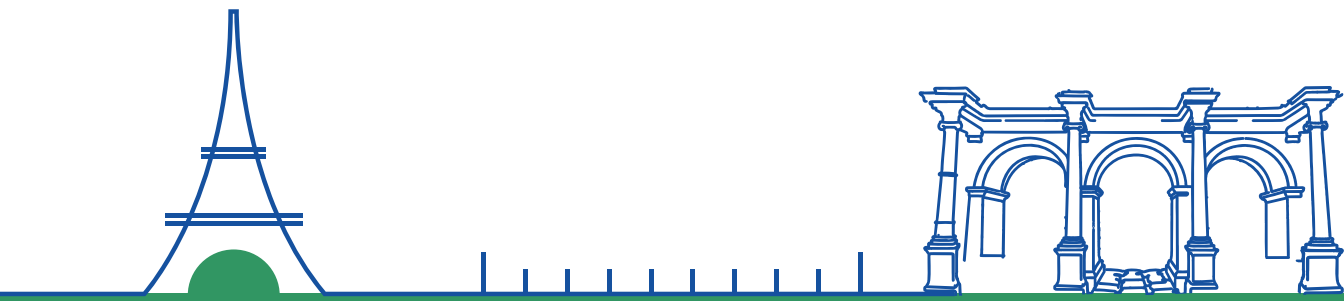
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COP31



PEOPLE LED POLICY

BANGLADESH POSITION @ COP 31

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Executive Summary

A decade after the Paris Agreement, the climate regime has an implementation problem. While the architecture is largely in place with successive NDCs, the Paris Rulebook, the Enhanced Transparency Framework, the Global Stocktake, the Global Goal on Adaptation and the Fund for Responding to Loss and Damage, yet emissions remain too high, adaptation is underfunded, Loss and Damage is escalating, and access to finance, technology and capacity remains deeply unequal. COP31 must therefore turn climate commitments into delivery and make implementation the measure of climate leadership.

For Bangladesh, this means matching domestic ambition with international responsibility. Contributing less than 0.5% of global greenhouse gas emissions and approaching LDC graduation, Bangladesh must strengthen resilience and pursue a just low-carbon transition while securing the means to deliver it.

NDC 3.0 commits Bangladesh to a 20.31% reduction in projected BAU emissions by 2035: 26.74 $MtCO_2e$ through unconditional action and a further 58.23 $MtCO_2e$ conditional on international support. The estimated USD 90.23 billion international support requirement is therefore more than a financing figure. It is a test of whether the international climate bargain is credible.

COP31 should strengthen that bargain through adequate, predictable, accessible, and equitable climate finance, prioritising grants, and highly concessional resources, alongside technology transfer and capacity support. Finance must reach implementation, not remain locked in plans and pledges. Bangladesh's National Adaptation Plan should translate into locally led adaptation, resilient water and WASH systems, infrastructure, livelihoods, health, and ecosystems.

The same principle must apply to Loss and Damage. The Fund for Responding to Loss and Damage (FRLD) should become accessible to affected communities through simplified procedures, small-grant mechanisms, safeguards, and accountability, including support for displacement, climate mobility, and non-economic losses.

Bangladesh's low-carbon transition must also be just. Energy security, green industrialisation, and decent green jobs should advance without shifting costs onto workers, farmers, low-income consumers, or climate-vulnerable communities. A just transition must ask not only how much emissions are reduced, but who benefits, who bears the costs and who has a voice.

Finally, climate implementation must be rooted in rights, participation, and equity. Women, youth, persons with disabilities and marginalised communities must be recognised as rights-holders, knowledge-holders, and decision-makers, with meaningful participation and accessible pathways to climate finance. Gender-transformative, disability-inclusive, and socially inclusive approaches must be embedded across climate action, not added as afterthoughts.

COP31 should not produce another layer of commitments without delivery. It should close the gap between ambition and implementation. For Bangladesh, which means turning NDC 3.0 into action, securing the international support required to do so, and ensuring that the communities facing the greatest climate risks have the resources and power to shape their future.

Introduction

A decade after the Paris Agreement, the global climate regime stands at a critical juncture. The challenge is no longer the absence of commitments or frameworks but the persistent gap between what governments have promised and what people are experiencing.

As countries prepare for COP31 in Antalya, Türkiye, the call from Bangladeshi civil society is clear: **implementation must become the measure of climate leadership.** Global commitments must translate into national action, national plans into local delivery, and climate finance into tangible improvements in people's lives.
For the third consecutive year, 34 leading Bangladeshi civil society organisations, academic institutions and youth networks have come together to articulate a collective position for COP. Representing organisations working with communities on the frontline of climate change, this paper brings together evidence, lived experience and policy analysis to inform Bangladesh's national negotiating position.
Bangladesh contributes less than 0.5% of global greenhouse gas emissions, yet faces intensifying climate risks across its coasts, rivers, cities, agricultural systems and communities. As the country approaches LDC graduation, it must simultaneously protect development gains, strengthen resilience, pursue a fair low-carbon transition and respond to mounting climate impacts. The question is not whether Bangladesh will act, but whether it will have the resources, technology, capacity and policy space to act at the scale required.

This Position Paper is intended to be practical and strategic. It seeks to influence government decision-making, strengthen Bangladesh's negotiating leverage and equip the official delegation with evidence-based positions and actionable demands for COP31. It also reflects a wider civil society expectation: that Bangladesh's climate diplomacy should be grounded in the realities of the people and communities whose lives are already being reshaped by climate change.

The paper addresses a set of interconnected priorities: the lessons of a decade of the Paris Agreement; implementation of NDC 3.0 and climate finance; Just Energy Transition; methane reduction, zero waste and green industrialisation; agroecology and resilient food systems; Bay of Bengal and ocean governance; urban and health resilience; meaningful youth engagement; children centred climate action and education; climate-resilient WASH; Loss and Damage; Locally Led Adaptation; and gender-transformative climate justice.
These are not isolated policy agendas. They are connected by a common demand for climate governance that is effective, equitable and accountable.

At its core, this paper asks a simple question:
What will it take to move Bangladesh from climate vulnerability to climate resilience and ensure that those most affected have the resources, rights and power to shape that transition?

COP31 should be a moment to answer that question through action, not another promise.

Ten Years of the Paris Agreement: Where Are We NOW?

Background

The Paris Agreement, adopted in 2015 under the UNFCCC, established a global framework to address climate change. Its core objectives are to keep warming well below 2°C while pursuing efforts to limit it to 1.5°C, strengthen climate resilience and adaptation, and align financial flows with low-emission and climate-resilient development (UNFCCC, 2015).

Over the past decade, the Agreement has developed an extensive implementation architecture through National Adaptation Plan (NAP), Nationally Determined Contributions (NDCs), five-year review cycles, the Enhanced Transparency Framework and the Global Stocktake. The first Global Stocktake,which concluded in 2023, confirmed that collective progress remains insufficient to meet the Paris goals (UNFCCC, 2023a). While significant institutions and mechanisms have been established, major gaps remain in emissions reduction, adaptation, finance, loss and damage, technology and implementation capacity (UNEP, 2025a).

This ten-year review assesses progress and remaining gaps across the Paris Agreement's 29 Articles and six major implementation building blocks, followed by cross-cutting gaps and Bangladesh civil-society priorities for COP31.

Clauses of the Paris Agreement

The Paris Agreement contains 29 Articles covering climate goals, mitigation, adaptation, loss and damage, finance, technology transfer, capacity-building, transparency, global stocktaking, implementation and compliance, institutional arrangements and public participation.

Over ten years, these provisions have evolved into an operational global climate regime. Key achievements include successive NDC cycles, completion of the Paris Rulebook, operationalisation of Article 6, the Global Goal on Adaptation framework, establishment of the Fund for Responding to Loss and Damage, strengthened climate-finance arrangements, the Enhanced Transparency Framework and the first Global Stocktake. However, implementation remains inadequate: emissions continue to rise, finance and support remain insufficient, and current commitments are not aligned with the 1.5°C pathway. The next decade must therefore focus on implementation, adequate support, equity and measurable results.

Major Building Blocks of the Paris Agreement: Progress to Date

The Paris Agreement consists of interconnected building blocks covering mitigation, adaptation, climate finance, loss and damage, technology development and transfer, and capacity-building. Together, these pillars are intended to enable stronger climate action while supporting vulnerable developing countries.

Mitigation

Mitigation aims to limit global warming by reducing greenhouse gas emissions. The Paris Agreement established the temperature goal and a framework for progressively strengthening NDCs (UNFCCC, 2015, Article 2).

Since 2015, important developments include the Paris Rulebook, successive NDC cycles, the COP28 call to triple renewable energy capacity and transition away from fossil fuels, and the operationalisation of Article 6 carbon markets. However, the implementation gap remains substantial. Global greenhouse gas emissions reached approximately 57.7 $GtCO_2e$ in 2024, while

current policies and commitments remain inconsistent with pathways compatible with 1.5°C (UNEP, 2025a). Faster and deeper emissions reductions are therefore required.

Adaptation
Article 7 establishes adaptation as a core component of the Paris Agreement and sets the Global Goal on Adaptation (GGA) to enhance adaptive capacity, strengthen resilience and reduce vulnerability (UNFCCC, 2015).

Progress includes accelerated National Adaptation Plan (NAP) development and the establishment of the UAE Framework for Global Climate Resilience. However, adaptation finance remains far below developing-country needs. International public adaptation finance was approximately USD 25.9 billion in 2023, leaving a substantial financing gap (OECD, 2024; UNEP, 2025). Strengthening locally led, measurable and adequately financed adaptation therefore remains essential.

Loss and Damage
Climate impacts create both economic and non-economic losses, including displacement, health impacts, cultural loss and damage to livelihoods. These impacts are particularly significant for highly vulnerable, low-emitting countries such as Bangladesh.

Bangladesh contributes less than 0.5% of global greenhouse gas emissions, yet climate impacts impose significant economic and social costs. The World Bank estimates that up to 13.3 million people could become internal climate migrants in Bangladesh by 2050 under climate-related scenarios (World Bank, 2021).

The establishment and operationalisation of the Fund for Responding to Loss and Damage (FRLD) represents an important institutional development. Definitional issues of loss and damage still persists, creating an ambiguity. However, predictable and adequate finance, attention to non-economic losses and long-term support for climate displaced people remain major gaps. Bangladesh's NDC 3.0 therefore identifies loss and damage as an important climate-justice priority.

Climate Finance
Article 9 establishes developed-country leadership in providing and mobilising climate finance for developing countries, including support for mitigation and adaptation (UNFCCC, 2015).

The earlier USD 100 billion annual finance goal was exceeded for the first time in 2022, reaching USD 115.9 billion—two years after the 2020 deadline (OECD, 2024). At COP29, Parties agreed on a New Collective Quantified Goal (NCQG) of at least USD 300 billion annually by 2035, with efforts to scale total climate finance from public and private sources to USD 1.3 trillion annually by 2035 (UNFCCC, 2024).

However, these figures remain below estimated developing-country requirements. Developing-country costed NDC needs are estimated at USD 455–584 billion annually to 2030, while adaptation needs are estimated at USD 215–387 billion annually (UNFCCC, 2024). The key challenge is therefore not only mobilisation, but also accessibility, concessionally, predictability and equitable distribution of finance.

Technology Development and Transfer
Article 10 recognises technology development and transfer as essential for mitigation and adaptation and established the Technology Mechanism to support international cooperation (UNFCCC, 2015).

The Technology Mechanism has expanded through the work of the Technology Executive Committee (TEC) and Climate Technology Centre and Network (CTCN). By 2024, the CTCN had supported more than 300 technical-assistance projects in 112 developing countries, working with a network of more than 760 partner organisations (UNEP, 2024).
Despite this progress, technology transfer remains difficult to measure because the Paris Agreement does not establish a numerical target. Developing countries continue to face barriers related to finance, access, intellectual property, institutional capacity and technology readiness. Better tracking of technology needs and actual transfer is therefore required.

Capacity-Building
Article 11 aims to strengthen developing countries' capacity to implement mitigation and adaptation, access climate finance, deploy technology and meet transparency requirements (UNFCCC, 2015).

Since 2016, the Paris Committee on Capacity-building (PCCB) has implemented successive workplans, supported knowledge exchange and strengthened coordination, while the Capacity-building Initiative for Transparency (CBIT) has helped developing countries improve their transparency systems.

However, capacity-building remains difficult to measure because there is no common framework for assessing actual institutional and technical capacity gains. The PCCB's 2024 review also identified continuing challenges related to coordination and duplication (UNFCCC, 2024).

Capacity-building should also extend beyond institutions to children, teachers, schools and communities. Climate change is increasingly disrupting education through heatwaves, floods, cyclones, displacement and damage to school infrastructure. Building climate resilience therefore requires climate education, teacher capacity, climate-informed curricula, disaster preparedness and opportunities for meaningful child participation.

For developing countries and LDCs, future capacity-building should focus on measurable institutional and technical outcomes, climate-resilient education systems, and sustained learning and knowledge-sharing mechanisms. This includes strengthening national education–climate coordination, integrating children and young people into climate planning, and promoting South–South knowledge exchange. Such an approach can help ensure that capacity-building contributes not only to stronger institutions, but also to children’s resilience, adaptive capacity and ability to participate in climate action.

CSO Position Towards Implementing Paris Agreement
Ten years of implementation of the Paris Agreement demonstrate that considerable progress has been made in establishing global rules, institutions and processes, but significant gaps remain between commitments and delivery. These gaps are particularly important for climate-vulnerable countries such as Bangladesh and other LDCs, where inadequate mitigation ambition, insufficient and debt-creating finance, limited access to adaptation and loss-and-damage resources, technology constraints, and weak institutional and local capacity directly affect people's lives and livelihoods. The following CSO Position Matrix translates these implementation gaps into priority advocacy positions across the six major building blocks of the Paris Agreement. It emphasizes climate justice, equity, adequate and grant-based finance, locally led action, direct access, technology and capacity development, and transparency and accountability, with the aim of ensuring that global climate commitments result in measurable benefits for vulnerable countries, communities and people.

Priority CSO position	Why this position? — gap, facts and figures
Mitigation	
The world must keep 1.5°C limit alive through faster and equitable emission reductions, particularly by major emitters.	Global GHG emissions reached about 57.7 $GtCO_2e$ in 2024, 2.3% higher than 2023. UN Environment Programme 2025 estimates warming of about 2.3–2.5°C with full implementation of available NDCs and 2.8°C under current policies. For a 1.5°C pathway, 2035 emissions would need to be around 55% below 2019 levels.
International support must enable ambitious mitigation in LDCs without creating additional debt.	Conditional support is a major mitigation gap: many developing-countries' NDC measures depend on finance, technology and capacity-building. High capital costs also make low-carbon transitions more difficult for developing countries.
Protect environmental integrity and national interests under Article 6 carbon markets.	Although Article 6 rules have become operational, the document identifies risks of double counting, weak additionality, permanence problems and inadequate safeguards.
Adaptation & GGA	
Establish substantially increased, predictable and primarily grant-based adaptation finance for LDCs and most vulnerable countries like Bangladesh.	By September 2025, 67 developing countries had submitted NAPs, while 144 countries had initiated or launched NAP processes. Yet UNEP concluded international public adaptation finance remained far below needs and that the Glasgow adaptation-finance doubling goal was off track.
Move from NAP preparation to large-scale NAP implementation.	A clear planning-to-implementation gap: adaptation planning has progressed considerably faster than implementation. Bangladesh already has 113 NAP interventions requiring implementation, and an estimated funding of 230 billion USD.

Make Locally Led Adaptation (LLA) a core financing approach and decentralise climate finance.	Resources often remain concentrated at national or intermediary level, although impacts and many solutions are local. It therefore calls for meaningful finance and decision-making to be devolved to local governments, communities and women-led organizations.
Make the Global Goal on Adaptation (GGA) measurable but nationally and locally relevant.	COP28 established seven thematic targets and four adaptation-cycle targets. COP30 subsequently adopted 59 Belém Adaptation Indicators. All governments including Bangladesh should operationalise the GGA indicators and revise existing NAPs as needed to incorporate GGA indicators.
Climate Finance	
Increase climate finance based on developing- countries' needs, while protecting developed-country obligations under Article 9.	The USD100bn goal was reached only in 2022—two years late—with USD115.9bn. COP29 established a goal of at least USD300bn annually by 2035, alongside efforts to scale all-source finance toward USD1.3tn annually by 2035. Developing-country NDC needs of USD455–584bn annually to 2030 and adaptation needs of USD215–387bn annually.
Measure the quality of climate finance, not merely its face value.	Of the USD115.9bn reported for 2022, USD91.6bn was public finance, USD21.9bn mobilised private finance and USD2.4bn export credits. The document highlights that loans and face-value accounting can obscure the actual financial burden on recipient countries.
Establish direct, simplified, predictable and multi-year climate-finance access for LDCs.	Complex procedures, co-financing requirements and project-by-project funding are barriers to long-term programmes.
Track how much climate finance actually reaches local people.	National aggregate finance figures can hide intermediaries and final beneficiaries. Therefore, local delivery and tracking are major gaps.

Loss & Damage	
Rapidly and predictably capitalise the FRLD at a scale responsive to actual loss and damage.	Only USD789m in cumulative FRLD is pledged by COP30, compared with USD250m allocated for its initial 2025–26 funding cycle, where estimated developing- countries' loss-and-damage needs is about USD395bn annually for 2025.
Loss-and-damage finance should be new, additional, grant-based, and not debt creating.	The FRLD has no formal quantitative funding target, while available resources remain tiny relative to estimated needs.
Establish simplified direct access and specific LDC/subnational windows.	The complex procedures can prevent vulnerable states and affected communities from accessing FRLD resources.
Recognise displacement, slow-onset impacts and non-economic loss.	Salinity, sea-level rise, ecosystems, culture, identity and social cohesion are difficult to quantify as losses. It also identifies insufficient long-term finance for displacement and livelihood reconstruction.
Technology Development & Transfer	
Make climate technologies affordable and accessible to LDCs through public and concessional finance.	High capital costs, licensing constraints and inadequate concessional finance are identified as barriers. Although technology institutions have expanded, the Paris Agreement has no numerical technology-delivery target.
Technology transfer must mean capability transfer and not simply equipment transfer.	The CTCN had supported more than 300 technical-assistance projects across 112 developing countries, linked with a network of more than 760 partner organisations, according to the document. Yet gaps remain in local manufacturing, skills, maintenance and infrastructure.

Invest in locally appropriate innovation, research and knowledge.	Imported technologies may not fit local social and ecological conditions always. Technology priorities identified in NDCs also vary considerably in detail and quantification.
Connect Technology Needs Assessments directly with climate finance.	The document finds that TNAs are not consistently translated into investment and deployment.
Capacity-building	
Replace one-off workshops with long-term institutional capacity development.	Short-term training is not a smart solution. Although the PCCB network has grown to 452 members, it remains difficult to quantify actual capacity gains.
Build permanent national capacity for climate finance and project preparation.	Limited accreditation, project-development and bankable-project expertise are identifed as barriers to climate-finance access.
Build strong climate data, MRV and transparency systems.	The first BTR deadlines exposed substantial data, inventory and reporting capacity needs. Fragmented databases and insufficient MRV expertise reduce both reporting quality and usefulness for domestic policymaking.
Build local-government capacity alongside decentralised climate finance.	The document observes that many adaptation measures are inherently local, but local institutions frequently lack authority, finance and technical skills.
Children and Youth need institutional not occasional participation	Children and young people are increasingly recognised as stakeholders in climate action, but participation often remains consultation-based rather than embedded in national climate planning and decision-making.
Capacity-building must reach the education system:	Teachers, education officials and schools need the knowledge, tools and resources to integrate climate education, disaster preparedness, risk management and learning continuity.

From Commitment to Delivery: Bangladesh's NDC 3.0 and the Global Bargain

The translation of the Paris Agreement's temperature goal into national action is dependent on the effective implementation of Nationally Determined Contributions (NDCs) (UNFCCC, 2016). Yet current global policies remain insufficient, increasing the risks of exceeding 1.5°C (UNEP, 2025) and escalating adaptation needs and loss and damage (UNEP, 2026). For Bangladesh, implementing NDC 3.0, which targets a 20.31% emissions reduction below business-as-usual (BAU) levels by 2035, is both an international commitment and a core development, energy-security, and climate-resilience priority (Government of Bangladesh, 2025).

Delivery therefore rests on a two-sided bargain: Bangladesh must credibly implement its unconditional commitments, while international partners must provide finance, technology, and capacity building commensurate with its conditional ambition. Effective delivery would advance low-carbon development, demonstrate domestic progress, clarify outstanding support needs, and strengthen Bangladesh's case for predictable, accessible, and appropriately concessional climate finance (Government of Bangladesh, 2025a, 2025b).

Nationally Determined Contribution Trajectory of Bangladesh

Bangladesh's NDC pathway demonstrates progressively broader sectoral coverage, stronger implementation detail, and increasing mitigation ambition. The 2015 Intended Nationally Determined Contribution (INDC) covered power, transport, and industry, targeting reductions of 12 $MtCO_2e$ unconditionally and 36 $MtCO_2e$ with international support by 2030 (Government of Bangladesh, 2015). The Updated NDC expanded coverage to Energy, Industrial Processes and Product Use (IPPU), Agriculture, Forestry and Other Land Use (AFOLU), and Waste, increasing the potential reduction to 89.47 $MtCO_2e$ (21.85% below BAU), comprising 27.56 $MtCO_2e$ unconditional and 61.9 $MtCO_2e$ conditional reductions (Government of Bangladesh, 2021).

NDC 3.0 extends the target year to 2035 and commits to reducing projected BAU emissions of 418.40 $MtCO_2e$ by 84.97 $MtCO_2e$ (20.31%), including 26.74 $MtCO_2e$ unconditionally and an additional 58.23 $MtCO_2e$ conditionally (Government of Bangladesh, 2025b). Energy accounts for most of the targeted reduction (69.84 $MtCO_2e$), followed by AFOLU (12.71 $MtCO_2e$), Waste (1.78 $MtCO_2e$), and IPPU (0.64 $MtCO_2e$), alongside a target to meet 25% of electricity demand from renewable sources and greater attention to adaptation, loss and damage, inclusion, and a just transition (Government of Bangladesh, 2025b). This progression demonstrates Bangladesh's increasing mitigation ambition while reinforcing the critical role of international support in delivering the conditional components of successive NDCs.

Current Mitigation Delivery and the Implementation Gap

Bangladesh's First Biennial Transparency Report (BTR1) estimates that implemented mitigation measures delivered 5.47 $MtCO_2e$ in emission reductions in 2025 (Government of Bangladesh, 2025a). Energy contributed 5.37 $MtCO_2e$ (approximately 98%), while AFOLU and Waste contributed only 0.02 and 0.08 $MtCO_2e$, respectively, with no separate quantified reduction reported for IPPU. BTR1 projects the total mitigation effort to increase from 5.47 $MtCO_2e$ in 2025 to 10.35 $MtCO_2e$ in 2026, 15.46 $MtCO_2e$ in 2027, and 22.28 $MtCO_2e$ annually from 2028 to 2030 as adopted and planned measures progressively become operational (Government of Bangladesh, 2025a).

These projections remain considerably below the scale required for NDC 3.0, which targets total reductions of 84.97 $MtCO_2e$ (26.74 $MtCO_2e$ unconditionally and 58.23 $MtCO_2e$ conditionally) by 2035 (Government of Bangladesh, 2025b). Bangladesh's anticipated emissions peak around 2029–2030 is therefore a projected trajectory, not an achieved outcome, and must be tracked through annual inventories, sectoral pathways, and measurable implementation milestones. Closing this implementation gap requires accelerated domestic action to expand delivery beyond the energy sector, rapidly operationalise adopted and planned measures, and establish credible implementation and monitoring systems, alongside adequate international support.

The Climate Financing Gap and Principles of Restorative Justice

NDC 3.0 estimates a requirement of USD 116.18 billion for mitigation implementation during 2026–2035: USD 25.95 billion for the unconditional contribution and USD 90.23 billion in international support for the conditional component (Government of Bangladesh, 2025b). Bangladesh's National Adaptation Plan (NAP) separately identifies 113 interventions costing approximately USD 230 billion over 2023–2050 (Government of Bangladesh, 2023). BTR1 reports approximately USD 9.91 billion mobilised across 154 climate programs during 2015–2024 (Government of Bangladesh, 2025a). While these figures cover varying timeframes, scopes, and accounting categories, they illustrate that future finance flows must increase substantially.

The critical issue is not merely the headline volume of climate finance, but its structural terms: **finance must be grant-equivalent, non-debt-creating, accessible, and truly new and additional.** The USD 90.23 billion international support requirement for the conditional component of NDC 3.0 must serve as a non-negotiable benchmark under the New Collective Quantified Goal (NCQG). Subordinating conditional mitigation delivery to loan-based or market-rate financing violates climate justice by compelling climate-vulnerable nations to incur commercial debt to resolve an ecological crisis they did not create. International delivery of this support must be 100% grant-equivalent; forcing frontline communities to absorb sovereign debt turns ecological reparations into fiscal entrapment and forces climate victims to pay interest on their own survival.

Strategic Frameworks for Implementation

Expectations from the Government of Bangladesh

The Government should establish a credible implementation architecture to translate NDC 3.0 commitments into measurable sectoral action, while maintaining a clear distinction between domestically financed unconditional measures and conditional measures dependent on international support:

- **Adopt a financially quantified NDC Implementation and Investment Plan (2026–2035)** with annual sectoral targets, responsibilities, financing needs, measurable indicators, and a finance-ready project pipeline.
- **Operationalise a government-led coordination mechanism** to oversee NDC delivery and publicly share tracking data regarding implementation progress, gaps, and required finance.
- **Strengthen climate-finance tracking** by disclosing sources, instruments, terms, disbursements, and results, while separately reporting international support received and outstanding conditional needs.
- **Ensure governance and oversight** through annual public reporting, parliamentary scrutiny, independent audits, meaningful civil-society participation, and robust Article 6 safeguards with equitable benefit-sharing.
- **Engage the private sector** through policy incentives, blended finance, risk-sharing instruments, and enabling regulations for low-carbon investment, with dedicated support for SMEs and CMSMEs.
- **Operationalise an inclusive just-transition framework** covering decent work, reskilling, social protection, gender equality, disability inclusion, youth, and affected communities.
- **Align NDC implementation** with the National Adaptation Plan, the Bangladesh Delta Plan 2100, and local development plans.

Expected Role of Civil Society Organizations (CSOs)
CSOs should bridge community-level implementation evidence, national accountability, and international climate negotiations:

1. **Independently track** NDC commitments, budgets, finance, implementation, and verified outcomes.
2. **Advocate for transparency and equity,** ensuring community-level priorities and evidence from climate-vulnerable groups inform policy and just-transition efforts.
3. **Strengthen participation** of workers, women, youth, persons with disabilities, and marginalised groups in decision-making processes.
4. **Monitor climate finance** against principles of additionality, accessibility, transparency, and local-level impact.
5. **Oversee Article 6 and carbon-market activities** to prevent double counting and protect community rights.

6. **In terms of NDC implementation,** the projects that CSOs have in mitigation should be part of the register and proactively be linked with GoB to highlight the outcomes.
7. **Translate field evidence into policy recommendations** for national decision-makers and international negotiators.

Strategic Alliances and Priorities for COP31

Strategic alliances can strengthen Bangladesh's ability to translate NDC commitments into field implementation by increasing collective negotiating leverage and expanding access to finance, technology, and regional solutions. As Bangladesh approaches Least Developed Country (LDC) graduation, coordinated engagement through the LDC Group, G77 and China, and the Climate Vulnerable Forum (CVF/V20) can help safeguard vulnerable-country priorities. Furthermore, alliances with graduating and recently graduated climate-vulnerable countries can advocate for smooth transition mechanisms from LDC-specific climate finance windows, recognising that graduation does not diminish physical climate vulnerability.

Key negotiation priorities for COP31 include:

- **Protect the conditional distinction:** Maintain a strict distinction between unconditional actions and conditional measures. Any support shortfall must be transparently reported as an international implementation gap rather than an unfunded national obligation.
- **Demand NCQG effectiveness:** Require predictable, accessible, and transparent finance accounting that clearly distinguishes grant-equivalent public finance from debt-creating flows.
- **Ensure Article 6 integrity:** Guarantee that carbon markets feature corresponding adjustments, double-counting protections, environmental safeguards, and equitable benefit-sharing without surrendering affordable domestic mitigation options.
- **Leverage legal frameworks:** Strategically utilise the 2025 International Court of Justice (ICJ) Advisory Opinion to reinforce legal obligations regarding state responsibilities, international cooperation, and climate accountability.

A Momentum for Bangladesh towards A Just Energy Transition

Bangladesh is not starting from zero. Recent policy directions provide a stronger foundation for transition. The Renewable Energy Policy 2025 targets renewable energy to meet 20% of electricity demand by 2030 and 30% by 2040. The National Renewable Energy Development Strategy 2026–2030 provides a pathway for scaling renewable technologies. The Net Metering Guideline, rooftop solar programme, incentives for private participation and new provisions for the use of government land are also creating a wider policy framework. NDC 3.0 further connects renewable-energy ambition with Bangladesh's climate commitments and brings a just-transition dimension into the national agenda. But policy ambition will matter only if implementation changes the structure of the energy system.

Just transition must be about people, not only megawatts

The transition, however, cannot be measured only by how many megawatts of renewable energy Bangladesh installs or how many tonnes of emissions it reduces. A transition becomes just when workers, farmers, women, youth, low-income consumers and vulnerable communities are able to participate in and benefit from it, and when they do not carry a disproportionate share of its costs.
Ownership also matters. Bangladesh should create more space for decentralised and community-led renewable energy.

COP31: moving from commitment to delivery

Bangladesh enters COP31 in Antalya with an opportunity to connect its domestic energy crisis with the global just-transition agenda. COP30 in Belém advanced the Just Transition Work Programme through the decision to develop the Belém Action Mechanism (BAM), based on a whole-of-society and whole-of-economy approach. COP31 should now be a moment to move from negotiated principles to implementation.
Bangladesh and other climate-vulnerable developing countries need an operational BAM that can provide technical assistance, capacity building, knowledge sharing and access to finance. Its governance and financing arrangements should be clear, accessible and responsive to the needs of LDCs. **Bangladesh should strongly argue that just-transition support cannot become another source of unsustainable debt.**

Climate finance for renewable energy, storage, grid modernisation, worker transition, social protection and community-led energy should therefore be predominantly grant-based and highly concessional. Technology transfer is equally important. Renewable-energy technology, storage, smart grids, energy efficiency and industrial electrification should be accessible on affordable and non-discriminatory terms. International financial institutions should also be accountable for ensuring that their investments do not create new fossil-fuel lock-in while developing countries are being asked to decarbonise.

Bangladesh should also take a clear message to COP31, reducing fossil-fuel import dependence in climate-vulnerable developing countries is both a climate and development priority. Countries such as Bangladesh have contributed little to historical emissions, yet they face high climate vulnerability while paying heavily for volatile international fossil-fuel markets. International support for diversification away from this exposure should therefore receive the same urgency as other mitigation and adaptation priorities, consistent with equity and differentiated responsibilities.

Key Demands:

- **Operationalise the Belém Action Mechanism (BAM):** COP31 should establish practical arrangements for finance, technology, capacity building, knowledge sharing and technical support, with simplified access for LDCs and climate-vulnerable countries.
- **Prioritise fair and accessible climate finance:** Bangladesh should call for predominantly grant-based and highly concessional finance for renewable energy, storage, grid modernisation, worker transition, social protection and community-led energy, without creating new debt burdens.
- **Accelerate renewable energy, electrification and energy efficiency:** Bangladesh should rapidly scale rooftop and distributed solar, storage, smart grids, clean mobility, industrial electrification, solar irrigation, renewable cold storage and other productive uses of clean energy to reduce fossil-fuel import dependence.
- **Put people, livelihoods and ownership at the centre:** The transition should protect workers, farmers, low-income consumers and vulnerable communities, while expanding decent green jobs, local entrepreneurship, community participation and opportunities for community and local ownership of renewable-energy systems.
- **Protect land, food, water and ecosystems:** Renewable-energy development should follow strong environmental and social safeguards, meaningful consultation and benefit-sharing, particularly where projects may affect agricultural land, wetlands, fisheries, water resources and local livelihoods.
- **Strengthen women and youth leadership:** Women and young people should be recognised as transition leaders, with greater access to skills, finance, employment, entrepreneurship, technology, research and decision-making across the clean-energy economy.

From crisis to a just energy future

Delivering this transition would also have international value. If an operational BAM and adequate climate finance can help a climate-vulnerable LDC such as Bangladesh move towards renewable energy while protecting workers, communities and livelihoods, it would provide concrete evidence that the global just-transition architecture can deliver in practice. It would strengthen confidence in the Just Transition Work Programme at a time when implementation is becoming more important than new declarations.

For Bangladesh, COP31 should therefore be more than another climate negotiation. It should be a moment to turn an energy crisis into momentum for structural change. The objective is not simply to replace fossil fuels with renewables. It is to build an energy system that is clean, reliable, affordable, resilient and people-centred. A just energy future must protect people's power, livelihoods, land, food, water and future, and ensure that those least responsible for the climate crisis do not pay the highest price for the transition.

Zero Waste, Methane Reduction and Green Industrialisation

There has been a tremendous increase in solid waste generation and dumping as well as incineration owing to rapid urbanisation and industrialisation. Greenhouse gas accounting on a national scale has categorized waste as one of the sectors having a fast rate of increasing non-energy-related sources of greenhouse gases, contributing to roughly 11% of the total greenhouse gases after energy, which contributes to 49%, and agriculture, forestry and land use, which contribute to 38%. This is because a majority of the waste is methane as opposed to CO2, giving us a better ratio of climate gain to cost.

With NDC 3.0, the reduction in MtCO2e to 1.78 has been achieved through four landfill gas recovery and waste-to-energy facilities, 26 landfill and material recovery facilities, and six sewage treatment facilities. It's a good beginning, but it still falls short in the sense that it is all about managing waste after production rather than avoiding it.

From Waste Management To Green Industrialisation
Zero waste and green industrialisation must be seen as one agenda, not two ones. Studies of Resource-Efficient and Cleaner Production (RECP) in Bangladeshi micro and medium industries show that cutting raw material and water losses recovering by□products and cleaning up better all bring down production costs, reduce effluent and cut methane at the same time. Taking RECP and industrial symbiosis (where one plant's waste becomes the input for another)from pilot work to practice in leather, textile, food processing and metal□working would let industrial growth grow without adding more waste.

Just Transition Must Be About People, Not Only Tonnes
A zero-waste transition cannot be called a success just because emissions go down if it makes life worse for people who are already working in this sector. Women make up a part of the informal waste sorting workforce. They often face conditions while handling waste. At the time they have little or no say in how waste systems are redesigned around them. A just transition means giving recognition to the work that waste pickers do everyday, to pay for their recovery efforts and provide gear and training so workers can move into composting or material recovery jobs. It means letting them have a real voice before new facilities are chosen and built and not after.

Moving From Commitment To Delivery Internationally
Bangladesh supported the Global Methane Pledge after it was introduced at COP26. Since 2018 Bangladesh has included methane in its plans. This gives Bangladesh a position to ask for climate finance in international meetings. This finance should mainly be grants and easy to use for municipal groups and small industries that are mostly responsible for waste. It should not be for projects that only focus on one place. The UNEP Emissions Gap Report 2025 says that global climate finance needs to increase by three times by 2030 to meet the goals of reducing emissions. However, only a small proportion of that amount is being utilised currently. Bangladesh's civil society can use this report to push for tools that fit the needs of municipal waste authorities and small and medium-sized industrial companies.

Key Demands During COP 31
Bangladeshi civil society organisations working on waste, industrial policy and air quality set out the following demands for government, industry and international partners to act on without delay:

- **Integrate zero waste as a cross-cutting theme:** Future updates to the NDC, National Adaptation Plan and short lived pollutant plan should treat waste as connected to energy and industrial policy not isolated from it.
- **Prioritise upstream prevention alongside downstream treatment:** Prioritise upstream prevention alongside treatment. Source segregation, composting and industrial waste minimisation should receive similar investment priority as landfill gas capture and waste to energy plants.
- **Formalise and finance the informal recycling workforce:** Waste pickers and small recyclers should receive recognised status, protective equipment, fair pricing and social protection.
- **Mobilise fair, accessible climate finance:** Bangladesh should demand grant based and concessional finance for landfill gas, composting and industrial RECP infrastructure. The funding should be sized for small enterprise actors and should not add new debt burdens.
- **Put women and informal workers at the centre:** Women and young people already working in the waste economy should be recognised as decision-makers and transition leaders, not only as vulnerable groups.
- **Strengthen monitoring, reporting and verification:** Reliable methane data, for landfills, wastewater and industrial sources should be treated as core infrastructure. This data is needed to track progress and unlock results based climate finance.

From Waste To Just Green Industrial Future

Bangladesh faces a choice that's not simply between industrial growth and climate responsibility. If Bangladesh treats zero waste and methane reduction as a core part of industrialisation instead of a separate environmental duty, Bangladesh can reduce near-term climate risk, improve urban air and water quality, create formal jobs from an existing recycling economy, and strengthen Bangladesh's case for the international finance Bangladesh needs to meet its climate commitments. Delivering this at home would also give Bangladesh weight abroad.

Food Security, Sustainable Agriculture, and Nature-based Solutions

Climate change is reshaping Bangladesh's food system. While national food production may remain relatively stable, climate-vulnerable communities face crop losses, ecosystem degradation, and declining incomes and livelihoods. Therefore, food system resilience must be measured beyond production, considering food access, ecosystems, livelihoods, nutrition, and communities' capacity to adapt and recover.

Bangladesh's food system extends beyond cultivated crops to capture fisheries, small indigenous fish, aquatic plants, and naturally occurring leafy vegetables. However, increasing salinity, saline-water intrusion, erratic weather patterns, and ecosystem degradation are directly affecting food production and negatively impacting socio-economic conditions.

From Recognition to Delivery
COP30 strengthened the visibility of agriculture, food systems and food security. The **Sharm el-Sheikh Joint Work on Implementation of Climate Action on Agriculture and Food Security** has increasingly focused attention on systemic approaches and the means of implementation, including finance, technology and capacity-building.

The Belém Adaptation Indicators under the Global Goal on Adaptation provide another opportunity to move beyond measuring hectares cultivated or tonnes produced. Food-system resilience should also be assessed through food access and affordability, nutrition and dietary diversity, water security, fisheries, biodiversity and ecosystem condition, producer livelihoods and the resilience of vulnerable groups.

Building on Bangladesh's Experience
Bangladesh's climate-resilient food-system pathway should combine science, technology, agroecology, and local knowledge. Crop diversification, stress-tolerant varieties, integrated crop-fish-livestock systems, agroforestry, soil and water management, sustainable fisheries, and resilient storage and markets all have a role.

Agroecology should be treated as an evidence-based approach that complements public research, extension services, farmer knowledge, and technological innovation to strengthen productivity, biodiversity, nutrition, and livelihoods.

Water is fundamental. Salinity cannot be addressed only through salt-tolerant crops, nor drought and flood risk only through stress-tolerant varieties. Rivers, canals, wetlands, drainage, groundwater and coastal water systems determine whether agriculture, fisheries and rural food systems can function.

Aligning Climate, Food, Water and Biodiversity Action
Implementation of Bangladesh's **National Adaptation Plan, National Biodiversity Strategy and Action Plan, the Kunming-Montreal Global Biodiversity Framework, the Global Goal on Adaptation, the emerging Forests Roadmap and the UNFCCC agriculture workstream** should increasingly converge around shared ecosystem, landscape, water, food-security and livelihood outcomes.

Such alignment is also essential for finance. Fragmented investments, with separate funding for crops, water, biodiversity, and livelihoods, cannot deliver resilient food systems at a scale.Food security is where adaptation, ecosystems, water, livelihoods, biodiversity and climate justice meet.

Bangladesh's Priorities for COP31 Action

Make food-system resilience an implementation priority: Strengthen agriculture and food-security action through accessible finance, technology and capacity support, recognition of agroecology and diversified food systems, and explicit attention to food-system Loss and Damage.

Food-system transformation should be treated as a cross-cutting climate priority: Connecting agriculture, adaptation, finance and Loss and Damage. Farmers, fishers, women, youth, Indigenous Peoples, academia and climate-affected communities should participate meaningfully in the design, implementation and monitoring of NDCs, NAPs, adaptation programmes and the future UNFCCC agriculture workstream.

Invest in integrated resilience: Treat water security, ecosystem restoration, sustainable agriculture, fisheries, and high-integrity Nature-based Solutions as interconnected adaptation investments, supported by adequate finance and safeguards.

Put finance, technology and institutional support within reach: Scale up predictable, accessible, and locally available grant-based and concessional finance, technology, climate information, research, and extension services for frontline producers and local institutions. Measure success by usable support reaching communities, not simply by the volume of finance pledged internationally.

Build resilience through agroecology: Recognize agroecology and diversified food systems as key climate-resilience pathways, including integrated farming, agroforestry, sustainable fisheries, and locally adapted seed systems.

Recognise food-system losses that current metrics miss: Ensure adaptation indicators capture food access, nutrition, ecosystems, fisheries, and producer livelihoods, not production alone. Recognise food-system Loss and Damage beyond crop losses, including salinity, ecosystem degradation, declining fisheries, biodiversity loss, reduced dietary diversity, and disruption of traditional food and livelihood systems.

Scale high-integrity Nature-based Solutions: *Recognise community-led Nature-based Solutions (NbS) and Ecosystem-based Adaptation (EbA) as core adaptation pathways, backed by accessible finance, technology and capacity support. Establish strong safeguards for biodiversity, land and resource rights, Indigenous and local knowledge, gender equality, participation and equitable benefit-sharing. Assess NbS by their adaptation, biodiversity, livelihood and social outcomes—not carbon benefits alone—and ensure they complement, rather than replace, emissions reductions.*

Oceans and Seas: Protecting the Bay of Bengal

Bangladesh, one of the world's most climate-vulnerable nations despite contributing less than 0.35% of global carbon emissions and a leader among Least Developed Countries (LDCs), should be actively engaged at UNFCCC COP31 in Antalya, Türkiye. Its "Oceans and Seas" agenda is a defining pillar: co-hosts Türkiye and Australia (with Pacific Island partners), building on the 2026 Ocean and Climate Change Dialogue, have for the first time made it a dedicated Action Agenda priority with three sub-priorities: resilience of coastal and marine ecosystems; blue carbon and ocean-based solutions; and ocean observation, data-sharing and regional cooperation. The aim is to move oceans to the center of the COP and turn ambition into "finance-ready" national strategies and multi-year blueprints.

Key Priorities & Objectives

- **Blue NDCs:** marine nature-based solutions, offshore renewables and maritime decarbonisation in updated NDCs.
- **Multi-Year Roadmap:** aligning the Ocean Dialogue with Paris Agreement ambition and implementation cycles.
- **Blue Carbon Protection:** restoring coastal wetlands, coral reefs and seagrass meadows.
- **Blue Finance:** accessible instruments for vulnerable coastal states, LDCs and Small Island Developing States (SIDS).

What Has Been Discussed So Far

Oceans entered the UNFCCC process late, but momentum has grown since Glasgow.

- **Ocean Dialogue and the "Blue Package":** The annual Ocean Dialogue (since COP25) focused in 2025 on finance access and blue bonds. COP30's "Blue Package" set five 2030 "Ocean Breakthroughs" (marine conservation, maritime transport, coastal tourism, renewable marine energy, aquatic food); 17 countries joined its "Blue NDC Challenge".
- **Finance and indicators:** The USD 1.3 trillion Baku-to-Belém Roadmap makes nature one of five pillars (MPAs, blue carbon, coastal resilience, ocean governance) but has no ocean window. The 59 Belém Adaptation Indicators under the Global Goal on Adaptation (GGA) cover marine and coastal habitats and nature-based adaptation, but are voluntary, unlinked to finance, with methodology left to the Subsidiary Bodies through 2027.
- **High Seas Treaty (BBNJ):** in force from 17 January 2026 (60 ratifications reached September 2025). Bangladesh, the 11th ratifier (September 2024), helped negotiate its marine genetic resources, technology-transfer and capacity-building provisions, a credible basis for leadership.

The Ocean Track: Key Milestones from COP25 to Antalya (2019-2026)

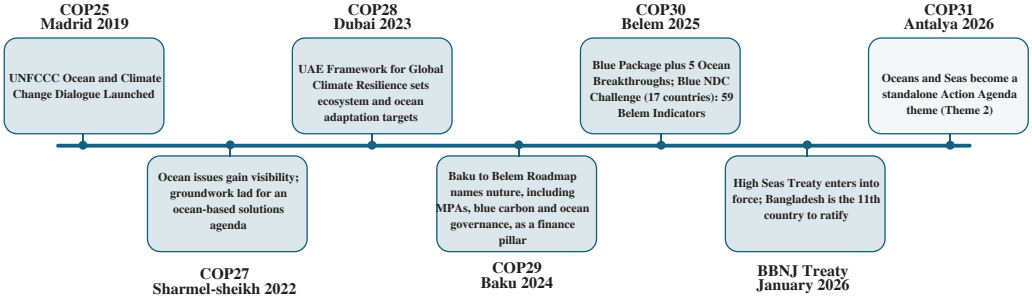


Figure: *The ocean track from COP25 (2019) to COP31 (2026).*

Key Concerns

- **Marine protected areas (MPAs) exist mostly on paper.** Seven MPAs since 2000, including Swatch-of-No-Ground (2014) and Saint Martin's Island (2022), cover only ~1.5% of the marine area. Only NijhumDwip has a published management plan, and illegal monofilament gillnetting persists inside both.
- **Coastal communities carry the cost.** Households in Satkhira, Khulna, Bagerhat and Cox's Bazar, most exposed to cyclones, erosion and salinity, rarely receive adaptation finance.
- **Fragmented governance.** Despite a Blue Economy Cell (Ministry of Power, Energy and Mineral Resources), overlapping mandates of the Departments of Fisheries, Shipping and Environment, Navy and Coast Guard keep management sector-by-sector.
- **Infrastructure outpacing safeguards.** Dredging and industrial buildout at the Matarbari deep-sea port and Moheshkhali-Matarbari hub (30-year, ~USD 60–65 billion plan) threaten the ecosystems the blue economy relies on.
- **Unassessed gas hydrates.** Estimates of 17–103 trillion cubic feet are unverified for lack of seismic coverage, technology and marine science; no country yet produces them commercially.
- **Under-resourced regional cooperation.** Bay of Bengal Large Marine Ecosystem (BOBLME) phase two (2023–2028; with India, Myanmar and five others) competes with BIMSTEC and IORA; none yet drives shared management.

Bangladesh's Position and Asks

From Declaration to Delivery: Protecting the Bay of Bengal

- A cost-cutting, time-bound plan for every existing MPA: published management plans, Coast Guard and Department of Fisheries patrols, and independent monitoring.
- MPA enforcement and blue carbon restoration (Sundarbans mangroves, seagrass beds) financeable under GGA ecosystem indicators, not unfunded mandates on the Forest and Fisheries Departments.
- A Marine Spatial Planning law and single ocean authority to implement BBNJ coherently, with co-management giving affected fishing households a stake and livelihood alternatives.

Balancing Blue Growth with Biodiversity: Deep-Sea Infrastructure and Gas Hydrates

- Support, via BBNJ technology transfer and COP31's ocean-observation sub-priority, for independent environmental and social impact assessment of the Matarbari port and hub.
- A comprehensive seismic and scientific gas hydrate survey, so decisions rest on verified data and are assessed against biodiversity impacts.
- No-net-loss and MPA co-location safeguards as a standard, financeable condition of coastal and offshore infrastructure finance.

Resource Collection for Betterment: A Sustainable Blue Economy

- An Ocean Policy and Blue Economy Act enables access to blue bonds and Green Climate Fund Ocean windows.
- Predictable funding for BOBLME and BIMSTEC/IORA cooperation, building on the 2012 and 2014 maritime boundary settlements with Myanmar and India, and early-ratifier leverage to shape BBNJ rules for developing coastal states.

Strategic Alliances

Bloc / Constituency	Leverage for Bangladesh
BOBLME / BOBP-IGO	Shared fisheries, habitat and pollution governance platform
BIMSTEC / IORA	Blue economy diplomacy beyond bilateral tracks
High Seas Alliance / early BBNJ ratifiers	Bangladesh's status as the 11th country to ratify BBNJ gives it a credible seat in shaping implementation rules on marine genetic resources and technology transfer
LDC Group / CVF	Bloc push for an ocean window in adaptation finance

Outcomes Sought at Antalya

Minimum Acceptable Outcomes	Ambitious Outcomes
Roadmap nature pillar linked to a blue-finance channel	Ring-fenced facility for MPAs, blue carbon and regional cooperation
MPA enforcement eligible under GGA ecosystem targets	No-net-loss safeguards on port and blue-hub finance; direct erosion and salinity finance for coastal households
Support for BBNJ implementation and technology transfer	Bay of Bengal observation and resource-assessment mechanism co-led with India and Myanmar

Climate-Friendly Resilient Cities & Dynamic and Resilient Health Systems

Bangladesh is among the most climate-exposed countries yet emits under 0.5% of global greenhouse gases. Its NDC 3.0 (2025) targets 20.3% emissions cut by 2035 at an estimated USD 116 billion, roughly USD 90 billion of it dependent on international support. Its sharpest vulnerabilities are unplanned urbanization led by Dhaka, one of the world's densest megacities, where climate-displaced people settle in informal peripheral housing, and a health system strained by climate-sensitive disease, heat and disasters. Both are priorities in the COP31 Presidency's ten-point Action Agenda, so Bangladesh can press for financed outcomes, not pledges.

What Has Been Decided So Far

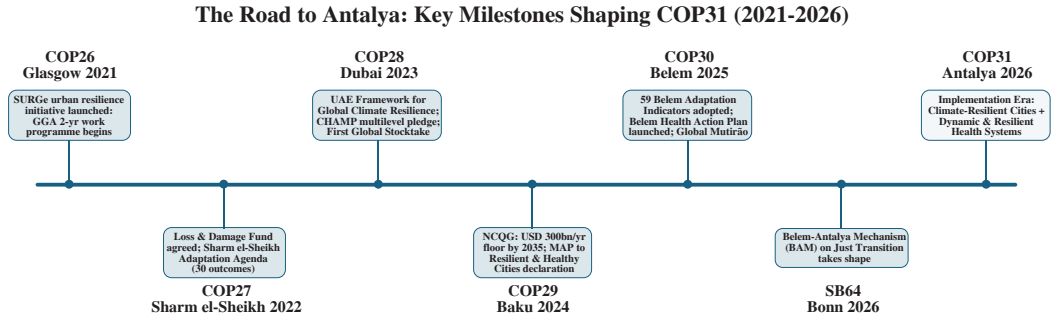


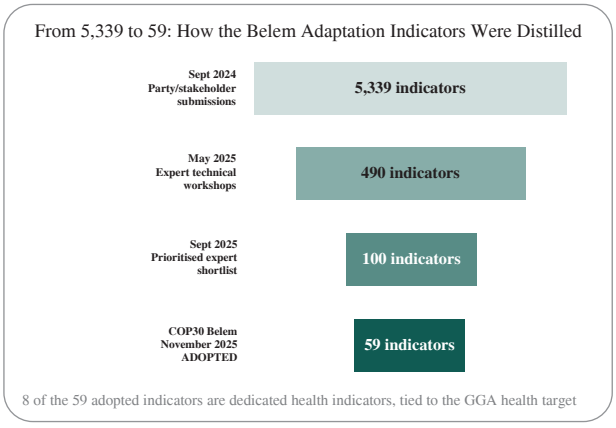
Figure: *Key milestones from Glasgow (2021) to Antalya (2026).*

- Cities: SURGe (COP27) → CHAMP multilevel-governance pledge (COP28) → MAP to Resilient & Healthy Cities (COP29) → Cities & Regions Hub, the Blue Zone local-government platform at COP30, the first COP to recognize informal-settlement upgrading and basic services as core adaptation.
- Health: WHO-led ATACH (launched at COP26) has 101 members; health became Action Agenda Objective 16 at COP30, which launched the Belém Health Action Plan (BHAP), the first health-specific adaptation framework (30 countries, 50 organizations, WHO secretariat), seeded with USD 300 million solely from philanthropy. Bangladesh's costed HNAP (2026, with WHO and UNFPA) covers infrastructure, surveillance, workforce and governance.

Finance and Just Transition

Finance instrument	Status heading into COP31
NCQG (COP29)	Floor of USD 300 billion per year by 2035
Baku-to-Belém Roadmap	USD 1.3 trillion per year from all public and private sources
Global Mutirão (COP30)	Triple adaptation finance by 2035; ~85% still loans (SB64, June 2026)
Loss and Damage Fund	USD 822 million pledged vs. USD 2.8 billion shortfall; Bangladesh request in review
Belém–Antalya Mechanism	Mandated at COP30 on Just Transition; SB64 dwelt on procedural terms of reference, leaving operationalization a headline COP31 item

The Global Goal on Adaptation and the Belém Adaptation Indicators



The GGA (Paris Agreement, Article 7.1) aims to enhance adaptive capacity, strengthen resilience and reduce vulnerability. After a two-year work programme launched at COP26, the UAE Framework for Global Climate Resilience (COP28, Dubai, 2023) set thematic targets on water, food and agriculture, health, ecosystems, infrastructure, poverty eradication and livelihoods, and cultural heritage, plus cross-cutting targets on planning, implementation and finance. A technical expert group under the UAE–Belém work programme then narrowed 5,339 submitted indicators (September 2024) to 490 (May 2025) and 100 (September 2025), before CMA7 adopted 59 at COP30. Figure: The technical distillation process behind the 59 Belém Adaptation Indicators.

The 59 indicators cover every target and the means of implementation (finance, technology, capacity-building); eight concern health. The Belém–Addis Vision (2026–2028), ahead of the 2029 Global Stocktake, will fold them into NAPs, NDCs, Biennial Transparency Reports and national communications. But they are voluntary and unlinked to finance, and their rushed, presidency-driven adoption left metadata, methodology and disaggregation to the Subsidiary Bodies through 2027 (before CMA9), work stalled at SB64 over a technical-versus-political taskforce.

Key Concerns

- **Debt-inducing adaptation finance:** the tripling uses a weaker, later baseline than vulnerable countries sought, and ~85% arrives as loans.
- **A financially empty health plan:** no government channel funds the BHAP or the costed priorities of Bangladesh's HNAP.
- **No direct city access:** Dhaka North and Dhaka South can reach the FRLD, Green Climate Fund (GCF) and Adaptation Fund only through national intermediaries.
- **Housing overlooked:** people displaced by erosion, cyclones and sea-level rise settle in unplanned peripheries with weak building standards; neither the urban track nor the GGA infrastructure target funds housing security or affordable green building.
- **Graduation and procedural risk:** LDC graduation may cut concessional access as needs reach an estimated USD 26 billion a year; the BAM may become a procedural shell.

Bangladesh's Position and Asks

Climate-Resilient Cities

- A multilevel-action work programme, linked to the New Urban Agenda and IPCC Special Report on Cities, with direct FRLD, GCF and Adaptation Fund access for city corporations.
- Adequate, safe, affordable, climate-resilient housing (in-situ informal-settlement upgrading, tenure security, basic services) financeable under the GGA infrastructure target.
- Support for enforced resilient, energy-efficient building standards (passive cooling, retrofits), low-carbon lifecycle pathways and inclusive green certification; heat-resilience and nature-based cooling in the NAP and NDC 3.0.

Dynamic and Resilient Health Systems

- A non-philanthropic channel for BHAP phase two: a GCF health window, an FRLD allocation or a ring-fenced share of tripled adaptation finance.
- HNAP 2026 as an ATACH exemplar; funded reporting on the eight health indicators; flood- and cyclone-resistant facilities with back-up power and water eligible under the GGA infrastructure target.

Strategic Alliances

Bloc / Constituency	Leverage for Bangladesh
LDC Group	Graduation-transition finance template with Bhutan and Nepal
G77 + China / CVF	Grant-based adaptation finance and 1.5°C ambition as a bloc
LGMA (ICLEI / UN-Habitat)	Dhaka North/South as direct finance-access pilots
ATACH (101 members)	HNAP 2026 as a costed exemplar for BHAP finance

Outcomes Sought at Antalya

Minimum Acceptable Outcomes	Ambitious Outcomes
Transparent tripling baseline, tracked via the Global Climate Finance Accountability Framework (COP30)	Multilevel work programme with direct city fund access
BAM adopted as an operational decision	Ring-fenced health window funding BHAP phase two
LDC-graduation needs acknowledged (details to SB65/66)	Resourced facility for LDC indicator reporting

Youth and Climate Justice

In 2026, a population exceeding 177.8 million was recorded in Bangladesh, of which nearly 46 million individuals, accounting for more than one-quarter of the population, were aged 15 to 29 years, and the national median age was estimated at 27.3 years.(PopulationPyramid, 2026). This is not merely a demographic footnote; it represents the workforce, electorate, and disaster-response volunteer base that Bangladesh's climate policies will rely on over the next two decades. Yet nearly four in ten young Bangladeshis are neither in education, employment, nor training (NEET), a rate that has remained persistently high and is further exacerbated by climate-related disruptions to education and livelihoods. Employment and livelihood opportunities are becoming increasingly challenging, while many young people are being forced to relocate or become displaced and are exposed to multiple forms of vulnerability.

On the contrary, young people are already at the forefront of Bangladesh's climate response, contributing to community awareness, innovative solutions, advocacy, activism, and emergency response—often with limited resources, capacity-building support, and access to decision-making spaces. As frontline responders and agents of change, young people should be recognised, adequately resourced, and meaningfully included in shaping climate policies, programmes, and financing decisions.

The Glasgow Climate Pact (COP26) called for meaningful youth participation at all levels. COP27 established the role of COP Youth Envoy. COP28 launched the first Youth Stocktake and opened the Just Transition Work Programme. COP30 in Belém agreed to develop the Belém Action Mechanism (BAM), wrote youth into the operative text as stakeholders whose broad and meaningful participation the mechanism must ensure, and adopted a wider political package explicitly calling for decent work within just transitions (ILO, 2025). Each step has been incremental, and none has yet given youth an actual governing seat. COP31 is the first COP where that gap can plausibly be closed, because the BAM's design is on the table for the first time.

Key demands:

- Realise the rights of climate-vulnerable young people by understanding their diverse needs and considering different contexts.
- Ensure youth voices are represented in the BAM Just Transition Mechanism and at all levels of climate governance.
- Respect the principles of just transition and promote green jobs for young people.
- Ensure grant-based, directly accessible climate finance to support youth-led climate action, including youth-led adaptation and mitigation efforts.

Respecting the youth voice is not a favour the world is being asked to grant. With nearly a quarter of Bangladesh's populationand a majority across the Global Southbeingunder 30, a just transition mechanism designed without the generation that will implement and inherit it risks failing its own mandate. Early leadership on youth inclusion in the BAM would cost Bangladesh little while strengthening its credibility within the LDC Group and CVF, where field-tested youth models remain limited. Bangladesh already has one, and advancing it can reinforce the country's wider negotiating position on finance and loss and damage.

Policy Position on Youth and Climate Justice

Bangladesh's policies already support youth-centred, gender-responsive climate action. The National Youth Policy, NDC 3.0, National Adaptation Plan, Climate Change and Gender Action Plan, Vision 2041, and Delta Plan all recognise youth participation, inclusion, and leadership as essential to development and resilience.

International frameworks reinforce this mandate. Article 12 of the Paris Agreement, successive COP decisions on youth, and YOUNGO provide established foundations for meaningful youth participation in climate decision-making.

Strategic Alliances
YOUNGO: The official children and youth constituency to the UNFCCC, representing youth voices through policy engagement, advocacy, and regional/local Conferences of Youth (COYs).
Presidency Youth Climate Champion (PYCC): Connects young people with the COP Presidency and helps bring youth perspectives into international climate negotiations.
UN Secretary-General's Youth Advisory Group on Climate Change: A 14-member group providing diverse youth perspectives and practical recommendations to accelerate global climate action.
UNICEF & Generation Unlimited: Promote youth inclusion, education, skills development, and green jobs within the global climate agenda.

Position of Bangladesh for Youth Engagement
For quick reference during the COP31 process:

- Youth representation in BAM: Bangladesh supports the Belém Action Mechanism (BAM) and calls for a named, adequately resourced youth seat in its governance structure, to be finalised at COP31 with transparent selection, gender and regional balance, and accountability to grassroots youth networks.
- Direct youth climate finance: Ensure direct, grant-based climate finance for youth-led organisations through simplified accreditation and capacity support, with explicit priority for marginalised youth, including ethnic and minority communities across South Asia.
- Youth implementation framework: Establish a dedicated youth implementation framework under NDC 3.0 and the National Adaptation Plan, with measurable targets, dedicated financing, transparent monitoring, and meaningful youth participation in climate budget monitoring.
- Youth-centred Just Transition: Ensure Just Transition financing supports green jobs, apprenticeships, and youth enterprises, particularly in climate-resilient agriculture, agroecology, land restoration, and water security, prioritising young women and youth in climate-vulnerable areas.
- Youth-sensitive Loss and Damage: Ensure the Fund for Responding to Loss and Damage (FRLD) recognises impacts such as interrupted education, youth displacement, increased child marriage risks, and child labour vulnerability, with appropriate safeguards for affected communities.
- Equity and inclusion: Recognise the leadership and rights of young women, Indigenous and ethnic minority youth, fisherfolk, displaced youth, and youth with disabilities.

Children at the Centre: Child Sensitive Climate Action and Education

As an LDC voice at COP31, Bangladesh's position is grounded in calls for stronger climate finance, adaptation support, Loss and Damage funding, technology transfer, and a just transition that protects vulnerable communities. NDC 3.0 reinforces this position by embedding children's rights.

Bangladesh's schools closed nationwide for extreme heat for the second year running in 2024, with nearly 16,000 schools damaged or disrupted by climate hazards that year alone (BANBEIS, 2023, as cited in UNESCO, 2025). Children in Sylhet lost up to eight weeks of school days to flooding and heatwaves over twelve months, Khulna, Chattogram and Rangpur around six each. This highlights the growing impact of climate change on children's education, well-being, and future opportunities; while a global funding gap leaves child-responsive climate programming chronically under-resourced (UN Bangladesh & UNICEF, 2024; ORF, 2025).

Bangladesh's Priorities for COP31

1. An ambitious, funded ACE action plan aligned with NDC 3.0. The Glasgow Work Programme's current action plan runs through 2026; its successor, under review at SBI 65, must name children and cross-sectoral education-ministry coordination explicitly, not fold them into general "public awareness" (UNESCO, 2026a; UNFCCC, 2026a). Bangladesh should press for that cycle to align with its own NDC review, due by 2030, so global and national education commitments move together.
2. Climate education embedded in the Just Transition Mechanism's design, not bolted on after. Bangladesh should press for climate education, including a learning-loss and remedial-education agenda, to be written into that design now, while it is still open.
3. Child-sensitive, cross-sectoral climate finance. The NCQG, the Green Climate Fund and the Adaptation Fund should recognise climate-resilient education infrastructure and cross-ministerial coordination capacity as eligible adaptation finance (Climate Action Network, 2026), closing the gap left by the GGA's missing education indicator (COP30 Brazil Presidency, 2025).
4. Standing child participation, not one-off consultation. Bangladesh should build on UN Committee on the Rights of the Child General Comment No. 26 (PMNCH, 2023) to give children a formal, safeguarded channel into NDC and NAP updates, beyond COP side events and youth-only delegations.
5. Capacity sharing, South-to-South, not just capacity received. Bangladesh should offer its own cross-sectoral education-climate coordination experience, including lessons from initiatives such as CSESI, as a model other LDCs can adapt, using ACE regional climate weeks and SBI capacity-building channels to share what its National Working Committee has learned.
6. National replication of cross-ministerial coordination. Bangladesh should formalise the Education, Environment and Finance coordination model piloted under CSESI as a standing structure linked to NAP and NDC 3.0 implementation, beyond any single initiative's funding cycle (Save the Children International, 2026; UNESCO, 2026b).
6. Children as equal stakeholders in climate agreements, not a future concern. Bangladesh should carry into its own delegation's approach the principle championed by child-rights organisations such as Save the Children: that children's rights, voices and vulnerabilities must be centred in international climate plans and agreements, including new NDCs, recognising children as equal stakeholders and agents of change (Save the Children International, 2025). This applies to Bangladesh's domestic climate governance as much as to what it asks of COP31.

Advancing Climate-Resilient WASH Services for the Vulnerable

Climate-related disasters damage Water, Sanitation, and Hygiene (WASH) infrastructure, disrupt essential services, threaten public health, human dignity and the basic right to safe drinking water and sanitation. Therefore, it is essential for Bangladesh to make climate-resilient WASH a clearly financed and measurable national adaptation priority.

The 2022 northeastern floods demonstrate the consequences of service disruption. The post-disaster assessment reported that approximately 4.2 million people experienced disrupted WASH services (Ministry of Disaster Management and Relief [MoDMR], 2023). It estimated service-related losses at BDT 525.9 million, using a proxy of 10% of assessed physical damage rather than a direct measurement of losses. It also documented additional water-collection burdens and loss of privacy and menstrual hygiene access for women and girls. These impacts support prioritising prevention, preparedness, and resilient recovery (MoDMR, 2023).

Bangladesh has a substantive policy foundation. NAP interventions CRC5 and CRC6 address inclusive, climate-resilient WASH technologies and services for urban communities (MoEFCC, 2022). Their activities include rainwater harvesting, managed aquifer recharge, resilient sanitation, and regular operation and maintenance (MoEFCC, 2022). A sectoral WASH NAP should connect these commitments with water-resource management, disaster preparedness, and local-government planning.

Under the NAP 2023-2050 framework, CRC5 and CRC6 estimate indicative investments of BDT 658 billion for climate-resilient urban WASH interventions (MoEFCC, 2022). However, a comprehensive national financing assessment is needed to identify sector-wide needs, financing gaps, and capital and recurrent costs. Bangladesh should mobilise predictable domestic and international adaptation finance, prioritising grants for vulnerable communities. Investments should support infrastructure, maintenance, institutional capacity, project preparation, and monitoring to ensure equitable and resilient WASH service delivery. Responsible agencies should assess WASH service vulnerabilities and financing needs and develop a costed investment pipeline with clear institutional responsibilities, annual milestones, and dedicated budgets. At the local level, governments and service providers should implement climate stress area-specific plans that combine resilient infrastructure with funded maintenance, source protection, anticipatory action measures, and inclusive community oversight to ensure reliable and sustainable service delivery.

Expectations from COP31

At COP31, Bangladesh should advance the following WASH-related negotiating priorities. These are proposed demands, not outcomes already agreed:

- Seek explicit prioritisation of climate-resilient WASH in adaptation implementation and finance discussions. Developed countries and climate-finance institutions should provide new, additional, predictable, and accessible support, with a grant-based core for essential services in vulnerable communities. Support should cover sectoral planning, project preparation, and the institutional capacity needed to sustain services.
- Seek dedicated technical and financial assistance to apply the Belém Adaptation Indicators through national systems. Bangladesh should defend their country-driven character and the provision that they must not become conditions for accessing finance (UNFCCC, 2025). Technology cooperation should help translate monitoring evidence into improved service design and operation.

- Call for accessible support to address WASH-related loss and damage, including disrupted services and impacts on dignity and health, alongside resilient recovery. The 2022 flood assessment demonstrates why these impacts require attention beyond physical reconstruction (MoDMR, 2023).
- Press for faster global emissions reductions alongside scaled-up adaptation support. UNEP (2025) identifies mitigation and adaptation as interconnected responses to overshoot; stronger mitigation must complement, not replace, investment in protecting vulnerable communities.

The Reality of Loss and Damage: Moving Beyond Adaptation Limits

For Bangladesh, Loss and Damage (L&D) is already a present-day development, human rights and climate justice challenge. Cyclones, floods, flash floods, river erosion, drought, extreme heat, salinity intrusion and sea-level rise are causing losses that cannot be fully avoided through mitigation, adaptation or disaster risk reduction.

Bangladesh has significantly reduced climate vulnerability as cyclone-related deaths have fallen by around 100-fold since 1970. However, climate impacts continue to impose major economic and social costs. Average tropical cyclones are estimated to cost around US$1 billion annually, while a severe flood could reduce GDP by up to 9%.

Climate risks include both rapid-onset events, such as cyclones, floods and river erosion, and slow-onset impacts, including salinity intrusion, sea-level rise, freshwater stress and ecosystem degradation. These impacts affect not only livelihoods and infrastructure but also health, education, cultural heritage, social cohesion, community identity and people's connection to place.

The World Bank estimates that, under a pessimistic reference scenario, around 13.3 million people in Bangladesh could become internal climate migrants by 2050. Bangladesh's NDC 3.0 notes that the country contributes less than 0.5% of global greenhouse gas emissions, while climate impacts are associated with annual losses of around 1–2% of GDP. It identifies averting, minimising and addressing L&D as a climate-justice priority, with proposed L&D actions conditional on international support.

The priority is therefore to move beyond emergency response toward a system that can assess, address and finance unavoidable and residual climate impacts while protecting people's rights and dignity.

Strengthening National Systems: From Policy to Frontline Impact

Bangladesh needs a coherent national L&D approach that complements, rather than duplicates, disaster risk reduction, humanitarian response and adaptation. Disaster response addresses immediate emergencies; adaptation reduces future risks; and L&D addresses residual economic and non-economic impacts, including those arising from slow-onset climate change.

A stronger national framework should:

- **Strengthen institutional coordination:** Clarify roles across ministries, agencies and levels of government.
- **Improve assessment and data:** Develop consistent systems for documenting economic and non-economic losses, including displacement, health, ecosystems, livelihoods and cultural heritage.
- **Strengthen local implementation:** Equip local governments and frontline institutions with adequate capacity and resources.
- **Ensure inclusive participation:** Meaningfully engage women, youth, persons with disabilities, Indigenous Peoples, farmers, fishers, displaced communities and other affected groups.

- Strengthen accountability: Establish transparent information systems, participatory monitoring and accessible grievance mechanisms.

Climate mobility reinforces the need for coordinated national systems to address displacement, livelihood recovery and durable solutions. The World Bank projects globally up to 216 million internal climate migrants could emerge across six regions under a pessimistic scenario. Strong climate and development action could substantially reduce this global figure.

Access to L&D finance should therefore be treated as a governance and equity issue, requiring simplified procedures, direct access and locally appropriate financing. The Fund for Responding to Loss and Damage (FRLD) has established initial grant and direct-access arrangements, while further mechanisms, including rapid disbursement and small grants, are being considered.

Bangladesh should prioritise:

- simplified access procedures;
- appropriate small-grant mechanisms;
- direct and locally accessible finance;
- strong fiduciary and social safeguards;
- protection against elite capture;
- transparent data and financial reporting; and
- effective grievance and accountability mechanisms.

The Financial Politics of Equity: Responsibility and the Funding Gap

L&D finance is fundamentally an issue of equity, responsibility and access. Article 9.1 of the Paris Agreement establishes developed-country responsibility to provide financial resources to developing countries for climate action. For vulnerable countries such as Bangladesh, L&D finance should reflect adequacy, equity, historical responsibility and differentiated responsibilities and capabilities.

Key principles should include:

- **Adequacy and predictability:** Resources should reflect the growing scale of climate impacts.
- **Grant-based finance:** Support should avoid unnecessarily increasing debt burdens.
- **Additionality:** L&D finance should not simply relabel adaptation, development or humanitarian resources.
- **Equitable access:** Finance should reach affected countries and communities through transparent mechanisms.
- **Public finance and solidarity:** Private investment can complement but not replace public finance for non-economic losses, displacement, public services and cultural heritage.

Commercial finance may support some recovery and resilience investments, but many L&D needs are not commercially bankable. Restoring public services, addressing displacement, protecting cultural heritage and responding to non-economic losses require public resources.
Bangladesh and other vulnerable countries should therefore advocate for adequate, predictable, additional and predominantly grant-based L&D finance that does not deepen

climate-related debt vulnerabilities. A clearly identifiable L&D finance component or sub-goal, with transparent tracking, would help distinguish L&D resources from adaptation, humanitarian and development finance.

Assessing Global Delivery: From Paris Agreement to Antalya (COP31)
COP30 advanced the operationalisation of the FRLD through initial grant-based interventions and country-led approaches. However, available resources remain modest compared with the scale of climate-related losses and future needs.

COP31 should therefore focus on moving from institutional establishment to adequate capitalisation and effective delivery.

The international architecture should operate coherently:

- **Warsaw International Mechanism (WIM):** knowledge, coordination and policy support;
- **Santiago Network:** technical assistance; and
- **FRLD:** financial support for responding to L&D.

These mechanisms should function as complementary parts of one system rather than disconnected processes.

For Bangladesh, COP31 should maintain particular attention to slow-onset impacts, non-economic losses and human mobility, given the country's exposure to sea-level rise, salinity, river erosion and recurrent extreme events.

Strategic Demands for COP31: A Roadmap for Delivery
For Bangladesh, the test of COP31 should be whether the L&D architecture can translate recognition of climate injustice into adequate resources, accessible institutions and tangible support. Bangladesh civil society should advocate for:

- **Agenda priority:** Keep L&D distinct and visible within the UNFCCC process and avoid its subsumption into adaptation.
- **FRLD capitalisation:** Substantially scale up the Fund and convert pledges into actual contributions, while supporting a successful first replenishment process beginning in 2027.
- **Adequate and equitable finance:** Mobilise predictable, additional and predominantly grant-based resources.
- **Transparent tracking:** Ensure L&D finance is clearly identifiable and not relabelled adaptation, humanitarian or development finance.
- **Direct and accessible finance:** Reduce bureaucratic barriers and strengthen direct-access and locally appropriate mechanisms.
- **Innovative sources:** Explore equitable international revenue mechanisms, including appropriate levies on high-emitting sectors, as complementaryandnotsubstitutesources of finance.
- **Comprehensive scope:** Address economic and non-economic losses, including health, cultural heritage, ecosystems, livelihoods, slow-onset impacts and human mobility.

- **Displacement & Recovery:** Ensure loss-and-damage finance supports safe and climate-resilient rebuilding of destroyed or uninhabitable homes and durable housing solutions for climate-displaced people.
- **Rights-based approaches:** Ensure meaningful participation, safeguards, transparency and accountability.
- **Integrated architecture:** Strengthen coherence among the WIM, Santiago Network and FRLD.

The Imperative of Tangible Recovery

L&D is one of the clearest expressions of climate injustice for Bangladesh. The country faces significant economic and non-economic impacts despite contributing a very small share of global emissions.

The scale of the challenge is already evident: approximately US$1 billion in average annual cyclone losses, US$90.23 billion in conditional NDC financing needs through 2035, and the potential for 13.3 million internal climate migrants by 2050 under a high-impact scenario.

The success of the international L&D architecture should therefore not be measured only by institutions, funds or procedures. It should be measured by whether adequate, accessible and non-debt-creating resources reach affected countries and communities, enabling people to recover, protect livelihoods and preserve their dignity, culture and connection to place.

Rights to Resilience

The multiple interconnected climate risks are compounded by poverty and unequal access to essential services, finance and resilient infrastructure in case of Bangladesh.The National Adaptation Plan (NAP) 2023–2050 and Bangladesh Delta Plan 2100 provide strategic frameworks for building a safe, climate-resilient and prosperous delta through inclusive adaptation, resilient livelihoods, nature-based solutions and equitable water governance. The Standing Orders on Disaster (2019) further promotes a whole-of-society approach, emphasising collaboration among government, communities, civil society, volunteers and development partners.

Climate change generates interconnected and cumulative risks, with disproportionate impacts on hard-to-reach and climate-vulnerable communities. These impacts extend across water, housing, infrastructure, livelihoods, health, early warning systems and meaningful participation in decision-making. A Rights to Resilience approach therefore goes beyond delivering adaptation interventions. It seeks to ensure that vulnerable people can access the support and resources they need, participate meaningfully in decisions that affect their lives, influence resilience planning, and live safely and with dignity in the face of climate change.

Strategies for Community Resilience Development

Locally Led Adaptation

Local actors should not simply be recipients of adaptation projects.

They should be **decision-makers, planners, implementers, monitors, knowledge holders.**

Nature-Based Solutions

Nature-based solutions should be scaled to deliver adaptation, ecosystem and livelihood benefits, including mangrove, wetland, river and char restoration.

Community led preparedness

Community-led preparedness is a core pillar of community resilience, combining community capacity development with practical, locally led actions. It also involves engaging service providers and duty bearers to ensure responsive preparedness, early warning, and emergency support.

Strategic Alliances & Coalition Alignment

UAE Framework for Global Climate Resilience: Adopted at CMA 5, this guides global adaptation goals, assessing and reducing systemic climate vulnerabilities.

Marrakech Partnership for Global Climate Action (MPGCA): Connects governments with non-party stakeholders (cities, businesses, investors) to scale up immediate resilience and emission-reduction transformations.

Climate Resilience Food Systems (CRFS) Alliance: Coordinates multi-stakeholder diagnostic tools, high-level advocacy, and adaptation strategies across vulnerable nations.

Position of Bangladesh for Specific Thematic Areas

Adaptation Finance: Commitment for substantial, predictable and accessible grant-based/highly concessional adaptation finance that reaches the local level and frontline communities.

Locally Led Adaptation: Mainstream LLA in climate finance, ensuring local actors lead the full cycle from risk assessment and planning to implementation, monitoring and evaluation.

Nature-Based Solutions: Calls for greater support for NbS, particularly mangrove restoration, which can strengthen coastal protection, biodiversity, livelihoods and community resilience while reducing climate-related risks.

Technology Transfer: Transfer green technologies to the global south to the most marginalised communities.

Bangladesh calls for climate finance to support community-based ecosystem restoration, climate-resilient water, housing and infrastructure, particularly in vulnerable coastal and remote areas. Early warning and anticipatory action should reach every climate-vulnerable person through last-mile systems, community volunteers and inclusive preparedness. Adaptation must also strengthen resilient livelihoods in agriculture, fisheries, livestock and alternative enterprises, enabling communities to recover and build forward better. Finally, COP31 should ensure gender-responsive, disability-inclusive and socially inclusive adaptation, with meaningful participation of women, children, older people and marginalised communities.

Gender and Climate Justice

Bangladesh enters COP31 as one of the countries whose climatic impacts have an inequitable effect based on gender, which determines who will bear the impact of a climate crisis. As being primarily responsible for gathering fresh water, women are often first to receive income shocks from salination and irregular rainfall.With a maternal mortality ratio of 173 per 100,000 live births and an adolescent birth rate of 83 per 1,000 women aged 15–19, climate stress on health systems and displacement disproportionately endangers women and girls of reproductive age. Bangladesh's COP31 position should reflect this integrated understanding rather than treating gender as a stand-alone item.

This approach must recognise that vulnerability is shaped not only by gender, but also by disability, ethnicity, religion, class, age, sexual orientation, gender identity, occupation and location. Women with disabilities, Indigenous, Dalit and minority women, sex workers, domestic and tea garden workers, and gender diverse people face compounded barriers to safety, land, livelihoods and decision-making. COP31 language should use an intersectional, human-rights-based and GEDSI framework.

NDC 3.0, submitted in September 2025, commits to GEDSI principles and a gender-responsive low-carbon transition, yet an independent review found no clear evidence its development met the gender-responsive standard of community engagement. Bangladesh has robust stand-alone climate and gender policies and does not lack the right language; the language has outpaced practice and closing that gap at home and at the negotiating table should be its central gender-climate objective.

The gap is also visible in limited reliability, community led and approved disaggregated data. Without it, Bangladesh cannot assess whether climate finance and social protection reach those most exposed. Bangladesh should advocate for mandatory, resourced data systems, including on gender-based violence, displacement, land ownership and unpaid care work.

Bangladesh's position is to frame gender not as a vulnerability to be documented, but as a justice claim: women receive climate finance, have a voice in decisions, and are considered from the start when designing infrastructure and protection. This includes equitable, localised or Indigenous access to land, resources, credit, technology, education, safe transport, health services and secure livelihoods, with mandatory structural changes at the center.

Climate Justice: Evidence and Reality

The Gender Snapshot 2025 suggests climate change may push up to 236 million more women and girls into food insecurity and 158.3 million more into poverty. Climate justice prioritises such marginalised groups, who depend directly on natural resources yet are underrepresented in climate action; women's voices must be prioritised over preservation of a system that has led to this crisis.

Climate justice must also address the structural conditions that prevent women from recovering from loss and damage, including non-economic losses.Research shows that most of the landowners are men while women’s control Men own more than 90% of all land, and women's control over businesses and financial assets remains limited. Insecure tenure, unequal inheritance and restricted credit can block compensation and rebuilding. COP31 outcomes should recognise secure land and resource rights as part of gender transformative adaptation and loss and damage action.

Bangladesh has targeted gender actions across six priority areas and constitutional guarantees under

Articles 10, 19 and 28, but these must translate into lived reality. Meeting NAP and NDC goals requires closing an annual financing gap of USD 20.1 billion, yet spending was the same 10% of the required amount for two consecutive years.gap. Bridging these the financing gaps requires redirecting climate finance towards women and local communities, strengthening women's leadership and local monitoring, and addressing structural inequalities. COP31 is the first major test of whether the Gender Action Plan can generate practical change. The implementation agenda should include:

- Recognition of women as farmers, fishers, forest users, energy users and first responders, with registration, identity cards and access to extension, credit, insurance and markets.
- Women-shaped water-management committees and resilient water infrastructure to reduce women's unpaid burden.
- Safe, private, accessible disaster shelters with separate sanitation, menstrual hygiene provisions, lighting, disability access, protection from gender-based violence and survivor care.
- Protection of Indigenous women's land sovereignty and resource rights, including in the Chittagong Hill Tracts; targeted measures for women with disabilities and gender diverse people in disaster preparedness, healthcare and social protection.
- Support for women's grassroots organisations to lead climate projects and access finance directly without loans.
- Recognition of unpaid care and domestic work. Climate shocks increase women’s unpaid care and responsibilities, limiting their time for education, paid work and participation.

Strategic Alliance

Each alliance below is named because it is the channel through which a specific objective and outcome aboveof key negotiating points can move:

- LDC Group and Climate Vulnerable Forum (CVF): Leverage on the NCQG adaptation-finance baseline and FRLD direct access runs through these blocks, in consideration of the gender perspective, where coordinated positioning outweighs a solo submission.
- Green Climate Fund focal points and BoardGender Action Plan: The route to a binding 2026 Gender Action Plan timeline, with simplified access for women's rights, disability and Indigenous groups and reporting on outcomes, not beneficiary numbers alone.
- Women and Gender Constituency (WGC): Tracks Belém GAP implementation and flagged the dilution of intersectional and human-rights language; work with it so women with disabilities, Indigenous, Dalit and Munda women, gender diverse people, sex workers and migrant and domestic workers are reflected in texts.
- UN Women, the Adaptation Fund, and the Climate Action Network: Technical backing to make disaggregated-data requirements enforceable.
- ILO and the Just Transition Work Program: NDC 3.0 references ILO's Just Transition Guidelines, making the JTWP the natural forum to press for unpaid care work as an explicit, financed activity area.
- AFD, Germany, and Sweden: AFD's €300 million policy loan funds ccGAP implementation; Germany's gender-marker model is a transferable template; Sweden's push for gender-transformative indicators supports gender criteria in procurement.

- UNFPA's GBV coordination structures: Best placed to translate a COP31 commitment into funded GBV protocols in disaster and displacement programming, including survivor centered care, MHPSS (Mental Health and Psychosocial Support), legal assistance, safe shelters and training for police and health providers.
- Domestic Civil Society Shadow Accountability Mechanism: Commit the delegation to a domestic, biennial Civil Society Shadow Accountability Report so grassroots movements, youth activists and researchers can audit whether funds reach Union Parishad budgets and female-headed households.

Key Negotiating Positions

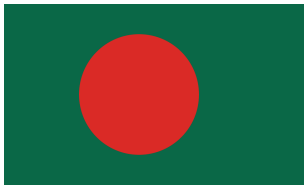
The following positions convert the discussions above into specific negotiation objectives and outcomes for the COP31 delegation.

- Gender-responsive, accountable finance with direct access within the FRLD and adaptation windows, now reaching only national implementing entities: simplified accreditation, small grants and capacity support for women's rights, disability, Indigenous and gender diverse led organisations.
- Full, equal and meaningful participation and leadership of women and girls, especially from marginalised communities, with real influence over decisions and resources, supported by accessibility, transport, childcare and remuneration.
- Require reporting beyond the number of women beneficiaries to whether projects improved women's control over resources, income, land, safety and decision making, led by women themselves.
- Require dedicated climate finance for resilient water infrastructure, clean cooking, care services that reduce women’s unpaid workload.
- Embed community-led gender-transformative screening in feasibility studies, safeguards and procurement for adaptation infrastructure and PPPs, at appraisal rather than bolted on afterward, covering land and resource rights, unpaid care, safe mobility, violence risks and community consent.
- Strengthen institutions with resources for gender and climate focal points; establish focal points and budgets for disability inclusion, Indigenous rights and gender-diverse groups; set up safe, community-led monitoring so women can report corruption and violence without fear.
- Ensure early operationalisation of the GCF's 2026 Gender Action Plan, linked to the Belém GAP, with a binding timeline, LDC accessibility, consultation with women's rights and grassroots organisations, and technical assistance for smaller organisations.
- Integrate gender-transformative budgeting and indicators into climate-finance planning and reporting; Bangladesh's national statement should commit to this timeline, distinguishing spending that merely counts women as beneficiaries from spending that changes their access to and ownership over assets, income, services and leadership.
- Make disability inclusion mandatory across NDCs, NAPs and climate policies, with disability-responsive targets, indicators and budgets.
- Strengthen safeguards against misappropriation of indigenous knowledge and support women-led conservation and adaptation.

- FRLD and Santiago Network support must recognise GBV prevention, MHPSS, legal aid, health services, safe shelter and long-term recovery as eligible costs, including for transgender, intersex and hijra people, women with disabilities, Indigenous women and sex workers.
- National gender and climate implementation roadmaps with responsible institutions, financing, time bound indicators and annual public reporting.
- Address gender gaps in agriculture, water, forestry, renewable energy and STEM, ensuring equal access to inputs, training, employment and leadership.
- Ensuring relocation, housing recovery, and compensation protect women's control over resources and identification (such as fishing cards), with individual rather than only household entitlements.

References





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