

Opinion in preparation for the United Nations Climate Change Conference (COP 30)



- **Own initiative**
 - **This opinion was prepared by the Energy and Climate Working Group**
 - **Approved by the FRDO-CFDD GA by written procedure on 25 September 2025**
 - **The original language of this opinion is French**
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1. Context

As the FRDO-CFDD wishes to contribute to the international process of combating climate change, it has decided to issue an own-initiative opinion in preparation for the UN Climate Change Conference in Belém (COP 30), setting out its priorities for our country.

2. Opinion

2.1. Introductory remarks

- [1] The FRDO-CFDD continues to emphasise¹ that, despite the many crises currently facing the world, efforts to mitigate and adapt to the effects of climate change and international climate financing must remain at the top of the political agenda.
- [2] In this context, the FRDO-CFDD emphasises the importance of Belgium's involvement in international climate negotiations.
- [3] The FRDO-CFDD requests that the Belgian governments and public services ensure that negotiations continue on the basis of the decisions already taken, that they support their implementation as efficiently as possible and that they do not accept any undermining of what has been achieved..
- [4] As in its previous opinions² in preparation for climate-related COPs, the FRDO-CFDD calls on Belgium to ensure that the following is taken into account during the negotiations at COP 30:
- the respect for environmental limits and the will to combat climate change, according to the principle of common but differentiated responsibilities
 - the importance of a high-performance economy with secure energy supplies and a global approach, leading, inter alia, to a 'level playing field' for businesses
 - the importance of social justice and a just transition, taking into account the five pillars: social dialogue, job creation (investment, research and development, innovation), training and skills, respect for human and workers' rights, and strong, coordinated social protection. The council recalls that the International Labour Organisation has developed guidelines³ for implementing policies and measures for a just transition
 - the importance of policy coherence for climate and sustainable development, with attention to the fact that transition in Belgium should not be at the expense of sustainable development in developing countries.
- [5] Finally, the FRDO-CFDD asks that consideration be given to the link between climate change, disruption of nature and biodiversity, and the consequences for health, peace and security.

2.2. Mitigation

- [6] The FRDO-CFDD requests that the negotiators from Belgium and the European Union emphasise the importance of increased ambition from the other Parties through their nationally determined contributions (NDCs) in order to respect the 1.5°C warming limit set out in the Paris Agreement.⁴

¹ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), 2024a10, 19/06/2024, § [1]. (*Opinion only in NL and FR.*)

² Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP27), 2022a12, 28/10/2022, § [5] and Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 28), 2023a12, 16/11/2022, § [3]. (*Opinion only in NL and FR.*)

³ International Labour Organisation (ILO), *Guidelines for a just transition towards environmentally sustainable economies and societies for all*, 2015, 23 pp.

⁴ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [4].

- [7] The FRDO-CFDD requests that these nationally determined contributions specify all relevant parameters in order to monitor their implementation and to compare the performance of the various Parties.⁵
- [8] The FRDO-CFDD recalls the objective of the Mitigation Work Programme to '*urgently scale up mitigation ambition and implementation in this critical decade in a manner that complements the global stocktake*'.⁶ It underlines the importance of this programme, given the need for mitigation measures by 2030, and urges it to fulfil its mandate by moving towards an action-oriented discussion resulting in sector-specific recommendations, as planned.^{7 8}
- [9] The FRDO-CFDD calls for the global mitigation targets set out in the *First Global Stocktake* to be followed up.
- "(a) Tripling renewable energy capacity globally and doubling the global average annual rate of energy efficiency improvements by 2030;*
- (b) Accelerating efforts towards the phase-down of unabated coal power;*
- (c) Accelerating efforts globally towards net zero emission energy systems, utilizing zero- and low-carbon fuels, well before or by around mid-century;*
- (d) Transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science;*
- (e) Accelerating zero- and low-emission technologies, including, inter alia, renewables, nuclear, abatement and removal technologies such as carbon capture and utilization and storage, particularly in hard-to-abate sectors, and low-carbon hydrogen production;*
- (f) Accelerating the substantial reduction of non-carbon-dioxide emissions globally, in particular methane emissions by 2030;*
- (g) Accelerating the reduction of emissions from road transport on a range of pathways, including through development of infrastructure and rapid deployment of zero- and low-emission vehicles;*
- (h) Phasing out inefficient fossil fuel subsidies that do not address energy poverty or just transitions, as soon as possible^{9 10}*

⁵ *Ibid.*, § [5].

⁶ Conference of the Parties serving as the meeting of the Parties to the Paris Agreement, decision 4/CMA.4, *Sharm el-Sheikh Implementation Plan*, 20/10/2022, § 1

⁷ Conference of the Parties serving as the meeting of the Parties to the Paris Agreement, decision 4/CMA.5, *Sharm el-Sheikh mitigation ambition and implementation work programme referred to in decision 4/CMA.4*, 13/12/2023, §§ 7 until 10.

⁸ *Cf.* Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [7].

⁹ Conference of the Parties serving as the meeting of the Parties to the Paris Agreement, decision 1/CMA.5, *Outcome of the first global stocktake*, 13/12/2023, § 28

¹⁰ *Cf.* Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [8].

- [10] The FRDO-CFDD points out that the investments needed worldwide to achieve the climate transition will be lower than the costs incurred by climate disasters, as the expected risks and negative effects, as well as the losses and damage resulting from climate change, will increase as global warming intensifies.¹¹
- [11] This year, the European Union, like all other Parties to the Paris Agreement, must submit a nationally determined contribution (NDC) to bring its greenhouse gas (GHG) reduction pathways into line with the Paris Agreement's objective. According to the FRDO-CFDD, in the run-up to COP 30, the EU must take the lead in climate policy and submit an ambitious and realistic NDC, demonstrating that it is possible to significantly reduce greenhouse gas emissions and achieve the Paris Agreement's overall objective, in line with the principles set out in § [4] above.
- [12] The FRDO-CFDD emphasises that the NDCs must take into account the first Global Stocktake carried out during COP 28. It notes that the European Commission's impact assessment concludes that *'the preferred option is Option 3, a net GHG reduction target for the EU of 90-95% by 2040'*.¹² It also recalls the recent opinion of the *European Scientific Advisory Board on Climate Change* (ESABCC): *'It concludes that achieving a 2040 emission reduction of 90-95 % domestically remains both feasible and would keep the EU on a credible path to climate neutrality by 2050. Aiming for a lower target would not only jeopardise the EU's progress towards this goal, but also undermine its sustainability, long-term competitiveness and energy security in a time of geopolitical uncertainty.'*¹³
- [13] As mentioned earlier,¹⁴ the FRDO-CFDD emphasises the importance of maintaining the competitiveness of companies in international climate policy. It believes that agreements at European level should at least aim to create a level playing field, as indicated in the industrial plan¹⁵ of the European Green Deal.
- [14] The FRDO-CFDD advocates that the European NDC, taking into account the elements mentioned in § [13] above and with regard to all sectors, should include the following elements:
- as envisaged in the Global Stocktake adopted at COP 28 in Dubai (see § [9] above), the preparation of plans for *'transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner'* and for the further development of low-carbon energy sources to contribute to the achievement of the overall objectives set out therein;
 - a commitment to avoid lock-ins in fossil technologies and infrastructures as much as possible;
 - concrete commitments to provide European citizens and economic actors with sufficient access to low-carbon energy at affordable prices and to the infrastructure necessary for decarbonisation. This means prices that enable businesses to be competitive;

¹¹ IPCC, 2023: Summary for Policymakers. In: *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*, p. 15, B.2.2.

¹² COMMISSION STAFF WORKING DOCUMENT, EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT REPORT, Accompanying the document, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS. *Securing our future, Europe's 2040 climate target and path to climate neutrality by 2050 building a sustainable, just and prosperous society*. SWD/2024/64/final, 06/02/2024, p. 3.

¹³ European Scientific Advisory Board on Climate Change, Scientific advice for amending the European Climate Law – Setting climate goals to strengthen EU strategic priorities. Summary and Recommendations. 02/06/2025, p. 6.

¹⁴ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [22].

¹⁵ European Commission. COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS. *A Green Deal Industrial Plan for the Net-Zero Age*, COM(2023) 62 final, 1/02/2023.

- a clear vision, accompanied by concrete measures, to facilitate the rapid establishment of the necessary infrastructure for decarbonisation;
- creating a common “budgetary capacity” at EU level to finance the transition (as outlined in the Employment-Competitiveness 2024 report¹⁶ of the Central Economic Council);
- a gradual phasing out of fossil fuel subsidies, taking into account climate objectives and the elements included in paragraphs [4] and [9] above.

[15] According to the FRDO-CFDD, particular attention must be paid to the consequences of climate change for the food and agricultural system. COP 30 should be used to strengthen Belgium's position and promote sustainable, economically viable and accessible food systems for all actors in the system. The fight against climate change, for public health and food security must be linked by ensuring coherence between the European NDC and policies in these different areas.

2.3. Adaptation

[16] The FRDO-CFDD calls for the development of climate change adaptation plans based on a methodology that makes states aware of the risks and needs in this area and allows for the monitoring of these plans.¹⁷

[17] The FRDO-CFDD also calls for the adaptation targets set out in paragraph 63 of the First Global Stocktake to be followed:

"(a) Significantly reducing climate-induced water scarcity and enhancing climate resilience to water-related hazards towards a climate-resilient water supply, climate-resilient sanitation and access to safe and affordable potable water for all;

(b) Attaining climate-resilient food and agricultural production and supply and distribution of food, as well as increasing sustainable and regenerative production and equitable access to adequate food and nutrition for all;

(c) Attaining resilience against climate change related health impacts, promoting climate-resilient health services and significantly reducing climate-related morbidity and mortality, particularly in the most vulnerable communities;

(d) Reducing climate impacts on ecosystems and biodiversity and accelerating the use of ecosystem-based adaptation and nature-based solutions, including through their management, enhancement, restoration

¹⁶ (Report only in NL and FR.) Centrale Raad voor het Bedrijfsleven. Een visie en een strategie voor een veerkrachtig, concurrerend, inclusief en houdbaar sociaal-economisch model tegen 2050 – verslag Werkgelegenheid-Concurrentievermogen 2024, CRB 2025-0050, 17/01/2025, p. 33: "Voor de realisatie van gepaste overheidsinvesteringen zijn budgettaire marges nodig. Maar er is ook nood aan een versterking van de Europese aanpak om het budget voor de transitie-investeringen voor de lidstaten te verhogen en het mogelijk te maken een gelijk speelveld tussen de lidstaten te creëren. De instelling van een gemeenschappelijke "budgettaire capaciteit", die wordt gefinancierd met gemeenschappelijke schulden, moet het mogelijk maken om de Europese publieke investeringen op te krikken en de dubbele - digitale en ecologische - transitie te ondersteunen, naar het voorbeeld van de Faciliteit voor Herstel en Veerkracht. Bovendien zou de instelling van een gemeenschappelijke "budgettaire capaciteit" de Europese eenheidsmarkt kunnen versterken, door initiatieven te financieren die passen binnen een gecoördineerd industriebeleid, die handelsbelemmeringen wegnemen en die billijke concurrentie stimuleren. Ze zou het mogelijk maken beter te reageren op economische schokken en op financiële crisissen die verschillende lidstaten van de EU kunnen treffen."

¹⁷ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [9].

and conservation and the protection of terrestrial, inland water, mountain, marine and coastal ecosystems;

(e) Increasing the resilience of infrastructure and human settlements to climate change impacts to ensure basic and continuous essential services for all, and minimizing climate-related impacts on infrastructure and human settlements;

(f) Substantially reducing the adverse effects of climate change on poverty eradication and livelihoods, in particular by promoting the use of adaptive social protection measures for all;

(g) Protecting cultural heritage from the impacts of climate-related risks by developing adaptive strategies for preserving cultural practices and heritage sites and by designing climate-resilient infrastructure, guided by traditional knowledge, Indigenous Peoples' knowledge and local knowledge systems." ¹⁸

2.4. Loss and damage

- [18] The FRDO-CFDD calls for sufficient attention to be paid to the management of loss and damage and to the damage that climate change (with its immediate and long-term consequences) is already causing in vulnerable countries and communities.¹⁹
- [19] The FRDO-CFDD recalls that at COPs 27 and 28, states approved new financing arrangements, including a *Loss and Damage Fund*, to help developing countries cope with loss and damage, and stresses the importance of continuing to finance this fund.²⁰
- [20] In this context, the FRDO-CFDD calls for the *Loss and Damage Fund* to be made operational as soon as possible, including the modalities for the annual financing of this mechanism. The FRDO-CFDD requests that the World Bank respect the conditions imposed on it as temporary host²¹ of the fund and calls for civil society and communities to be properly involved in the management of the fund.²²
- [21] The FRDO-CFDD notes that on 7 April 2025, the *Loss and Damage Fund* contained pledges²³ worth USD 768.4 million, of which USD 314 million had actually been transferred. It recalls that paragraph 14 of the *New collective quantified goal on climate change* (hereinafter: NCQG) recognises that these countries need public financing in the form of grants or loans on highly favourable terms to compensate for losses and damage.

¹⁸ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [10].

¹⁹ *Ibid.*, § [11].

²⁰ *Ibid.*, § [12].

²¹ See: Fund for responding to loss and damage, [Addendum to the background paper on matters relating to the operationalization of the Fund as World Bank-hosted financial intermediary fund](#), FLD/B.1/Add.1, 27/04/2024

²² Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [13].

²³ Zie: <https://unfccc.int/topics/climate-finance/funds-entities-bodies/fund-for-responding-to-loss-and-damage/pledges-to-the-fund-for-responding-to-loss-and-damage> (geraadpleegd op 25/08/2025).

- [22] In order to objectify the financing needs in this area, the FRDO-CFDD calls on the Belgian authorities to advocate for the preparation of a *Loss and Damage Gap Report*, following the example of the UNEP's *Emissions Gap Report*.²⁴ In this context, the FRDO-CFDD asks that the human rights implications and economic and non-economic aspects be taken into account in the assessment of losses and damages, in order to ensure that they are accurate and complete.
- [23] In view of the above, the FRDO-CFDD advocates that solutions be proposed during the negotiations to address the concerns mentioned in § 19 of the NCQG, namely *'the significant gaps that remain in responding to the increased scale and frequency of loss and damage' and 'the need for urgent and enhanced action and support for averting, minimising and addressing loss and damage associated with climate change impacts.'*
- [24] Finally, the FRDO-CFDD calls for future institutions to ensure that local communities are sufficiently involved in the implementation of solutions for losses and damage, based on the active and meaningful participation of those affected.

2.5. Climate finance

- [25] The FRDO-CFDD recalls Article 2(1)(c) of the Paris Agreement, which states that the Agreement aims to strengthen the global response to the threat of climate change by *'Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.'*²⁵ ²⁶
- [26] The FRDO-CFDD also recalls Article 9, paragraph 1, of the Paris Agreement, which states that *'Developed country Parties shall provide financial resources to assist developing country Parties with respect to both mitigation and adaptation in continuation of their existing obligations under the Convention.'* When signing this agreement, the developed countries committed to mobilising and making available 100 billion dollars annually until 2025 for the countries of the South.
- [27] The FRDO-CFDD also recalls § 8 of the NCQG, which *'[r]eaffirms (...) Article 9 of the Paris Agreement and decides, in continuation of the objective referred to in paragraph 53 of Decision 1/CP.21, with developed countries taking the lead, to set a target of at least USD 300 billion per year by 2035 for developing countries for climate action (...)'* and § 7 that *'calls on all actors to work together to scale up climate finance for developing countries from all public and private sources to at least USD 1.3 trillion per year by 2035.'* Within the framework of the NCQG, Belgium has committed to participating in this new climate finance target.

²⁴ See: <https://www.unep.org/resources/emissions-gap-report-2024>

²⁵ According to the IPCC, climate finance flows for mitigation, for example, would need to be multiplied by a factor of three to six annually to meet average annual needs between 2020 and 2030. See: Intergovernmental Panel on Climate Change, *Climate Change 2022 – Mitigation of Climate Change*, WG III contribution to the Sixth Assessment Report of the IPCC, 2022, p. 1610.

²⁶ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [14].

- [28] The FRDO-CFDD also emphasises that the annual target of \$300 billion for developing countries agreed at COP 29 (with a balance between adaptation and mitigation financing) is different from the call to achieve total financing of \$1.3 trillion for climate action in developing countries. This call must be specified in the *Baku to Belém Roadmap to 1.3T*²⁷ (hereinafter: *B2B Roadmap*) and must include a concrete, phased action plan to provide funding where it is most needed, in particular to protect vulnerable communities.
- [29] The FRDO-CFDD notes that the agreement reached at COP 29 to help developing countries with mitigation and adaptation, amounting to 300 billion dollars per year, falls short of their financing needs, both in terms of adaptation (estimated at more than 300 billion dollars according to the *Adaptation Gap Report*)²⁸ and mitigation (estimated at \$455 to \$587 billion according to the UNFCCC).²⁹
- [30] Finally, the FRDO-CFDD points out that Belgium contributed €248 million to international climate finance in 2023,³⁰ which, according to the Climate Change Service of the DG Environment of the FPS Health, Food Chain Safety and Environment, corresponds to €182 million in ODA equivalents.³¹ The ODA equivalent reflects the benefit that a beneficiary country derives from a loan at a rate more favourable than the market rate. Each beneficiary country is assigned a discount rate, depending on its income category, which is comparable to the interest rate at which it usually borrows on the financial markets.

2.6. Just transition

- [31] According to the FRDO-CFDD, Belgium must place the principles of a just transition at the heart of the negotiations within the European delegation and the UNFCCC process, as set out in the *Guidelines for a just transition towards environmentally sustainable economies and societies for all*,³² which were adopted at the 111th session of the International Labour Conference in 2023.
- [32] The FRDO-CFDD also recalls the existence of the *Just Transition Work Programme* (JTWP), which should lead to a *Just Transition Action Plan* that focuses on the requirements and principles of Resolution ILC. 111/V³³ of the ILO are central and in which the states commit themselves to setting out in their NDC how they will take these principles into account, including social dialogue and consultation with stakeholders. In this context, the FRDO-CFDD calls on Belgium to play a constructive role in the development of the *Just Transition Action Plan*.

²⁷ See: <https://unfccc.int/topics/climate-finance/workstreams/baku-to-belem-roadmap-to-13t>

²⁸ See: United Nations Environment Programme (2023). *Adaptation Gap Report 2023: Underfinanced. Underprepared. Inadequate investment and planning on climate adaptation leaves world exposed*, Nairobi, p. 40.

²⁹ See: UNFCCC (2024) Second report on the determination of the needs of developing country Parties related to implementing the Convention and the Paris Agreement, <https://unfccc.int/documents/640757>

³⁰ See: https://indicators.be/nl/i/G13_CCF/nl

³¹ The ODA equivalent is a measure of the donor's effort. ODA grants and loans that are included in the calculation of the ODA equivalent are referred to as ODA contributions..

³² See: <https://www.ilo.org/publications/guidelines-just-transition-towards-environmentally-sustainable-economies>

³³ See: *Resolution concerning a just transition towards environmentally sustainable economies and societies for all*, ILC.111/Resolution V, 16/06/2023.

- [33] Finally, the FRDO-CFDD recalls the existence of Decision 3/CMA.5 (§ 2)³⁴ on the scope of the JTWP and recommends that the Parties continue their work on the basis of the decisions taken by consensus during previous sessions and focus on their implementation.

2.7. Gender Action Plan

- [34] The FRDO-CFDD calls for the full implementation of the UNFCCC decisions on gender and climate and recalls the commitment³⁵ made by Belgium (and 81 other countries) to strive for just and gender-responsive transitions in the implementation of the Paris Agreement, as set out in the *Gender-responsive Just Transitions and Climate Action Partnership*.³⁶
- [35] The FRDO-CFDD has repeatedly emphasised the importance of taking the gender dimension into account in climate policy,³⁷ including with regard to access to climate finance. This theme is particularly important this year, given the historic step taken in 2024 with the approval of the extension of the Gender Action Plan (GAP) from 5 to 10 years by decision 7/CP.29³⁸ and the mandate given to COP 30 to define the concrete areas and activities of the plan.
- [36] To this end, various proposals have been submitted via the official channel of the UNFCCC. The FRDO-CFDD informs the government of the proposal by UN WOMEN and that of the *Women and Gender Constituency*, which highlights eleven essential elements.³⁹
- [37] The FRDO-CFDD recalls that Belgium, as a pioneer in this field, has a legislative framework⁴⁰ that sets out obligations in this regard, particularly with regard to the effective participation of women, gender

³⁴ See: Conference of the Parties serving as the meeting of the Parties to the Paris Agreement – United Arab Emirates *just transition work programme*, decision 3/CMA.5, 13/12/2023

³⁵ See: <https://www.cop28.com/en/cop28-gender-responsive-just-transitions-and-climate-action-partnership>

³⁶ See: <https://www.cop28.com/en/cop28-gender-responsive-just-transitions-and-climate-action-partnership>

³⁷ See opinions 2022a12, 2023a01, 2023a03, 2023a07, 2023a12, 2024a10.

³⁸ See: Conference of the Parties, decision 7/CP.29, Gender and climate change, 27/03/2025 (https://unfccc.int/sites/default/files/resource/cp2024_11a01_adv.pdf?download).

³⁹ See: Women & Gender Constituency, Submission from the Women and Gender Constituency on the format and scope of the in-session technical workshop to be held at SB62 (June 2025) to facilitate the design of gender action plan activities, 18 pp. https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202503312013---WGC_Submission_GAPWorkshop_2025.pdf; United Nations Entity for Gender Equality and the Empowerment of Women (UN Women), Submission to the UN Framework Convention on Climate Change On the development of a new Gender Action Plan 31 March 2025 https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202503311626---UN-Women%20UNFCCC%20Submission_GAP_2025_Final.pdf; Office of the United Nations High Commissioner for Human Rights (OHCHR), Submission to inform the in-session technical workshop to be held at SB 62 (June 2024), to facilitate the design of the new gender action plan (GAP) activities under the extended enhanced Lima work programme on gender, 20 pp. https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202504071400---GAP%20submission%20UNFCCC_OHCHR%20March%202025_final.pdf

⁴⁰ See, among others (*text only in NL and FR*): (1) 13 juli 2023, Wet voor de preventie en de bestrijding van feminicides en gendergerelateerde dodingen, https://www.ejustice.just.fgov.be/cgi/article_body.pl?language=nl&caller=summary&pub_date=2023-08-31&numac=2023044133; (2) 28 juni 2023, Wet houdende wijziging van de wet van 30 juli 1981 tot bestraffing van bepaalde door racisme of xenofobie ingegeven daden, van de wet van 10 mei 2007 ter bestrijding van bepaalde vormen van discriminatie en van de wet van 10 mei 2007 ter bestrijding van discriminatie tussen vrouwen en mannen, https://etaamb.openjustice.be/nl/wet-van-28-juni-2023_n2023043712; (3) 7 december 2018, Bestuursdecreet Vlaamse overheid, https://etaamb.openjustice.be/nl/decreet-van-07-december-2018_n2018032457; (4) 7 januari 2016, Decreet gendermainstreaming Franse Gemeenschap; (5) 15 december 2013, De genderanalyse, voorzien in de Wet houdende diverse bepalingen inzake administratieve vereenvoudiging; (6) 28 juli 2011, Wet tot wijziging van de wet van 21 maart 1991 betreffende de hervorming van sommige economische overheidsbedrijven, het Wetboek van vennootschappen en de wet van 19 april 2002 tot rationalisering van de werking en het beheer van de Nationale Loterij teneinde te garanderen dat vrouwen zitting hebben in de raad van bestuur van de autonome overheidsbedrijven, de genoteerde vennootschappen en de Nationale Loterij, https://etaamb.openjustice.be/nl/wet-van-28-juli-2011_n2011003317; (7) 5 mei 2003, Bijzondere wet op de gewaarborgde aanwezigheid van personen van verschillend geslacht in de Vlaamse Regering, de Franse Gemeenschapsregering, de Waalse Regering, de Brusselse Hoofdstedelijke Regering en onder de Gewestelijke

mainstreaming in plans and policies, the collection of gender-disaggregated data, taking intersectionality into account, combating gender-based violence and femicide, and that it must also defend these positions at the international level. Sexual and reproductive health and rights are also a priority of Belgium's international policy.⁴¹

- [38] The FRDO-CFDD also points out that international institutions, including within the UNFCCC, have made recommendations regarding the transfer of gender-sensitive technologies,⁴² the role of men⁴³ in the fight for gender equality, and the inclusion of “care” in climate policy.⁴⁴ This last point is particularly important given the impact of climate change on health, including for Belgian citizens.
- [39] The FRDO-CFDD also pointed out⁴⁵ that Belgium has committed⁴⁶ to increasing the proportion of global public and private climate finance targeted at and invested in gender-equitable climate solutions by 2026, particularly at local and national level. This can be achieved in particular by increasing the share of marked bilateral and multilateral climate finance that targets or takes gender into account to 88%,⁴⁷ in line with the commitments of the *Coalition for Feminist Action for Climate Justice of the Equality Generation Forum*. The FRDO-CFDD urges that all climate finance be monitored and reported on the basis of gender indicators and that access to local women's and feminist grassroots organisations be guaranteed.⁴⁸
- [40] As already emphasised, according to the FRDO-CFDD,⁴⁹ the markers relating to gender equality must be communicated to the OECD and the UNFCCC in a transparent and consistent manner. It requests that the Parties comply with Decision 20/CP.26 and, in particular, with the call for Parties to *‘be more explicit about the gender responsiveness of climate finance with a view to strengthening the capacity of women and furthering work under the gender action plan (...)’*,⁵⁰ including in the national communications and biennial reports submitted to the UNFCCC.

Staatssecretarissen van het Brussels Hoofdstedelijk Gewest.

https://www.ejustice.just.fgov.be/cgi/article_body.pl?language=nl&caller=summary&pub_date=03-06-12&numac=2003012206 | (8) 12 januari 2007, Wet strekkende tot controle op de toepassing van de resoluties van de wereldvrouwenconferentie die in september 1995 in Peking heeft plaatsgehad en tot integratie van de genderdimensie in het geheel van de federale beleidslijnen, https://www.ejustice.just.fgov.be/cgi/article_body.pl?language=nl&caller=summary&pub_date=07-02-13&numac=2007002011

⁴¹ See: <https://diplomatie.belgium.be/sites/default/files/2025-03/Beleidsverklaring-03-2025.pdf>

⁴² See: Climate Technology Centre and Network (CTCN) *Gender Policy and Action Plan 2023–2027*, https://www.ctc-n.org/sites/default/files/AB2023.22.24_CTCN_Gender_Policy_and_Action_Plan_2023_2027_Endorsed.pdf en Technology Executive Committee Briefing: *Gender responsive Technology and Infrastructure*, <https://unfccc.int/ttclear/tec/transport.html#brief18>

⁴³ See paragraph 14 of the 24/CP.27 *Intermediate review of the implementation of the gender action plan* (COP 27) <https://unfccc.int/documents/626564>

⁴⁴ See: <https://www.ilo.org/publications/mainstreaming-care-work-combat-effects-climate-change>

⁴⁵ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [25].

⁴⁶ See <https://www.cop28.com/en/cop28-gender-responsive-just-transitions-and-climate-action-partnership> (geraadpleegd op 6/06/2024).

⁴⁷ See: https://commitments.generationequality.org/sites/default/files/2022-09/Consolidated-Indicators_ACs_1.pdf (geraadpleegd op 6/06/2024).

⁴⁸ Cf. (text only in NL and FR) Adviesraad Gender en Ontwikkeling, *Advies over de verbinding tussen gendergerelateerd geweld en klimaat*, 6/10/2022, Hoofdstuk 3.3, § 3, p. 7.

⁴⁹ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [26].

⁵⁰ Conference of the Parties, Decision 20/CP.26, Gender and Climate Change, 11/11/2021, § 13.

- [41] As already indicated,⁵¹ the FRDO-CFDD calls for the principles of inclusion, human rights and gender equality to be taken into account. It also refers to the conclusions of the recent ILO conference: *'Inclusive just transition entails a strong gender dimension to address many of the environmental challenges and leverage the potential opportunities.'*⁵² It adds that a just transition also has an international dimension, particularly through the principle of 'common but differentiated responsibilities'. It also supports the position of the ILO conference that *'Gender equality, social inclusion and equity should be promoted, paying particular attention to indigenous and tribal peoples and groups in vulnerable situations.'*⁵³ The council calls for the application of the principle of *leaving no one behind*.⁵⁴
- [42] According to the FRDO-CFDD, the GAP must raise awareness at global, national, subnational and local levels about the different impacts of the climate crisis on people of different genders. To this end, it must define concrete actions.

2.8. Civil society involvement in the negotiations

- [43] The FRDO-CFDD calls for guaranteed access to the negotiations for all Parties and observers, with particular attention to improving the representation of women's organisations, LGBTQI+ persons and marginalised groups.⁵⁵
- [44] In this context, the FRDO-CFDD particularly appreciates the opportunity for representatives of civil society to attend the coordination meetings of the Belgian delegation during the COPs, as well as the opportunity to exchange views with the Minister responsible for climate during a round table discussion prior to the COP.

⁵¹ See: *(text only in NL and FR)* Rechtvaardige transitie: kaderadvies, 2023a07, 10/10/2023, § [21].

⁵² International Labour Conference – 111th Session, 2023, Records of proceedings, § 8.

⁵³ International Labour Conference – 111th Session, 2023, Records of proceedings, § 17.

⁵⁴ See: <https://unsdg.un.org/2030-agenda/universal-values/leave-no-one-behind>

⁵⁵ Cf. Own-initiative opinion in preparation for the United Nations Climate Change Conference (COP 29), op. cit., § [28].