



LATIN AMERICA AND CARIBBEAN NDCs: Recommendations for decision-makers

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FOREWORD

FROM AMBITION TO IMPLEMENTATION

The LAC region has a good record in submitting revised NDCs and in increasing their climate ambition. But there are critical exceptions – and all governments must now put their plans into practice and more clearly make the links between protecting climate, nature and people.

The Latin America and the Caribbean region is a good example of the threat posed by climate change and the opportunities that aggressive climate action offers, being a vulnerable and biodiversity-rich region. Many governments have stepped forward with ambitious climate plans – but now they must turn those plans into action. And the ones who are yet to do so must follow suit. The region must appreciate that a new global economic system, framed by climate considerations, is starting to form. Not to consider this is to jeopardize the region's future development.

WWF has assessed 15 of these plans - known as Nationally Determined Contributions, or ('NDCs'), which set out countries' emissions reduction goals as part of the Paris Agreement process. In assessing these submissions, we thought about what ambition looks like, and we wanted to look beyond emissions targets, vital as they are. There are other crucial elements of countries' climate plans: how they enable adaptation to inevitable impacts; how they contribute to sustainable development and a green recovery; whether they are inclusive; how they allow progress to be tracked...

Overall, governments across the region have made good progress in increasing the climate ambition contained in these plans, the first versions of which were drawn up in 2015, ahead of the Paris climate talks. We have categorized five of them (Colombia, Suriname, Dominican Republic, Panama and Costa Rica) as "NDCs we want".

There are two notable exceptions to this positive story. Brazil and Mexico have not raised ambition compared with their earlier NDCs and could even meet their targets while also emitting more carbon due to methodological issues. It is especially discouraging that these are the two largest economies in the region; they should be leading by example.

Yet even for those countries who have drawn up commendable NDCs, this is just the latest step on a long journey. There is no time to lose in moving from ambition to implementation.

The targets in these NDCs will not be met without a whole-of-government – indeed a whole-of-society – effort. Legislation must be enacted. Regulations must be drafted. Ministries must be properly resourced. And civil society, the private sector, local government and academia, must all be mobilized to deliver these NDCs. Participatory governance structures must be strengthened where they already exist or put in place where they do not.

Doing so promises numerous benefits above and beyond climate protection. Most importantly, well-designed climate action can help create jobs and provide economic growth. It can promote public health in urban areas, by reducing pollution. And, critically in Latin America and the Caribbean, it offers the potential of protecting some of the most biodiverse ecosystems on the planet, such as the Amazon rainforest.

Several Latin American and Caribbean countries in the region are already making a positive start to this journey - recognizing the potential to link climate action with economic recovery from the pandemic. Some are making the connections between protecting nature, mitigating climate change and creating jobs. These elements are vital and timely. An opportunity exists - that we all must exploit - to use climate action to drive systemic change, address inequalities, delivering a green recovery and protecting nature.

In this crucial year for climate action, many governments in Latin America and the Caribbean have stepped up with credible, ambitious NDCs. But neither the work, nor the scrutiny, stops here. They must put these plans into practice, and begin to deliver the carbon reductions, social benefits and protection of nature that we need to see. We hope that the lessons shared in this report will help them on this task of fundamental importance to the planet.

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Manuel Pulgar-Vidal WWF Global Lead Climate & Energy

CONTEXT

The Latin American and Caribbean (LAC) region encompasses a wide range of ecological systems, including globally significant ones such as the Amazon rainforest.

The region is increasingly experiencing extreme weather events such as Hurricane lota in November 2020 which caused serious damage in Nicaragua and Honduras and devastated Colombia's Caribbean islands, destroying nearly all the infrastructure on Providencia and causing severe damage to San Andrés and Santa Catalina. The frequency and magnitude of these types of events will only increase as temperature rises. Extreme weather events and the wider impacts of climate change jeopardize the social and economic gains that have already been achieved - with COVID-19 exacerbating the challenges in the region. In addition, the region faces political fragmentation and equity gaps.

Countries in the region have already taken steps to address climate change including, for example, through protection of forests, building multi-sector coalitions and kick-starting the energy transition. The submission of updated National Determined Contributions (NDCs) to the United Nations Framework Convention on Climate Change (UNFCCC) brings an opportunity for all countries to increase ambition and show progress in other areas, such as adaptation, contributing to sustainable development, participation and inclusiveness and transparent systems to track progress. However, the findings of the 2021 NDC Synthesis Report shows that although individual countries have mostly increased mitigation targets, overall it falls far short of what the science says we need to keep the rise in global temperature to 1.5 °C. Countries should submit their new or enhanced NDC ahead of COP 26, ideally by 30 July so they can feed into the UNFCCC final NDC Synthesis Report.

In an effort to foster NDC enhancement, WWF has developed the **#NDCsWeWant Checklist** to benchmark updated NDCs submitted in 2020/21 against five areas: i) ambition (in mitigation, adaptation and finance), ii) fostering systemic change, iii) inclusiveness and participation in the NDC design process, iv) contribution to sustainable development, and v) systems for tracking progress. Using the Checklist enables WWF to hold countries accountable and to shine a light on the main advances and challenges towards implementation of the Paris Agreement. The checklist is also used to open conversations with governments on how to improve NDCs – to lay foundations for a proper long-term response to the climate crisis. WWF also provides resources to support enhancing NDCs in several areas.

With COP26 postponed until November 2021, countries have been given a greater window to reflect on their ambition and propose stronger targets and measures. There is still opportunity for all LAC countries to reflect on regional progress, COVID-19 recovery plans, and apply lessons learned to further develop their own NDC commitments ahead of COP26.



By December 2020, 15 LAC countries had submitted new or updated NDCs. Five are categorized by WWF as NDCs We Want (Dominican Republic, Colombia, Panama, Costa Rica and Suriname), 4 have a Short Way to Go (Argentina, Chile, Ecuador and Jamaica), 4 are rated as Some Way to Go (Cuba, Peru, Grenada and Nicaragua), 1 (Mexico) has a Long Way to go and 1 is an NDC We Don't Want (Brazil). With the exception of Brazil, even where the NDCs do not meet WWF's criteria for #NDCsWeWant there is usually one or more elements in each of the NDCs showing progress across the region.

LESSONS FROM THE LAC REGION

1. Ambition

MITIGATION



LESSONS

Most countries in the region have increased their mitigation targets in their latest NDCs, through, for example, moving from intensity to absolute targets as in Chile or increases in the percentage reductions, as in Peru. Both Jamaica and Colombia have approximately doubled previous NDC commitments. If it implemented all the planned policies, Chile could peak emissions in 2023 rather than the proposed year of 2025 - which would make it a frontrunner on climate action according to the Climate Action Tracker (CAT). In contrast, the two largest economies in the region (Brazil and Mexico) have not made enhanced commitments. While Brazil's 2030 indicative target has been converted into a definitive one, a change in base year emissions means that it could emit an additional 500 MtCO2e by 2025 and 400 MtCO2e by 2030 and still meet its target. The weakening of the NDC has been opposed by civil society, and six young climate activists are suing the government to present a really enhanced NDC compared to the previous one to comply with the Paris Agreement. Ambition in Mexico is effectively reduced as it has the same percentage target but on a higher business as usual baseline leading to higher overall emissions in 2030. In addition, the peaking year of 2026 is no longer mentioned.

Of the few NDCs in the region that have been analyzed by the Climate Action Tracker, Costa Rica is the most ambitious, although not aligned with 1.5°C; according to them, it is one of the few countries in the world to align to 2°C.

Chile and Costa Rica have committed to carbon neutrality by 2050, while other countries such as Peru and Colombia mention that national strategies towards 2050 are being developed. Only a few countries have developed a plan to reach carbon neutrality, including Costa Rica who submitted their National Decarbonization Plan (2018-2050) to the UNFCCC in 2019.

RECOMMENDATIONS

- Countries with larger economies and therefore greater emissions and capacity should enhance ambition by setting stronger economy-wide absolute targets.
- Countries with either an aspiration for net zero or no net zero ambition should start (and report on) the steps towards developing a long-term net-zero strategy aiming to set targets as soon as possible.
- Countries with a net zero target should develop short term implementation plans to set them on the right path to this goal and avoid risks such as stranded assets.
- Countries that intend to rely on Article 6 transactions in particular should set a carbon budget aligned with 1.5°C, otherwise the environmental integrity of those transactions is damaged. To be able to reach 1.5°C it is very important that there is no double counting of emissions reductions through Article 6 transactions.

ADAPTATION



LESSONS

Adaptation is particularly important in a region as vulnerable to climate change impacts as LAC and it is therefore positive that most NDCs have been enhanced in this area. The only country not to mention adaptation in its updated NDC is Brazil, although the previous NDC had mentioned it. Although mitigation is the central piece of NDCs, presenting clear goals and priority areas for adaptation is important as most actions and measures have co-benefits for mitigation and also for getting financial support.

Most countries have set out clear goals and/or priority areas for adaptation, such as Cuba, which prioritizes measures for adaptation, with particular attention to coastal zones. In several countries, this is complemented by specific targets and/or actions. Mexico, for example, presents 27 lines of action

across five general themes and incorporates cross-cutting elements such as nature-based solutions, Community-Based Adaptation, Ecosystem-Based Adaptation as well as Disaster Risk Reduction based Adaptation.

National Adaptation Plans (NAPs) (or similar plans) have been or are being developed in most countries but are not in place in Nicaragua, despite being mentioned in the original NDC submission.

RECOMMENDATION

Where not in place, NAPs (or similarly concrete plans) should be developed as a priority to turn goals
established in NDCs into concrete actions and targets.

FINANCE



LESSONS

With very few exceptions, the NDCs do not state the national resources allocated to implementation, nor estimate the total financial needs, making this one of the main gaps in the NDCs in this region. One of the exceptions is the NDC from the Dominican Republic, which provides estimated costs for adaptation and mitigation measures and also commits to tracking public spending on climate change. In recognition of this gap, a few countries either state that it is a priority to develop these estimates or set out the type of financial mechanisms which will be used without detailing totals.

Several countries have either moved from commitments that depend on international financing (conditional targets) to ones that are fully or to some extent unconditional (e.g. Argentina, Chile, Colombia), or expanded the unconditional components (e.g. Jamaica and Suriname). Countries like Colombia have stated that their NDC commitments are unconditional, however, they will proactively seek to increase international support to mobilize action to meet their ambitious goals. In the 2015 NDC for Brazil, it was stated that its implementation was not contingent on international support. This statement has now been removed, leading to doubts about whether it is conditional or not.

Only one country (Suriname) sets out the financing needed for conditional targets, estimating costs and giving implementation details, including duration and location of projects, objectives and types of finance expected. In the other countries even the rationale for the conditional targets is missing, which is a key element in developing strong asks for financial support to donor countries and institutions.

RECOMMENDATIONS

- Countries should complete the steps needed to identify financial needs. Credibility of the targets will be significantly increased when the needed finance is estimated and commitments of national resources made.
- · Countries should plan to move from conditional to unconditional targets.
- Countries with conditional targets should set out clear and actionable needs for international finance

 how much is needed, what type and what will it achieve to enable finance from private sources of
 funding, and multilateral and bilateral donors.



2. Fostering systemic change

LESSONS

Most countries have expanded the sectoral coverage of their NDCs, but of the 6 largest economies in the region only Colombia reports specific sectoral targets. Sectoral targets are key for NDC credibility, for monitoring implementation and for transparency. The importance of the land sector is recognized with specific targets or activities for land use in most countries. Suriname commits to maintaining 93% of its forest cover (conditional on international finance) and increasing protected areas. Mexico includes a wide range of measures in this sector including promotion of agroforestry systems, sustainable treatment of livestock residues and a strategy towards net-zero deforestation.

Health and education are mentioned as important structural sectors in most countries, with other sectors such as tourism (e.g. Dominican Republic and Costa Rica) and food security mentioned in others (e.g. Grenada).

There is a commitment to a just transition in Chile, Colombia, Costa Rica and Suriname, with Colombia also addressing the impact of COVID-19. Most others mention social policies on equity more generally.

RECOMMENDATIONS

- Sectoral targets are key for implementation, monitoring, credibility, predictability and for transparency. Countries should make efforts to include them in their NDCs.
- Larger economies in particular should ensure that there are quantitative targets and plans in place for all sectors. Lower income countries should expand the number of sectors covered by sectoral targets as a step towards an economy wide target.
- Social policies to address equity and just transition issues should be put in place in the few countries where they are absent to protect vulnerable parts of the population.



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3. Inclusiveness and participation

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LESSONS

A broad participatory process was described in all but the Brazil and Cuba NDCs and there are examples of good practice in several countries such as Chile, Ecuador, Panama and Colombia (see Case Study). However, details are often not provided of how information was disclosed and how the inputs received were incorporated into the NDC. This is particularly important in the context of transparency, trust-building and ownership of the plan. Exceptions to this include Costa Rica who reached out to vulnerable groups not normally consulted, including amongst others, Afro-descendants, transsexuals, indigenous peoples and elderly people and also presented details on how information was disclosed and on the contributions were received. The Indigenous Platform for Climate Change gives indigenous communities in Peru a voice with policymakers.

Participatory governance structures are described in most NDCs. The exceptions are Brazil, Cuba and Jamaica, where either the governance structure is not described or it is not clear how broad participation is ensured.

RECOMMENDATIONS

- The few remaining countries without one should put in place a participatory and inclusive process to make sure all stakeholders have a say in the NDC design and implementation.
- For transparency, the processes on sharing drafts and on incorporating feedback should be described in the NDCs.
- Those countries that have not already developed participatory governance structures should do so to
 ensure meaningful engagement of subnational governments and non-state actors.



4. Contribution to sustainable development

LESSONS

Only Brazil and Cuba have not made clear links to SDGs. In many of the countries, both the general link and specific links between actions/targets and SDGs are made. Chile described clearly the correlation between commitments and SDGs. Most often the link is made between adaptation and the SDGs, but also with mitigation in some countries.

Given the importance of land use and agriculture for most of the countries in the region it would be expected that nature-based solutions (NbS) could make a significant contribution. This is recognized by most countries but in Brazil and Grenada this area has not been strengthened compared to the previous NDCs. Argentina mentions ecosystem-based adaptation but does not present targets or metrics for assessing their contribution. The most common targets presented are for forest protection or restoration but several countries also present similar quantitative targets in other biomes such as oceans and water basins. In Ecuador, the REDD+ Action Plan "Forests for Good Living" 2016-2025 not only helps protect forests but also supports rural and indigenous communities to improve their livelihoods. In 2019, Ecuador became one of the first countries to receive international support for REDD+ results-based financing

receiving \$18.5 million from the Green Climate Fund. Chile includes climate change in the management of marine protected areas. The Rapa Nui protected area (roughly the size of mainland Chile) around Easter Island prohibits industrial fishing and mining but traditional fishing is permitted. It is one of the few protected areas where indigenous people voted to establish the boundaries and level of protection.

RECOMMENDATIONS

- Where not included, countries should make the link between specific climate change actions and achievement of SDGs to help ensure alignment with broader development strategies and national targets.
- Those countries that have not already done so should explore all ecosystem types that can provide climate benefits, including oceans as appropriate, and include what technical and financial support is needed to achieve results. Useful framing resources are available from WWF.
- The contribution of NbS to both mitigation and adaptation should be recognized by defining measurable targets, including ocean and coastal activities.



5. Tracking progress

LESSONS

There is a mixed picture on whether countries have a transparent national system to track implementation, with a roughly equal split in number of countries between a system in place, a commitment to create such a system and no concrete information. Countries including Panama and Ecuador express intent to develop a tracking system while Colombia will report in the Biennial Transparency Reports monitoring indicators for both GHG emissions and GHG emission reductions. The Dominican Republic has established a national system for monitoring, reporting and verification developed with the support of the Initiative for Climate Action Transparency, including institutional architecture to track financing.

RECOMMENDATION

Those countries without a national system or concrete plans to develop one should address
this lack as a matter of priority. Tracking progress is an important process for building
credibility, allowing course correction if needed and avoiding unintended consequences.



6. The opportunity for green recovery

Several LAC countries have already recognized the opportunity to align economic recovery from COVID-19 with climate related activities as a way to achieve both faster economic recovery and protection of the environment - known as Green Recovery. However, more efforts need to be made to align the NDC revision with the post-COVID economic recovery packages. Opportunities for reducing emissions and improving air quality for example by promoting clean transportation through actions such as expanding Bus Rapid Transit systems also bring economic benefits. Responding to the pandemic, Costa Rica launched a bioeconomy strategy to support jobs and livelihoods, while the sustainable use and rehabilitation of nature are ensured in the face of climate change. Foreseen actions include sustainable use of biodiversity and bio-tourism in biological corridors.

Peru recognized the importance of "efforts to achieve economic reactivation and a transition to a more sustainable and greener economy¹" when developing their NDC. Colombia also recently approved the National Recovery Policy which establishes the policy and materializes an investment plan for more than US\$135 billion. The strategy is made up of 33 lines of work and 141 specific actions, which seek to consolidate processes such as energy transformation, the bioeconomy and the circular economy, with plans such as the mitigation of the increase in poverty, the economic vulnerability of households and the decumulation of human capital.

Other countries have begun recovery efforts although not all are aligned well with a low carbon transition. Argentina for example aims to protect the oil and gas industry from collapsing prices and demand. Pursuing such alignment should be a key priority for the region. This is an opportunity to bring about a just and green transition towards environmentally and socially sustainable economies that generate new sources of jobs, equity and social inclusion, while halting and reversing biodiversity loss and tackling climate change.

RECOMMENDATIONS FOR GOVERNMENTS TO SET THE RIGHT CONDITIONS FOR GREEN RECOVERY BY:

- Facilitating and incentivizing investment to maximize environmental and social benefits for example by increasing the use of renewable energy and strengthening the role of energy efficiency policies in industry recovery plans.
- Spurring investments in sector transformations in areas such as urban transport to address climate change and reduce inequality and vulnerability of populations.
- Stopping deforestation, while ensuring the rights and livelihoods of local indigenous territories.
- Generating opportunities through the conservation and sustainable use of biodiversity, including naturebased solutions such as conservation and recovery of mangroves or increasing community-managed forest areas to address social and economic issues.



Source: Gabriel Guijandria, Ministry of Environment Peru in Peru CAEP Spotlight video NDC Partnership

CASE STUDY Inclusiveness and participation in colombia

Inclusiveness and Participation has been a strong component in LAC NDCs. In Ecuador there was a pioneering approach to gender mainstreaming, supported by UNDP and UN Women. In Panama, public hearings were held, with a focus on gender equity, presence of minority groups, young and elderly people, literate and illiterate people. Below we highlight the Colombian NDC lessons and challenges in conducting an inclusive and participatory process. The NDC recognized key elements: differential ethnic, gender and human rights approach, the importance of just transition, the articulation between territorial and sectoral goals and the contribution of the private sector.

COLOMBIA'S NDC

OVERVIEW

The Government of Colombia officially submitted its Nationally Determined Contribution (NDC) on 29 December 2020, pledging to reduce its greenhouse gas emissions by 51% by 2030 compared to the projected baseline and promising accelerated sustainable and resilient development. That made Colombia the only developing country in the "50% plus club" of climate leaders, together with the UK, EU, Norway and the US.

Colombia's 2030 goal is accompanied by more than 30 mitigation and adaptation measures to make it a reality. The commitment of 51% is aligned with the Long-Term Strategy (E2050), which seeks that, by 2050, Colombia will have achieved a carbon-neutral development (when its emissions are offset and neutralized through carbon capture and storage strategies).

Like most Latin American countries, Colombia is a diverse country in terms of nature and culture. According to the National Administrative Department of Statistics (DANE) in 2018 in Colombia, 4.4% (1,905,617) of the population recognized themselves as indigenous, while 9.34% (4,671,160) belonged to the Afro-Colombian and Raizal Palenquera - NARP community. With 32 regional departments plus the capital district of Bogota, the country ranks second worldwide in biodiversity (IDEAM, 2018).

Colombia contributes to 0.57% of global GHG emissions (IDEAM, 2018), however, it is highly vulnerable to the impacts of climate change. The Third National Communication on Climate Change (TCNCC) warned that the entire Colombian territory has some level of threat to climate change impacts and that 56% of the departments are in the very high threat category, mainly in the Andean and Caribbean regions. In terms of vulnerability, 13% of the departments are in the very high category, mainly in the departments located in the Colombian Amazon along with San Andrés, Providencia and Santa Catalina, regions in which a large part of the ethnic communities are located.

WWF ASSESSMENT

Though applying the NDCs We Want Checklist and taking into account that Colombia is a vulnerable middle-income country with relatively low emissions, WWF considers this as one of the most ambitious NDCs in Latin America so far - **an NDC We Want**. One particular aspect of the Colombian NDC development of note was the collective and participatory process applied by the Government, supported by WWF, to ensure diverse contributions to national target setting on climate ambition.

PARTICIPATORY APPROACHES

Throughout the NDC development process, the Government provided several participation spaces for inputs from experts from public and private entities, academia, and civil society aiming to leverage national expertise and views to prioritize mitigation measures. This process adopted multi-cultural and gender-based approaches to facilitate participation across these groups; and its outcomes informed the final Colombia NDC submission to the UNFCCC, and national targets on climate ambition. The process combined top-down (considering macroeconomic projections and official national data) and bottom-up up information gathering and analysis (with decentralized leadership between sectors and territories of mitigation and adaptation measures, coordinated with and aggregated at the national level) to generate an innovative process with a differentiated focused on gender, ethnicity, generation and territory.

Participatory approaches integrated multiple efforts and plans at the national, regional and local levels, such as the Comprehensive Climate Change Management Plans (PIGCC), sectorial and territorial, the Comprehensive Strategy for Deforestation Control and Forest Management (EDGB), the Colombian Strategy Low Carbon Development (ECDBC), and the National Adaptation Plan (PNACC), among others. Multiple participation mechanisms were implemented, such as expert surveys; public consultation; dialogue with communities; and workshops with the members of the nine Regional Climate Change Nodes in the country. Through the Climate Promise Initiative and in partnership with UNDP, for example, the Government participated in dialogues

WW P's NDC rating grades	WWF checklist for Colombia's 2020 NDC assessment
🕢 NDC We Want	litzan .
🕕 Short Way to Go	Photo:
🖉 Some Way to Go	Fainting sprins datage
🚫 Long Way to Go	Interior al Religion
NDC We Don't Want	Larrier v Schilde Griegenit
	Colonita's rating grade after assessments: 🙆 person

with women and youth groups focused on mobilizing the priorities of climate actions, incorporating outputs into the NDC process.

Both expert and public consultation delivered support for stronger climate ambition in national targets and discussion on the role of international cooperation. Further, this process reinforced the importance of integrating cross-cutting opportunities such as human rights, just transition and gender equality across NDCs and national climate planning.

As an active member of Colombian civil society, WWF supported the participatory process, working with the national Ministry of Environment and Sustainable Development and the World Bank in the 'Participation and Communication Strategy for the NDC update process'. The aim of this process was to strengthen the inclusivity of different actors and groups in the consultative process. To this, communicating the NDC technical information to different groups in clear, simple and understandable ways was a key factor-focusing our efforts in supporting those in ethnic and rural communities. To facilitate the effective participation of citizens, various targeted communication pieces on the NDC process were designed for different groups of actors. This facilitated a multicultural and gender-based approach, tailored to the level of knowledge and information needs of stakeholders. Among the tools used were videos, graphic pieces on social media and other media and live streaming on the content and process of the NDC update.

CONCLUSION

Article 12 of the Paris Agreement stresses the importance of improved public participation and access to information in the context of national target setting. Effective and meaningful participation in the NDC process is critical to ensure that national pledges respect the rights of communities and contributes to social improvements in gender equality and social justice. This also aligns public support for climate measures and thus delivers stronger national targets for emissions reduction and improving climate resilience.

The Climate Action Network International, of which WWF is a member, points out a need to clearly carve out inclusive, transparent and binding participatory processes that enable marginalized and less-represented groups to make their voices heard. This will bring forward solutions that address the main concerns and challenges of those affected by climate change and provide real solutions that have the potential for a successful implementation at the local level. In this current cycle of NDC enhancement, Colombia is one of a number of countries in Latin America that lead the field globally in ensuring participation in NDC development: Chile, Costa Rica, Ecuador, Grenada and Panama, among others, have all pushed the boundaries in promoting participation, and all scored highly against WWF's NDCs We Want Checklist.

Civil society, subnational governments and other stakeholders need to be fully engaged in developing and defining climate change policies that will affect and be implemented by them. Public participation needs to be ongoing and meaningful, throughout NDC development and implementation and go beyond the mere attendance and presence at workshops. We hope LAC countries can follow the good practice in this region so far and in our #NDCsWeWant analyses.

17 LAC Countries must still submit NDCs

There are 33 LAC countries in total. Of these, we have assessed 15 of the 16 submitted NDCs (WWF's assessment of St Lucia's NDC pending)





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