

POLICY BRIEF

NDCs 3.0 in the Western Balkans

This policy paper is based on the Climate Action Network International [Guidelines for Nationally Determined Contributions 3.0: Delivering on the Global Stocktake outcome and beyond](#), taking into account the specific context of the Western Balkans Six countries¹ and further developing the related aspects relevant for credible and ambitious climate action in the region.

Why are NDCs needed in the Western Balkans?

The Nationally Determined Contributions (hereinafter: NDCs) are the centrepiece of the [Paris Agreement](#)² ambition cycle, embodying each country's efforts to reduce national emissions and adapt to the impacts of climate change, reflecting the highest possible level of ambition. **Every five years**, each Party to the Agreement is required to prepare, communicate and maintain successive NDCs that it intends to achieve, pursuing domestic mitigation measures with the aim of achieving the objectives of such contributions (Paris Agreement Article 4, paragraph 2). Taking into account every country's **fair share**³ - NDCs should address all the goals defined in Article 2 of the Paris Agreement and outline a range of mutually reinforcing measures to reach the long-term goals on temperature, resilience, means of implementation and cross-cutting actions.

In this year's **third round of NDCs**, it is imperative that global greenhouse gas (GHG) emissions reductions amount collectively to 43 per cent by 2030 and 60 per cent by 2035, in order to retain a realistic chance of limiting global warming to 1.5°C. Developed countries are expected to take the lead with higher ambition and stronger targets.⁴ The new NDCs must implement the outcomes of the **Global Stocktake** (GST); they should be informed by its findings and address the gaps it identifies. NDCs must also concretise and operationalise the transition away from fossil fuels and

¹ Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia.

² Paris Agreement to the United Nations Framework Convention on Climate Change, Dec. 12, 2015.

³ Climate Action Network, Fair Shares – Lessons from Practice, Thoughts on Strategy, 2022.

⁴ Climate Action Network, Guidelines for NDCs 3.0: Delivering on the GST outcome and beyond, May 2024 available at <https://climatenetwork.org/resource/guidelines-for-ndcs-3-0delivering-on-the-gst-outcome-and-beyond/>.

clearly contribute to the global tripling of renewable energy capacity, the increase in energy efficiency, and the preservation and restoration of nature.⁵

For [non-Annex I](#) countries such as those in the Western Balkans, NDCs should be tailored to reflect both **developmental priorities and capacity constraints**, while **advancing ambitious climate action**. As comprehensive climate action plans, they should go beyond mitigation targets as the key element, and capture the wider purpose of policies and plans that would steer the transformation of our societies through climate-safe, just, equitable and sustainable pathways. They must also encompass adaptation and loss and damage measures, and address climate finance.

NDCs need to be seen in the strategic longer-term context of long-term strategies that are commensurate with **near-zero global gross emissions by 2050** and with efforts to build **resilience** to anticipated threats posed by the changing climate. These NDCs, aligned with a common time frame, will follow a **ten-year perspective** and should serve as the building blocks for a country's 2050 social, environmental, and economic development vision. It is fair to say that since the second round of NDCs, these climate plans have increasingly become the primary planning instrument for addressing climate change at the national level, despite a persistent implementation gap. The NDC Synthesis Report of November 2023 confirms this vision.⁶

Climate commitments in the Western Balkans

In the few years since Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia have submitted their NDCs to the Paris Agreement (while Kosovo developed a voluntary NDC), and political leaders committed to the **Western Balkans Green Agenda's goal of carbon neutrality by 2050**, some efforts have been made in establishing the necessary frameworks and pathways for an accelerated just transition. Considering the region's EU accession ambition, the high economic and social cost of coal-based electricity production, and limited investment resources, decarbonisation has become a prevailing narrative. In the developed **National Energy and Climate Plans** (hereinafter: NECPs) we have witnessed the Western Balkans drop projects for building new coal power plants and strive to find alternative and sustainable pathways, with significant efforts devoted to increased renewable energy development.

However, the work initiated with the adoption of the **2030 headline energy and climate targets** as well as NECPs is yet to be followed by corresponding long-term strategies and climate legislation, supported by decarbonisation tools such as carbon pricing. While the adoption of the **Clean Energy Package** within the Energy Community (hereinafter: EnC) provided the base to support the efforts of the EnC contracting parties to fulfil the 2030 ambition, its implementation remains slow. Although the region needs to gradually align towards the rest of the EU's Fit for 55

⁵ Ibid.

⁶ Climate Action Network International NDCs Guidelines, 2024.

package, discussions are still largely confined to the introduction of carbon pricing schemes in response to the entering into force of the Carbon Border Adjustment Mechanism. Meanwhile, the EU introduced a new Reform and Growth Facility aimed at accelerating the countries' green transition, among other reforms, whose efficiency remains to be seen.

While processes are progressing slowly and often lack coordination, the new NDC cycle is urging countries to consolidate their plans by providing a clear vision that would tackle **two main challenges in the Western Balkans**: setting a level of **ambition high enough** to be credible to reach decarbonisation by 2050, and establishing a **compatible coal-phase-out timeline**.

NDCs 3.0 in the Western Balkans

New NDCs were due in early 2025 and are expected to present countries' intended climate actions through 2035, taking into account the Global Stocktake. The evaluation of global progress on achieving the goals of the Paris Agreement highlighted the **critical need for countries to strengthen their climate policies and commitments**. In parallel, recent research confirms that **climate impacts** are occurring more rapidly and with more severe consequences than previously projected. Human-caused climate change is already influencing many weather and climate extremes across all regions of the globe.⁷ Adverse impacts, as well as associated losses and damages to both nature and people, have been recorded throughout the Western Balkan region⁸. This demonstrates the disproportionate vulnerability of communities that have historically contributed the least to climate change but are among the most affected. These developments underscore the urgent need to slash emissions, scale up adaptation efforts, and significantly increase investment in climate action.⁹

2035 marks the midpoint between when most countries began implementing their NDCs in 2020 and when many, like the Western Balkans, have pledged to reach net-zero emissions by 2050. As such this round of NDCs is crucial for aligning short-term actions with long-term objective goals.¹⁰ The updated contributions, covering a ten year time-frame from 2025 to 2035, represent a decisive final opportunity to keep the 1.5°C goal within reach.

For the Western Balkan region, it is important to recognise how NDCs can address and support **national development objectives beyond merely mitigating climate**

⁷ IPCC, 2023: [Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change](#) [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland.

⁸ Regional Cooperation Council, SEE2020 Series: Study on Climate Change in the Western Balkans Region, Sarajevo, 2018.

⁹ All about NDCs, available at: <https://www.un.org/en/climatechange/all-about-ndcs/>.

¹⁰ Next Generation NDCs: Accelerating Climate Action under the Paris Agreement, available at <https://www.wri.org/ndcs>.

change. These national climate plans can also serve as national investment and development plans and strategies, guiding countries towards a transformative shift in sustainable development.¹¹

Furthermore, NDCs provide a platform for countries to outline their **just transition pathways**, including how they intend to support communities and industries most impacted by the transition to renewable energy. They can promote greater social inclusion by identifying and stipulating specific benefits for women, youth and other vulnerable communities.¹²

New [OECD-UNDP preliminary analysis](#) provides evidence that higher climate ambition is not only achievable, it also makes economic sense, even in the near term. The 2025 NDC cycle is presenting an opportunity to build collaborative approaches around climate, development and growth priorities, broaden and strengthen ownership of development-enhancing mitigation strategies, and inform effective investment plans and strategies to mobilise public and private sources of finance to deliver action.¹³

Well-designed climate policies can deliver stronger economic growth than business-as-usual pathways:

- ❖ Accelerated climate action does not hinder economic growth, it provides economic gains. Under an Enhanced NDCs scenario aligned with the Paris Agreement, global GDP in 2040 would be 0.2% higher than under the Current Policies Scenario. This corresponds to the current GDP of Sweden.
- ❖ A low-carbon economy is a more efficient economy. Today, the world emits 0.34kg of CO₂-equivalent per dollar of economic output. Under an Enhanced NDC scenario emission intensity would drop by more than half to 0.14 kg by 2040.
- ❖ Investing in clean energy and energy efficiency increases productivity and innovation, balancing the economic impact of policy constraints on prices and consumption. Reinvesting carbon revenues can further boost GDP while ensuring a just transition and securing public support for climate policies.
- ❖ Policy uncertainty weakens investment and slows growth. Unclear policies risk delaying private investments and reducing GDP by 0.75% as early as 2030. NDCs provide policy certainty, giving markets the confidence to mobilise resources toward sustainable growth.

*An extract from
"Key Messages - Investing in Climate for Growth and Development: The case for enhanced NDCs, OECD-UNDP, March 2025"*

¹¹ All about NDCs, available at: <https://www.un.org/en/climatechange/all-about-ndcs/>.

¹² All about NDCs, available at: <https://www.un.org/en/climatechange/all-about-ndcs/>.

¹³ Key Messages - Investing in Climate for Growth and Development: The case for enhanced NDCs, OECD-UNDP, March 2025.

The **new NDCs developed by Western Balkan countries** must ensure consistency and coherence in energy and climate planning at the national level. These NDCs, which chart the path to 2035, should build on existing commitments and clearly demonstrate how national-level policies – such as those outlined in their NECPs – will deliver that ambition on the global stage. It is therefore essential that the development or revision of NECPs provides the technical and policy backbone for data-driven NDCs. In addition, as countries in the region pursue EU membership, NDCs should be designed to complement the EU's broader climate and energy agenda. Such alignment will not only support coherence but would also facilitate access to EU funding and technical assistance.

NDCs in the Western Balkans must be ambitious – presenting both mitigation and adaptation targets alongside credible fossil-fuels phase-out plans. They must also be participatory, community-centred, and demonstrate a firm commitment to global climate objectives while addressing local developmental priorities and challenges. Only such tailored and inclusive NDCs can mobilise the political, financial and societal support necessary to accelerate the just transition.

In the spotlight:

In February 2025, **Montenegro** was the first country in the Western Balkans to submit their Nationally Determined Contribution 3.0.

Kosovo, although not a UN member, has voluntarily adopted its first Nationally Determined Contribution in the beginning of 2025.

Key pillars of the NDCs and corresponding elements

1. Mitigation

Only a few of the NDCs submitted to date respond meaningfully to the outcomes of the Global Stocktake. CAN Europe reiterates that NDCs must act as drivers for closing the 1.5°C gap in this critical decade, aligning with the science and direction established by the **GST outcomes and science**. While Parties may still need to develop a common interpretation of some aspects of the GST outcome, the extensive support already available through the science-informed policy recommendations provided through the IPCC Sixth Assessment Report and outputs from the technical phase of the GST, must be noted. The clear underlying message from all sides is the rapidly closing window for ambition to get back on track in line with the goals of the Paris Agreement, and to secure a liveable future for all.¹⁴

Mitigation efforts must be clear, transparent and understandable in terms of the requirements set out in Annex I to decision 4/CMA. The NDCs in the Western Balkans must:

1. Reflect the [UN Secretary-General's \(UNSG\) Climate Action Acceleration Agenda](#):

- Include economy-wide absolute targets, clearly outlining the assumptions and methodologies – including how and to what extent the economy-wide target is reached by reductions, removals or offsetting (buying external credits);
- Include enhanced 2030 targets, as well as 2035 targets aligned with 1.5° C trajectories suggested by the IPCC for 2035, in line with ensuring that emissions reductions amount collectively to 43 per cent by 2030 and 60 per cent by 2035 relative to 2019 levels.
- Ensure that Long Term Strategies are aligned with these short- and mid-term goals.
- Accelerate the decarbonisation of high-emitting sectors such as shipping, aviation, steel, cement, agriculture and food systems, aluminium, and defence.

2. Close the 2030 gap by upscaling existing cost-effective, socially and environmentally safe mitigation options¹⁵:

- All WB countries should explicitly address how cost-effective, socially and environmentally safe technologies identified in the AR6¹⁶ will be rolled out in new NDCs, and how these reflect in strengthened 2030 ambition.

¹⁴ Climate Action Network International NDCs Guidelines, 2024.

¹⁵ Excluding BECCs, nuclear and geoengineering.

¹⁶ Listed in IPCC AR6 Synthesis Report [Figure SPM.7](#)

- All WB countries should provide transparent justification and grounds for claiming to submit fair and more ambitious NDCs, including a clear progression compared to the previous submission.

The energy sector is the leading source of greenhouse gas emissions in the Western Balkans, accounting for 75 percent of regional emissions – up to 80 per cent excluding Albania, which has no coal in its energy mix. In accordance with the UNSG Climate Action Acceleration Agenda, all Western Balkans countries **must present credible energy transition plans with concrete actions to ensure net-zero electricity generation by 2040.**

Concrete actions and plans must include:

- No new coal now and coal phase-out by 2040;
- Redirection of fossil fuel subsidies toward renewable energy;
- The end of all licensing and financing (public and private) of new coal, oil and gas projects;
- A halt to the expansion of existing oil and gas reserves.

Although all six countries have endorsed the Green Agenda for the Western Balkans and committed to climate neutrality by 2050, Albania, Montenegro, North Macedonia and Kosovo must also present economy-wide targets in line with their **Powering Past Coal Alliance pledge**. Furthermore, all countries in the region are signatories to the **Global Methane Pledge** – a commitment that needs to be reflected in their new and enhanced targets and actions.

Nationally Determined Contributions need to therefore also provide **sectoral objectives** aligned with development priorities:

1. Transitioning away from Fossil Fuels and towards 100% and just renewable energy systems

NDCs must include and clearly articulate:

- Policies and measures to achieve the global goal of doubling the annual rate of **energy efficiency** improvements by 2030;
- The integration of **sufficiency** considerations;
- **Economy-wide phase-out timelines for coal, oil and gas**, aligned with achieving net-zero emissions by 2050 at the latest;
- Policies and measures to achieve the **global goal of tripling renewable energy capacity by 2030**, moving towards fully sustainable and human rights compliant renewable energy systems by 2050 at the latest.
 - Countries should include quantitative targets for 2030 as well as corresponding plans, policies and measures that put people first and in synergy with the Convention on Biological Diversity (CBD) agreed goals to halt and reverse nature loss;
 - Countries should include development plans for necessary related infrastructure (e.g. grid modernisation, storage capacity);

- Countries should include measures to increase the rate of annual renewable energy additions in the power sector and all end-use sectors (transport, buildings, industry) in line with 1.5°C scenarios with no to low (limited) overshoot;
- Countries should outline their strategies to promote renewable energy communities, and build an overarching enabling legal and regulatory framework, in line with the EU's Renewable Energy Directive. This will underpin the social acceptance, promote democratic citizens led energy transition and ensure that renewable energy is accessible to all.
- **Phasing out fossil fuels in the power sector** with a substantial, measurable decline within this critical decade and with the aim to keep 1.5°C within reach¹⁷ by:
 - Committing to an immediate end to new fossil fuel power plants in all countries;
 - Developing and implementing detailed plans, policy measures, pathways and identification of financial and technological support needs to fully phase out coal and gas power by 2040 at the latest;
- **Plans to halt fossil fuel production:**
 - Countries should include a clear commitment to immediately stop the approval of new fossil fuel exploration, production, and fossil fuel transmission infrastructure projects;
 - Countries should include a clear outline of national fossil fuel production phase-out trajectories aligned with 1.5°C scenarios with no to low (limited) overshoot grounded in equity – with production ending no later than 2050 for countries with high fossil fuel dependence and very limited financial capacity.

2. Aligning climate and biodiversity action and protecting ecosystem integrity

Parties should ensure that NDCs:

- Increase ambition to protect and restore the integrity of land, freshwater and ocean ecosystems;
- Integrate climate and biodiversity actions, aligning with the objectives of the CBD's Global Biodiversity Framework and National Biodiversity Strategies & Action Plans (NBSAPs);
- Reflect a clear mitigation hierarchy that prioritises the protection of existing ecosystem carbon stocks to avoid emissions, including primary ecosystems. This should be followed with actions to reduce emissions and enhance carbon sinks through ecosystem restoration;
- Take a rights-based approach in ecosystem and biodiversity related commitments;

¹⁷ Source: <https://climateactiontracker.org/publications/paris-aligned-benchmarks-power-sector/> .

- Minimise reliance on land-based carbon dioxide sequestration, such as large-scale monoculture afforestation;
- Exclude Bioenergy with Carbon Capture and Storage, given its often counterproductive impacts on biodiversity and nature.

3. Halting and reversing deforestation and forest degradation

- Include ambitious, time-bound measures to halt and reverse deforestation, forest degradation, and the conversion of other ecosystems by 2030. This includes addressing key drivers of deforestation, such as the expansion of road infrastructure and hydrocarbon projects. These commitments should be underpinned by robust delivery and transparent accountability mechanisms.
- Exclude the use of woody biomass from forests for combustion for energy production and as a means to meet NDC's energy targets.

4. Oceans and seas (coastal countries)

- Integrate ocean-based initiatives into national climate goals, aligned with the Kunming-Montreal Global Biodiversity Framework and the High Seas Treaty.
- Include commitments to end overfishing and a transition to low-impact, ecosystem-based fisheries management – recognising this as essential to maintaining the ocean's vital climate mitigation role.

Just transition

With the exception of Albania, countries in the Western Balkan region generate the majority of their electricity from lignite. This makes the energy sector not only the leading contributor to greenhouse gas emissions, but also the primary source of the highest levels of air pollution in Europe. Kosovo has the biggest reliance on coal for electricity generation (95 per cent), followed by Serbia (67 per cent), Bosnia and Herzegovina (65 per cent), North Macedonia (51 per cent) and Montenegro (41 per cent)¹⁸. This level of dependence on coal is inconsistent and does not comply with the EU acquis and the Paris Agreement, and may contribute to delays in EU accession negotiations.¹⁹ The region's ageing, inefficient thermal coal-powered plants require significant investments to meet environmental standards and mitigate serious public health impacts. This reinforces the urgency of an accelerated and socially just transition. Despite political recognition and declarative references to just transition in some policies, governments in the region have so far failed to establish comprehensive just transition plans. Progress has been sporadic, limited to isolated

¹⁸ Ruiz Castello, P., Medarac, H., Somers, J. and Mandras, G., Recent trends in coal and peat regions in the Western Balkans and Ukraine, EUR 30837 EN, Publications Office of the European Union, Luxembourg, 2021, ISBN 978-92-76-41929-7, doi:10.2760/81752, JRC126154.

¹⁹ Barbara Frey, The Energy Transition in the Western Balkans: The Status Quo, Major Challenges and How to Overcome them, 2024.

initiatives and slow advancement in the preparation of diagnostic reports, national just transition draft roadmaps or action plans.

The previous NDCs submitted by the Western Balkans countries included varying degrees of reference to just transition. However, the level of their development and depth of integration ranged from non-existing, partial, to moderate, depending on the country.

- North Macedonia acknowledged **social impacts**, and emphasised **fairness** – especially in relation to coal phase-out – and drew links between climate action, **job creation**, and **economic development**.
- Serbia, made general reference and provided some levels of **alignment to just transition principles**, but lacked detailed implementation measures or timelines.
- Bosnia and Herzegovina made minimal reference to just transition.
- Albania focused primarily on resilience **and adaptation**, with some mentions of **poverty and inequality**.
- Montenegro, in its third NDC, referred to the need for mechanisms and awareness raising to ensure a just transition, but fell short of presenting concrete plans or related policy measures.

As the region moves towards decarbonising their economies, decoupling growth from emissions and phasing out fossil fuels, governments need to make sure that the coal reliant communities are not left behind and the benefits from the transition are accessible to all. **Social, economic and environmental considerations** need to be enshrined as core pillars. While outlining their just transition plans, countries should clearly state how they will support workers, communities and industries most affected by the transition to renewable energy sources. Furthermore, NDCs can serve as a platform to promote greater social inclusion by setting out target benefits for **women, youth and other vulnerable groups**.²⁰

Therefore, **just transition plans** in the Western Balkans' NDCs need to be addressed at a minimum through:

- **A social, labour, health, human rights and environmental assessment** – or a clear timeline for conducting such an assessment – of the impacts of climate action as outlined in the NDCs and Long-Term Strategies. This should include impacts on macroeconomic shifts, human rights, labour markets, social dynamics and environmental impacts in the key affected territories;
- **Social and environmental targets** linked to the just transition approach, along with a description of the economic plans and policy measures to ensure the creation of alternative low-carbon sectors. These should also promote and safeguard trade union rights in new emerging sectors, including commitments to decent job creation, , lifelong skills development and training, occupational health and safety, long-term health monitoring and care, and universal social

²⁰ All about NDCs, available at: <https://www.un.org/en/climatechange/all-about-ndcs/>.

protection for all workers – including those in both the formal and informal economy, for women and men, and young workers.

- **An outline of the institutional mechanisms** used to engage with affected groups and communities through social dialogue, as well as meaningful, multi-level consultations with other rights holders and relevant stakeholders.
- **International cooperation and assistance initiatives** that can help scale up their just transition strategies –particularly in support of economic diversification and sustainable land use planning – to maximise the economic, environmental and social benefits while minimising risks and unwelcome trade-offs.
- An explanation of how the country plans to **invest in care work**, as recognising its social, environmental, and economic value, and its role in reinforcing the infrastructure for universal social protection.
- **Investments in community and citizen energy projects** (e.g., energy communities or household rooftop solar) that can offer an additional source of income and/or significant reduction in energy bills for households affected by the transition.

Reflecting equity through Fair Shares

Fair shares include both fair domestic emissions reductions and, for countries with greater capacity and historical responsibility, fair financial support. That means all Parties, regardless of their level of responsibility or implementation capacity, must explain why they consider the contributions and actions set out in their NDCs to be aligned with their fair share of the global effort.

- Countries should strive to be quantitative and accountable, providing clear evidence why their proposed efforts are fair and proportionate in relation to their share of global capacity and responsibility.
- This explanation must go beyond mitigation. The fair-shares challenge applies equally to adaptation, loss and damage, and the need to support a global just transition –including a fair, rapid, orderly, and equitable phase-out of fossil fuel extraction and consumption.

As countries with relatively lower responsibility and capability, the Western Balkans should **nonetheless revise 2030 targets and set 2035 targets that reflect the highest possible level of ambition** for emission reductions, in accordance with the principle of equity and Common but Differentiated Responsibilities and Respective Capabilities (CBD-RC). They should aim to achieve domestic net-zero by 2050 at the latest. Where countries require financial and technical assistance to go beyond what they consider their fair share, they should explicitly state the scale and type of support **needed – financial, technological, and institutional** – for the implementation of such conditional actions.

Transparency & tracking progress

NDCs should explicitly state:

- How the Party has responded to each element in the GST decision.
- Which voluntary pledges and initiatives (e.g. under the Climate Action Agenda engagement) the Party adheres to, and how their implementation is being tracked.
- How the Party is strengthening their monitoring and reporting capacities, and aligning them with the EU data reporting requirements.
- How the Party is developing, monitoring, and enforcing measures for national actors, such as private companies, to ensure coherent contribution by all actors at the national level toward the NDC's targets.
- How the national Monitoring, Verification and Reporting (MVR) systems interact with the NDC and the Biennial Transparency Report (BTR).

2. Adaptation and Resilience

Non-Annex I countries often face severe climate impacts despite having fewer resources. In the Western Balkans, climate change is already manifesting with increased intensity, and the whole region is experiencing adverse impacts and related losses and damages to both nature and people²¹. Floods, drought, extreme heat, landslides, and wildfire hazards are occurring more frequently and with greater severity, posing escalating risks to lives, livelihoods, and economic stability. This has made the Western Balkans a climate and other natural hazard hotspot within Europe.²² Last year, a combination of extreme weather and other factors including drought, heatwaves and strong wind episodes among others, have caused an unprecedented number of fires and a significantly higher area burnt than the recent year average.²³ Although projections have long indicated a rise in climate extremes, many countries in the region still lack evidence-based adaptation strategies and plans to enable the systematic management of climate risks.²⁴

Montenegro's new NDC recognises the critical importance of adaptation and reflects its alignment with the country's National Adaptation Plan (NAP). Following EU's practice, the government has indicated that it will communicate specific adaptation contributions in a separate submission.²⁵

Therefore, the NDCs cycle in the Western Balkans must deliver ambition on adaptation alongside mitigation. Countries must ensure that local risk assessments and vulnerability mapping are conducted to identify and address the region's primary climate risks. Tailored adaptation strategies should be developed in parallel with other national planning efforts aimed at improving resilience, and should incorporate early-warning systems and disaster preparedness.

²¹ Regional Cooperation Council, SEE2020 Series: Study on Climate Change in the Western Balkans Region, Sarajevo, 2018.

²² Green Agenda: Climate Change Adaptation in the Western Balkans; GIZ, available at <https://www.giz.de/en/worldwide/153413.html>.

²³ The 2024 Wildfires Season in maps, European Civil Protection and Humanitarian Aid Operations, available at <https://arcgis.jrc.ec.europa.eu/portal/apps/storymaps/stories/6899de68f8d04d739a4677f57cfe45fa>.

²⁴ Climate ADAPT: Outlook on climate change adaptation in the Western Balkan mountains, 2016 available at <https://climate-adapt.eea.europa.eu/en/metadata/publications/outlook-on-climate-change-adaptation-in-the-western-balkan-mountains>.

²⁵ UNDP NDC Insights series, Issue No. 2, March 2025.

What does effective alignment between NAP and NDC look like?

Benefits of alignment	Reduce planning burden	Strengthen the case for investment
	<ul style="list-style-type: none"> • Integrated planning and coherent policy cycles with common frameworks and timeline • Harmonized governance, including institutional arrangements and coordination mechanisms 	<ul style="list-style-type: none"> • Strengthened evidence base for NDC delivery with robust adaptation analysis via the NAP process • Increased investment opportunities through integrated measures delivering mitigation and adaptation co-benefits • Coordinated financing strategy and complementary project pipelines for NDCs and NAPs
Indicators of effectiveness	Increase synergies and efficiency	Increase visibility and political support
	<ul style="list-style-type: none"> • Combined stakeholder consultations • Shared assessments and unified data systems • Consistent metrics or indicators • Integrated monitoring and reporting systems 	<ul style="list-style-type: none"> • Consistent and coherent messaging at highest political level • Coordinated contributions to deliver the Global Goal on Adaptation (GGA) and UAE Framework for Global Climate Resilience and to inform the Global Stocktake

Source: UNDP, NDC Insights Series, Issue No.2

New NDCs therefore should:

- Ensure coherence with National Adaptation Plans where applicable or address the lack of NAPs and other adaptation strategies;
- Provide a clear correlation with the Adaptation pillar, under the Western Balkan Green Agenda and its Adaptation Roadmap,
- Map and assess climate-related loss and damage risks, with efforts made to quantify impacts where possible,
- Prepare a detailed assessment of the economic and non-economic impacts of loss and damage, including secondary and tertiary effects;
- Based on this assessment, present explicit measures in place or planned to address loss and damage;
- Set out national plans to enable the full implementation of the Early Warnings for All initiative;
- Translate national responses to the Global Goal on Adaptation into concrete adaptation targets, including multi-sectoral targets related –but not limited – to water, agriculture, urban areas, health and biodiversity;
- Envisage the establishment of institutional adaptation governance frameworks.

In addition, a recent Regional Organisation for Security and Co-operation in Europe (OSCE) Assessment confirmed that climate change will not only affect the region's environment and economies, but also impact overall societies in complex and far-reaching ways – increasing pressure on already fragile political systems.²⁶ The Assessment identified **seven risk clusters** of particular relevance to regional security and stability: agriculture and tourism; energy; mining and mining waste; health; transboundary rivers; forests; and illegal logging. Climate change is a conflict driver and a threat multiplier, intensifying existing economic challenges and environmental degradation²⁷. As such, there is an urgent need to develop climate-conflict sensitive NDCs and identify opportunities for joint transboundary climate action, which could also serve as a foundation for new peace-building opportunities in the region.

Given the interconnected nature of the region's climate and landscape, with several transboundary protected areas, shared natural resources and six transboundary river or lake basins²⁸, NDCs should reflect a regional adaptation perspective. Incorporating joint approaches can foster greater cooperation, build stronger synergies, and offer enhanced solutions to common environmental challenges.

²⁶ Rüttinger, Lukas; van Ackern, Pia; Gordon, Noah; and Adrian Foong. Regional Assessment for South-Eastern Europe. Security implications of climate change. (Berlin: adelphi; Vienna: OSCE, 2021).

²⁷ OSCE Ministerial Council Decision No. 3/21 "Strengthening Cooperation to Address the Challenges Caused by Climate Change", 2021.

²⁸ Rüttinger, Lukas; van Ackern, Pia; Gordon, Noah; and Adrian Foong. Regional Assessment for South-Eastern Europe. Security implications of climate change. (Berlin: adelphi; Vienna: OSCE, 2021).

3. Enhancing Inclusiveness, Participation, and Equity

A rights-based approach

It is vital that the design, planning and implementation of NDCs follows a rights-based approach. This includes:

- **Setting ambition levels in line with human rights obligations:** NDCs must reflect the highest possible level of ambition to protect the enjoyment of human rights from climate-related harm. This includes taking all feasible steps to reduce greenhouse gas emissions, in line with the 1.5°C goal and the principle of CBDR-RC.
- **Designing gender-responsive, child-sensitive and disability-inclusive NDCs:** Gender considerations must be mainstreamed across all sectors covered by the NDCs, in their formulation, implementation, monitoring and their reviewing, including through gender-responsive budgeting, and the collection, use and analysis of gender-disaggregated data.
- **Integrating due diligence regulations:** in line with the state duty to regulate private actors, NDCs should reference mandatory human rights and environmental due diligence requirements. These should apply to companies, financial institutions, and public authorities, obliging them to identify, prevent, mitigate, and account for human rights abuses, environmental harm and additional green-house emissions across their operations, subsidiaries, and value chains – including in the context of mining and minerals for renewable energy production.
- **Promoting a health-based approach:** NDCs should consider the health impacts of climate change and climate action, aim to build resilient and sustainable health systems, and realise health co-benefits across sectors such as energy, agriculture, and transport.

Inclusiveness and participation

People have a right to shape how governments respond to the climate crisis, and to have their views taken into account in government plans and climate policies. For participation to be meaningful and effective, access to information is essential.

NDCs should therefore:

- Guarantee **the meaningful, informed, and effective participation** of all rights-holders – including local communities, women and youth – in the design, implementation, and monitoring of national climate commitments and related policies;
- Commit to recognising and **protecting the rights of environmental human rights defenders** involved in the development, implementation and monitoring of NDCs.

- Ensure **the active participation and leadership of women and their diversity at all stages** of the NDC cycle, and provide support for their engagement,
- **Include information on public participation** in NDC development, particularly with regard to youth engagement as defined in the Actions for Climate Empowerment (ACE) Action Plan, and highlight existing gaps in gender, youth, and civil society inclusion.
- **Engage with national human rights institutions, sub-national and local human right bodies**, and National Gender and Climate Change Focal Points, ensuring coherence with a state's broader human rights framework.

Human rights obligations of States must be embedded throughout the NDC process – from planning to implementation, monitoring, and evaluation²⁹. An effective and inclusive public participation process is essential, as is the protection of civic space, which underpins social acceptance and successful implementation of NDCs and climate commitments. Civil society organisations play a crucial role in ensuring transparency, accountability, and community resilience, as well as in supporting environmental monitoring and the just delivery of climate action.

In the spotlight

Analysis shows that approximately 80 per cent of enhanced NDCs include considerations of **young people**, compared to 40 per cent of first-generation NDCs³⁰. In the six Western Balkan economies, youth represents 21 per cent of the total population. However, youth engagement, youth representation and the integration of youth perspectives in the development and implementation of climate-related policies and measures do not reflect these demographics. Despite sporadic references to youth in plans to achieve the set national climate targets, there are persistent concerns that decisions are often made on behalf of young people, rather than in collaboration with them or through their meaningful inclusion in the decision-making process.³¹

A recent regional study revealed significant differences among the countries in terms of **just transition readiness** – with some countries, such as North Macedonia, having more advanced plans, while others remain in the early stages. However, even where public consultations were held on just transition plans, there was no identifiable evidence of youth involvement in these

²⁹ See more in the INTEGRATING HUMAN RIGHTS IN NATIONALLY DETERMINED CONTRIBUTIONS: A TOOLKIT FOR PRACTITIONERS, at https://www.ohchr.org/sites/default/files/documents/issues/climatechange/publications/2022-12-09/Integrating-Human-Rights-in-Nationally-Determined-Contributions_Toolkit-for-Practitioners.pdf

³⁰ The State of Climate Ambition, Nationally Determined Contributions Global Outlook Report 2021, UNDP

³¹ <https://www.friendsofeurope.org/insights/the-youth-climate-movement-from-pledges-to-action/>

processes.³² To ensure meaningful youth engagement in the development and implementation of climate-related policies, governments must prioritise the provision of targeted education, the strengthening of youth networks and the removal of barriers to youth participation.

Addressing development challenges and co-benefits: Alignment with the Sustainable Development Goals (SDGs)

- Describe how climate action outlined in the NDC contributes to poverty eradication and sustainable development, and how it is aligned with the SDGs objectives – with a focus on creating co-benefits.
- Explain how inter-ministerial coordination was ensured in the development of the NDC and in order to ensure joint planning and realise cross-sectoral co-benefits in areas including health, sustainable development, gender, youth and human rights.

Montenegro states in its **new Nationally Determined Contribution** that the document has been shared and discussed with stakeholders, and that comments received have been taken into account. It further notes:

The NDC is prepared in the context of Montenegro's commitment to gender equality and cross-cutting priorities, as articulated in commitments such as: the commitment to create and maximise synergies between the social, environmental, and economic dimensions of sustainable development; integrating the dimensions of human rights and gender equality into the national plans and strategies; and the Montenegro's support for adoption of the United Nations Declaration on the Rights of Indigenous Peoples. Montenegro aims to achieve gender-balanced participation and encourage the full, equal, effective and meaningful participation and leadership of women and youth at all levels of climate action and decision making. The country will also continue to support their meaningful engagement in climate change decision-making processes, as well as climate education and training, and increase public awareness on climate change. Montenegro welcomes the recognition by the UN Human Rights Council and General Assembly that the right to a clean, healthy and sustainable environment is a human right and will actively engage in discussions advancing this right and promote inclusion and non-discrimination.

³² Generation Climate Europe & CEE Bankwatch Network (2023). The State of Youth Engagement in the Just transition of the EU in the Western Balkans. GCE & Bankwatch: Brussels.

4. Adequate Finance to respond to needs

Given the limited domestic resources and investment needs, the Western Balkan Six – as non-Annex I Parties – **should detail in their NDCs how they plan to access international climate finance**, including EU grants, concessional loans and technical assistance.

Adequate access to high-quality financial means is a prerequisite for enabling climate action at the speed and scale needed to chart a course consistent with 1.5°C-compatible pathways. To support the use of NDCs as investment plans, developing countries should also specify the amount and type of finance needed, indicate the sources from which this finance is expected (public and/or private, domestic and/or external), and outline the national and international policy changes required to support and facilitate access to such finance.

In the development of NDCs, the following information should also be considered:

- **Assessment of the economic and financial costs and benefits** of achieving GHG targets and non-GHG targets, including those related to cross-cutting actions such as gender equality, awareness-raising, education for sustainable development as well as, adaptation and loss and damage policies or actions.
- **Financing strategies to meet targets or implement specific policies or actions** – for example, by mainstreaming climate priorities into national, sectoral, and/or subnational budgets, or by identifying international grant opportunities.
- Technological transfer and capacity building activities that support **monitoring, proper track of data and implementation.**
- **Identification of potential domestic funding sources and accompanying policy reforms** – such as phasing out fossil-fuel subsidies and proper assessment and planning for the renewable capacity potential –that could mobilise resources and help finance the transition.
- Explicit recognition that the design and implementation of **just transition** policies, plans, programmes, and practices contribute to climate ambition and are therefore eligible for climate finance support.

REFERENCES

- Barbara Frey, The Energy Transition in the Western Balkans: The Status Quo, Major Challenges and How to Overcome them, 2024.
- Climate ADAPT: Outlook on climate change adaptation in the Western Balkan Mountains, 2016.
- Climate Action Network, Guidelines for NDCs 3.0: Delivering on the GST outcome and beyond, May 2024
- Climate Action Network, Fair Shares – Lessons from Practice, Thoughts on Strategy, 2022
- Generation Climate Europe & CEE Bankwatch Network (2023). The State of Youth Engagement in the Just transition of the EU in the Western Balkans. GCE & Bankwatch: Brussels.
- Integrating Human Rights in Nationally Determined Contributions: A toolkit for practitioners, OHCHR, 2022.
- IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland.
- Key Messages - Investing in Climate for Growth and Development: The case for enhanced NDCs, OECD-UNDP, March 2025.
- OSCE Ministerial Council Decision No. 3/21 “Strengthening Cooperation to Address the Challenges Caused by Climate Change”, 2021.
- Paris Agreement to the United Nations Framework Convention on Climate Change, Dec. 12, 2015
- Regional Cooperation Council, SEE2020 Series: Study on Climate Change in the Western Balkans Region, Sarajevo, 2018.
- Paris-aligned benchmarks for the power sector, Climate Action Tracker, 2024.
- Ruiz Castello, P., Medarac, H., Somers, J. and Mandras, G., Recent trends in coal and peat regions in the Western Balkans and Ukraine, EUR 30837 EN, Publications Office of the European Union, Luxembourg, 2021, ISBN 978-92-76-41929-7, doi:10.2760/81752, JRC126154.
- Rüttinger, Lukas; van Ackern, Pia; Gordon, Noah; and Adrian Foong. Regional Assessment for South-Eastern Europe. Security implications of climate change. (Berlin: adelphi; Vienna: OSCE, 2021).
- The State of Climate Ambition, Nationally Determined Contributions Global Outlook Report 2021, UNDP
- UNDP NDC Insights series, Issue No. 2, March 2025.

Websites:

- All about NDCs, available at: <https://www.un.org/en/climatechange/all-about-ndcs/>.
- Next Generation NDCs: Accelerating Climate Action under the Paris Agreement, available at <https://www.wri.org/ndcs>.
- Green Agenda: Climate Change Adaptation in the Western Balkans; GIZ, available at <https://www.giz.de/en/worldwide/153413.html>

Useful links:

[Guidelines for NDCs 3.0: Delivering on the GST outcome and beyond: Climate Action Network](#)

[CAN Europe's Position on the EU Climate Targets & an Equitable GHG budget for the EU](#)

[Policy Brief: Enabling a 2040 climate-neutral EU](#)

[Integrating Human Rights in Nationally Determined Contributions: A toolkit for Practitioners](#)

Equity calculators:

[Climate Equity Reference](#)

[Climate Action Tracker](#)

[Climate Analytics](#)

[NDC Equity Tracker](#)



Climate Action Network Europe asbl
rue d'edimbourg 26, 1050 Brussels, Belgium
Tel: +32 (0) 28944670, fax: +32 (0) 2 8944680
e-mail: info@caneurope.org www.caneurope.org

Author: Frosina Antonovska, frosina.antonovska@caneurope.org

This paper was produced with contributions from CAN Europe members and partners in the Western Balkans Region.

Climate Action Network (CAN) Europe



[@caneurope.org](https://twitter.com/caneurope.org)



[@can.europe](https://www.instagram.com/can.europe)



info@caneurope.org



www.caneurope.org