

Updating the NDC requires an assessment of the progress of implementing the current ones to provide a basis for any additions and changes it plans for the next iteration, including the current gaps and challenges in their enforcement and areas for improvement. This may be shown through the upcoming multistakeholder consultations or through other forms of communication with different stakeholders, as part of more transparent means of communications and engagements with all government agencies, development partners, and other actors engaging throughout this process.

We also request the following information to also be directly addressed by the Philippine government:

- Mechanisms, benefits, and challenges regarding the retirement of GHG emission sources across different sectors;
- Developing a balanced baseline for developing sectoral mitigation targets;
- Pre-screening and prioritization of PAMS, accounting for their respective GHG emissions, required financing for implementation, co-benefits for adaptation and national and local sustainable development, and existing capacities of stakeholders;
- Integrating financial and impact tracking into the delivery of NDC, especially financing from private sector and including improving the implementation of the CCET regarding the use of allotted budgets for NDC PAMS; and
- Accelerating electrification in all sectors.

➤ **We support including in the next NDC the emphasis on measures to avert, minimize, and address loss and damage associated with climate change impacts.**

The inclusion of ongoing efforts and planned strategies to avert, minimize, and address climate L&D within the Biennial Transparency Report (BTR) and considerations for developing a national L&D policy framework are welcomed. Building on these initiatives, the inclusion of L&D in the next NDC is also strategic with the Philippines' current position as the host of the Board of the Fund for Responding to Loss and Damage.

Nonetheless, a deeper integration of L&D into the updated NDC and subsequent Implementation Plan must go beyond the acknowledgment of this pillar of climate action being a key part of the country's current climate profile. The Philippine government may explore strategies to account for how much economic and non-economic L&D impacts the implementation of NDC PAMS and how to address them.

⁷ Catilogo, M. I. (2024, September 3). DOF, UNDP to draw up climate finance strategy for PH. *Inquirer.net*. <https://business.inquirer.net/477827/dof-undp-to-draw-up-climate-finance-strategy-for-ph>

⁸ Jocson, L. M. (2024, January 18). DoF studies carbon tax, emissions trading system. *Business World*. <https://www.bworldonline.com/top-stories/2024/01/18/569625/dof-studies-carbon-tax-emissions-trading-system/>

⁹ This was revealed during the "High-Level Meeting of the CVF-V20 and Members of Congress of the Republic of the Philippines," on 14 July 2024 at the National Museum of Fine Arts, Manila.

➤ **The next NDC and its accompanying Implementation Plan must feature nature-based solutions (NbS) as a cross-cutting approach across all corresponding policies and measures.**

If designed and implemented properly, NbS has tremendous potential for delivering co-benefits for biodiversity conservation, ecosystem services, and community resilience while contributing to emission reductions and removal. The significance of NbS in the climate context is acknowledged in several national climate and development plans, most notably in the updated Philippine Development Plan¹⁰.

The inclusion of NbS enhances policy coherence that is necessary to accelerate the attainment of climate, nature, and development targets in the Philippines. Among these involve NbS as particularly recognizing that nature-based solutions can serve as cost-effective measures for disaster risk reduction and climate change adaptation, which in turn also aids in minimizing loss and damage that impact communities, biodiversity, and ecosystems.

Applicable PAMS to be included in the updated NDC should be part of a comprehensive national framework to be established for scaling up NbS across terrestrial and marine ecosystems, including coastal blue carbon ecosystems, watershed restoration, and urban green infrastructure, with measurable targets for ecosystem restoration and conservation that contribute to the attainment of both mitigation and adaptation goals.

While we acknowledge that the Philippine government intends for the NDC to be a strategy to attract climate investments to support its implementation, we emphasize that all NbS, as part of the updated NDC or otherwise, must not be largely driven by the number of potential investments, but instead by the imperative of conservation. They must also contribute to the goal of biodiversity and ecosystem protection and conservation, especially in designated protected areas (PAs), Key Biodiversity Areas (KBAs), Community-Based Forest Management Areas (CBFMAs), Indigenous and Community Conserved Areas (ICCAs), and Other Effective Area-based Conservation Measures (OECMs).

We recommend that the Philippine government, through the Department of Environment and Natural Resources, must still set a national policy on NbS that would, among other purposes, serve as the foundation for the NbS-relevant PAMS included in the updated NDC. Furthermore, we suggest to include among the key principles for the updated NDC those that indicate coherence with biodiversity and nature-relevant goals, such as “nature-positive” or “ecological conservation”.

➤ **The multistakeholder NDC consultations must also include discourse regarding a multi-stakeholder updating of the NDCIP, with direct representation of non-government stakeholders in the corresponding process.**

We reiterate our concerns about the relevance of the *current* NDCIP, given the short period of time between its formal submission to the UNFCCC and the updating of the NDC itself before COP30 and the previously-mentioned gaps in policy coherence and implementation across levels of governance.

The updating of the NDCIP itself must also be addressed during this pre-COP30 process to ensure continuity and sustainability in implementing current PAMS while enabling the execution of new climate solutions. This would also enable a smoother cascading of the updated NDC to the regional and local scales, including through the implementation of Local Climate Change Action Plans (LCCAPs).

¹⁰ This specifically refers to the draft Chapter 15: Accelerate Climate Action and Strengthen Disaster Resilience, where it states that “the updating process will include in-depth sectoral assessments, including evaluation of new NDC sectors (e.g., forestry, and other nature-based solutions), and cross-cutting analysis of synergies and trade-offs among the sectoral policies and measures.

The NDCIP updating process also provides a concrete opportunity for representation among civil society and people's organizations, labor groups, and communities, whose role under the current NDCIP is less defined and involved compared to the private sector. This is strongly in line with the "client-focused" gender equality objectives and strategic and sectoral gender actions specified in the NDC Gender Action Plan 2024-2030 to increase participation of stakeholders (i.e. civil society, women's organizations, and vulnerable and marginalized groups) in consultations, climate actions and decisions.

➤ **The updated NDC must integrate the health agenda.**

Incorporating health agenda into the NDC boosts the Philippine's comprehensive approach to climate change. It acknowledges that the health sector is both a first responder to climate-related threats and a major contributor to emissions. Globally, healthcare systems account for 4.4% of GHG emissions; tackling this in the Philippines will help lower carbon footprints while also constructing climate-resilient, sustainable health systems.

Furthermore, prioritizing health in the updated NDC aligns with global and national frameworks on addressing air pollution and attaining national sustainable development. At the multilateral level, the Philippines is a signatory to the World Health Organization's COP26 Health Commitments, while also being a member of its Alliance for Transformative Action on Climate and Health. It also aids in the attainment of the UN Sustainable Development Goals, specifically on Goals 3 and 13.

Given the strategy of mitigation as a function of adaptation, this integration is aligned with health being one of the priority thematic areas under the NAP. This is especially critical for the agriculture sector, whose policies and measures must also integrate health considerations, in the context of food security and public health. This would also enhance the implementation of the Universal Health Care Act and the Philippine Health and Climate Change Roadmap 2025–2052.

➤ **The multistakeholder NDC consultations must present updates about the institutionalization of a monitoring, review, and validation (MRV) process for the updated NDC.**

We recognize the MRV system for the first NDC, as outlined in the current Implementation Plan. While we note of the publication of documents and tools that are also aligned with MRV (i.e., Biennial Transparency Reports), the current NDCIP presented opportunities for updating the NDC MRV system, including on:

- Ensuring that the MRV framework is operational starting in 2026, prioritizing the necessary tools for tracking progress on fossil fuel phaseout efforts and including corresponding systems for Internationally-Traded Mitigation Outcomes and Corresponding Adjustments in the same year;
- Integrating the NDC and NAP MRV and planning;
- Establishing an MRV track to assess the impact of green procurement by 2024; and
- Establishing a system for comprehensively tracking international private finance in support of the NDC implementation and/or updating.

Presenting updates on these identified opportunities and timelines for improving the MRV system for the current and subsequent NDCs is critical to present a comprehensive picture of NDC implementation in the Philippines. It would also enable non-government stakeholders to identify any additional gaps and spaces for directly contributing to addressing them, forming an important component of localizing and mainstreaming the updated NDC.

SPECIFIC RECOMMENDATIONS

We present the following specific recommendations on proposed policies and measures for the next NDC on the six expected mitigation sectors for the updated NDC: agriculture; waste; industrial processes and product use; transport; FOLU; and energy, including cross-sectoral measures. These were produced based on focused group discussions and on-site consultations conducted by AKP and its partners (**Table 1**) and the following:

- Joint CSO statement on the development of the first Philippine NDC, communicated to the Philippine government on 15 February 2021;
- Two previous AKP submissions to the JTF development to national government agencies on 6 November 2024 and 4 July 2025, including all listed just transition frameworks, declarations, and statements by non-government groups;
- “Enhancing Policy Coherence Toward Increased Ambition in the Philippines’ Nationally Determined Contributions”, a rapid review and scoping study by Parabukas; and
- “Phasing Out Fossil Fuels Through NDCs”, a guide for policymakers by the World Wide Fund for Nature (WWF).

These also include the proposed PAMS from the sectoral agencies – Department of Agriculture (DA), Department of Environment and Natural Resources (DENR), Department of Energy (DOE), and Department of Transportation (DOTr), that we support, based on the preliminary list of PAMS accessible to AKP as of 15 August 2025.

Table 1. List of focused group discussions and consultations on the Nationally Determined Contribution conducted by AKP and its partners.

| Date | Location | Session |
|-----------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 March 2025 | Virtual | Focused group discussion with civil society and community representatives of mining-affected communities in Mindanao |
| 11 April 2025 | Pandan, Antique | Consultation with civil society and community representatives in Aklan and Antique, focusing on the issues of forestry, biodiversity, and energy |
| 14 April 2025 | Quezon City | Focused group discussion with civil society representatives in the health sector |
| 30 April 2025 | Baguio City | Consultation with civil society and community representatives in Baguio City and surrounding areas, focusing on the issues of energy, waste, and Indigenous Peoples |
| 26 May 2025 | Quezon City | Focused group discussion with civil society representatives involved in the forestry, land use, and biodiversity sectors |
| 13 June 2025 | Quezon City | Focused group discussion with civil society representatives involved in the agriculture sector |
| 18-19 July 2025 | Quezon City | National children and youth consultation on the NDC and just transition ¹¹ |
| 22 July 2025 | Virtual | National NDC CSO consultation |

¹¹ The first paragraph in the sections concerning each of the AWITFE sectors are the corresponding sectoral calls from the participants of this event.

On agriculture

"Burning residues, overusing chemicals, and unsustainable practices harm people and the planet. Farmers need support to shift to climate-smart methods while valuing indigenous knowledge. Fisherfolks must be protected from reclamation and extraction. Both farmers and fisherfolk's rights must be protected. Women should be empowered in agriculture, and young people should be involved in sustainable food systems and agriculture must be promoted in communities through education."

1. With the anticipated promotion of more nature-based solutions (NbS) in the Philippines, we seek clarification of what specific NbS will be covered in the agricultural sector in the next NDC that would address livestock-enteric fermentation, livestock-manure management, and biomass burning.
2. With the understanding that agricultural PAMS listed in the current NDC would only commence implementation in 2026 and based on the list of tentative PAMS proposed by the DA¹², we seek clarification if the following current agricultural PAMS would directly refer to the following proposed PAMS by the DA, and if all the listed potential PAMS would have at least an unconditional component¹³:

| Current NDC agricultural PAMS | Potential agricultural PAMS for the updated NDC |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Use of alternate wet and drying, cropland management, and renewable energy (RE) for flood control and water management systems in paddy rice cultivation | <ul style="list-style-type: none"> • AWD paddy rice (National Irrigation Administration) |
| <ul style="list-style-type: none"> • Use of biodigester and nature-based solutions in livestock-manure management | <ul style="list-style-type: none"> • Biodigester under NAWRMP (Bureau of Animal Industry) • Rapid composting for buffalo (Philippine Carabao Center) • Climate-smart feeding for buffalo (Philippine Carabao Center) |
| <ul style="list-style-type: none"> • Use of nature-based solutions and breeding interventions in livestock-enteric fermentation | <ul style="list-style-type: none"> • Rapid composting for buffalo (Philippine Carabao Center) • Climate-smart feeding for buffalo (Philippine Carabao Center) |
| <ul style="list-style-type: none"> • RE-powered service centers and offices of the Department of Agriculture | <ul style="list-style-type: none"> • Renewable Energy Program (Bureau of Agricultural and Fisheries Engineering) |
| <ul style="list-style-type: none"> • Implementation of carbon sequestration measures (i.e., use of organic fertilizers; use of biochar; expansion of coconut bands along storm surge prone shores; rehabilitation/ expansion of mangrove areas; establishment of bamboo plantation; and increase soil organic carbon sequestration) | <ul style="list-style-type: none"> • Massive Coconut-Planting Program (Philippine Coconut Authority) • Integrated Coconut Processing Hubs (Philippine Coconut Authority) • Carbon optimization of coconut (Philippine Coconut Authority) • Rice Straw Collection and Processing (StrawInnovation) |
| <ul style="list-style-type: none"> • Use of precision agriculture and cropland management | <ul style="list-style-type: none"> • Advanced Agricultural Technologies (High Value Crops Development Program) |

¹² These were all presented by the DA on 4 July 2025 to agriculture-focused CSOs.

¹³ This is based on a confirmation by a DA representative during the National children and youth consultation on the NDC and just transition

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Increase the adoption of existing RE technologies in the agriculture and fisheries sector | <ul style="list-style-type: none"> • Renewable Energy Program (Bureau of Agricultural and Fisheries Engineering) • Energy-efficient mechanized farming (Philippine Center for Postharvest Development and Mechanization) • Solar-energy utilization (Bureau of Plant Industries) • Water Management through Solar-Powered Irrigation Systems (National Organic Agriculture Program) |
| <ul style="list-style-type: none"> • Implementation of additional measures to reduce carbon footprint of agricultural products including using renewable energy powered equipment, precision agriculture, changing crop varieties, etc. | <ul style="list-style-type: none"> • Rice Straw Collection and Processing (StrawInnovation) |
| <ul style="list-style-type: none"> • Use of cropland management, precision agriculture, and biotech crops to reduce N2O emissions from annually cultivated soils | <ul style="list-style-type: none"> • Promote and Implement Sustainable Land Management (Bureau of Soils and Water Management) |

3. In addition to the previously-mentioned policies and measures, we also propose the following to be either added or promoted as part of the updated NDC:

- We recommend the expansion of the Scaling of Rice Technologies projects under the National Rice Program that would address the emissions under the rice production sub-sector as an unconditional measure.
- We recommend the promotion of utilization and knowledge-sharing of indigenous agricultural practice, including through integration into current and potential agricultural PAMS, with special emphasis on traditional ecological knowledge that incorporates nature-based solutions such as terracing systems, companion planting, and biodiversity-enhancing farming methods that have proven climate resilience benefits.
- We recommend the programmatic establishment and expansion of community-based and accessible seed banks, prioritizing support to local varieties instead of hybrid varieties that often require chemical inputs. This could aid in climate change mitigation through minimizing transportation-related emissions, promoting sustainable farming practices, and enhancing carbon sequestration in the soil.
- We recommend the programmatic establishment and expansion of community-based and accessible soil clinics to enhance the understanding of farmers about soil health management techniques, in aid of emissions removal and establishing climate-resilient agricultural communities and monitoring, reporting, and verification related to the current and next NDCs. This is also aligned with “improve soil health management programs” being one of the solutions under Outcome 2 of the “Agriculture and Fisheries and Food Security” under the National Adaptation Plan.
- With the current energy PAMS including knowledge sharing and learning as a solution in the current NDC, we recommend the development of farmer-friendly planning tools for climate change mitigation and relevant capacity-building for implementation for the agriculture sector in the next NDC. This is also aligned with “Encourage sustainable farming and fisheries management” being one of the solutions under Outcome 2 of the “Agriculture and Fisheries and Food Security” under the National Adaptation Plan.

- We recommend as a sectoral PAM the adoption of urban farming practices, aligned with it being one of the solutions under Outcome 1 of the “Agriculture and Fisheries and Food Security” under the National Adaptation Plan, with a small unconditional component.
4. We recommend the systematic integration of agroecological and nature-based farming practices as core components of climate-smart agriculture, including agroforestry systems, conservation agriculture, integrated pest management using natural predators, and restoring of agricultural landscapes to enhance carbon sequestration, while improving productivity and resilience.

List of proposed PAMS

- Climate-smart feeding for buffalo
- Rapid composting for buffalo
- Renewable Energy Program (cross-sectoral with energy)
- Rice Straw Collection and Processing (cross-sectoral with energy)
- Energy-efficient mechanized farming (cross-sectoral with energy)
- Water Management through Solar-Powered Irrigation Systems (cross-sectoral with energy)
- Advanced Agricultural Technologies (cross-sectoral with energy)
- Solar-energy utilization (cross-sectoral with energy)
- Massive Coconut-Planting Program (cross-sectoral with FOLU)
- Integrated Coconut Processing Hubs
- Sustainable Agroforestry (cross-sectoral with FOLU)
- Promote and Implement Sustainable Land Management (Bureau of Soils and Water Management)
- Agroforestry through fruit tree seedlings (cross-sectoral with FOLU)
- Carbon optimization of coconut (cross-sectoral with FOLU)
- Urban farming program
- Scaling of Rice Technologies projects under the National Rice Program
- Programmatic establishment and expansion of community-based and accessible seed banks
- Programmatic establishment and expansion of community-based and accessible soil clinics

On waste

"Pollution from plastics, open burning, and landfills poisons communities. Cleanup is not enough. We need proper waste segregation and disposal, local material recovery facilities and systems, and strong and consistently implemented regulations. Innovation is needed to convert waste into re-usable materials, especially at the household level."

1. We acknowledge the proposed policy/measure by the DENR to "Scale circular economy for plastic wastes through the EPR programme and expand to other recyclable wastes" as somewhat aligned with our recommendation of addressing plastic pollution as an additional sectoral PAM in the next NDC, given its relevance to multiple sectors, such as on waste and health. Nonetheless, aligned with the circular economy ambitions of the Philippines, we encourage the Philippine government to commit to the following initiatives that may be part of the intended 50% conditional component of this proposed policy/measure:
 - Expand the EPR program for plastic waste to also cover initiatives to promote redesign, reduction, and reuse; and
 - National ban on single-use plastics in the Philippines, with clear and binding reduction targets; and
 - Promoting reuse and refill systems, especially at the local level.
2. We support the proposed policies/measures of "reduction in post-consumer food waste" and "composting of biodegradable waste", given that biodegradable waste, especially food waste, constitute the highest share of waste generated in the Philippines. However, we encourage the DENR to review if a target higher than 10% by 2035 would be feasible for the updated NDC.
3. On proposed sectoral PAMS pertaining to energy recovery, we recommend the exclusion of technologies using burning and thermal treatment of waste for said recovery, given their adverse impacts on air quality, public health, additional GHG emissions, and other environmental issues.
4. We recommend a provision within the next NDC and its corresponding Implementation Plan on strategies to manage waste generated from RE sources, which is also aligned with the principles of circular economy and just energy transition.

List of proposed PAMS

- Composting of biodegradable waste – 50% conditional
- Anaerobic digestion of solid waste for energy recovery – 10% unconditional
- Phasing out of open dumpsites and controlled dumping facilities and subsequent land remediation – 50% unconditional
- Reducing waste open burning – fully unconditional
- Scaling circular economy of recyclable wastes – 50% unconditional
- Reduction in post-consumer food waste – 50% unconditional
- Aerobic wastewater treatment in non-Manila-Bay Region – 20% unconditional
- Aerobic wastewater treatment in Manila-Bay Region – 80% unconditional
- Enhanced management of industrial aerobic wastewater treatment facilities – fully unconditional

On industrial processes and product use

"Factories burning fossil fuels drive emissions. Industries must adopt cleaner, sustainable and greener technologies and systems, be more transparent, and follow evidence-based policies; and the government should support in this transition and transformation. We demand greater accountability for major polluters and call for stronger partnerships between government, industry actors, and communities."

1. We support the policy/measure of "shift to low-Global Warming Potential (GWP) refrigerants in the RAC industry" as an unconditional measure and the initiative for a non-incineration destruction facility for ozone-depleting substances (ODS), aligned with the Philippines' commitment Montreal Protocol, including the Kigali Amendment and the imperative of mitigating short-lived climate pollutants, such as hydrofluorocarbons (HFCs).

List of proposed PAMS

- Substitution of clinker in cement production with supplementary cementitious materials such as fly ash, blast-furnace slag, and other pozzolanic materials – unconditional
- Shift to low-Global Warming Potential refrigerants in the refrigeration and air-conditioning industry – unconditional
- Destruction facility (non- incineration) for ozone-depleting substances and hydrofluorocarbons – conditional
- SF₆ emission reductions in electrical grids – conditional

On transport

“Smoke-belching vehicles and traffic worsen air pollution. Access to clean, safe, affordable transport must be expanded, especially for our peers that have to travel great distances. Biking, walking, and public transportation should be safe and incentivized. Future road and transport systems should be inclusive, climate-resilient, multi-modal and respect ancestral land.”

1. With the ongoing development of the Active Transport Master Plan and the lack of resources for the Active Transport Office despite active travel being part of the current NDC, we recommend that enhancing modes of active transport and securing the necessary resources for proper infrastructure and the operationalization of implementing actors must be part of the next NDC. We also recommend that ongoing projects for active travel may be considered as unconditional. We emphasize the need for infrastructure planning and development to be more ecologically-sustainable and climate-resilient.
2. We also seek clarification regarding the intended goal of an additional 2000 km in operational bikeways, considering the previously-declared target of 2400 km by 2028 under the Active Transport Program.
3. With the DOTr expected to finish the implementation of their PAMS in the *current* NDC earlier than other national government agencies, we seek clarification on which of the upcoming infrastructure projects¹⁴ will be proposed by said department as PAMS for the *updated* NDC; this is given how previous infrastructure projects as listed below are the main group of actions the department proposed in the current iteration.
4. We support the inclusion of the Motor Vehicle Inspection System (MVIS-1) Program as an unconditional measure for the updated NDC, as its own item or as part of overall strategies to improve fuel efficiency of private vehicles, as this directly addresses GHG emissions from private vehicles that arguably causes as much climate pollution than public vehicles.
5. While we support the intent of fleet electrification to promote more sustainable and less pollutive transportation, it must be coupled with the electricity source being from renewable energy to aid in reducing and avoiding GHG emissions.
6. We recommend that the measure of planning for integrated transport systems be further enabled through the enactment of necessary legislation, with incentives and penalties, and avoid this being an act of, at the minimum, mere compliance by LGUs.

List of proposed PAMS

- Encouraging public transport fleet improvements - with unconditional component
- Expanding passenger railways network – with unconditional component
- Improving existing railways operations - with unconditional component
- Exploring cargo railway network - conditional
- Promoting non-motorized transport (at least 2000 km additional operational bikeways) - unconditional
- Shifting to bus transport systems (BRT in Cebu; HPB in Davao) - with unconditional component
- Developing low carbon ferry systems (i.e., MAPALLA ferry system) - conditional
- Enhancing energy efficiency of domestic ships (cross-sectoral with energy) - conditional
- Promoting green ports - conditional

¹⁴ This refers to all infrastructure projects for the aviation sector, maritime sector, road sector, and rail sector listed here: <https://dotr.gov.ph/infrastructure-projects/>

- Pushing for night-capable airports - conditional
- Promoting green airports recognition - conditional
- Sustainable Aviation Fuels - conditional
- Improving overall fleet fuel economy (cross-sectoral with energy) – with unconditional component (especially for MVIS)
- Pursuing fleet electrification (cross-sectoral with energy) - conditional
- Promoting telecommuting - with unconditional component
- Planning for integrated transport systems (cross-sectoral with FOLU) - conditional
- Promoting smart terminal management system - conditional
- Establishing central transport data repository - conditional
- Planning for optimized routers - conditional

On forestry and other land use

“Deforestation, illegal logging, unregulated quarrying and land conversion increase risks and release carbon. Protect ancestral lands, enforce environmental laws, act based on science and research, and respect Indigenous Peoples’ roles in conservation. Urbanization should not erase forests. Reforestation should prioritize native species and be guided by science and communities.”

1. We support the following proposed PAMS by DENR-Forest Management Bureau:
 - Forest protection to avoid deforestation and degradation; and
 - Conservation of forest carbon stock, aligned with the attainment of the 30x30 goal under the Kunming-Montreal Global Biodiversity Framework and under the PBSAP and including blue and green carbon accounting.
2. While we support the intent of the proposed “reforestation” PAM, we express our concern with how the enhanced National Greening Program (e-NGP) has been implemented so far, which even the Commission on Audit has mentioned in its report¹⁵. We reiterate that issues associated with the e-NGP must be properly addressed (i.e., planting of native species, increasing seedling survival, alignment with PBSAP, good governance) to avoid this proposed action being detrimental to the attainment of climate and biodiversity targets, including under the NDC.
3. We emphasize that mangroves be highlighted more as one of the proposed PAMS instead of being only subsumed under “reforestation”. We propose that at the bare minimum, the mangrove-specific components aligned with the National Blue Carbon Roadmap be highlighted more, highlighting the protection, restoration, and sustainable management of coastal and marine ecosystems as critical nature-based solutions for climate mitigation, with specific targets for mangrove restoration and, if technically feasible, seagrass and coastal wetland protection.
4. Under the umbrella of blue carbon-specific PAMS, we recommend for actions such as comprehensive wetlands mapping and restoration to be unconditional, and others such as peatland conservation and sustainable management, and inland wetlands restoration for flood control and carbon sequestration to be conditional.
5. We also recommend as one of the PAMS for the FOLU sector in the next NDC the passage of the National Land Use Act for improvement of current land use classification and planning approaches to avoid infrastructure or renewable energy projects resulting in biodiversity or forest loss. This is also relevant to the recent cases of flooding that has been observed too often around the country.
6. In addition to our aforementioned comments on the e-NGP, we call for proper environmental and social safeguards to be implemented in all programs aligned with reforestation, including:
 - Ensuring the protection of reforested or afforested areas from all destructive practices;
 - Acknowledging local forestry initiatives as complementary or supplementary to large-scale programs and supporting said initiatives, including the implementation of Community-Based Forest Management (CBFM) Strategic Plan;
 - Protecting from development aggression and other actions lands deemed as “unproductive” vis-à-vis initiatives to increase forest cover yet hold significant cultural value to groups such as Indigenous Peoples; and
 - Ensuring biodiversity conservation, especially in PAs, KBAs, CBFMAs, ICCAs and OECMs

¹⁵ Please click the [link](#) to review the report on the National Greening Program by the Commission on Audit.

7. With global calls, including by the COP30 host-country Brazil, for oceans to be featured more in NDCs and given the Philippines' archipelagic context, we recommend the integration of oceans-based solutions into the updated NDC, including the following mitigation-relevant actions aligned with the "Blue NDC Challenge":
 - Sustainably managing, conserving and restoring coastal and marine ecosystems, especially protected areas and other areas of importance to biodiversity conservation, including mangroves, seagrass beds, and saltwater marshes as blue carbon ecosystems;
 - Integration of wetlands into coastal zone management and marine spatial planning;
 - Reducing emissions in maritime sectors, including shipping and seafood value chains;
 - Scaling up marine renewable energy aligned with the principles of just energy transition;
 - Supporting sustainable, climate-resilient fisheries and aquaculture to ensure long-term ocean health and food security; and
 - Enabling marine spatial planning across coastal local areas, integrated coastal zone management, and other strategies aligned with sustainable coastal and marine ecosystems and resources management.
8. Building on our accepted call in the current NDC, we recommend a stronger language on upholding ecosystems integrity to incorporate the context of other land use and potential adaptation co-benefits, maintaining the emphasis on human rights and the rights of Indigenous Peoples.
9. In addition to PAs and in aid of achieving biodiversity and climate targets under the PBSAP and the updated NDC, the Sustainable Forest Land Management Agreement Guidelines should also exclude KBAs, CBFMAs, ICCAs, and OECMs.
10. We recommend that the role and contributions of Indigenous Peoples as guardians of the country's forests and other ecosystems and their rights to a share in the benefits from related activities be formally and truly recognized in the next NDC through applicable PAMS, including the use of traditional and Indigenous Peoples knowledge.
11. While we acknowledge the carbon sequestration potential of the Massive Coconut Planting Program and Carbon Optimization of Coconut-based Agroforestry Landscapes (COCAL) Program and their cross-sectoral benefits in the agricultural sector, we express our concern that these programs could also lead to loss of natural forests that would also be counterproductive to emissions removal. With this context, we emphasize that said initiatives must not result in land use changes that harm natural forests and ecosystems.
12. We call for the greater involvement of the National Commission on Indigenous Peoples (NCIP) in the NDC process to ensure that the needs and concerns of Indigenous Peoples will be integrated into all resulting policies and measures, especially pertaining to forestry and other land use.

List of proposed PAMS

- Forest protection – at least 50% unconditional
- Conservation of forest carbon stock - unconditional
- Reforestation and habitat restoration – unconditional, but with the caveat that issues related to the implementation of the e-NGP be fully addressed;
- Protection, restoration, and expansion of blue carbon, aligned with the formulation of the National Blue Carbon Roadmap – partially unconditional, preferably as its own item
- Restoration of degraded and denuded lands into forests or agricultural lands – unconditional (cross-sectoral with Agriculture)

- Passage of the National Land Use Act for stronger implementation of land use classification and planning to avoid infrastructure or renewable energy projects resulting in biodiversity or forest loss
- Massive Coconut Planting Program (cross-sectoral with agriculture)
- Carbon Optimization of Coconut-based Agroforestry Landscapes (COCAL) Program (cross-sectoral with agriculture)

On energy

“Fossil fuels and natural gas still dominate, despite its apparent harm. Transitioning to clean, renewable energy is urgent, especially in off-grid areas. Access to sustainable energy must be treated as a right. Investments should support innovation, upskilling and reskilling of affected workers, and inclusive energy transitions.”

1. We acknowledge that the energy PAMS for the updated NDC would be based on the Philippine Energy Plan (2023-2050), which solely in terms of policy coherence is an improvement from the current NDC.
2. The next NDC must maintain the prioritization of developing the country’s indigenous RE resources (i.e., solar, wind), promoting distributed RE, and localized RE systems in off-grid areas that would enable access in underserved communities. All of these would aid in formulating more ambitious RE targets, especially with the implementation of RA 9513 (“Renewable Energy Act of 2008”) now in full effect. Aligned with the NDC coherence with just transition principles as stated in the current NDC Implementation Plan, we also recommend the acknowledgement of environmental and social safeguards to the most vulnerable communities affected by local climate impacts or adverse effects from RE projects.
3. We recommend the exclusion of all new coal and gas-fired power plants, the retirement of existing coal plants, a stricter implementation of the coal moratorium, and corresponding financing of their construction or operations into the Philippine energy system. The lack of a current phaseout plan for gas contradicts the government’s own assertion of it as a “transition fuel”.
4. We also oppose the inclusion of nuclear energy as one of the “alternative fuels” that is part of the energy sectoral PAMS. In the context of climate action, we regard nuclear as a “false solution” that detracts from the necessary resources to accelerate renewable energy development, with our concerns regarding the issues on nuclear (i.e., safety, waste disposal, high upfront costs) also remaining largely unanswered by its proponents.
5. We recommend that the Philippine government set a clear phaseout plan for both coal and gas facilities in the country, especially aligned with its own justification of gas being a “transition fuel”, no later than 2050. Prioritizing alignment of the NDC with the 1.5°C goal under the Paris Agreement is unconditional.
6. Compared to the current NDC, we recommend a stronger emphasis on energy conservation as into the next NDC, aligned with the government strategy of implementing energy efficiency and conservation programs together; being a demand-driven measure that can be readily promoted by the Philippine government, it can be set as a partially unconditional measure that is also aligned with proposed PAMS from other sectors that are partially based on the demand side (i.e., reduction of food waste under the waste sector).
7. While we support the adoption of smart grid technologies, we emphasize that the Transmission Development Plan of the National Grid Corporation should prioritize RE projects currently in the pipeline to accelerate the upgrading of the infrastructure necessary to ensure more communities would benefit from RE-sourced electricity, including those located nearby RE power plants.
8. In the context of energy transition minerals, protection of biodiversity and ecosystems, upholding human rights, and protecting Indigenous Peoples along with their lands, territories, and resources, mining must be included as a key cross-sectoral issue to be addressed in the NDC. We request that the Philippine government produce a study indicating how much minerals classified as necessary for just energy transition are necessary to achieve the country’s RE targets in

coordination with the Department of Finance that currently serves as Secretariat to the Philippine Extractive Industries Transparency Initiative.

9. GHG emissions resulting from the entire value chains of coal, gas, and mining within the Philippine jurisdiction, including those caused by forest loss, should be accounted for in the NDC calculations and monitoring. This should also be aligned with all updated guidelines for reporting by businesses involved in said operations, including through those to be formally adopted under the Securities and Exchange Commission.

List of proposed PAMS

- Strengthen energy efficiency and conservation programs and initiatives – unconditional
- Renewable energy (35% RE by 2030; 50% RE by 2040) – with unconditional component
- Increase port infrastructures to support the development of offshore wind projects – conditional
- Adopting advanced and smart grid technologies – conditional
- Electric vehicle penetration rate in road transport – conditional; with the caveat of their electricity source being predominantly, if not fully from RE
- Strategic placements of energy storage systems in the power systems, including their integration in variable renewable energies – conditional

On localization

We further reiterate the aforementioned overarching call on enhancing inclusivity, direct representation and participation of non-government stakeholders, especially civil society, women's rights organizations, vulnerable and other marginalized groups, in consultations, climate actions and decisions on the NDC and other climate-related policies and planning processes. Key to translating this call into action is through promoting localization of the NDC.

1. We recommend that the updated NDC Implementation Plan include provisions for a mechanism to localize the appropriate PAMS, ensuring alignment between national and local policies and among implementing entities and all stakeholders. This includes, but are not limited to the following:
 - Conduct of capacity-building and community empowerment initiatives that lead to the formulation of localized policy roadmaps;
 - Clearly-defined roles and responsibilities for local government units and other local stakeholders across all areas in the Philippines in NDC implementation, potentially following the practice observed under Local DRRM Councils; and
 - Promotion and institutionalization of nature-based solutions in Local Climate Change Action Plans and other local development plans; including coordination mechanisms to ensure an inclusive approach in planning and implementation;
 - Integration of NDC-relevant PAMS, such as NbS, into Local Biodiversity Strategy and Action Plans and discourse with allotted biodiversity-relevant decision-making spaces (i.e., Protected Area Management Boards);
 - Integration of indicators of gender equality and social inclusion into the MRV process for the updated NDC, including its PAMS; and
 - Incentives for community-led initiatives and activities contributing to the attainment of NDC targets, especially through PAMS.

Among the proposed PAMS whose implementation would be enhanced through localization and greater direct involvement of non-government stakeholders, with the necessary support for their implementation, include the following:

- Composting of 50% of biodegradable waste by 2035;
 - Reduction in post-consumer food waste by 10%;
 - Scaling circular economy of recyclable wastes;
 - Forest protection;
 - Conservation of forest carbon stock;
 - Reforestation;
 - Planning for optimized routers;
 - Promoting telecommuting;
 - Strengthen energy efficiency and conservation programs and initiatives; and
 - Renewable energy (35% RE by 2030; 50% RE by 2040).
2. In addition to the aforementioned PAMS, applicable sectoral strategies identified in the National Action for Climate Empowerment (ACE) Strategy should also be included as entry points for mainstreaming and localization of the current and updated NDC; this also applies to the ongoing NAP localization process. We recommend for all agencies to integrate said strategies into the NDC implementation process.

3. With the data collection for the NDC remaining largely sectoral, we recommend a provision in the next NDC and its corresponding Implementation Plan for enabling more localized GHG inventories, which would both aid in developing subsequent national GHG inventories and more locally-led climate actions. This would include making calculators and other tools necessary for determining GHG emissions across different scales and sectors more accessible.
4. We also recommend that the CCC continue to engage with all Regional Development Councils to further hasten the localization of the updated NDC through the PAMS, in coordination with the Department of Economy, Planning, and Development.
5. From the NDC Gender Action Plan, priority "client-based" actions across sectors were identified, further supporting the rationale and need for localization tailor fitted to various gender-based needs of groups, which include, among others:
 - Involvement of women and marginalized groups in all stages of NDC PAMS, and climate change program and project development and implementation;
 - Increasing awareness of women's rights and access to resources in climate change project sites;
 - Organizing inclusive local organizations in project sites;
 - Provision of capacity-building and leadership training for women in agriculture; and
 - Collaboration with local government units on occupational health and safety measures for waste workers.

On Indigenous Peoples

1. We recommend that the next NDC set out clear provisions for a dedicated mechanism that upholds and advances the rights, leadership and meaningful participation of Indigenous Peoples across all PAMS. This should ensure that national climate commitments are designed and implemented in a way that respects and aligns with Indigenous Peoples' self-determined priorities. This may include, but is not limited to the following:
 - Ensuring the full recognition and operationalization of Indigenous Peoples' rights to their lands, territories, and resources as a cornerstone of climate action. This includes areas with issued Certificates of Ancestral Domain Titles (CADTs) as well as those with pending CADT applications, in recognition of the inherent and time immemorial rights of Indigenous Peoples under the Indigenous Peoples Rights Act (IPRA).
 - i. Existing legal instruments such as CADTs and Ancestral Domain Sustainable Development and Protection Plans (ADSDPPs) shall serve as foundational references in the planning and implementation of climate actions.
 - ii. In areas with pending CADT applications, interim measures must be adopted to respect and safeguard Indigenous Peoples' rights, including the observance of Free, Prior and Informed Consent (FPIC) and the recognition of customary governance system
 - Strict compliance with the principles and processes of Free, Prior and Informed Consent (FPIC) for all climate-related projects, programs and activities that may affect Indigenous lands, territories and resources
 - Mainstreaming the protection and respect for the human rights of Indigenous Peoples within all climate policies, with clear mechanisms for monitoring and redress
 - Strong safeguards against critical mining activities and other extractive operations in Indigenous Peoples lands and territories, especially those that pose threats to the integrity of Indigenous lands, waters and resources
2. In view of the vital role of Indigenous Peoples' knowledge systems and practices, we recommend a financial and technical provision in the next NDC and its corresponding Implementation Plan to ensure the integration, protection and promotion of Indigenous Peoples' rights to their lands, territories, and resources. This would support more effective and equitable adaptation and mitigation measures, strengthen Indigenous Political Structures and Indigenous-led climate governance and uphold Indigenous Peoples' self-determined sustainable development pathways.
3. To further enable the protection and participation of Indigenous Peoples, their ancestral domains, and nearby ecosystems while providing co-benefits to the attainment of the updated NDC targets, we encourage the Philippine government to consider supporting the enactment of the following proposed legislation:
 - Sustainable Forest Management Bill;
 - Alternative Minerals Management Bill; and
 - Indigenous Communities Conserved Territories & Areas (ICCA) Bill.

On children and youth

Despite the country's high vulnerability to the climate crisis, the current NDC or its accompanying Implementation Plan is not classified as being children and youth-friendly¹⁶. This is due to a lack of specific sectoral policies and measures that accounts for the needs and concerns of children and youth and a lack of emphasis on intergenerational justice and equity. It is also a reflection of the lack of specific role of non-government stakeholders in the current NDC beyond consultation, which must be addressed in the updated iteration.

From the outcomes of the National Consultation for Children and Youth on Nationally Determined Contribution and Just Transition held on 18-19 July 2025, we directly cite the commitments that many children and youth in the Philippines are ready to make in aid of implementing the updated NDC and climate action in the country:

- **Educating and engaging.** We raise awareness in our schools and communities through forums, workshops, and various forms of media to help others understand the climate crisis and how it affects us. We create content, speak out, and organize campaigns that push for sustainability and inclusion.
- **Leading by example.** At the individual level, we manage and reduce our waste, making sure that our consumption is sustainable and responsible. Every small and consistent action matters.
- **Speaking up.** We participate in consultations, dialogues with officials, assemblies, and organize groups and movements. We share our lived experiences and propose solutions. We demand accountability and inclusion, and are committed to working with duty bearers.
- **Supporting each other.** We provide peer-to-peer education, and look after each other during difficult times. We work for and with those who are often excluded to amplify their voices.

The Filipino children and youth also acknowledge the interlinkages between the NDC and just transition, as evidenced through their following specific calls to duty-bearers related to the development of the country's JTF:

- **Undertake comprehensive studies.** A just transition must be guided by inclusive, evidence-based planning. Research should capture the lived realities of those most at risk - such children and the youth. Building a robust knowledge base that gives us a proper voice will help shape solutions that are effective, equitable, and resilient.
- **Empower affected communities.** Workers, families, children, and youth affected by the transition must receive support. This comes in the form of livelihood opportunities, capacity building, and social protection. Women and indigenous peoples must have access to resources, training, and meaningful participation and leadership roles.
- **Ensure meaningful participation.** The children and youth must be involved in policy design, decision-making, and implementation; they must not just be consulted, but empowered. Programs must be child- and youth-inclusive and -centric, culturally sensitive, and responsive to marginalized groups.
- **Invest in systems and infrastructure.** Public transportation, health, education, water, and energy systems must be reimagined and transformed to be more climate-resilient, accessible, and sustainable. Communities at risk of relocation must be given support.
- **Support education and innovations.** Schools should strengthen climate education and better incubate child- and youth-led initiatives and research. Upskilling and reskilling must prepare and equip everyone - particularly the children and youth - to meaningfully participate in a green economy.

¹⁶ This is based on the assessment of UNICEF, as seen through this [link](#).

- **Make polluters pay.** Under government leadership, those responsible for environmental harm must be held accountable. Fines and reparations should be reinvested in affected communities through fair, transparent, and equitable systems.

In further solidarity with the calls of children and youth in the Philippines, we also highlight their collective calls on mitigation, relevant to updating the NDC, based on the 2024 Philippine Youth Statement that was produced from the 2024 Local Conference of Youth:

- We demand that the government of the Philippines enhance renewable energy investment by increasing government investment and venture into renewable energy research and technology development. Enhance financial incentives and support mechanisms for renewable energy projects to attract significant investment and accelerate the transition to clean energy. This includes offering tax credits, subsidies, and other financial tools to stimulate private sector participation and expedite the deployment of renewable technologies.
- We demand that the government of the Philippines upgrade renewable energy infrastructure by investing in the development of advanced energy storage solutions and improvements to the national grid to support the integration of renewable energy sources, ensuring a stable and reliable energy supply.
- We demand that the government of the Philippines adopt a more ambitious National Renewable Energy Plan by strengthening the commitment to renewable energy with a target of up to 75% renewable energy power generation by 2030 and 100% by 2040.
- We demand that the government of the Philippines review and reinforce the Renewable Energy Act of 2008, as its implementation has been stagnant and far from achieving its intended goals.
- We demand that the government of the Philippines set energy efficiency standards by implementing and enforcing stringent energy efficiency standards for buildings, appliances, and industrial processes to reduce overall energy consumption and greenhouse gas emissions.
- We demand that the government of the Philippines promote transparency by ensuring the transparent allocation and use of climate finance resources through clear reporting mechanisms, enhancing accountability and effectiveness in achieving climate goals.

On gender

The publication of the NDC Gender Action Plan (GAP) for 2024-2030 is a critical step towards mainstreaming gender into Philippine climate action, specifically on mitigation. Its implementation and updating are necessary to address the disproportionate impacts of the climate crisis on women and girls and avoid worsening existing gender inequalities.

With the understanding that it has only recently commenced implementation, we forward the following calls and recommendations about the NDC GAP:

1. We suggest that the NDC GAP be extended until 2035 to allow for its full implementation, albeit updating it to reflect the latest set of NDC PAMS and to align with the developments on gender under the UNFCCC negotiations.
2. We seek clarification as to why the energy sector is not classified as a critical sector compared to agriculture, waste, IPPU, and transport in the current NDC GAP.
3. We request for an update from the CCC, DA, DENR, DOTr, and DOE about the progress, if any, of the recommended responses emerging from the gender analysis from the NDC GAP, namely on the thematic areas of governance, adaptation and mitigation, measurement, reporting, and verification, and finance, including the following priority actions (immediate and near short-term) until 2026:
 - Designation of focal leads, gender aware-technical staff, and other relevant personnel in each NDC sectoral agency for overseeing the NDC GAP implementation and foster inter-agency coordination, through the Gender and Climate Change Advisory Group;
 - Strengthening the inclusion and/or integration of gender statements in the updated NDC PAMS and other climate change-related policies;
 - Formulation of the Harmonized Gender and Development Guidelines checklists for ensuring comprehensive gender mainstreaming;
 - Developing agency-level policies for sex-disaggregated data collection and establish gender databases;
 - Finalizing the gender indicators with corresponding baselines and targets for PAMS in agriculture, waste, IPPU, and transport, which will address gender mainstreaming across said thematic areas and should likely include FOLU and energy aligned with the updated NDC;
 - Mainstreaming gender through appropriate indicators into the applicable current and government-proposed PAMS and corresponding budget processes;
 - Developing guidance for private sector implementers to promote gender and inclusion in NDC implementation.
 - Institutionalization and implementation of capacity-building initiatives in support of the actions under the NDC GAP.

On engagements related to Article 6 of the Paris Agreement

We acknowledge the Philippines' intent to fully engage in cooperative approaches under Article 6 of the Paris Agreement, given that while developed countries continue to refuse to provide sufficient means of implementation (i.e., finance, technology transfer and development, capacity-building) to the Philippines and other developing countries, the nation still experiences the impacts of this crisis and climate change mitigation strategies need to be urgently implemented, including those that would be included in the updated NDC.

However, we remain cautious about the country's engagements on Article 6, especially under Article 6.2 and Article 6.4. This is given that issues regarding carbon leakage, lack of sufficient integrity and transparency, greenwashing, the resulting distrust by many communities with these processes, and uncertainties about the additionality and permanence of emissions reductions have been well-documented within the global carbon market landscape.

With this context, we present the following recommendations about integrating Article 6 engagements into updating and implementing the Philippine NDC:

- **The Philippine government must present a comprehensive study on how carbon credits would enable the country's attainment of its NDC targets.** This must include an estimate of projected carbon credits, including Internationally-Traded Mitigation Outcomes (ITMOs), needed to be generated from all engagements of the country under Articles 6.2 and 6.4 of the Paris Agreement to help achieve the economy-wide targets under its updated climate commitment, including sectoral targets. This must not only be integrated into the decarbonization pathways in the updated NDC, but also show the socioeconomic benefits from said engagements. We expect that the ongoing studies commissioned by national government agencies, including the one on carbon pricing by the Department of Finance with the World Bank, would cover the information needed to produce this estimate, including specific targets across the AWITFE sectors.
- **Emission reductions should be prioritized by the Philippine government in transactions involving ITMOs.** The current NDCIP showed that the country can achieve emissions reductions if most of the conditional part of the 75% mitigation target is met. Robust and stringent rules must be created on all types of emissions trading under Articles 6.2 and 6.4, with mandatory inclusion of social and environmental safeguards and protection of local communities and Indigenous Peoples (i.e., documentation of free, prior, and informed consent). In defining a national carbon pricing framework and system, any type of temporary emission removal must not be included as an eligible activity. We also expect the sectoral policies to be set by the DENR, DOE, DA, and DOTr and the national-level framework relevant to carbon pricing framework and system to be not only coherent with one another, but also prioritize reductions over offsetting.
- **All transactions resulting in cooperative approaches under Article 6 must feature the necessary safeguards upholding transparency and accountability by involved Parties and other stakeholders.** These include the public disclosure of all bilateral agreements under Article 6.2 and all emissions reductions and removals to be included in the international registry under Article 6.4. Any justifiable confidentiality claim must adhere to a code of conduct, with accompanying requirements for involved entities to comply.
- **Environmental integrity and avoiding double-counting must be paramount in considerations for developing clear guidance on methodologies and consequences of ITMOs.** Aligned with the calls for environmental integrity and avoiding double-counting, the private sector in the Philippines should be prohibited from securing offset units under Articles 6.2 and 6.4.

- **The Philippine government must set its definition and strategy on non-market approaches (NMAs) under Article 6.8 that places it as of equal importance to its market-based approach strategies.** While the Philippine government delegation has previously disclosed its omnibus position on NMAs to be focused on cooperation on climate policies, there remains an opportunity for the Philippines to accelerate the implementation of its NDC and other climate strategies through said approaches.
 - Ensuring the more urgent delivery of sufficient means of implementation for the Philippines to implement their NDCs must be prioritized under Article 6.8. This must cover finance, technology transfer and development, and capacity-building from developed countries.
 - A NMAs-based strategy must exclude carbon offsets, as well as measures designed simply to build readiness for carbon markets, in order for NMAs to have the potential to bring about the much-needed change of course, disrupt business-as-usual and contribute to enhanced ambition.
 - Article 6.8 must be built within a transparent and accessible framework of social justice, gender justice, rights-based and ecosystems approaches. Priority areas of focus should therefore include land tenure and rights-based approaches, external debt cancellation, interlinkages with just transition, ecosystems protection and conservation, landscape restoration, zero deforestation supply chains, enhanced traceability, accountability, and participation, and restorative justice-aligned initiatives.