Recommendations and Considerations for Argentina's NDC 3.0

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Executive Summary

The formal deadline for submitting new Nationally Determined Contributions (NDCs) was February 2025. As of March 2025 (when this document is written), only 18 countries had submitted their updated NDCs, and Argentina was not among them. However, there is still an opportunity—and a challenge—to raise climate ambition in line with the Paris Agreement's goal of limiting global warming to 1.5°C above pre-industrial levels. As a signatory, Argentina is required to communicate its mitigation and adaptation commitments. This document outlines considerations and recommendations to ensure that Argentina's NDC is fair, participatory, comprehensive, and effective. It puts forward a vision for Argentina's NDC 3.0 that emphasizes integrating human rights and equity, reinforcing the commitment to a just transition. Additionally, it calls for stronger oversight, transparency, and participation mechanisms to prevent policies from perpetuating existing inequalities and to drive meaningful change based on human rights and biodiversity protection.

Introduction and Context

The year 2025 marks a decade since the adoption of the Paris Agreement and will be a pivotal moment for advancing climate action at both global and national levels. February was the deadline for countries to submit a new round of Nationally Determined Contributions (NDCs)[1] outlining their climate actions through 2035. Although Argentina, like several other countries, did not submit its NDC on time, it still has the opportunity to do so. This update should reflect greater ambition than the previous round, incorporating the latest scientific findings and insights from the first Global Stocktake.[2]

For Argentina, updating its NDC is not just about meeting an international obligation—it is also a strategic opportunity to address the country's unique challenges. With an economy largely based on agricultural exports, Argentina is characterized by deep social inequalities, growing social and environmental conflicts, and high vulnerability to climate change. The country is already experiencing extreme weather events like droughts, heatwaves, floods, and glacier retreat, which affect its economic stability, food sovereignty, ecosystems, and the quality of life of its population (Argentine Ministry of Environment and Sustainable Development, 2020).

Additionally, increasing international pressure to comply with climate policies, along with new trade and financial conditionalities, creates a scenario where Argentina will face tougher requirements to access climate finance and compete in global markets. The rise in carbon border adjustment mechanisms, stricter environmental traceability requirements, and new regulatory frameworks designed to promote investments in social and ecological transitions in central countries is already reshaping the global economic and trade landscape.

1. NDCs are national plans and targets that countries are required to update and submit every five years under the Paris Agreement. They are the main tool for translating the global goal of limiting temperature rise to 1.5 °C into concrete action to prevent the worst impacts of the climate crisis the world is going through.

2. Under the Paris Agreement, Global Stocktakes are the official process to assess collective progress towards the climate goals set by the Agreement. See first Global Stocktake of the Paris Agreement, decision 1/CMA.5: https://unfccc.int/sites/default/files/resource/1_CMA.5.pdf

In this context, and in line with its responsibility to contribute to global emissions reductions and significantly strengthen adaptation policies, it is strategic for Argentina to use this new NDC (NDC 3.0) to position itself competitively in a shifting international landscape. By aligning its development policies with global climate commitments and funding opportunities, Argentina can prioritize the well-being of its population and the preservation of its ecosystems over the evolving global dynamics.

At the national level, the energy sector accounts for 50% of greenhouse gas (GHG) emissions, making it the largest source of emissions. The farming sector is the second-largest source, accounting for 25.48% of the country's emissions in 2022 (Argentine Environment Undersecretariat, 2024).

Beyond GHG emissions, the activities linked to these sectors cause significant social, economic, environmental, political, and institutional impacts. Tackling these issues calls for a structural approach, a thorough rethinking of the current development model, and a large-scale reorganization of production. Moreover, as Argentina is a federal country, provinces and local governments need to be engaged in the process to ensure NDC 3.0-related policies are consistent with local regulations.

In this context, this document aims to offer general considerations and sector-specific recommendations for preparing Argentina's NDC 3.0, which will be presented to the United Nations Framework Convention on Climate Change (UNFCCC) in the coming months of 2025. The goal is to strengthen Argentina's ambition and response to the global climate and ecological crisis.

General Considerations and Recommendations

First, Argentina's mitigation commitments under NDC 3.0 must align with the pathways that limit warming to 1.5 °C[3] suggested by the Intergovernmental Panel on Climate Change (IPCC) for 2030 and 2035, and thus with the goals of the Paris Agreement, considering the results of the first Global Stocktake. This, however, does not mean reducing GHG emissions should be the only focus. Argentina's NDC 3.0 must have respect for human rights and social and environmental justice at its core, addressing the multiple crises facing the country, such as poverty, community vulnerability to climate change impacts, pollution, and biodiversity loss, among others.

In this sense, NDC 3.0 could become a tool that, alongside other national climate policies, could contribute to countering the social inequalities exacerbated by increasingly extreme, frequent, and prolonged climate and weather events such as droughts, floods, heat and cold waves, and fires, among others. This is why incorporating a just transition approach into NDC 3.0 presents an opportunity to pave the way for fairer, more inclusive, equitable, and climate-resilient societies.

To be successful, Argentina's NDC 3.0 will need to include commitments to a just transition across all sectors of the economy, ensure the participation and collaboration of all relevant stakeholders affected by and involved in climate policies, and place the well-being of people and ecosystems at its core. To achieve this, it will be essential to review the current governance structure at all levels, as political and administrative divisions do not reflect territorial or social dynamics, ecosystems, and the way these factors interact.

3. Global emission reductions are set to reach 43% by 2030 and 60% by 2035, compared to 2019 levels. Developed countries are expected to lead this effort with stronger and more ambitious targets (IPCC, 2023).

Taking all this into account, some general considerations are outlined below to guide the elaboration and implementation of NDC 3.0.

Citizen Participation and Human Rights Approach

Argentina's NDC 3.0 must be planned, developed, and implemented within a genuinely participatory, inclusive, transparent, and democratic process. This process should not only involve the main productive and economic sectors but, most importantly, include rights holders such as indigenous peoples, local communities, women, LGBTI+ people, youth, civil society organizations, and other relevant stakeholders. **The actions promoted by NDC 3.0 must, at all times, ensure full respect for the rights of access to public information, citizen participation, and access to justice in environmental matters, as required by national legislation and the Escazú Agreement**[4]. The State must take a proactive approach, making a concerted effort to identify the relevant stakeholders and encourage their early involvement. Citizen participation should be fostered from the earliest stages of the decision-making process, ensuring that feedback from the public is taken seriously and contributes to these processes.

Additionally, Argentina's NDC 3.0 must keep human rights and social and environmental justice at its core to address the multiple challenges facing the country, such as rising poverty, social inequalities, gender disparities, and the vulnerability of people and ecosystems to climate change, environmental degradation, and biodiversity loss. **NDC 3.0 must acknowledge the key role indigenous peoples and local communities play in tackling the climate and biodiversity crises and ensure their rights are fully respected, including their right to consultation and to free, prior, and informed consent (FPIC), as well as their rights to land and territories.**

Use of Strategic Environmental Planning and Management Tools

The uncontrolled expansion of farming and extractive industries at the expense of native forests and other natural ecosystems is a major source of GHG emissions. As such, it drives biodiversity loss and worsens social and environmental conflicts in Argentina (National Biodiversity Strategy and Action Plan, 2024; Argentine Ministry of Environment and Sustainable Development, 2023). To tackle these issues comprehensively, the country needs to effectively include a social and environmental approach to territory planning and management. This will make it possible to develop a shared long-term development vision and guide land use in a way that balances social, economic, and environmental needs.

Over two decades ago, Argentina adopted its environmental territory planning framework through Law 25675 on Environmental Matters, which remains a key tool to define territory management policies and plan for sustainable long-term development. Although Argentina's NDC 2.0 includes a commitment to advance comprehensive territory planning, this process is still pending. **NDC 3.0 must reaffirm the commitment to implement a national environmental territory planning process, including adopting national standards before the end of 2025,** which can then be adapted by the provinces to suit their local realities. This process must be based on scientific knowledge as well as local and traditional knowledge, and it should ensure citizen participation, particularly during project planning and evaluation stages, in accordance with Law 25675, Section 21.

4. The Agreement was ratified by Argentina through Law 27566: https://servicios.infoleg.gob.ar/infolegInternet/verNorma.do?id=343259

Another key environmental management tools are Strategic Environmental Assessments (SEAs), which integrate social and environmental sustainability into decision-making at the highest levels for policies, programs, and development plans. Unlike Environmental Impact Assessments (EIAs), which only look at the impact of specific projects after decisions have been made, SEAs take a more proactive approach, holistically assessing the cumulative and synergistic effects of different options and development paths early on. This strategic vision allows for a comprehensive approach to long-term environmental, social, and economic challenges, promoting coordination across areas and levels of government. It aligns with global goals like biodiversity conservation and climate change adaptation and mitigation, while also encouraging meaningful discussions on territorial development models before decisions become irreversible. **For this reason, NDC 3.0 must set specific commitments to systematically implement SEAs in industry-specific and territory policy planning.**

Multi-Criteria Analysis of Measures and Coordination Across Sectors

Given the cross-cutting implications of the energy and agriculture, forestry, and other land use (AFOLU) sectors across various social, environmental, and economic dimensions, there is a need for **multi-criteria evaluation models and tools that will enable a comprehensive assessment of the measures to be considered for the NDC.** With these tools, it would be possible to identify the social and environmental impacts of the actions planned, meaning production decisions would be based on more than a cost-benefit analysis. Instead, they would include a comprehensive view of economic, social, cultural, and environmental human rights, treating all these dimensions equally in the decision-making process.

The lines of action aimed at transforming the AFOLU sector require close coordination with supplementary initiatives and transformations in other key areas, particularly the energy and production sectors. In the energy sector, it is necessary to reduce agribusiness's growing reliance on fossil fuels, cut down on the use of synthetic phosphorus and nitrogen fertilizers—which are highly energy-intensive to produce—and enhance energy efficiency in production processes.

Furthermore, given the growing importance of the so-called bioeconomy, strict and comprehensive sustainability criteria must be adopted to ensure that the contribution of bioenergy to decarbonizing energy systems is kept within sustainable levels. While generating energy from biomass can be useful to diversify energy sources, improve supply security, and foster the development of local and regional value chains (Bisang *et al.*, 2021; Blanco *et al.*, 2021), biomass production and use still are a net source of GHG emissions. Furthermore, it can have significant negative social and environmental impacts, violating the rights of communities (Booth, 2018; Creutzig *et al.*, 2014; Jeswani *et al.*, 2020; Liu *et al.*, 2017; Malins, 2018; Reid *et al.*, 2019; Sterman *et al.*, 2018). The impacts related to increased deforestation and turning natural ecosystems into energy crop plantations to meet the growing demand for bioenergy are particularly concerning, along with competition with food production and the increased use of water, fertilizers, and pesticides. Therefore, factors such as what type of biomass is used, how it is managed, what the scale of the project is, and what the energy generated is intended for must be assessed thoroughly, and a full life-cycle analysis of emissions and social and environmental impacts must be carried out. This approach will contribute to preventing negative externalities and promote solutions tailored to each territorial context (Blanco *et al.*, 2021).

When it comes to production, universal access to quality food should be prioritized, as well as food sovereignty. This concept refers to the right of people to access affordable healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems (International Forum for Food Sovereignty, 2007). This

means placing the aspirations and needs of those who produce, distribute, and consume food at the heart of food systems and policies, prioritizing them over the demands of markets and corporations (Via Campesina, n.d.). It is therefore urgent to promote a transition toward healthier and more sustainable diets, centered on fresh, minimally-processed and highly-nutritious food. Whenever possible, priority should be given to seasonal and locally sourced products, obtained through agroecological practices that ensure our common goods are used rationally and equitably. This underscores the need to rethink the current agro-industrial system, particularly regarding food production, with a focus on minimizing waste and enhancing recovery along value chains.

Debunking False Equivalences

NDC 3.0 mitigation efforts should prioritize achieving Geological Net Zero,[5] acknowledging that fossil emissions and removals from the AFOLU sector are neither equivalent nor interchangeable (Allen *et al.*, 2024; IPCC, 2022; Fankhauser *et al.*, 2022; Mackey, 2013; Zickfeld *et al.*, 2023). While carbon released into the atmosphere from using and burning fossil fuels constitutes a permanent net addition to the carbon cycle, biogenic emissions and removals are part of a pre-existing stock, requiring a distinct and independent approach to balancing them (Mackey *et al.*, 2013).

Setting differentiated targets for emission reductions and removals by sinks would prevent a false equivalence between carbon cycles, avoid shifting the mitigation burden from the energy sector to the AFOLU sector, and reduce the risks associated with overreliance on future carbon removal—an approach fraught with uncertainties and social and environmental risks (McLaren *et al.*, 2019; Gonda, 2023).[6]

Building on this, it is important **not to rely on carbon markets as a way to offset emissions, as they have consistently failed to deliver real reductions**[7]. These mechanisms falsely equate permanent fossil fuel emissions with temporary carbon removals from the AFOLU sector, ultimately slowing down the urgent decarbonization in the energy industry. International experience highlights structural flaws in carbon markets, including systematically overestimating emission reductions, failing to deliver real additionality, double counting, and relying on forest-based removals that are only temporary (Cames *et al.*, 2016; Cullenward *et al.*, 2023; Probst *et al.*, 2024; Trencher *et al.*, 2024). Moreover, the expansion of carbon credit projects can fuel social and environmental conflicts and lead to human rights violations (see, for example, Obergassel *et al.*, 2017).

In the energy sector, it is crucial **to move away from technological narratives and promises that, instead of fostering a comprehensive energy, social and ecological transition, delay the fundamental transformative changes that need to take place. This includes the idea of natural gas as a transition fuel, carbon capture and storage, and the production of green hydrogen as an energy carrier** (FARN, 2024). These so-called "solutions" do not aim at reducing GHG emissions at the source; rather, they seek to perpetuate the fossil fuel paradigm.

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5. The concept of "Geological Net Zero" (Allen *et al.*, 2024) refers to balancing fossil-based carbon emissions with their absorption and permanent storage in geological reservoirs, acknowledging that these emissions differ fundamentally from the carbon that exists naturally in the planet's biological cycle. Given the high costs and technical challenges related to permanent geological CO_2 storage, for there to be a true Geological Net Zero fossil fuel consumption would need to be significantly reduced.

6. To learn more about this topic, read this FARN document (in Spanish): https://farn.org.ar/wp-content/uploads/2023/05/DOC_RDC_links.pdf

7. To learn more about this topic, read this FARN document (in Spanish): https://farn.org.ar/wp-content/uploads/2022/07/DOC_GLOSARIO-Mercados-Carbono-1.pdf

Transparency and Oversight

The new NDC should establish clear and measurable targets backed by specific indicators and deadlines to ensure ambition, transparency, and effective oversight of proposed measures. In this sense, each measure should:

- → Include a detailed plan with specific deadlines so that actions are planned for the long term and can be effectively monitored.
- → Specify its concrete contributions to an emissions pathway that aligns with the mitigation target set for 2035.
- → Be grounded in the best available scientific evidence and incorporate local and traditional knowledge to take an inclusive approach tailored to specific territorial contexts.
- → Explain how it contributes to the objectives and goals outlined in the National Biodiversity Strategy and Action Plan, while also strengthening the resilience of both the population and biodiversity to the impacts of climate change.

Consistency and Alignment with Biodiversity Goals and Relevant Multilateral Environmental Agreements

Climate change, biodiversity loss, and growing social inequality must be understood as interconnected issues that not only share common causes but also exacerbate one another. The importance of aligning responses to the crises of climate change and biodiversity loss has been acknowledged by numerous scientific studies[8] and reflected in various international agreements and decisions, including target 8[9] of the Kunming-Montreal Global Biodiversity Framework (GBF) and the first Global Stocktake of the Paris Agreement.[10]

In the National Biodiversity Strategy and Action Plan submitted to the Convention on Biological Diversity (CBD) in October 2024,[11] Argentina committed to streamlining, by 2026, all strategies, plans, and projects arising from national laws related to the three Rio Conventions.[12] In this context, **the new NDC must ensure that its actions and objectives are aligned with the goals outlined in the National Biodiversity Strategy and Action Plan and the National Action Programme to Combat Desertification and Land**

8. Some of these studies can be consulted at: https://www.ipbes.net/events/ipbes-ipcc-co-sponsored-workshop-biodiversity-and-climate-change; https://www.science.org/doi/10.1126/science.abl4881

9. See: https://www.cbd.int/gbf/targets/8

10. Decision 1.CMA/5, paragraph 33, available at: https://unfccc.int/sites/default/files/resource/1_CMA.5.pdf

11. To learn more about this topic, read the document at: https://ort.cbd.int/nbsaps/my-country/D8430A20-A1DE-1861-E0BE-60202374E0EC/view.

12. The United Nations Framework Convention on Climate Change, the Convention on Biological Diversity, and the United Nations Convention to Combat Desertification (UNCCD).

Degradation and Mitigate the Effect of Droughts,[13] promoting synergies, ensuring coherent planning and implementation, and preventing actions in one area from undermining the objectives of another. To achieve this, the process of reviewing AFOLU targets and actions for NDC 3.0, centralized through the National Climate Change Cabinet (GNCC, by its acronym in Spanish), should be carried out in close collaboration with the Advisory Committee for the Conservation and Sustainable Use of Biological Diversity (CONADIBIO, by its acronym in Spanish).

At the same time, other relevant national and international plans and processes should be considered, such as the Ramsar Convention on Wetlands of International Importance, the Convention on the Conservation of Migratory Species of Wild Animals, the Sendai Framework for Disaster Risk Reduction, the Agreement on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ), the Stockholm Convention, the Rotterdam Convention, the United Nations Declaration on the Rights of Indigenous Peoples, and the Sustainable Development Goals.

Climate Funding

Access to quality climate funding is a major barrier to implementing climate policies in Argentina, particularly regarding adaptation measures. Thus, NDC 3.0 must prioritize strengthening financial mechanisms that align resources with both international and national targets, ensuring they are rooted in principles of social and environmental justice. These principles include respecting human rights, taking a gender- and diversity-based approach, managing risk comprehensively, promoting public health, ensuring a just labor transition, and protecting biodiversity. Furthermore, these financial instruments must not worsen Argentina's significant debt burden. They should also avoid supporting energy sources or carriers that contradict climate commitments, such as those that perpetuate reliance on fossil fuels, destroy ecosystems, and violate human rights.

In this regard, collaboration with the recently endorsed Loss and Damage Fund, which is still under development at the international level, could also be considered. As Argentina has many highly vulnerable areas, any new instruments of this sort could be a viable option to fund adaptation and restoration measures.

To make this happen, national and local technical teams must be trained on how to apply for international funding and manage climate projects that are financed internationally and aligned with the NDC 3.0 goals. At the same time, efforts should be made to gather more quantitative and qualitative data on mitigation and adaptation policies to make it easier to apply for and access international climate finance.

Recommendations for the Energy Sector

In Argentina, the energy sector is the largest source of GHG emissions. The latest National Greenhouse Gas Inventory shows that by 2022, this sector was responsible for 50% of the country's emissions (Argentine Environment Undersecretariat, 2024).

13. Available in Spanish at: https://www.argentina.gob.ar/ambiente/bosques/desertificacion/programa-de-accion-nacional-de-lucha-contra-la-desertificacion

The 2023 Argentine Energy Balance shows that fossil fuels—coal, oil, and gas—accounted for 86% of the national energy mix in 2023 (Argentine Environment Undersecretariat, 2024). While this data stresses the urgency to move away from fossil fuels, the transition to cleaner energy sources must not come at any cost. Most importantly, it must prioritize fair, adequate, safe, equitable, and affordable access to energy for all.

According to the guidelines proposed by FARN (2024a, 2024b), the energy transition must be driven by principles of decarbonization, democratization, decentralization, diversification, and equity and keep gender issues and human rights at its core. This approach requires enhancing the participation of all stakeholders in decision-making, promoting the efficient production and use of renewable energy at the local level, and ensuring that the transition does not exacerbate existing inequalities.

That is why **Argentina's NDC 3.0 must include ambitious and achievable commitments for the energy sector's transition and a strong focus on human rights, food sovereignty, energy sovereignty, and biodiversity protection.** The main pillars that NDC 3.0 should address are outlined below.

Ending the Expansion of Fossil Fuels

As mentioned above, 86% of Argentina's energy mix relies on fossil fuels, with only a small share allocated to renewable energy sources. Beyond contributing to climate change, fossil fuel development leads to significant social conflicts and a range of environmental and public health issues, which tend to disproportionately impact the most vulnerable and marginalized communities (FARN, 2024a).

In the context of the climate crisis, pollution, and biodiversity loss, **national policies, plans, and programs must be in line with the outcomes of the Global Stocktake. This includes the goal of "transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science."**[14]

In this regard, NDC 3.0 must clearly and concretely outline when and how this transition will be achieved. Following this approach, NDC 3.0 should prioritize the shift from fossil fuels to renewable sources, with a focus on socio-ecological justice, ensuring that the transition fully respects planetary boundaries and human rights. To achieve this, Argentina can leverage its valuable renewable energy policy tools, such as Law 27191[15] and Law 27424[16], which promote diversified, decentralized, inclusive, and GHG-free energy systems. Additionally, energy policies must undergo suitable SEA processes.

Ensuring Energy Equity and Sufficiency

Although the global trend in recent years shows a decrease in the percentage of the population without access to electricity, in 2021, 675 million people still lacked this essential service, which is crucial for the full enjoyment of their basic rights (IEA *et al.*, 2023). This situation is misaligned with Sustainable Development Goal 7, which aims to guarantee affordable, reliable, and modern energy for all, and remains

14. See: https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf

15. Law amending Law 26190 on Promotion of Renewable Energy Sources for Electricity Production.

16. Law on the Promotion of Distributed Generation of Renewable Energy integrated into the Public Electricity Grid.

one of the major global challenges. It particularly impacts people's quality of life, especially in countries in the Global South.

Given that energy is the foundation of our society, NDC 3.0 must include a rethinking of the model under which energy is produced and consumed in our country. In this sense, **commitments should aim to reduce energy and material consumption, particularly among those segments of society currently leading unsustainable lifestyles, while ensuring access to a stable, continuous, safe, fair, and affordable energy supply.**

Promoting a Rational and Efficient Use of Energy

In line with the previous point, **implementing measures for a rational and efficient use of energy is one of the most affordable, immediate, and cost-effective ways to strengthen the social and environmental sustainability of energy systems.** These measures can also contribute to reducing energy bills, government expenditure in subsidies and infrastructure, and energy imports, while creating jobs and improving the capacity to meet energy needs (FARN, 2023c). These measures include:

- Implementing awareness and education campaigns that encourage rational and efficient energy use, focusing on applications with the highest potential for savings in the residential, industrial, and transport sectors.
- Broadening the scope of mandatory energy efficiency labeling systems, while gradually and progressively updating the requirements for minimum efficiency standards.
- Creating replacement and financing plans to make it easier for households to access more efficient appliances.
- Promoting industry-specific programs to encourage the use of energy-efficient machinery in production processes.

Promoting Decentralized Energy Systems

Given the need for deconcentration and decentralization of the energy system, which has effects on price and service quality, distributed generation—both of electricity and thermal energy, i.e., heat—is particularly relevant as an opportunity. Its scale and modular nature make it easier to finance, while also fostering local technological development and territorial development by creating productive enterprises and value chains (Center for Environmental Technologies at the School of Engineering at Universidad Nacional del Centro de la Provincia de Buenos Aires, 2023).

In this context, Argentina's NDC 3.0 must promote distributed generation by expanding electricity generation capacity to ensure the right to access energy. This approach will contribute to reduce territorial inequalities, especially in the face of extreme weather events such as heatwaves, which increase the population's demand for energy.

Additionally, greater decentralization fosters energy sovereignty, allowing communities and local stakeholders to play a more significant role in managing and controlling energy production (FARN, 2024a), while also reducing dependence on large monopolies or imported fossil fuels.

Respecting Human Rights, Information, Participation, Consultation and Free, Prior, and Informed Consent

When planning and development of energy projects related to the energy transition, **human rights must be fully respected and indigenous communities must have access to information, public participation, consultation and FPIC.**

These processes must adhere to national and international standards, such as the Escazú Agreement and International Labour Organization Convention 169, ensuring reliable and representative outcomes that lead to open debates and are not just formalities. It must also be ensured that specific consultation processes[17] are included within a framework that respects the rights of communities over their lands and territories, allowing for the integration of local knowledge and expertise, with the goal of ensuring that the co-created insights contribute to the decisions made.

Recommendations for the Agriculture, Forestry and Other Land Use Sector

Farming

The transformation of the farming and agrifood system towards a low-emission model, grounded in environmental sustainability, presents multiple opportunities to strengthen food security and sovereignty, improve public health, enhance the resilience of production systems to climate change, and foster more equitable and sustainable rural development. To achieve this transformation, the following priorities must be addressed.

→ **Promoting a gradual transition towards integrated and agroecological farming systems as a new socio-productive paradigm.** Applying agroecological principles tailored to local conditions and needs when designing and managing agroecosystems (Altieri, 1995; Altieri, 2000), would reduce reliance on external inputs, promote biodiversity and crop diversification, enhance the resilience of agrifood systems, improve soil quality and carbon sequestration, support traditional agricultural practices, and foster greater social equity. The economic, social, and environmental viability of this approach is underpinned by a wide variety of successful cases in different regions of our country, both in intensive and extensive production systems (FARN, 2020). Promoting this transition progressively and across the entire territory will require a robust regulatory and institutional framework that includes:

- Offering specific economic and financial incentives for productive reconversion.
- Promoting the design of training programs with an agroecological approach, along with training and technical assistance programs for producers.

17. A case in point is the Kachi Yupi protocol created by the indigenous communities in the Salinas Grandes and Laguna de Guayatayoc basins, in the provinces of Salta and Jujuy in the north of Argentina, for the consultation and FPIC processes that have to be carried out with them.

- Increasing investment in research and extension to develop agroecological practices that meet regional and local needs.
- Ensuring public access to research results and information.
- Providing differentiated support for small- and medium-scale production to ensure a just transition.

→ **Setting specific targets for the absolute reduction of methane emissions from livestock farming,** which accounts for approximately 77% of the GHG emissions mix of the farming sector (Argentine Environment Undersecretariat, 2024). In addition to applying agroecological principles and practices to cattle farming for a transition to more sustainable production systems, aligning this activity with decarbonization goals can only be achieved through both supply- and demand-side approaches.

From the supply side, while a gradual reduction in the cattle stock for the domestic market would be consistent with the declining trends in beef consumption in the country (CICCRA, 2024), it may not lead to a decrease in total production. This is because external demand for Argentine meat remains high and, in many cases, is not very responsive to changes in domestic consumption. In this context, emission reduction strategies must take into account both the dynamics of international trade and public policies aimed at encouraging healthier and more environmentally sustainable diets. At the same time, a reduction in emissions intensity can be achieved by improving production efficiency through better nutritional, reproductive, and health management of the herd.

Silvopasture should be implemented following specific technical guidelines and complying with Law 2633, which sets minimum standards for the environmental protection of native forests ("Law on Forests").[18] Combining livestock farming with forestry should support the conservation of native forests, rather than contribute to their degradation. Priority should be given to areas that are already being used for grazing, and strong social, environmental, and cultural safeguards must be established to ensure a genuine reduction in emissions.

→ **Setting targets for the gradual reduction of synthetic fertilizer use,** supported by crop rotation, cover crops, and bio-based alternatives. This is an urgent challenge, as Argentina uses agrochemicals at a much higher rate than the global average (FAO, 2024), with severe consequences for biodiversity and the health of people, particularly in rural areas. In this regard, NDC 3.0 should be backed by **a law on minimum standards for agrochemical use[19] that adopts a comprehensive approach to their management.**

18. To learn more about this topic, read this FARN document (in Spanish): https://farn.org.ar/aportes-al-documento-los-sistemas-silvopastoriles-y-la-ley-de-bosques/

19. To learn more about this topic, read these FARN documents: https://farn.org.ar/wp-content/uploads/2020/06/10.06.15-FARN-Propuesta-legislacion-agroquimicos_con-modificaciones.pdf (2015); https://farn.org.ar/wp-content/uploads/2019/02/DOC_AGROQUIMICOS_links.pdf (2019).

Natural Ecosystems

Protecting and restoring native ecosystems integrity must be a key focus when designing and implementing strategies in the AFOLU sector, as these efforts will contribute to both climate change adaptation and mitigation, while also supporting biodiversity goals. The concept of "ecological integrity" refers to an ecosystem's ability to maintain its main characteristics (such as composition, structure, functions, and ecological processes) within natural variations, recover from disturbances, and adapt to changing conditions (IPCC, 2022b; Rogers *et al.*, 2022). Ecosystems with high ecological integrity are essential for reducing disaster risk, safeguarding critical freshwater resources, providing climate refuges for biodiversity, and offering a range of other vital ecosystem services (Elsen *et al.*, 2023; IPCC, 2022b). Moreover, high-integrity ecosystems, like primary forests, provide more stable and resilient carbon sequestration, protecting stored carbon from external disturbances, in contrast to degraded ecosystems (Rogers *et al.*, 2022).

Furthermore, there is a need for more research on the structure, functioning, and contributions of key ecosystems for both climate change mitigation and adaptation, as well as their resilience capacity. If the critical gaps in understanding how climate change and human activities impact these ecosystems are not addressed, they may shift from being carbon sinks and reservoirs to sources of GHG emissions. Therefore, without a clear assessment of ecosystem integrity or condition, focusing only on area-based goals could result in actions that fail to achieve the desired outcomes.

Forests and Forestry

Native forests play a fundamental role as carbon reservoirs and sinks, storing carbon in both plant biomass and soils in a stable manner. When these forests are cleared or degraded, they release carbon that has been stored for centuries into the atmosphere, and once lost, this carbon cannot be recovered within relevant timeframes (IPCC, 2022). The degradation and loss of forests also lead to biodiversity loss, soil erosion, disruptions in the hydrological cycle, and the displacement of rural communities. For these reasons, protecting existing native forests in line with the Forests Law should be a top priority in NDC 3.0. Accordingly, the following actions are recommended.

→ **Committing to zero deforestation and degradation.** This commitment should be supported by a gradual increase in annual budget allocations to the National Fund for the Promotion and Conservation of Native Forests, aiming to fully fund it by 2030 and ensuring the funds are utilized effectively. Additionally, participatory processes for developing performance indicators for management tools should be promoted, along with a goal to at least double the area of native forests under conservation and restoration plans by 2030, compared to a baseline to be determined. The implementation of an effective oversight system for these plans should also be prioritized.

→ **Ensuring that at least 30% of the total area of native forests that have been cleared or degraded is undergoing ecological restoration by 2030.** These restoration processes should prioritize native species, using the original ecosystems of the affected areas[20] as a reference, and exclude commercial plantations or exotic species from contributing to this goal.

20. Here, it is advisable to adhere to the ten principles for ecosystem restoration and the standards of practice to guide ecosystem restoration developed by the Food and Agriculture Organization of the United Nations (FAO), the Society for Ecological Restoration (SER), and the Commission on Ecosystem Management at the International Union for Conservation of Nature (IUCN).

→ **Limiting the role of commercial plantations with exotic species in climate change mitigation and adaptation measures.** While forest plantations contribute to raw material production and the economic development of some regions, their ability to store carbon, support adaptation, and provide other ecosystem services is significantly limited. Forest plantations store carbon less reliably (and, in some cases, at lower rates) than native forests. Their harvesting and thinning processes release much of the stored carbon back into the atmosphere. Additionally, they are more vulnerable to damage and loss from pests, diseases, droughts, fires, and the escalating impacts of climate change (Lewis *et al.*, 2019; Osuri *et al.*, 2020; Rogers *et al.*, 2022). In addition, intensive practices and the use of exotic species that rapidly become invasive can significantly harm the country's biodiversity and native ecosystems, particularly affecting the grasslands and wetlands in Northeastern Argentina (Paritsis and Aizen, 2008; Trentini *et al.*, 2017; Iezzi *et al.*, 2018: Vicari *et al.*, 2010).

Wetlands

Argentina is home to a great diversity and richness of wetlands which cover approximately 21% of its territory. **These ecosystems are key for mitigating climate change, acting as significant carbon reservoirs and sinks. Additionally, wetlands enhance the resilience and adaptive capacity of natural systems and populations in the face of adverse impacts.** They hold immense biological, ecological, and social value, boasting an exceptional biodiversity, performing numerous vital functions, and underpinning local and regional economies. Access to freshwater from wetlands fosters productive development, as well as opportunities for recreation and tourism.

However, the ecological integrity of wetlands and their valuable contributions to society are under serious threat from farming, speculative urbanization, pollution, climate change, and, particularly in the north of the country, the expansion of lithium mining, driven by the rising demand in recent years. Therefore, the following actions are key.

→ **Enacting a law establishing minimum standards for the environmental protection of wetlands,** which will halt their degradation and conversion, and ensure their conservation, sustainable use, and restoration, in line with Section 41 of the National Constitution. This law should establish a minimum level of protection, facilitate territory planning and making an inventory of wetland areas while ensuring the preservation of the unique characteristics of high Andean wetlands, among others, and incorporate the perspectives of local communities who live in and understand these ecosystems.

→ **Developing and implementing a national wetland restoration plan** as part of Argentina's broader national restoration plan, which the country committed to completing by 2026 (2024 National Biodiversity Strategy and Action Plan). This plan should aim to achieve the global target of restoring 30% of terrestrial, inland water, and coastal-marine ecosystems, making sure that participatory processes are included throughout.

→ **Strengthening environmental public policies aimed at protecting high Andean wetlands and the communities that live in the area from the impacts of lithium mining.** This should include:

- Carrying out FPIC processes with indigenous and local communities, respecting their right to self-determination over their land, including the right to say no to mining.
- Ensuring effective public participation and access to information on mining policies and projects.

- Conducting studies across all high Andean basins to better understand the structure, function, and role of Andean wetlands. This should involve building knowledge from both scientific research and traditional knowledge, as well as assessing the potential impacts of climate change and human activities on their functioning and integrity.

- Evaluating the role of high-altitude wetlands through a multi-dimensional lens, not just in terms of decarbonization goals.

- Implementing suitable, open, and transparent mining policies SEAs, along with appropriate EIAs that consider how communities use and relate to the land and its elements. These assessments should also analyze cumulative and synergistic impacts to understand how each project affects the entire basin system.

- Establishing a permanent water balance monitoring system in basins affected by lithium mining, ensuring the participation of local communities and public access to information.

It is necessary to adopt a holistic approach that acknowledges the full value of wetlands, considering their ecological, social, and cultural contributions. In this way, the actions taken would not only address climate change but also uphold the human right to a clean, healthy, and sustainable environment in line with UN Resolution A/RES/76/300 to guarantee a balanced and suitable environment for human development, both now and for future generations.

Final Thoughts

Developing Argentina's NDC 3.0 offers a historic opportunity for Argentina to update and strengthen its commitment to the Paris Agreement, linking climate action with social and environmental justice. This document outlines general and specific recommendations for two key sectors—energy and AFOLU—which, given their significance, may shape the country's emissions pathway and resilience to climate change.

In short, NDC 3.0 must go beyond meeting quantitative emission reduction targets. It must serve as a guiding framework for the future of Argentina's public policy on climate, socioeconomic, and environmental issues. Its true value will lie in its transformative potential, its ability to steer the country toward the goals of the Paris Agreement and the pressing need to build an inclusive and sustainable future for all.

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