

Second Submission by the Kingdom of Morocco on the Baku to Belém Roadmap to \$1.3T

This submission, Morocco's second on the topic following the first earlier this year,¹ responds to the second call for input by the COP29 and COP30 Presidencies under the UNFCCC on the development of the “Baku to Belém Roadmap to 1.3T”

Introduction

The Kingdom of Morocco remains fully committed to constructive engagement within the United Nations Framework Convention on Climate Change (UNFCCC) multilateral process on climate finance. Throughout three years of efforts toward the New Collective Quantified Goal (NCQG), Morocco consistently undertook to convey the importance of a needs-based approach that would be adequate to the aims of the Paris Agreement, enabling developing countries to implement Nationally Determined Contributions (NDCs) and National Adaptation Plans (NAPs).

However, the approach taken with the \$300 billion commitment decided at COP29 was not only unequal to the aims of the Convention and its Paris Agreement, but also unequal to the needs associated with current nationally determined ambitions. As such, it presents a continued challenge to wider multilateral climate efforts. Morocco affirms that needs-based international provision of public finance will be necessary to bridge gaps in ambition and implementation.

The Baku to Belém Roadmap to \$1.3T is a special opportunity, therefore, to make amends and come closer to a needs-based approach. In keeping with the African Ministers' vision for a \$1.3 trillion target prior to COP29 (from AMCEN), the Roadmap should focus on mobilization and provision of public finance, and be “delivered mainly through concessional finance and grants”. As a product of the current and incoming Presidencies, the Roadmap has the potential to send a strong message to the international community about what needs-based ambition in international cooperation, notably in provision of finance, would look like.

Morocco calls for the Roadmap to recognize the needs of developing countries with fiscal constraints, to uphold the principle of common but differentiated responsibilities, and to be developed in an open and balanced manner, in which the Presidencies offer all Parties and observer constituencies equal opportunity for bilateral engagement.

Below are Morocco's detailed responses to each question posed by the COP Presidencies. We remain available for further clarifications.

¹ Please refer to Morocco's first submission here:

https://unfccc.int/sites/default/files/resource/Morocco_Baku_to_Bel%C3%A8m_Roadmap.pdf

(a) What short-term (by 2028) and long-term (beyond 2028) actions are needed to scale up climate finance for developing countries?

1. Short-term priorities - by 2028

1.1. Baku to Belém Roadmap offers thought leadership and promotes ambition by proposing needs-based expectations for international provision of finance by developed countries to developing countries:

1.1.1. The Roadmap should begin by grounding itself in needs-based quantifications² of the public finance required from international provision by developed countries to developing countries, expressed in nominal as well as grant-equivalent terms, in the context of common but differentiated responsibilities, at levels consistent with delivery of nationally determined objectives as well as global goals established under the UNFCCC, in mitigation and adaptation, in addition to meeting costs of loss and damage.

1.1.2. In order to successfully drive ambition in provision by developed countries, the Roadmap must also translate such overall needs-based sums into readily comprehensible indicative benchmarks for public spending on provision by individual developed countries. One suggested approach would be to suggest a clear benchmark for annual public spending as a percent of national GDP or GNI. Such a percentage might be calculated simply based on the aforementioned quantification of total provision needs as a percentage of the combined GDP/GNI of developed countries.

1.2. By 2028, developed countries increase their national spending to significantly scale international provision of climate finance, measured in grant-equivalent terms, informed by a clearer standard of the ambition required. Clearer benchmarks for ambition on finance lead to greater awareness and ambition in national budgetary processes and public spending by developed countries for international finance for climate action. Progressive early movers lead, and then others follow. This leads to a substantial increase in concessional financing and grant financing, accelerating climate action in developing countries which face debt distress, limited fiscal space, and higher costs of capital.

1.3. Process under agenda item on Article 9.1 of the Paris Agreement. Making Article 9.1 an agenda item under the CMA will allow for enhanced transparency, visibility, trust, consensus, and action around the provision of international

² We would be happy to elaborate further on our understanding of quantitative assumptions, as conveyed last year in the Technical Expert Dialogue Process.

climate finance. The support expressed for such an agenda item by Global South countries, represented by the G77+China, underscores the importance of this agenda. As recently emphasized by the International Court of Justice, Article 9.1 of the Paris Agreement speaks to a legal obligation of developed countries to engage in provision to developing countries, at a level consistent with the commitments defined under Article 2.

- 1.4. Improved reporting and clarity around definitions for finance:** There is an urgent need to establish widely agreed-upon definitions for climate finance. The Roadmap can develop distinct working definitions for finance provision, which necessitates measurements in grant-equivalent terms, versus finance mobilization (as per the \$100bn goal) versus wider finance flows (as with the \$1.3 trillion). These can, and should, later be formalized and multilaterally agreed. In terms of reporting, by 2028, all developed countries should be reporting their finance provision in grant-equivalent terms (in addition to nominal terms). All developing countries should enhance their needs reporting to identify their needs both in grant-equivalent as well as nominal terms.

2. Long-term priorities - Beyond 2028

- See items above, in particular items 1.2-1.4, which entail further trajectories of work and efforts beyond 2028, as well as items identified below such as the development of the UN tax cooperation convention, which are expected to result in enhanced flows of financial resources for climate action in developing countries.

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

- See above. In Morocco's experience, provision of grant-equivalent public financial resources for grants-based and concessional financing are crucial for financing climate adaptation in vulnerable regions, including in Africa. Morocco is host of the Initiative for the Adaptation of African Agriculture (AAA) and would be happy to share its experience.

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

1. The African Ministers' proposal for a \$1.3 trillion target prior to COP29 (from AMCEN) should guide the Roadmap, meaning the Roadmap should focus on mobilization and provision of public finance, and 1.3 trillion USD be "delivered mainly through concessional finance and grants".

2. The experience of mobilizing the \$100 billion, in the context of its lack of concessional finance and low proportion of grants, is instructive.
3. The experience with the multilateral climate funds cited below is instructive.
4. The proposals associated with the UN tax cooperation convention, noted below, suggest that hundreds of billions (USD) could be made available to developing countries from currently missing revenues.
5. The experience of successes and failures in mobilizing private finance is instructive. While global capital reserves are sufficient to address the climate finance gap, structural barriers impede these financial flows from reaching developing countries, including the higher cost of capital in developing countries. The Roadmap should not rely on unrealistic assumptions of leverage ratios.

(d) What existing multilateral initiatives should be considered as appropriate, to support the delivery of the USD 1.3 trillion target?

Within the UNFCCC process, **the Standing Committee on Finance's work, notably on the Needs Determination Reports (NDRs) and definitions of climate finance**, will be important to take into account in the development of the Roadmap to 1.3 trillion.

We urge the Presidencies to acknowledge and build on the experiences of the following funds, for which the Roadmap should envisage significant growth over the following decade :

- **The Green Climate Fund (GCF)** : The GCF offers crucial financial mechanisms and lessons for channeling funds; learning from the GCF's experiences can inform the development of innovative climate finance mechanisms for scaling impact. The Roadmap should explore pathways to increase the GCF's scale while improving its effectiveness at leveraging its resources.
- **The Adaptation Fund (AF)**: The unique experience of the Adaptation Fund, particularly in terms of its mode of financing, would be insightful for the Roadmap to draw upon in terms of envisaging a scaling of adaptation finance over the next decade. Given the increasing impacts of climate change, adaptation finance is crucial.
- **The Fund for Responding to Loss and Damage (FRLD)** : Responding to the impacts of climate change and compensating impacted communities is a key pillar for climate finance under the 1.3 trillion. The Roadmap must address the growing need for finance related to loss and damage by envisaging a much larger FRLD which is at-scale to meet global needs.

Outside the UNFCCC process, various multilateral initiatives are relevant to take into account, notably:

- **The 4th International Conference on Financing for Development (FfD4)**, under the United Nations, offered a dedicated multilateral space to address the systemic issues

hindering development and climate finance flows to developing countries. The Compromiso de Sevilla document provides a consensual overview of financing mechanisms such as taxation that developed countries could use to mobilize public resources for international climate finance. Since the Roadmap underscores the importance of “grants, concessional and non-debt-creating instruments, and measures to create fiscal space”, FfD4 conclusions relating to these areas are of particular significance to the Roadmap. Lastly, FfD4 also provides the Roadmap with a basis of strong consensus for initiatives regarding the role of MDBs in scaling finance, particularly in terms of recommended practices for increasing financing, reducing the cost of capital, derisking projects, and expanding private sector investments for developing countries.

- **United Nations Tax Convention process:** The UN Convention on International Tax Cooperation is a multilateral initiative that could play a key role in bridging existing gaps in climate finance, by unlocking great quantities of new fiscal resources, both for developing countries as well as for developed countries as climate finance contributors. This process was initiated by the African Group in 2023 by introducing the Resolution 78/230 on the development of a UN tax convention at the UN General Assembly (UNGA), with the Kingdom of Morocco engaging closely in this effort, and led to a vote at UNGA in November 2024 to adopt the mandate for establishing a new global process on tax. The process to prepare this convention is now underway.
- **International Court of Justice (ICJ) on climate finance and reparations:** A cross-regional Core Group of States, including Morocco, led a push that resulted in the successful adoption of a resolution at the UN General Assembly in 2023, which requested an ICJ Advisory Opinion on the obligations of states concerning climate change under international law and also the legal consequences for affected countries, peoples, and individuals. In July 2025, the ICJ delivered its advisory opinion. The Court explicitly recalls legal obligations to provide financial assistance under the UNFCCC’s Article 4 and the Paris Agreement’s Article 9.1. On this basis, the Court additionally acknowledges that a failure by developed countries to provide climate finance per such obligations could constitute an “internationally wrongful act”. This could then entail several obligations, notably the duty to make full reparation through restitution and/or compensation.