

UNLOCKING ASEAN'S CLIMATE POTENTIAL: STRATEGIES FOR ENHANCING “NATIONALLY DETERMINED CONTRIBUTIONS” COHERENCE AND REGIONAL COOPERATION

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Abstract

ASEAN Member States have taken divergent approaches to their Nationally Determined Contributions (NDCs), with limited regional coordination and persistent gaps in ambition, transparency, and implementation. While sovereignty concerns often limit integration, this article argues that ASEAN's flexible governance model can accommodate practical, non-binding mechanisms to strengthen climate coherence. Drawing from a comparative content analysis of six ASEAN NDCs, expert interviews, and a regional survey, the study identifies key deficits in alignment, monitoring, and sectoral strategies. It proposes a regional toolkit of voluntary instruments, including a common indicator dashboard, an ASEAN NDC stocktake, peer-learning platforms, and joint finance windows, to accelerate convergence without compromising national autonomy. These recommendations position ASEAN to respond collectively to the Paris Agreement's Global Stocktake and align with national development priorities.

Keywords: ASEAN, Nationally Determined Contributions, climate governance, Paris Agreement, Enhanced Transparency Framework, climate finance, ASEAN Way, NDC 3.0

Received: 7 May 2025

Revised: 5 August 2025

Accepted: 21 August 2025

The Association of Southeast Asian Nations (ASEAN), a region of vibrant economic growth and rich cultural diversity, confronts a stark reality: it is one of the world's most susceptible areas to the multifaceted and escalating impacts of climate change. Five ASEAN Member States (AMSs), Myanmar, the Philippines, Viet Nam, Thailand, and Cambodia, were ranked among the top 20 countries globally most affected by extreme weather events between 1998 and 2017.¹ The region's vulnerability is further compounded by factors such as high poverty levels, significant economic reliance on climate-sensitive sectors like agriculture, and extensive coastlines with concentrated populations and economic activities vulnerable to sea-level rise. For instance, an estimated 77% of the region's population lives in coastal areas, with major cities and ports located there.² The

1 Wings, M. & Eckstein, D., Hutfils, M.-L. (2018). *Global climate risk index 2019: Who suffers most from extreme weather events? Weather-related loss events in 2017 and 1998 to 2017*. Germanwatch. <https://www.germanwatch.org/en/16046>

2 ASEAN Secretariat. (2021). *ASEAN state of climate change report 2021*. Association of Southeast Asian Nations (ASEAN). https://asean.org/wp-content/uploads/2021/10/ASCCR-e-publication-Correction_8-June.pdf

frequency and intensity of climate-related natural disasters, including typhoons, floods, and droughts, are rising, causing significant economic and social losses.

This profound vulnerability, often characterized by shared transboundary risks such as the degradation of common river basins and cross-border haze, urgently calls for collective action. Nationally Determined Contributions (NDCs), the primary instruments under the Paris Agreement for countries to communicate their climate commitments, embody the principle of national determination but also call for progressively increasing ambition³. However, the NDCs submitted by AMS currently exhibit considerable fragmentation in ambition, scope, and transparency, compounded by persistent coordination gaps that challenge a unified regional response. As an expert affiliated with Indonesia's Ministry of Environment and Forestry observed, "there is no strong mandate for regional climate harmonization."⁴

This article aims to analyse this NDC fragmentation and, more importantly, to assess the potent, yet often under-explored, potential for regional cooperation mechanisms to enhance NDC ambition and foster greater policy coherence within ASEAN. The central thesis is that while ASEAN's unique governance model, the "ASEAN Way" of non-interference and consensus-based decision-making, precludes legally binding, European Union (EU)-style regulatory harmonization for NDCs, it does not render regional cooperation ineffective. To the contrary, ASEAN's institutional architecture and diplomatic traditions can be strategically leveraged. This research argues that such soft-law coordination tools – including peer-learning platforms, voluntary common frameworks, shared technical resources, and joint capacity-building initiatives – are not only politically feasible within the ASEAN context but are essential for unlocking the region's collective climate action potential. The "ASEAN Way," often perceived as a constraint, can thus be a source of strength if regional climate initiatives are designed to be inclusive, respectful of national sovereignty, and focused on demonstrating tangible co-benefits aligned with national development priorities. Drawing insights from a qualitative comparative analysis of key AMS NDCs, triangulated with expert interviews and stakeholder perspectives, this research identifies pragmatic pathways forward for ASEAN climate cooperation.

3 United Nations Framework Convention on Climate Change (UNFCCC). (2015). *Paris Agreement*. https://unfccc.int/sites/default/files/english_paris_agreement.pdf

4 Interview I2. Interview conducted by the author, personal communication, 2025. Anonymized official, Government of Indonesia. Transcript on file with the author.

The findings of this paper are particularly timely. The upcoming submission of third-round NDCs (NDC 3.0) by 2025,⁵ informed by the critical insights of the first Global Stocktake (GST1),⁶ and the concurrent development of the ASEAN Climate Change Strategic Action Plan (ACCSAP),⁷ create a significant “policy window.” This moment presents a unique opportunity for ASEAN to institutionalize more robust, facilitative regional cooperation frameworks for NDCs. This research seeks to inform these processes by exploring pragmatic pathways that acknowledge ASEAN’s structural realities while aiming for a progressive enhancement of regional climate action, ultimately contributing to a more climate-resilient and sustainable future for its peoples and a more impactful collective voice in global climate governance.

1. Theoretical and legal context

1.1. Legal nature of Nationally Determined Contributions: Procedural duties, substantive discretion, and the Enhanced Transparency Framework

NDCs under the Paris Agreement are characterized by a unique legal structure that balances national sovereignty with collective ambition.⁸ Primarily, the obligations associated with NDCs are procedural rather than substantive in terms of legally binding emission reduction outcomes. Article 4.2 of the Paris Agreement stipulates that each Party shall prepare, communicate and maintain successive NDCs that it intends to achieve, and shall pursue domestic mitigation measures to achieve the objectives of such contributions. Furthermore, Article 4.8 requires Parties to provide the information necessary for clarity, transparency and understanding (ICTU) under relevant decisions. While these procedural duties are mandatory, the specific content and level of ambition within an NDC remain at the discretion of each Party, reflecting the “nationally determined” nature of these contributions.

The Enhanced Transparency Framework (ETF), established under Article 13 of the Paris Agreement, is a critical component designed to promote accountability and track progress. The ETF mandates the submission of Biennial Transparency Reports (BTRs), which must include a national greenhouse gas inventory and information necessary to

5 UNFCCC. (2025). *NDC 3.0*. <https://unfccc.int/ndc-3.0>

6 UNFCCC. (2023). *Global Stocktake*. <https://unfccc.int/topics/global-stocktake>

7 Institute for Global Environmental Strategies. (2025). *The ASEAN Climate Change Strategic Action Plan 2025-2030 Project*. IGES. <https://www.iges.or.jp/en/projects/accsap2024>

8 UNFCCC. (2015). *Paris Agreement*.

track progress made in implementing and achieving a Party's NDC. These BTRs are subject to a Technical Expert Review (TER) and a Facilitative, Multilateral Consideration of Progress (FMCP), processes intended to build mutual trust and confidence and promote effective implementation.

1.2. ASEAN's legal architecture: The "ASEAN Way" and its implications for climate governance

The ASEAN operates under a distinctive legal and institutional framework, formally codified in the ASEAN Charter,⁹ which upholds national sovereignty as a paramount principle. Article 2.2(a) affirms "respect for the independence, sovereignty, equality, territorial integrity and national identity of all ASEAN Member States," operationalized through decision-making rooted in "consultation and consensus" (Article 20.1). This "ASEAN Way" translates into a regional climate governance model that is primarily facilitative rather than regulatory. ASEAN legal norms are embedded horizontally, with implementation dependent on domestic political due to the absence of regional enforcement mechanisms.¹⁰

Consequently, ASEAN bodies like the Working Group on Climate Change (AWGCC) function as platforms for coordination and dialogue, not as authorities imposing binding targets. As one official from the ASEAN Centre for Energy explained, their mandate is to "facilitate discussion, build shared understanding, and provide data."¹¹ Policy remains squarely within the hands of national governments. This institutional design inherently limits the top-down harmonization of NDCs. Without mechanisms for enforcement or even coordination of ambition levels, collective progress depends on voluntary alignment. The absence of sanctions is not incidental – it reflects a foundational principle of ASEAN governance. As one ASEAN expert noted, "We prefer to have a discussion than nothing at all."¹²

However, the Charter's "ASEAN Minus X" formula (Article 21(2)), permitting initiatives by a subset of willing members, offers a potential, though historically underutilized in environmental governance, pathway for flexible cooperation. Desierto (2021) suggests such "coalitions of the willing" could pioneer regionally aligned

9 ASEAN Secretariat. (2008). The ASEAN Charter. ASEAN. <https://asean.org/wp-content/uploads/images/archive/publications/ASEAN-Charter.pdf>

10 Desierto, D. & Cohen, D. (2022, August 1). *ASEAN Law and Regional Integration: Governance and the Rule of Law in Southeast Asia's Single Market*. Routledge.

11 Interview A1. Interview conducted by the author, personal communication, 2025. Anonymized ASEAN climate policy advisor. Transcript on file with the author.

12 *Ibid.*

actions like harmonized MRV systems, a sentiment echoed by a former Indonesian official: “If ASEAN cannot agree to do something together, maybe a few countries can start and show that it works.”¹³

While often viewed as a constraint to deep integration, the ASEAN Way can also enable durable, context-sensitive cooperation within a diverse region. Progress built on trust, peer learning, and voluntary alignment is often more sustainable than prescriptive mandates. Thus, enhancing NDC ambition and regional coherence in Southeast Asia necessitates working with this foundational framework, designing facilitative mechanisms that are politically acceptable and practically useful, thereby transforming perceived limitations into strengths for incremental and respectful climate progress.

1.3. Comparison with the European Union climate governance: Contrasting models of regional integration

The EU presents a contrasting model of regional climate governance, characterized by significant supranational authority, legally binding targets, and robust institutional enforcement. The European Commission drives climate policy through legislative initiatives and oversees compliance via its Directorate-General for Climate Action, supported by the European Environment Agency’s (EEA) independent data analysis.¹⁴ Key instruments include the Effort Sharing Regulation (ESR), which assigns binding national emission reduction targets,¹⁵ and mandatory National Energy and Climate Plans (NECPs)¹⁶ assessed by the Commission for alignment with EU-wide goals. A comprehensive, legally codified MRV system underpins this, with the European Court of Justice empowered to address non-compliance.¹⁷

This regulatory and enforcement-driven model facilitates a high degree of policy harmonization, though negotiations on burden-sharing and implementation still reflect internal EU diversity. ASEAN, by contrast, with its emphasis on national sovereignty and consensus,

13 Interview I3. Interview conducted by the author, personal communication, 2025. Anonymized former Indonesian government official. Transcript on file with the author.

14 Jensen, L. & Dewulf, N. (2024). *Enforcing EU climate legislation*. European Parliament, European Union. [https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/762378/EPRS_BRI\(2024\)762378_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/762378/EPRS_BRI(2024)762378_EN.pdf)

15 Trio, W. & Mühlenhoff, J. (2025, May). *Effort Sharing Regulation (ESR): European Green Deal Risk Radar updated brief*. Heinrich-Böll-Stiftung EU. <https://eu.boell.org/sites/default/files/2025-05/12-egd-risk-radar-updated-esr.pdf>

16 European Commission. (n.d.). *Governance of the Energy Union and Climate Action*. European Commission. https://climate.ec.europa.eu/eu-action/climate-strategies-targets/governance-energy-union-and-climate-action_en

17 European Commission. (n.d.). *Legal enforcement: Environment*. European Commission. https://environment.ec.europa.eu/law-and-governance/legal-enforcement_en

has no equivalent regional NDC or binding targets; each Member State submits its NDC individually.

While the EU's supranational approach is not directly transferable to ASEAN's distinct institutional philosophy, specific procedural elements from the EU experience offer valuable lessons. The EU's structured NECP process, for instance, could inform a voluntary, non-binding ASEAN framework for national "Climate Action Roadmaps," thereby encouraging greater policy coherence and foresight among Member States without infringing on sovereignty. Similarly, the EEA's role in providing independent data and progress assessments serves as a useful reference for the potential functions of the ASEAN Centre for Climate Change (ACCC), which could evolve into a vital regional hub for technical support, enhancing transparency, and establishing regional benchmarks through facilitative means.¹⁸ The EU's experience, with financial mechanisms designed to support climate action among its diverse membership,¹⁹ also underscores the critical need for ASEAN to address equity and capacity differences through its regional funding initiatives. By critically examining and adapting such procedural lessons, ASEAN can strengthen its unique consensus-based model for more effective regional climate cooperation.

Table 1: Comparative overview of regional climate governance

Aspect	European Union	ASEAN
NDC status	Joint NDC for EU-27 (e.g., at least 55% net GHG reduction by 2030 vs 1990); internal effort-sharing arrangements	Individual NDCs from each Member State; ASEAN is not a Party to the Paris Agreement
Legal commitments	Legally binding via European Climate Law; enforceable regulations; infringement procedures possible	Primarily non-binding; no enforcement; national sovereignty and voluntary participation upheld under the "ASEAN Way"

18 European Environment Agency. (n.d.). *European Environment Agency's home page*. European Environment Agency. <https://www.eea.europa.eu/en>

19 European Commission. (n.d.). *Supporting climate action through the EU budget*. European Commission. https://climate.ec.europa.eu/eu-action/eu-funding-climate-action/supporting-climate-action-through-eu-budget_en

Aspect	European Union	ASEAN
Institutional coordination	Commission proposes and monitors legislation; Parliament and Council co-legislate; DG CLIMA and EEA coordinate implementation	ASEAN Secretariat compiles reports and facilitates meetings; decisions made by consensus in ministerial platforms
Target-setting & burden-sharing	Formal EU-wide targets allocated through ESR; ETS trading mechanisms	No regional burden-sharing; national targets set independently
Monitoring & accountability	MRV systems codified in law; NECPs reviewed by Commission; EEA tracks implementation	Reporting to UNFCCC continues; regional reporting is non-binding and peer-led
Climate finance	Internal redistribution through EU funds, significant external climate finance contributions	Relies on international finance; ACGF supports project finance but lacks redistributive scope
Regional strategy	European Green Deal defines 2050 climate neutrality as legal objective; climate mainstreamed across sectors	ASEAN Community Vision 2045 and ACCSAP guide cooperation; long-term regional strategy under discussion but not yet binding

Source: Compiled by the author

2. Results and discussion

2.1. Comparative Nationally Determined Contributions ambition and structure: Targets, conditionality, transparency

A comparative analysis of the latest NDCs from Indonesia, Myanmar, the Philippines, Singapore, Thailand, and Viet Nam reveal significant heterogeneity in their approaches to climate mitigation and adaptation, underscoring the “fragmentation and asymmetry” central to this paper’s inquiry. This diversity is evident across multiple dimensions, including the type and ambition of mitigation targets, the extent and nature of conditionality, sectoral coverage, and the clarity of information provided.

2.1.1. Mitigation targets

Mitigation targets across the six NDCs vary in type, scope, and reference baselines. Indonesia, Thailand, Viet Nam, Myanmar, and

the Philippines continue to anchor their commitments to Business-As-Usual (BAU) emission projections.

- Indonesia (2022)²⁰ pledges a 31.89% unconditional and 43.20% conditional reduction against a 2030 BAU of 2.869 GtCO₂e.

- Thailand (2022)²¹ targets a 30% unconditional and up to 40% conditional cut from its 2030 BAU of approximately 555 MtCO₂e.

- Viet Nam (2022)²² commits to 15.8% unconditional and 43.5% conditional reductions from its BAU trajectory, with an additional goal to reduce emissions intensity per unit of GDP by at least 15% compared to 2014.

- The Philippines (2021)²³ aims for a cumulative 75% reduction by 2030, with only 2.71% being unconditional.

- Myanmar (2021)²⁴ adopts cumulative reduction goals of 244.52 MtCO₂eq (unconditional) and 414.75 MtCO₂eq (conditional), with focus on energy and AFOLU sectors.

While BAU-based targets offer flexibility for economies prioritizing growth, they also obscure the true ambition of commitments. As several interviewed experts noted, BAU projections often lack transparency and may be inflated. A civil society respondent observed, “BAU targets give space for ambition inflation. Without a third-party methodology, they’re hard to verify.”²⁵ This sentiment was echoed across stakeholder consultations, where concerns were raised about the inconsistent quality of BAU modelling.

In contrast, Singapore (2025)²⁶ adopts an economy-wide absolute cap, eschewing BAU constructs altogether. Its second NDC commits to peaking emissions at 65 MtCO₂e by around 2030 and reaching net zero by 2050, with an interim reduction to 45-50 MtCO₂e by 2035. A Singapore-based sustainability expert articulated this rationale: “We

20 Republic of Indonesia. (2022). *Enhanced NDC - Republic of Indonesia*. UNFCCC. <https://unfccc.int/documents/615082>

21 Government of Thailand. (2022). *Thailand 2nd Updated NDC*. UNFCCC. <https://unfccc.int/documents/620602>

22 Socialist Republic of Viet Nam. (2022). *Vietnam NDC 2022*. UNFCCC. <https://unfccc.int/documents/622541>

23 Republic of the Philippines. (2021). *Nationally determined contribution*. UNFCCC. <https://unfccc.int/sites/default/files/NDC/2022-06/Philippines%20-%20NDC.pdf>

24 The Republic of the Union of Myanmar. (2021). *Updated nationally determined contribution*. UNFCCC. <https://unfccc.int/sites/default/files/NDC/2022-06/Myanmar%20Updated%20%20NDC%20July%202021.pdf>

25 Interview T1. Interview conducted by the author, personal communication, 2025. Anonymized ASEAN Secretariat official. Transcript on file with the author.

26 Government of Singapore. (2025). *Singapore second nationally determined contribution*. UNFCCC. <https://unfccc.int/sites/default/files/2025-02/Singapore%20Second%20Nationally%20Determined%20Contribution.pdf>

wanted a target that's quantifiable and bankable. Investors and regulators need a number, not a percentage off an imaginary baseline."²⁷ This fundamental divergence in target architecture, BAU projections versus an absolute cap, is a primary manifestation of the region's fragmented approach to NDC mitigation commitments.

2.1.2. Conditionality

Beyond the structure of targets, the profound reliance on conditionality is a defining characteristic of most ASEAN NDCs, directly impacting the certainty and collective strength of the region's pledged ambition.

- Indonesia maintains a conditional commitment, which is over a third, higher than its unconditional pledge.

- Thailand's conditional goal raises the country's ambition by an additional 10 percentage.

- Viet Nam sets a conditional target approximately 2.75 times its unconditional ambition.

- The Philippines' NDC is overwhelmingly contingent, with approximately 96% of its headline 75% reduction target (equating to 72.29 percentage points) being conditional upon international support

- Myanmar's conditional ambitions are nearly twice as important as its unconditional ones.

Singapore is the exception among these examples, as it has not put forward a conditional target and focuses only on an unconditional commitment to peak emissions earlier and achieve around 65 MtCO_{2e} in 2030.

This widespread dependence on international finance, technology transfer, and capacity building reflects the Paris Agreement's recognition of common but differentiated responsibilities. Yet, the lack of specificity regarding the type and scale of support required, and the plans to absorb such support, can create uncertainty regarding the feasibility of achieving these conditional targets. This reliance is also a key finding from the regional survey, where "inadequate international support/difficulty accessing international climate finance mechanisms" was consistently ranked as a top barrier to NDC implementation.

One ASEAN climate advisor noted, "Conditional targets are often aspirational, shaped by what governments think donors want to hear. But implementation depends on systems that many countries haven't yet built."²⁸ Similarly, a Filipino expert emphasized that "Conditionality

27 Interview S1. Interview conducted by the author, personal communication, 2025. Anonymized sustainability and ESG specialist, Singapore. Transcript on file with the author.

28 Interview A1, *supra* note 11.

reflects realism... but if every country relies too much on conditional targets, the region's ambition signal weakens.”²⁹ Effectively mobilizing predictable and adequate climate finance is therefore not just an enabling factor but a determinant for translating the bulk of ASEAN's stated climate ambition into tangible, verifiable action.³⁰ This pervasive contingency introduces a high degree of variability to the region's collective climate posture.

2.1.3. Information for clarity, transparency, and understanding: A foundation for trust and comparability

The varying levels of Information for clarity, transparency, and understanding (ICTU) embedded within ASEAN NDCs represent a critical dimension of their fragmentation, directly impacting regional comparability, collective progress assessment, and investor confidence. While Singapore's NDC, for example, provides extensive methodological notes and aligns with detailed ICTU requirements, others, particularly those reliant on complex Business-As-Usual projections or with significant Land Use, Land-Use Change, and Forestry (LULUCF) components, may offer less explicit details on crucial assumptions, baselines, or accounting methodologies. This opacity was a concern noted in the regional survey, with respondents frequently finding their national NDCs “Somewhat unclear” or “Less structured,” and some stating, “The data and methodology are unclear making it open for interpretation.”³¹

Robust ICTU is not only essential for assessing NDC ambition but also foundational for effective tracking under the Enhanced Transparency Framework and for preparing credible Biennial Transparency Reports.³² Without clear, comparable data and transparent methodologies, building regional trust, fostering mutual learning on best transparency practices, and attracting climate finance predicated on verifiable impacts becomes considerably more challenging for ASEAN as a collective.

29 Interview I1. Interview conducted by the author, personal communication, 2025. Anonymized Indonesian climate policy expert. Transcript on file with the author.

30 UNFCCC secretariat. (2023). *Guidebook on how to access climate finance for Member States of the ASEAN*. UNFCCC. https://unfccc.int/sites/default/files/resource/J0008_UNFCCC_NBF_ASEAN_Guidebook_FINAL_AW_digital.pdf

31 Regional survey conducted by the author, personal communication, 2025. Anonymous online questionnaire of 26 respondents across ASEAN. Participants consented to anonymization. Responses and instrument on file with the author; not publicly available.

32 Jeudy-Hugo, S., Lo Re, L., Hyun, H., & Pouille, C. (2024, October). *Considerations for informing, implementing, and investing in the next nationally determined contributions (NDCs)* (OECD/IEA Climate Change Expert Group Papers No. 2024(3)). OECD Publishing. <https://doi.org/10.1787/4f014ce6-en>

2.1.4. Sectoral coverage

While ASEAN NDCs commonly prioritize the Energy and Agriculture, Forestry, and Other Land Use (AFOLU) sectors for mitigation, reflecting their significant share of regional emissions, the specific emphasis, depth of proposed actions, and degree of integration across economic sectors reveal significant heterogeneity. This diversity, while rooted in national contexts, complicates the development of synergistic regional climate strategies and the effective implementation of existing ASEAN sectoral cooperation frameworks. For instance, Indonesia's NDC places substantial emphasis on its vast FOLU sector, detailing ambitious targets for reducing deforestation and peatland degradation. In contrast, highly urbanized and resource-constrained Singapore concentrates heavily on industrial energy efficiency, strategies for low-carbon energy importation, and the development of advanced technologies like hydrogen and Carbon Capture and Storage (CCS). While countries like Viet Nam and Thailand present broader measures across energy, transport, agriculture, and waste, the varying depth of these sectoral commitments and the underlying policy frameworks can hinder coordinated regional action.

This divergence impacts the potential for integrated regional initiatives. Additionally, while adaptation priorities are prominent in the NDCs of vulnerable nations like the Philippines and Viet Nam, the differing balance and integration of mitigation versus adaptation efforts across the region's NDCs can fragment regional approaches to resource mobilization and strategic planning for these two interdependent pillars of climate action.

The significant variation in how ASEAN NDCs define baselines, articulate conditionality, and ensure transparency, not only complicates the regional aggregation of climate efforts but also creates substantial barriers for attracting international climate finance.

Global financial institutions and private investors increasingly seek clarity, comparability with strong MRV systems to ensure the credibility and impact of their investments.³³ Fragmented and opaque NDCs make it challenging for financiers to assess investment risks and opportunities at a regional scale. This is a critical issue, as expert interviews and survey data consistently identify “difficulty accessing international climate finance” as a primary impediment to NDC

33 World Economic Forum. (2024). *5 ways NDCs can become private climate finance catalysers*. World Economic Forum. <https://www.weforum.org/stories/2024/07/5-ways-ndcs-become-private-climate-finance-catalyzers/#:~:text=To%20mobilize%20private%20investment%2C%20five,and%20global%20consistency%20and%20harmonization>

implementation.³⁴ A regionally supported initiative to improve the ICTU aspects of NDCs, potentially through common reporting templates or minimum transparency standards, even if voluntary, could therefore significantly enhance the “investibility” of ASEAN NDCs and unlock greater financial flows for climate action in the region.³⁵

2.2. Institutional coordination and stakeholder inclusion

The implementation credibility of ASEAN NDCs hinges not only on technical design but also on the strength of institutional coordination and the inclusion of diverse stakeholder voices. Across the region, significant disparities persist in both domains, revealing systemic governance challenges that constrain effective climate action.

2.2.1. Fragmented institutional coordination

At the national level, inter-ministerial coordination remains a significant hurdle in many AMS. As an Indonesian expert stated, “One of the biggest challenges is inter-ministerial coordination... Each [ministry] has its own targets and responsibilities, making integration complicated.”³⁶ This sentiment is echoed by other experts who point to “policy fragmentation and inter-ministerial ego.”³⁷ where ministries may pursue conflicting objectives, such as agricultural production goals that inadvertently increase emissions, thereby undermining climate targets. In Viet Nam, while the NDC is aligned with broader national strategies, its operationalization as a multisectoral governance tool is constrained, particularly at subnational levels. The Philippines also faces challenges with “overlapping mandates between different departments.”³⁸ Even in Singapore, which has a more centralized Inter-Ministerial Committee on Climate Change (IMCCC), ensuring deep decarbonization across all sectors requires continuous effort. The establishment of national climate change committees or equivalent bodies, such as Indonesia’s NCCC or Thailand’s Department of Climate Change and Environment (DCCE), represents efforts to improve such coordination, but their effectiveness varies.

2.2.2. Stakeholder inclusion

The extent and quality of stakeholder participation in NDC processes across ASEAN are also mixed. While most NDCs mention

34 Regional survey, *supra* note 31.

35 Jeudy-Hugo, S. at el. (2024), *supra* note 32.

36 Interview I1, *supra* note 29.

37 Interview A2. Interview conducted by the author, personal communication, 2025. Anonymized official, ASEAN Centre for Energy. Transcript on file with the author.

38 Interview P1. Interview conducted by the author, personal communication, 2025. Anonymized environmental policy researcher, Philippines. Transcript on file with the author.

stakeholder consultations, the depth and impact of this engagement are often questioned by experts and civil society. For instance, an Indonesian expert described consultations as often “one-directional,”³⁹ with ministries presenting plans and feedback not always integrated into subsequent drafts. In Viet Nam, direct consultation with indigenous people for the NDC was reportedly limited due to capacity constraints and prioritization of livelihoods over policy engagement by these communities; NGOs often act as intermediaries.⁴⁰ The survey data reinforces this, with many respondents unaware of formal participation mechanisms or deeming them partially effective at best.⁴¹

The inclusion of indigenous people is particularly critical, given their role as stewards of significant forest resources and their unique vulnerabilities to climate change. While some NDCs, like those of the Philippines and Indonesia, explicitly recognise the rights and roles of indigenous people and the importance of traditional knowledge, the translation into meaningful participation in policy design and benefit-sharing remains a challenge. Similarly, youth and gender considerations are increasingly mentioned in policy discourse and some NDCs (e.g., Viet Nam’s NDC notes impacts on women and youth; Philippines’ NDC mentions gender-responsive development), but systematic integration into actionable strategies, budgeting, and M&E is often lacking.

The limited and often “performative”, as one expert termed it,⁴² inclusion of non-state actors, especially marginalized groups like indigenous people, in NDC formulation processes across ASEAN is not merely an equity concern. It represents a significant missed opportunity to integrate valuable local knowledge, traditional ecological practices, and innovative grassroots solutions for both mitigation and adaptation. Indigenous communities, for example, often possess generations of experience in sustainable forest management (crucial for the AFOLU sector) and adaptive strategies to local climate variability, insights that are invaluable for crafting effective and contextually relevant climate actions.⁴³

39 Interview I2, *supra* note 4.

40 Interview V1. Interview conducted by the author, personal communication, 2025. Anonymized official, Ministry of Natural Resources and Environment, Viet Nam. Transcript on file with the author.

41 Regional survey, *supra* note 31.

42 Interview A1, *supra* note 11.

43 Guillao, J. A., Indrarto, G. B., Lim, T., Venugopal, D. and Zunga, U. (2022, April). *Nationally determined contributions in Asia: Are governments recognizing the rights, roles and contributions of Indigenous Peoples?*. Asia Indigenous Peoples Pact (AIPP) & Forest Peoples Programme (FPP). https://aippnet.org/wp-content/uploads/2022/06/NDC_South_East_Asia_April2022-digital-compressed.pdf

Similarly, CSOs and youth organizations frequently have strong community ties and can play vital roles in awareness-raising, mobilizing local action, and monitoring NDC implementation. Excluding these groups or relegating their participation to superficial consultations can lead to NDCs that are disconnected from local realities, lack broad social legitimacy, and are ultimately less effective in their implementation.

The Draft ASEAN Declaration on Environmental Rights, with its emphasis on access to information, public participation, and protection of environmental defenders, provides a normative framework that could be leveraged to advocate for more inclusive processes regionally.⁴⁴

2.3. Adaptation–mitigation synergies

The fragmentation of ASEAN NDCs and persistent institutional silos extend to the sporadic and unsystematic integration of adaptation–mitigation synergies. This lack of a coordinated approach weakens the effectiveness of climate action in a region with limited resources and high vulnerability.⁴⁵ While some NDCs, such as Viet Nam’s, acknowledge the co-benefits between adaptation and mitigation, systematic strategies to identify, measure, and optimize these interlinkages are generally absent.

Nature-based Solutions (NbS), like mangrove restoration, illustrate clear dual benefits: carbon sequestration (mitigation) and coastal protection (adaptation). Climate-smart agriculture similarly improves food security and resilience while reducing emissions. Yet such synergies are rarely reflected in integrated planning. NDCs often compartmentalize these objectives, leading to inefficient resource use. A key barrier is the institutional divide between mitigation-oriented energy ministries and adaptation-led environment ministries, as confirmed by an ASEAN Centre for Energy official.⁴⁶

A regional strategy to promote high-impact synergies, such as in agriculture, forestry, and urban resilience, could generate significant gains. ASEAN platforms like ACCSAP and the ACCC could support this by facilitating knowledge exchange, standardizing methods to assess co-benefits, and mobilizing finance for integrated projects. This would not only improve project effectiveness but also enhance

44 Arini, W., RWI, and Syaharani (n.d.). *ASEAN Environmental Rights Declaration: Impact, Challenges, and Strategies for Paris Agreement Goals*. Raoul Wallenberg Institute of Human Rights and Humanitarian Law. <https://rwi.lu.se/asean-environmental-rights-declaration-impact-challenges-and-strategies-for-paris-agreement-goals/>

45 ASEAN Secretariat. (2021), *supra* note 2.

46 Interview A2, *supra* note 37.

alignment with the Sustainable Development Goals, increasing both their developmental value and investment appeal. Importantly, adaptation-mitigation synergies offer a politically feasible path for regional cooperation. Experts noted that adaptation is “less politically sensitive” and “avoids geopolitical friction”,⁴⁷ making it a more acceptable entry point for collaboration. While mitigation can trigger debates over responsibility and competitiveness, adaptation aligns with national priorities and shared threats like flooding and drought.

Focusing on synergistic actions that respond to mutual vulnerabilities can build trust among Member States and facilitate progressive enhancement of NDCs. It offers a pragmatic route to deepen regional ambition while respecting ASEAN’s consensus-based approach, maximizing both climate and development outcomes across Southeast Asia.

2.4. National implementation challenges

The successful implementation of NDCs in ASEAN is beset by a range of common challenges, frequently cited in literature, survey responses, and expert interviews.

2.4.1. Financial constraints and budget tagging

A significant and persistent challenge is the substantial gap between the financial resources required for ambitious mitigation and adaptation actions and the funds currently accessible to ASEAN Member States. Many AMS NDCs feature significant conditional targets that are contingent upon international climate finance, which has historically been insufficient, difficult to access, and often skewed towards mitigation. As an expert on climate finance highlighted, “Most ASEAN NDCs are heavily conditional on external support, yet the mechanisms for accessing and deploying this support effectively are still underdeveloped.”⁴⁸ This reliance is underscored by the Needs-based Climate Finance (NBF) Project’s technical assessment, which estimated regional needs at 422.17 US dollars billion by 2030, while annual international climate finance flows averaged only 3.2 US dollars billion between 2013–2017, with other estimates suggesting similar significant shortfalls.⁴⁹

47 Interview A1, *supra* note 11.

48 Interview S2. Interview conducted by the author, personal communication, 2025. Anonymized climate-finance specialist, Singapore. Transcript on file with the author.

49 ASEAN Secretariat (2024, November). *Access to finance: Issues and challenges to ASEAN (ASCC-RD Trend Report CC6-2024)* (Vol. 6). ASCC Research and Development Platform on Climate Change ASEAN. https://asean.org/wp-content/uploads/2024/11/ASCC-RD_Trend-Report_CC6-2024.pdf

While some countries, like the Philippines with its Climate Change Expenditure Tagging (CCET) system,⁵⁰ and Indonesia with similar initiatives, have begun to track climate-related expenditures, these systems are often nascent. A Filipino expert involved in NDC implementation planning noted, “Our analysis showed that only a very small percentage of national funds tagged for climate... are directly traceable to NDC policies and measures, revealing a significant disconnect between budget allocation and strategic climate priorities.”⁵¹ This indicates that even when domestic funds are notionally allocated, their direct impact on NDC actions is not always clear or systematically monitored. Mobilizing private investment requires clear targets, stable policy frameworks, transparent governance, and integrated climate finance mechanisms.⁵² However, attracting private capital remains a hurdle due to perceived risks, a lack of bankable projects, and the need for more conducive enabling environments.

Furthermore, accessing international funds like the Green Climate Fund can be slow and cumbersome, often involving lengthy due diligence and co-financing requirements that can create bottlenecks for provinces with limited budgets. An ESG specialist from Singapore pointed out that even with mechanisms like carbon taxes, their immediate impact on behavioural change can be limited if not set at transformative levels and if significant rebates are offered to key industries.⁵³

2.4.2. Subnational implementation gaps

A significant disconnect frequently exists between national NDC targets and the planning and implementation capabilities of subnational entities (provincial, local). An Indonesian expert starkly stated, “Local governments often don’t even know about the national targets... There’s a huge gap between the national document and regional planning.”⁵⁴ This vertical integration challenge is often exacerbated by decentralized governance structures and limited technical and financial capacity at the local level to translate national goals into concrete actions and budgets.

50 Republic of the Philippines. (2023). *Implementation Plan for the Republic of the Philippines Nationally Determined Contribution (NDC) 2020-2030*. The Climate Change Commission (CCC) and the Department of Environment and Natural Resources (DENR). <https://niccdies.climate.gov.ph/files/documents/The%20Philippines-%20NDC%20Implementation%20Plan%20-%2020072024.pdf>

51 Interview P2. Interview conducted by the author, personal communication, 2025. Anonymized NGO specialized in NDC implementation, Philippines. Transcript on file with the author.

52 UNFCCC secretariat. (2023), *supra* note 30.

53 Interview S1, *supra* note 27.

54 Interview I1, *supra* note 29.

The ASEAN State of Climate Change Report notes that while national policy progress is commendable, this “needs to percolate down to the grassroots level”, requiring empowered local institutions.⁵⁵ For instance, a respondent from the Philippines highlighted that the Department of Environment and Natural Resources (DENR) faces challenges in “streamlining national policies into their regional field offices and to local government units.”⁵⁶ Effective NDC implementation necessitates that subnational actors are not only aware of but are also equipped and incentivized to contribute to national climate objectives.

2.4.3. Data deficiencies and Monitoring, Reporting, and Verification systems

The lack of reliable, comprehensive, and standardized data for Greenhouse Gas inventories, progress tracking, and robust Monitoring, Reporting, and Verification (MRV) systems is a pervasive issue across many ASEAN nations. This deficiency hampers evidence-based policymaking complicates accurate reporting under the Paris Agreement’s Enhanced Transparency Framework and undermines the ability to attract results-based finance. An expert from Viet Nam’s Ministry of Natural Resources and Environment lamented, “We lack Monitoring, Evaluation, and Learning systems. Policymaking still relies on damage reports rather than forward-looking risk assessments,” and noted that “local data...is often fragmented, not scientifically validated.”⁵⁷ Similarly, another Vietnamese interviewee pointed out that inconsistent data from sectors like agriculture and transport “undermine confidence in reported mitigation outcomes.”⁵⁸

An Indonesia expert, drawing on his regional experience, observed that “readiness remains low across much of ASEAN, especially for adaptation MRV,” though he also stressed that “having a registry system is an enabling condition not only for transparency but also to attract finance.”⁵⁹ Indonesia’s National Registry System (SRN), and similar efforts in Singapore and Thailand represent positive steps. However, the ASCCR details challenges in GHGI MRV, including incomplete coverage of gases and sectors, and varied adherence to IPCC methodological tiers.⁶⁰ The development and consistent use of national indicators and methodologies for tracking NDC progress, as

55 ASEAN Secretariat. (2021), *supra* note 2.

56 Interview P1, *supra* note 38.

57 Interview V1, *supra* note 40.

58 Interview V2. Interview conducted by the author, personal communication, 2025. Anonymized Public Law student, Viet Nam. Transcript on file with the author.

59 Interview I2, *supra* note 4.

60 ASEAN Secretariat. (2021), *supra* note 2.

required by BTRs, are crucial for assessing collective advancement towards GST1 energy and forestry outcomes.

2.4.4. *Political stability and governance issues*

The implementation of NDCs in ASEAN is often hindered by political instability and governance deficits. In Myanmar, the 2021 coup led to an abrupt halt in climate finance flows, as international institutions suspended funding to the military regime. A local NGO representative noted: “Since the 2021 coup, most [climate finance] flows have been frozen... International institutions have policies that prevent funding unrecognized governments.”⁶¹ This has paralyzed projects dependent on external support and fragmented national responses.

Even in more stable contexts, persistent governance challenges limit progress. Conflicting policies undermine climate goals, such as in the Philippines, where the Department of Energy’s continued promotion of coal contradicts national targets for renewable energy expansion.⁶² These policy misalignments erode coherence and stall decarbonization.

The political nature of NDCs further complicates implementation. A former Indonesian official observed that NDCs are “inherently political” and heavily shaped by high-level actors.⁶³ Shifting political priorities, often tied to electoral cycles, reduce long-term commitment to climate investments, whose benefits accrue over decades.

Transparency and accountability gaps also impede progress. The UNFCCC’s Guidebook for ASEAN (2024)⁶⁴ warns that weak governance and corruption can compromise project management and deter climate finance. Without credible safeguards, national efforts risk inefficiency and public distrust.

Across the region, stakeholders call for “clearer, standardized templates for tracking progress” and better integration of “social dimensions” into NDC processes.⁶⁵ Strengthening foundational capacities, such as harmonized MRV systems, transparent data protocols, and subnational planning tools, through regional cooperation could help address these recurring issues and enhance implementation across ASEAN.

61 Interview M1. Interview conducted by the author, personal communication, 2025. Anonymized NGO representative, Myanmar. Transcript on file with the author.

62 Interview P1, *supra* note 38.

63 Interview I2, *supra* note 4.

64 UNFCCC secretariat. (2023), *supra* note 30.

65 Regional survey, *supra* note 31.

3. Regional mechanisms for greater coherence

3.1. *Strategic rationale for regional cooperation: Beyond national action*

While NDCs are, by definition, nationally framed, the transboundary nature of climate change and the profound, shared vulnerabilities within ASEAN provide a compelling strategic rationale for enhanced regional cooperation.

3.1.1. *Addressing transboundary risks and enhancing collective resilience*

Many climate impacts inherently defy national borders, necessitating coordinated regional responses. Floods and droughts in shared river basins, most notably the Mekong, have cascading impacts on agriculture, energy, and livelihoods across multiple nations. An officer from Viet Nam's Ministry of Natural Resources and Environment emphasized that "60% of our water comes from outside our borders,"⁶⁶ highlighting the critical role of bodies like the Mekong River Commission as models for transboundary water resource management. Another expert pointed out how unilateral actions, such as Laos' hydropower projects, can directly affect downstream countries like Viet Nam, underscoring the need for "stronger coordination through ASEAN meetings or shared environmental impact mechanisms."⁶⁷ Rising sea levels and increased storm intensity threaten interconnected coastal ecosystems and populations throughout the region. Transboundary haze pollution, a persistent issue in ASEAN, directly impacts public health and economies across borders, necessitating agreements like the ASEAN Agreement on Transboundary Haze Pollution.⁶⁸

Regional mechanisms can facilitate joint risk assessments, bolster early warning systems, and enable collaborative adaptation strategies, thereby pooling resources and expertise to build collective resilience. The ASCCR itself points to existing frameworks like the ASEAN Agreement on Disaster Management and Emergency Response (AADMER) as a basis for managing such climate-related disasters.⁶⁹

3.1.2. *Strengthening diplomatic voice and negotiating power*

A more cohesive ASEAN, articulating shared priorities informed by aligned NDCs, can significantly amplify its influence in global climate negotiations. This is particularly crucial in discussions concerning climate finance, technology transfer, and loss and damage. As noted by an expert, "leveraging the consolidated economic and soft power

66 Interview V1, *supra* note 40.

67 Interview A2, *supra* note 37.

68 ASEAN Secretariat (n.d.). *ASEAN Agreement on Transboundary Haze Pollution*. ASEAN. <https://asean.org/wp-content/uploads/2021/01/ASEANAgreementonTransboundaryHazePollution-1.pdf>

69 ASEAN Secretariat. (2021), *supra* note 2.

of ASEAN member-states allows not only for a stronger voice in the global climate arena....”⁷⁰ The ASEAN Joint Statements on Climate Change delivered at UNFCCC COPs already serve to “attest to our region’s aspirations and renewed commitments”, and as an expert from the ASEAN Centre for Energy described, these are perhaps the “closest thing to a regional climate consensus.”⁷¹ For a region acutely vulnerable to climate impacts yet contributing moderately to historical global emissions, a unified front is indispensable.

3.1.3. *Facilitating capacity building and knowledge exchange*

AMS often face common capacity constraints in crucial areas such as GHG inventory development, establishing robust MRV systems, undertaking sophisticated climate modelling, designing effective policies, and navigating the complex landscape of climate finance. An expert highlighted that ASEAN’s role is to “facilitate knowledge-sharing and identify areas of common interest”, where “coordinated learning” can occur even if full harmonization is not feasible.⁷² Regional platforms can act as vital hubs for this exchange. Initiatives like the ASEAN Climate Change and Energy Project (ACCEPT II), hosted by ACE, exemplify this by explicitly working to bridge the energy and climate sectors through knowledge dissemination, capacity-building workshops, and technical modelling support for AMS. For instance, ACCEPT II provided crucial support to Lao PDR in launching its first official net-zero model. The ASEAN State of Climate Change Report further details extensive capacity needs across AMS in both adaptation and mitigation.⁷³ Such collaborative efforts lead to more efficient resource utilization, accelerated learning, and the diffusion of best practices, such as the development of national emissions registry systems seen in Indonesia, Singapore, and Thailand. The OECD/IEA also underscores that ongoing capacity-building support is vital for the preparation and implementation of enhanced NDCs.⁷⁴

3.1.4. *Attracting scaled-up climate finance and investment*

A regionally coordinated approach can significantly enhance ASEAN’s appeal for international climate finance and private sector investment. Common standards for green projects, regional investment pipelines, and platforms like the ASEAN Catalytic Green Finance Facility (ACGF) can help to de-risk investments, reduce transaction

⁷⁰ Interview P2, *supra* note 51.

⁷¹ Interview A2, *supra* note 37.

⁷² Interview A2, *supra* note 37.

⁷³ ASEAN Secretariat. (2021), *supra* note 2.

⁷⁴ Judy-Hugo, S. at el. (2024), *supra* note 32.

costs, and mobilize capital at a scale that individual national efforts may struggle to achieve. As one expert noted, “A coordinated ASEAN approach could improve access to climate finance by pooling demand and attracting larger-scale investments.”⁷⁵ A regional strategy for climate finance is crucial for addressing the significant funding gap. While ACE itself does not directly facilitate finance, it supports the creation of “enabling environments”, and a “shared ASEAN platform for green finance mobilization is still in the early conceptual phase.”⁷⁶

By demonstrating collective leadership and effective, coordinated problem-solving on a critical global challenge, ASEAN reinforces its “Centrality” in the evolving regional and global architecture. This proactive stance not only contributes vital momentum towards global climate goals but also aligns with ASEAN’s broader strategic objectives of fostering a resilient and integrated community capable of addressing shared destiny issues. It was aptly summarized that the “ASEAN Way” as one that “respects national autonomy while still promoting cooperation...not about creating binding regional laws but about inspiring progress through shared experience.”⁷⁷

3.2. Structural barriers to regional coherence

Despite the compelling strategic rationale for cooperation, the pursuit of greater NDC coherence within ASEAN is confronted by deep-seated structural barriers. These are not merely extensions of national implementation challenges but are intrinsic to the historical development, foundational principles, and operational modalities of ASEAN itself, shaping the landscape for collective climate action.

3.2.1. The enduring “ASEAN Way”: Sovereignty, consensus, and institutional design

The foremost barrier is the “ASEAN Way”, a governance model profoundly shaped by the region’s history, including a colonial past that instilled a deep-seated emphasis on national sovereignty and non-interference. This historical sensitivity is a cornerstone of the ASEAN Charter and dictates a consensus-based decision-making process. ASEAN, as a regional body has no authority to standardise or enforce climate targets. Consequently, ASEAN’s approach, as an ESG expert from Singapore noted, “works by consensus, and every country wants its own influence”, which inherently “limits ambition at the regional

75 Regional survey conducted by the author, personal communication, 2025. Anonymous online questionnaire of 26 respondents across ASEAN. Participants consented to anonymization. Responses and instrument on file with the author; not publicly available.

76 Interview A2, *supra* note 37.

77 Interview I3, *supra* note 13.

level.”⁷⁸ This institutional design favours non-binding agreements and “soft mechanisms, policy blueprints, consensus documents, and knowledge exchange”, rather than supranational directives for NDCs.

3.2.2. *Divergent national interests, economic competition, and political economies*

The considerable “economic and political asymmetry” within ASEAN, as one Vietnamese expert put it, results in varied national priorities that can impede unified regional climate action.⁷⁹ An expert from the private sector of Singapore highlighted that ASEAN States have “varying levels of economic development and, therefore, economic considerations” and “different geophysical conditions”, which “affect each country’s pathway to decarbonisation. As such, shared initiatives... may not be applicable to ASEAN.”⁸⁰ National economic strategies can also introduce competitive dynamics; for example, the ACE expert mentioned Laos’s ambition to be the “Battery of Southeast Asia”, a plan with significant transboundary environmental implications where “national priorities still dominate” regional considerations.⁸¹ This pursuit of distinct development models, often influenced by powerful domestic industries, means that, as a youth activist stated, “each country still prioritizes its own development model”, making alignment on potentially costly or restrictive regional climate measures secondary.⁸² Furthermore, scepticism among developing nations, fuelled by perceived shortfalls in climate finance commitments from developed countries, can make AMS “hesitate to increase ambition” collectively if regional pacts are seen as inequitable or unsupported.⁸³

3.2.3. *Asymmetries in technical capacity and data for regional frameworks*

Beyond national-level capacity issues, the unevenness in technical expertise, data quality, and institutional maturity among AMS is a critical barrier to formulating and monitoring coherent regional climate strategies. The ASCCR details these disparities, which affect GHG inventory quality, MRV robustness, and climate modelling across the region. An expert from the ASEAN Secretariat pointed directly to this challenge for regional action: “the current diversity in NDC templates makes comparative analysis and tracking very difficult... ASEAN lacks

78 Interview S1, *supra* note 27.

79 Interview V1, *supra* note 40.

80 Interview S2. Interview conducted by the author, personal communication, 2025. Anonymized climate-finance specialist, Singapore. Transcript on file with the author.

81 Interview A2, *supra* note 37.

82 Interview I1, *supra* note 29.

83 Interview A1, *supra* note 11.

a common definition of ‘net zero’ or ‘carbon neutrality.’ Aligning on terminology is a necessary first step before developing synchronized policies.”⁸⁴ This lack of foundational standardization hinders the establishment of common regional benchmarks or harmonized MRV systems, which the ASCCR identifies as a necessary precursor for regional carbon markets. An expert from Viet Nam’s government also expressed doubts about the feasibility of “harmonized indicators without more political will or functional incentives.”⁸⁵

3.3. Policy pathways for enhanced regional Nationally Determined Contributions coherence

Despite inherent structural barriers, tangible policy pathways exist to cultivate greater NDC coherence and collective ambition within ASEAN. These pathways, by strategically leveraging existing institutional frameworks and respecting the region’s operational modalities, can foster shared understanding, bolster regional capacities, and forge stronger strategic alignment in climate action, moving beyond fragmented national efforts.

3.3.1. Strengthening ASEAN institutional mechanisms for climate action

A more robust and coordinated institutional backbone within ASEAN is fundamental for nurturing regional NDC coherence and translating shared climate objectives into harmonized action. The AWGCC is a “consultative and collaborative platform to enhance regional cooperation and action.”⁸⁶ Its mandate and resources should be strategically enhanced to transform it into a more dynamic hub for NDC harmonization. This includes facilitating systematic dialogues on NDC updates, co-developing common methodological approaches where feasible, and coordinating unified regional positions for UNFCCC engagements. An ASEAN officer observes that the AWGCC already “proactively sought opportunities to coordinate action plans with other relevant working groups... beyond the environment sector, such as energy, transport, agriculture, forestry, and science and technology” underscores its potential for driving cross-cutting NDC coherence if adequately empowered.⁸⁷

The nascent ACCC, an initiative spearheaded by Brunei Darussalam, represents a critical opportunity to institutionalize regional

84 Interview A3. Interview conducted by the author, personal communication, 2025. Anonymized ASEAN Secretariat official. Transcript on file with the author.

85 Interview V1, *supra* note 40.

86 ASEAN Secretariat. (2021), *supra* note 2.

87 Interview A3 *supra* note 82.

climate expertise.⁸⁸ To maximize its impact on NDC coherence, the ACCC must prioritize functions that directly empower all AMS. This includes providing demand-driven technical assistance for NDC design and MRV, undertaking regional climate modelling and vulnerability assessments that can inform more aligned national targets, serving as a secure repository for standardized regional climate data, and spearheading targeted capacity-building programs. By cultivating unimpeachable technical credibility and responsiveness to diverse AMS needs, the ACCC can mature into a trusted, neutral “technical secretariat”, fostering peer learning and bolstering regional capacity for more coherent NDCs without impinging on national determination.⁸⁹

Furthermore, deepened cross-sectoral collaboration within ASEAN’s multifaceted architecture is paramount. Strengthening the operational linkages between the AWGCC/ACCC and influential sectoral bodies, particularly those governing energy (such as AMEM, supported by ACE’s ACCEPT II project, which explicitly aims to bridge the energy-climate policy divide, agriculture, transport, and finance is essential. Systematically mainstreaming climate objectives, informed by NDC aspirations, into the core work programs and policy outputs of these sectoral bodies, as envisioned by the ASEAN Socio-Cultural Community Blueprint 2025 (2016)⁹⁰ is indispensable for the effective regional implementation of ambitious, multifaceted NDCs.

3.3.2. Facilitating Member State-led initiatives

Voluntary, Member State-driven initiatives, resonating with the “ASEAN Way”, can organically foster trust and catalyse NDC enhancement across the region. The establishment of a Voluntary ASEAN NDC Peer Review Mechanism, carefully adapted to the region’s consensus-based culture, could prove highly effective. This would not be a punitive compliance audit but a facilitative and constructive platform, echoing an expert’s emphasis on “fostering lesson-sharing” as a key regional strength. Through such a mechanism, AMS could openly share NDC formulation methodologies, implementation hurdles, innovative solutions, and critical lessons learned, thereby promoting mutual learning and aiding countries in identifying concrete areas for improvement in subsequent NDC cycles. An ACE officer’s description of existing and successful ACE workshops as

88 Hübner, C., Piseth, K., & Chakriya, P. (Eds.). (2022, June). *ASEAN Climate Change Response*. Konrad-Adenauer-Stiftung e.V. & Asian Vision Institute.

89 Interview A3, *supra* note 84.

90 ASEAN Secretariat. (2016). *ASEAN Socio-cultural Community Blueprint 2025*. ASEAN. <https://www.asean.org/wp-content/uploads/2012/05/8.-March-2016-ASCC-Blueprint-2025.pdf>

“peer-learning space” where countries compare NDC experiences and dissect barriers provides a foundational model that could be formalized and scaled for comprehensive NDC review. Concurrently, develop a Climate Focal Points Network to enable more regular, structured, and technically substantive dialogue specifically on NDC matters, including coordinated preparations for UNFCCC submissions, sharing practical insights on ETF reporting challenges, and collectively tracking progress towards regional climate goals articulated in frameworks like the ACCSAP, would significantly improve regional coordination and the development of a more unified ASEAN voice.

3.3.3. Leveraging international partnerships

ASEAN can, and must, strategically leverage international partnerships to surmount common regional challenges that hinder collective climate action and NDC coherence. For mobilizing climate finance at the necessary scale, a collective and strategically coordinated ASEAN engagement with international partners and multilateral funds, including the GCF, is likely to be more impactful than fragmented national approaches. An ACE officer astutely noted that while a dedicated shared ASEAN finance platform remains conceptual, “building a regional pipeline of bankable projects could help AMS access funds.”

Regional facilities like the ASEAN Catalytic Green Finance Facility (ACGF) can be instrumental in this by de-risking investments and attracting larger-scale capital aligned with regionally identified priorities. International partners are also vital for delivering targeted technical support and capacity building. This is especially critical for enhancing the quality and comparability of NDCs in areas such as GHG inventories, sophisticated climate modelling, the development of clear sectoral decarbonization roadmaps, and, crucially, aligning national MRV systems with the rigorous requirements of the Paris Agreement’s Enhanced Transparency Framework.

It was proven that AMS have a shared interest in exploring harmonized MRV, potentially as a precursor to regional carbon markets. To be effective, such support must be genuinely demand-driven and meticulously coordinated through regional bodies like the ACCC, or specialized entities such as ACE for energy-specific MRV capacity, thereby ensuring relevance, preventing duplication, and building sustainable in-region expertise. This is indispensable for enabling all AMS to prepare comprehensive Biennial Transparency Reports (BTRs) and to participate meaningfully in international review processes like the TER and FMCP.

The full operationalization of the ACCC offers a pivotal opportunity to serve as the central nervous system for many of these facilitative functions. By establishing itself as a centre of excellence providing impartial technical expertise, robust data analysis, and a trusted, neutral platform for continuous dialogue, the ACCC can significantly empower AMS to develop progressively more ambitious, coherent, and implementable NDCs, thereby reinforcing regional cooperation and climate leadership firmly within the “ASEAN Way”. ●

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Author Contribution

The author solely contributed to the study conception and design. The author read and approved the final manuscript.

Declarations

Conflict of Interest: The author declares no competing interests.

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