SUBMISSION TO INFORM THE BAKU TO BELEM ROADMAP TO 1.3T (SECOND SUBMISSION)

The following submission has been prepared by the Loss and Damage Collaboration (L&DC) in response to the second call for input by the Presidencies of the sixth and seventh sessions of the Conference of the Parties serving as the meeting of the parties to the Paris Agreement (CMA 6 and 7) on the development of the "Baku to Belém Roadmap to 1.3T" (Roadmap).

This submission, which focuses on our Loss and Damage expectations for the Roadmap, builds upon our initial submission made in response to the first call for input in March 2025.

Under each of the guiding questions developed by the Presidencies, we detail our expectations for how Loss and Damage should be included in the Roadmap and how the Roadmap should address the failure of the New Collective Quantified Goal on Climate Finance (NCQG) to deliver Loss and Damage finance at the scale of the needs of developing countries. Additionally we also detail our expectations for the delivery of the Roadmap in this final phase and the report of the COP 30 Circle of Finance Ministers.

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OUR EXPECTATIONS ON THE PROCESS

Although we previously welcomed the Presidency's aim of an "inclusive, participatory and transparent" process to develop the Roadmap, we wish to highlight a number of concerns and expectations, in response to the information provided in the workplan update (released on 6 August) and our experience of engaging with the process. These concerns and expectations include:

- **A draft Roadmap to be released immediately, and at least two rounds of virtual consultations to be held before the Roadmap is published:** We had expected the Presidencies to (i) provide a synthesis of submissions as a basis for ongoing consultations, then (ii) deliver a draft Roadmap at least two weeks before the 2025 Bonn Climate Change Conference. However, this expectation was not met. In light of this, we expect the Presidencies to immediately release a draft of the Roadmap and to convene at least two rounds of inclusive and accessible virtual consultations with Parties and Non-Party stakeholders and to take into serious consideration their views, well in advance of the publishing of the Roadmap on 27 October 2025. To ensure meaningful participation in these consultations, we call for the notifications to be made available via the Roadmap's dedicated webpage in a timely manner, sessions programmed to cater for all timezones and for live translation to be provided in the six UN languages and International Sign. These Consultations should draw from the constructive experience of the NCQG's Technical Expert Dialogues, allowing for the engagement of Non-Party stakeholders, including experts from UNFCCC constituencies, on equal footing with Parties. Meaningful consultation of vulnerable groups not represented by UNFCCC constituencies, including migrants, refugees and displaced persons should also be ensured.

- **Increased transparency and meaningful participation within the work of the Circle of Finance Ministers:** The Ministry of Finance of Brazil announced the launch of the COP 30 Circle of Finance Ministers (Circle) on the 15 April 2025 and provided further information during consultations at the 2025 Bonn Climate Conference. However significant questions remain about how the Circle will support the COP 30 Presidency in the development of the Roadmap. During the consultations civil society organisations, UNFCCC constituencies and developing country Parties raised serious concerns about transparency and meaningful participation in the work of the Circle. We therefore call for the Presidencies to implement the following:
    - Publicly disclose the names and affiliations of the members of the Circle on the COP 30 Circles webpage;
    - Publicly disclose the dates, times, venues and countries where the Circle will meet and the objectives of these meetings and a timeline of work;
    - Clarify what status and what role the report made by the Circle will have in the development of the Roadmap;
    - Publicly release the draft report; and
    - Confirm that Loss and Damage finance and the resource mobilisation strategy for the Fund for Responding to Loss and Damage (FRLD) will be addressed in the report.
- **Clarifying the objective of the high-level event on the Roadmap at CMA 7 and observer participation modalities:** The Presidencies should release in a timely manner notifications for the high-level event providing further information on its objectives, outcomes and the participation modalities for observers.

- **Clarifying how Parties will be able to respond to the Roadmap at CMA 7:** Under a dedicated CMA 7 agenda item Parties and observers must be given the opportunity to respond to the report and provide guidance on the continuation of the process that the Roadmap will lay out. .

OUR RESPONSES TO THE PRESIDENCIES QUESTIONS

In the following sections, we provide responses to each of the Presidencies four questions.

(a). What are priority short-term (by the end of 2028) and medium-to-long-term (beyond 2028) actions necessary to enable the scaling up of financing for climate action to developing countries? Based on experience to date and evidence, what can those actions contribute to in terms of progress in enabling the scaling up of financing?

The Roadmap must prioritise the following key objectives to achieve its mandate of scaling up climate finance to developing country Parties to at least 1.3 trillion USD by 2035. These short-term actions are essential to build a foundation of trust between developing and developed countries that the NCQG will be successfully implemented. Whilst the medium to long term actions listed are needed to ensure that structural inequalities within the global financial system, which are stopping developing countries from tackling the climate crisis in an effective and sustainable manner, are addressed.

Short-term Actions (By the End of 2028)

1. **Putting in place a plan to achieve both the 1.3 trillion USD and 300 billion USD per year goals by 2035:** It is essential that the 300 billion USD per year goal is not seen as the public finance component of the 1.3 trillion USD per year goal.

2. **Putting in place a ratcheting up mechanism to reach the at least 1.3 trillion USD and 300 billion USD per year goals starting from a floor of 300 billion in 2025:** The mechanism must include clear annual targets for developed countries to provision public grant-based finance to all developing countries.

3. **Addressing the failure to deliver Loss and Damage Finance at scale under the NCQG:** The Roadmap must put in place a clear plan for developed countries to provide grants from public sources at a scale of hundreds of billions a year to developing countries so that they can address Loss and Damage. This plan must:

    a. Recognise that the scale of Loss and Damage needs for developing countries are at least 724.43 billion USD a year and that the Loss and Damage needs of developing countries are expected to be 395 [128–937] billion USD in 2025 alone.

    b. Inform the resource mobilisation strategy for the FRLD, including how the Roadmap will enable the FRLD to disburse at least 400 billion USD a year by 2035.

    c. Ensure that finance will also flow to the Warsaw International Mechanism for Loss and Damage (WIM), its Executive Committee (ExCom), and Santiago Network for Loss and Damage (SNLD) and support the implementation of Loss and Damage commitments in National Determined Contributions (NDCs).

4. **Defining the structure of the NCQG:** The decision on the NCQG failed to put in place sub-goals or affirm the balance between mitigation, adaptation and Loss and Damage. The Roadmap must identify subgoals for the provision of public finance for: Loss and Damage, adaptation and mitigation through inclusive just transition pathways.

5. **Define the public finance component of the at least 1.3 trillion USD and 300 billion USD goals in grant equivalent terms:** The Roadmap is mandated to prioritise grants, concessional finance and non-debt-creating instruments to expand fiscal space. To achieve this, it must establish a clear public finance component measured in grant equivalent terms for each sub-goal.

6. **Operationalising support to implement Loss and Damage in NDCs:** Legal advice from Legal Response International (LRI) has made clear that paragraph 5 of the NCQG decided that the goal will support the implementation of developing country Parties Loss and Damage NDCs (see the example of Vanuatu's revised and enhanced NDC). The Roadmap must operationalise the provision of finance from developed countries to all developing countries to implement their Loss and Damage NDCs.

7. **Increasing public finance through the operating entities of the Financial Mechanism including the FRLD:** As clarified by legal advice from LRI, paragraph 16 of the NCQG decided that a significant increase of public resources should be provided through the operating entities of the Financial Mechanism of the UNFCCC, which includes the FRLD. The Roadmap must therefore put in place a plan to capitalise and replenish the Fund at the scale of the needs with public resources and must inform the FRLD's resource mobilisation strategy.

8. **Putting in place a process for Parties to agree on a clear universally accepted definition of climate finance and what types of concessionality should be considered equitable:** A clear universally accepted definition of climate finance that includes Loss and Damage and an agreement on what type of concessionality should be considered equitable must be agreed under the Roadmap. This is crucial to prevent the overstatement of financial contributions, provide clarity on what qualifies as climate finance and to ensure that efforts to mobilise 1.3 trillion USD do not increase debt and further reduce fiscal space in developing countries. Key elements of an equitable, justice and rights-aligned climate finance definition include: accessible, new and additional, timely, adequate, public finance, grant-based, predictable, precautionary, pro-poor, human-rights based, child-responsive, gender transformative, highly concessional, effective and following the subsidiarity principle (i.e. decisions should be made at the lowest possible and appropriate political and institutional level).

9. **Ensuring that developed countries meet their climate finance obligations:** The Roadmap must include transparency and accountability mechanisms that ensure that developed countries meet their climate finance obligations under the NCQG in line with articles 4.3 and 4.4 of the UNFCCC, article 9.1 of its Paris Agreement and the obligations underscored by the Advisory Opinions on climate change from the

International Court of Justice (ICJ) and Inter American Court of Human RIghts (IACHR).

10. **Ensuring equitable access and finance for Least Developed Countries (LDCs) and Small Island Developing States (SIDS):** The Roadmap must put in place plans to implement paragraphs 22 (f), 23 (e) and 24 of the NCQG decision on increasing finance, scaling up highly concessional finance and enhancing access particularly for LDCs and SIDS. This is essential to ensure that no one is left behind.

Medium-to-Long-term Actions (Beyond 2028)

1. **Acknowledging that 1.3 trillion is not enough:** The Roadmap should explicitly acknowledge that the 1.3 trillion USD and 300 billion USD annual goals are not adequate to meet the needs of developing countries —noting that both goals are to scale up finance to "at least" 300 billion USD and 1.3 trillion USD— and put in place plans to exceed these targets..

2. **Accelerating reform of the international financial system:** The Roadmap must include plans to massively accelerate reform of the global financial system to address debt and inherent inequalities that favour developed countries. These plans should take into account the commitments made under the Sevilla Commitment to close the financing gap with urgency and enhance coherence and effectiveness and proposals for reform made by the Bridgetown Initiative.

(b). What strategies can be implemented to enhance and scale up public and private financing mechanisms for climate adaptation, especially in vulnerable regions?

- **Adaptation finance at scale is needed to minimise loss and damage, but loss and damage will still happen as we are reaching the limits to adaptation:** The Roadmap needs to deliver Loss and Damage finance in addition to massively scaling up adaptation finance.

- **Only public grant-based finance must be prioritised for adaptation and Loss and Damage:** Loss and Damage finance must be one hundred percent grant-based to avoid further exacerbating debt burdens in developing countries. Highly concessional finance may be appropriate for adaptation projects where building resilience includes sustainable development that leads to financial returns (e.g. a coastal adaptation project that includes renewable energy generation). In all other cases, adaptation finance must be grant-based.

- **Strategies to enhance and scale up public finance for adaptation and Loss and Damage must center on developed countries providing and mobilising grant-based finance:** In line with their obligations, developed countries must take the lead in providing and mobilising public grant-based finance to all developing countries for adaptation and Loss and Damage. Strategies for developed countries to moblise public funds should include equitable, pro-poor and polluter pays taxes and levis such as a wealth tax, financial transition tax and a climate damages tax (see examples under alternative sources below).

(c). What other experiences, proposals or approaches could help inform and accelerate efforts to mobilise USD 1.3 trillion in financing, including through grants, non-debt creating instruments, new sources of finance, and strategies to create fiscal space?

In this section we will focus on experiences and proposals and approaches that must inform and accelerate the Roadmap's efforts to mobilise at least 1.3 trillion USD by 2035.

Experiences

- **The scale of climate finance needs of developing countries are much greater than the NCQG:** Within the Second Needs Determination Report[1] the costed needs reported in NDCs from 98 Parties amount to 5.012 to 6.852 trillion USD cumulatively to 2030 (annualised to 455–584 USD billion per year). Similarly, our analysis projected that the costs of climate action in developing countries will in fact be much greater at 6.88 trillion USD a year to cover the costs of mitigation, adaptation and Loss and Damage. Both estimations make clear that the at least 1.3 trillion USD and 300 billion USD annual goals are not adequate to meet the needs of developing countries.

- **The scale of the Loss and Damage needs of developing countries is significant:** Our calculations suggest at least 724.43 billion USD a year is needed by developing countries to respond to Loss and Damage and economic quantification has suggested the needs will be 395 [128–937] billion USD in 2025 alone.

- **Transparency and accountability is essential to ensure equity:** The Roadmap must put mechanisms in place to ensure that the NCQG disburses transparent and equitable climate finance with clear reporting on sources, flows, gender transformativeness and impacts to ensure accountability. Without transparency and accountability, the integrity of climate finance is compromised, something that will potentially lead to the misallocation of funds, unmet climate goals and to the further erosion of trust that the non-delivery of the 100 billion USD goal by developed countries has set in motion. The Roadmap must also clearly articulate how the NCQG will interact with, relates to and/or informs other ongoing transparency and accountability frameworks, work programs, assessments and reports under the UNFCCC and its Paris Agreement including: the Global Stocktake the Sharm-el-Sheikh Dialogue on Article 2.1(c) and relevant reports under the Standing Committee on Finance.

[1] UNFCCC, (2024), Report of the Standing Committee on Finance. Addendum - Second report on the determination of the needs of developing country Parties related to implementing the Convention and the Paris Agreement (Advanced, Unedited Version).

- **Qualitative elements are needed to ensure no one is left behind:** The Roadmap must establish qualitative elements under the NCQG, which must include: addressing disablers of climate action, which includes debt, the cost of capital and unilateral measures; a definition of concessionality; recognition of vulnerability groupings; what constitutes enabling environments; tracking impact and disaggregation; access and timely delivery; inclusivity and age as well as gender transformativeness of climate finance; and adherence to human rights. This should include the development of clear implementation strategies (e.g. the development of explicit guidelines for gender-transformative budgeting within climate finance allocations). This is essential to ensure that climate finance reaches all developing countries, including those which are fragile and conflict affected and margalised groups such as women, children, youth, refugees, migrants and displaced persons.

- **The impact of debt burdens is severe:** Developing countries are being forced to divert finance from essential services such as health and education, to address the impacts of the climate crisis. If the NCQG were to allow loans at market rates to be counted as climate finance, increased debt repayments would further reduce fiscal space at a time when regions, including Africa, are spending more on servicing debt than serving their peoples' health and schooling needs.[2] The following points further demonstrate why the Roadmap must not increase debt burdens:

    - In 2023, global debt hit an unprecedented level of 97 trillion USD. Whilst the public debt of developing nations accounts for less than a third of this sum, at 29 trillion USD, it has expanded at twice the rate of advanced economies since 2010[3].

    - The United Nations (UN) highlights that almost two-thirds (60 per cent) of LDCs and Low Income Countries (LICs) are either in debt distress or at high risk of debt distress, a number that has doubled since 2015.[4] Which, according to analysis by the International Institute for Environment and Development (IIED), results in the world's poorest and most climate-vulnerable countries spending more than twice as much to service their debts as they receive to fight the climate crisis.[5]

    - The Pact for the Future noted with deep concern the emergence of unsustainable debt burdens and vulnerabilities in many developing countries and the constraint this imposes on their development progress. The Pact also stressed the need for reforms to existing multilateral processes to facilitate collective action to prevent debt crises and facilitate debt restructuring and debt relief.

    - A report for the International Monetary Fund (IMF) found that debt levels of small climate-vulnerable developing States quickly increase following

[2] UNCTAD. (2023), A world of debt
[3] Ibid.
[4] United Nations, Debt, Affordable Finance, and a Future for the Least Developed Countries
[5] IIED, World's least developed countries spend twice as much servicing debts as they receive in climate finance

climate-related disasters. Not only because of the impact on their economies, but also because they have to take on new debt to finance reconstruction[6].

- **An overemphasis on the private sector must be avoided:** The Roadmap must not pursue an agenda where limited amounts of public grant based finance are used to attract, leverage and derisk private finance. Repeatedly the discourse on "enabling environments" for climate finance in developing countries is overly and unhelpfully focused on attracting private sector finance for market-based solutions, including by utilising scarce public finance to leverage and de-risk additional private sector investments, instead of looking at the policy mix required for public-sector led green transition. Similarly, focus is placed on de-risking external private finance to the detriment of local financial sectors to the extent that highly concessional public finance is used to incentivise private sector investments. Instead domestic micro-, small- and medium-sized enterprises (MSMEs) in developing countries must be prioritised and investments must not subsidise multinational private sector corporations. It is critical that the Roadmap focuses on developed countries' obligation to provision and mobilising high quality climate finance to all developing countries, instead of putting the onus on developing countries to create "enabling environments" or attract investments.

- **Direct access for developing countries must be ensured:** Without enhanced access the NCQG will be ineffective. At present, climate finance is largely inaccessible for developing countries and climate-vulnerable communities due to cumbersome accreditation requirements and long lag times in program delivery —especially where funding goes through multilateral development banks. This lack of access is exacerbating climate vulnerabilities and exposure to loss and damage which is eroding development gains. The Roadmap must ensure and prioritise direct access to climate finance for governments, national and regional institutions, sub-national agencies, local non-governmental and community-based organisations including civil society groups, Indigenous Peoples and grassroots organisations.

  For developing countries, enhanced and direct access is essential to ensure that they can obtain climate finance in a timely manner and that the amount received is not diminished by transactions and fees incurred when funds pass through international intermediaries such as multilateral development banks or UN Agencies. Direct access to climate finance, also ensures that developing countries make demand-driven decisions based on their evolving needs and priorities that build in-country capacity that supports appropriate bottom-up, country-led and coherent nationwide efforts for climate action and sustainable development[7] that greatly mitigate the risk of unsuccessful initiatives and unsustainable outcomes.

  Whilst for communities direct access to climate finance is essential to realise local leadership and ownership and community-led approaches to; and decision making on; climate action, thereby leading to more effective and sustainable implementation that sees funding targeted to community needs and priorities. Mechanisms to ensure

[6] J. Tiedemann et al. (2021). Meeting the Sustainable Development Goals in small developing States with climate vulnerabilities: Cost and financing. IMF Working Paper, No. 2021/062, International Monetary Fund, Washington, DC.
[7] WRI, (2015), Direct Access" to Climate Finance: Lessons Learned by National Institutions

direct access for communities are particularly important in contexts where national governments have limited capacity or willingness to ensure access for and participation of local groups and communities and those on the move. Furthermore, community access and local leadership are principles that are well recognised across humanitarian and development finance —including under the The Grand Bargain, Pledge for Change and principles of locally-led adaptation— and therefore must inform the development of the Roadmap.

Proposal and approaches

Grants and Non-debt creating instruments

- **Prioritising grants and highly concessional loans, with a clear definition of concessionality:** A consistent demand from developing countries throughout discussions on the NCGQ has been to prioritise grants and highly concessional loans in the same way that the FRLD has been mandated to do so within its Governing Instrument[8]. This demand for grant-based and highly concessional finance is, at its core, a demand for climate justice, inline with the guiding principles of equity and common but differentiated responsibilities and respective capabilities (CBDR-RC) enshrined in the UNFCCC and its Paris Agreement. One that recognises that developing countries have contributed the least to the climate crisis yet are disproportionately affected by it and often have the least financial means to address it. The submission made by Alliance of Small Island States (AOSIS)[9] ahead of the Second Meeting of the Ad Hoc working Group and Tenth Technical Expert Dialogue of the NCQG provides clear guidance on what types of concessionality should be considered equitable in the context of climate finance delivered under the NCQG:
    - Interest rate: 1 percent or below (fixed).
    - Grace period: 5 years or above.
    - Maturity period: 20 years or above.
    - Charges or fees: 1.5 percent or below.
    - Mandatory inclusion of climate resilience debt clauses.
    - Concessionality levels must also consider the debt servicing capacity of developing countries —especially for LDCs and SIDS.

  The Roadmap should also ensure that creditors follow responsible lending and borrowing principles — such as, the United Nations Conference on Trade and Development's Principles on Promoting Responsible Sovereign Lending and Borrowing.[10]

[8] See paragraph 57 of Decision 1/CP28.
[9] AOSIS. (2024). New Collective Quantified Goal on Climate Finance – Draft Elements
Also refer to: AOSIS and LDC Group. (2024). Joint Statement & Submission By The Least Developed Countries and Alliance Of Small Island Developing States Groups On The New Collective Quantified Goal On Climate Finance (NCQG).
[10] UNCTAD. (2012). Principles on Promoting Responsible Sovereign Lending and Borrowing

Strategies to create fiscal space

In addition to a massive scaling up of climate finance, measures to create fiscal space in developing countries include:

- **Debt cancellation and forgiveness or at the least debt payment pauses[11]:** Debt cancellation will free up much needed fiscal space by eliminating debt servicing payments (principal and interest) that will otherwise consume government revenue, allowing governments to reallocate those funds to essential public services and to addressing the climate crisis. However, resources freed up from debt cancellation must not be counted as climate finance as the are not new and additional[12].

- **Special drawing rights from the IMF:** Redirecting or reissuing Special Drawing Rights (SDRs) for climate finance can deliver at least 200 billion USD a year[13].

- **Reforming the international financial system:** We expect the Roadmap to accelerate the reform of the international financial system, towards justice and equity. Reform of the IMF, the World Bank and the World Trade Organization (WTO) as well as other multilateral development banks (MDBs) and international financial institutions (IFIs) and the way that they make decisions, is needed to ensure the delivery of climate finance that is justice and human rights aligned and to enable the creation of fiscal space in developed countries due to the high level of debt owed by developing countries to IFIs and MDBs. The Roadmap offers a critical opportunity to accelerate forward looking reform taking the needs of developing countries, related to access, quality, the subsidiarity principle and debt cancellation as a guiding star.

New sources of finance:

- **No expansion of the contributor base, developed countries have clear obligations to take the lead:** Articles 4.3 and 4.4 of the UNFCCC article 9.1 of its Paris Agreement and the Advisory Opinions on climate change from the ICJ and IACHR are clear that developed countries must take the lead in delivering climate finance to all developing countries.

- **Alternative sources of public grant-based climate finance raised by developed countries:** A recent paper[14] from Oil Change International highlights that Annex II Parties to the Convention —which includes the USA, UK, Canada, France, Germany— can mobilise 5.3 trillion USD annually for climate finance by redirecting existing resources. As articulated above, the Roadmap must ensure that developed countries take the lead on mobilising a wide range of alternative sources of finance in an equitable way. Examples of alternative sources include:

    - A Climate Damages Tax (CDT) on the extraction of fossil fuels could generate 44.6 billion USD in its first year and increase in subsequent years[15].

[11] T. Woolfenden, S. Sharma, Debt Justice (2022), The debt and climate crises: Why climate justice must include debt justice
[12] Global Debt and Climate Working Group (2024). Debt Demands & Debunking Distractions for Climate Action
[13] Oxfam (2024), Beyond Crises: The future of Special Drawing Rights as a source of development and climate finance
[14] Oil Change International, (2024), Road to COP29: Shifting and unlocking trillions for a just energy transition
[15] S. Sharma and D.Hillman(2023). The Climate Damages Tax.

- Research by the International Council on Clean Transportation[16] shows a tax on aeroplane tickets could raise 164 billion USD in one year.

- The IMF shows that in 2022, fossil fuel subsidies amounted to 7 trillion USD —equivalent to 7.1 percent of global GDP. This represents an increase of 2 trillion USD from 2020 to 2022. Fossil fuels subsidies should therefore be redirected to climate finance.

- Fossil fuel companies have made record profits, with the global oil and gas industry earning more than 2.4 trillion[17] USD in 2023. Action Aid highlights that by applying a 90 percent tax on these windfall profits, close to 382 billion USD could be raised for climate finance.[18]

- A Maritime fuel levy could raise 60-80 billion USD a year.[19]

- A Financial Transaction Tax could generate revenues of 237.9 to 418.8 billion USD annually[20].

- A minimum wealth tax billionaires could raise 200 to 250 billion USD.[21]

- Minimum corporate tax rate of 25% could raise 395 billion USD (annex II).[22]

- Re-directing fossil fuel subsidies and state-owned company investments in fossil fuels could raise 270 billion USD (annex II).[23]

- A 2023 paper[24] from Equal Right sets out a plan for a cap and share system that could raise over 5 trillion USD annually through a global charge on fossil fuel extraction.

- Cracking down on tax evasion could raise 363 billion USD (annex II)[25].

- Tax on annual sales of big technology, arms, and luxury fashion companies could raise 112 billion USD (annex II).[26]

[16] E. Kellogg and S. Zheng, S (2024). Taxing aviation for loss and damage caused by climate change. ICCT.
[17] Energy Profits (2024), History-Making Profits, World-Ending Emissions
[18] Action Aid (2024), Taxing windfall profits of fossil fuels and financial companies can boost climate finance
[19] https://unctad.org/system/files/official-document/tcsgdsinf2023d1_en.pdf
[20] Pekanov A and Schratzenstaller M (2019). A Global Financial Transactions Tax : theory, practice and potential revenues. WIFO Working Papers no.582, Austrian Institute of Economic Research. Available at https:// www.econstor.eu / bitstream / 10419 / 207155 / 1 / 166860552X.pdf
[21] G. Zucman, (2024). A blueprint for a coordinated minimum effective taxation standard for ultrahigh-net-worth individuals
[22] Oil Change Intenational (2024), https://www.oilchange.org/wp-content/uploads/2024/09/Fact-Sheet-We-can-pay-for-it-1.pdf / World Inequality Report, Chapter 8, scenario with 25% minimum and no carveouts, https://wir2022.wid.world/insights/ .
[23] Oil Change Intenational (2024), https://www.oilchange.org/wp-content/uploads/2024/09/Fact-Sheet-We-can-pay-for-it-1.pdf
[24] Equal Right (2023), Climate Justice Without Borders
[25] Oil Change Intenational (2024), https://www.oilchange.org/wp-content/uploads/2024/09/Fact-Sheet-We-can-pay-for-it-1.pdf / World Inequality Report Scenario 3, applied to 2023 GNI for Annex II countries. Through a 4% raise in Tax to GDP ratios through wealth taxes — FINDING THE FINANCE, ActionAid Australia, 2024, p 7, https://actionaid.org/sites/default/files/publications/Finding%20the%20Finance%20Report%20-%20FINAL.pdf.
[26] Oil Change Intenational (2024), https://www.oilchange.org/wp-content/uploads/2024/09/Fact-Sheet-We-can-pay-for-it-1.pdf / Developing countries suggest rich nations tax arms, fashion and tech firms for climate, https://www.climatechangenews.com/2024/06/06/developing-countries-suggest-rich-nations-tax-arms-fashion-andtech-firms-for-climate/

- Savings from avoidable highway and road expansion could raise 185 billion USD (annex II).[27]

(d) **What key actors and existing multilateral initiatives should be considered or involved, as appropriate, to support the delivery of the USD 1.3 trillion target?**

Actors

- **Developed countries:** Article 9.1 of the Paris Agreement is clear that developed countries must take the lead in the delivery of climate finance to all developing countries. At the 2025 June Climate Meetings, the G77 and China proposed an agenda item on the implementation of article 9.1. We expect this agenda item to be taken up at COP 30 / CMA 7 and for the outcome to further reinforce the obligations of developed countries.

- **Climate Funds**: Scaling up and capitalising the existing operating entities of the financial mechanisms like the Adaptation Fund, Green Climate Fund, Global Environment Facility, FRLD, the Least Developed Countries Fund and the Special Climate Change Fund.

- **Multilateral Developed Banks:** Should increase grant based and high concessional finance based on principles of concessionality previously articulated.

- **No private sector:** Private sector actors that are not Small and Medium-sized Enterprises (SMEs) should not be engaged. Private sector actors are focused on profit generation. The focus must remain on developed countries meeting their climate finance obligations.

Multilateral initiatives

- **Global Solidarity Levies Task Force**: The Global Solidarity Levies Task Force will report back at COP 30. The recommendations of the Task Force are expected to suggest how developed countries can mobilise new and additional public grant-based finance to meet their climate finance obligations to developing countries by taking the lead on implementing initiatives such as: a financial transactions levy, private air passenger levy, fossil fuel subsidy phase-out, maritime fuel levy, fossil fuel windfall profits levy and a fossil fuel levy or carbon damages levy.

- **United Nations Framework Convention on International Tax Cooperation:** The United Nations Framework Convention on International Tax Cooperation should enable developed countries to generate new and additional climate finance for climate action in all developing countries. The Roadmap provides an essential political platform to call on developed countries to leverage the Convention to raise

[27] Oil Change International (2024), https://www.oilchange.org/wp-content/uploads/2024/09/Fact-Sheet-We-can-pay-for-it-1.pdf / Savings under IEA's 'high rail' scenario compared to their base case. Global total is adjusted from USD 2015 [PPP] to 2024. The Future of Rail, Opportunities For Energy and the Environment, IEA, 2019, p. 116.https://iea.blob.core.windows.net/assets/fb7dc9e4-d5ff-4a22-ac07-ef3ca73ac680/The_Future_of_Rail.pdf

public finance to meet their climate finance obligations.

- **Bridgetown Initiative:** The Bridgetown Initiative seeks to reform the international financial architecture to make it fit for purpose to meet the growing needs of developing countries in the face of the climate crisis.

- **Sevilla Commitment:** Under the Sevilla Commitment made at the Fourth International Conference on Financing for Development (FfD4), governments committed to launch an ambitious package of reforms and actions to close this financing gap with urgency and catalyse sustainable development investments at scale.