

Federative Republic of Brazil

Submission on the Work Programme on Climate Finance, including on Article 9, paragraph 1, of the Paris Agreement in the context of Article 9 of the Paris Agreement as a whole

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During the COP30 cycle, Parties presented their new Nationally Determined Contributions (NDCs) outlining updated plans and commitments for implementing the Paris Agreement. In Belém, through the Mutirão Decision, Parties reaffirmed their resolve to “decisively transition to a focus on implementation” and to “remain united in the pursuit of efforts to achieve the purpose and long-term goals of the Agreement, with a view to delivering climate action and support for people and the planet”.

To this end, the Presidencies of COP29 and COP30 presented to Parties the “Baku to Belém Roadmap to 1.3T”, with concrete measures to scale up climate finance. In the formal process, COP30 adopted a set of decisions that will significantly shape future discussions under the climate finance agenda. Among these, the CMA decided to establish the **Work Programme on Climate Finance, including on Article 9, paragraph 1, of the Paris Agreement in the context of Article 9 of the Paris Agreement as a whole**.

Brazil considers this one of the most strategic debates in the lead-up to COP31 and within the broader context of the implementation of the Paris Agreement. We therefore thank the co-chairs for the opportunity to contribute to the structuring of the Climate Finance Work Programme.

Some elements of the Work Programme are clear from the outset. The process and its outcomes must be firmly grounded in the rules and commitments of the Paris Agreement, including the principle of equity and common but differentiated responsibilities and respective capabilities, in the light of different national circumstances (CBDR-RC). It must also reflect the differentiated responsibilities embedded in Article 9 of the Agreement, including the provision of financial resources by developed countries to assist to assist developing country Parties with respect to both mitigation and adaptation.

Other elements remain to be defined. These include, inter alia, the expected outputs and outcomes of the process, the mode of work, and the specific topics to be addressed.

The title of the Work Programme itself, the overarching call of the Mutirão Decision to shift towards implementation, and the provisions of Article 9 provide a solid basis for defining the scope of the discussions. The focus must clearly be on the implementation of Article 9.1 within the broader context of Article 9 and climate finance as a whole. In practical terms:

- It should provide a space to discuss how the provision of climate finance under Article 9.1 can support and enhance the broader climate finance landscape in developing countries.
- The debate should include aspects related to the predictability of climate finance flows and the capacity of mobilizing resources at the scale needed and with the required level of concessionality for the effective implementation of the Paris Agreement.
- The process must be guided by collective efforts to strengthen real implementation of the Paris Agreement.
- The Programme must focus on the delivery of climate finance to developing countries, in accordance with Article 9 of the Agreement and taking into consideration the messages of the “Baku to Belém Roadmap to 1.3T”.

What are your overall expectations for the climate finance work programme? What concrete outputs and outcomes should the climate finance work programme deliver?

The Climate Finance Work Programme offers an important opportunity for Parties to engage more deeply in substantive discussions on climate finance, including on the barriers to its effective delivery. It must move beyond inconclusive debates or repetitive statements.

The Climate Finance Work Programme should enable Parties, with the contribution of non-Party stakeholders, to elaborate a clear plan on how the provision of public resources can contribute to mobilizing climate finance at the scale and with the quality required for timely and enhanced implementation of the Paris Agreement in developing countries.

While fully respecting national sovereignty, the Work Programme could deliver and/ or enhance practical, non-prescriptive tools to help overcome barriers to climate finance, such as:

- General principles or best-practice guidance aimed at standardizing eligibility criteria and access procedures, helping to reduce fragmentation in the current climate finance architecture.
- Development of positive incentives for the implementation of Article 9.1, including the establishment of positive lists of donors, based on agreed criteria and procedures.

- Structured exchange of experiences on country platforms and national investment frameworks for climate action, as concrete references for the discussion on how public resources can catalyze scaled-up and better aligned climate finance in developing countries.
- Development of a UNFCCC Climate Finance portal serving as a hub for information on climate finance, national platforms and facilitating matchmaking tools between donors and projects anchored in national plans. This platform could also function as an integrative tool for existing initiatives.

What are the thematic pillars of the climate finance work programme and the related subtopics that we should address within each pillar?

The list of topics that can be explored under the Work Programme is extensive, but it can be captured under a single overarching objective: determining how the provision of public resources can best help mobilize climate finance at the scale and quality required for the timely and effective implementation of the Paris Agreement in developing countries.

Article 9.1 to 9.3: provision and mobilization

- Scaling up public finance and increasing the level of concessionality in climate finance.
- Development of a delivery plan for the USD 300 billion goal and for scaling up financing to developing country Parties for climate action from all public and private sources to at least USD 1.3 trillion per year by 2035, in line with the obligations under Article 9.
- Implementation of Article 9 as a means to support national climate plans, priorities and strategies in developing countries, including NDCs and NAPs.

Article 9.4: balance between adaptation and mitigation; country-driven strategies; priorities and needs of developing country Parties, especially those particularly vulnerable to the adverse effects of climate change and have significant capacity constraints, such as the LDCs and SIDS

- Enhancing grant-based and concessional finance for climate-resilient development, including concrete steps to ensure a better balance between adaptation and mitigation finance.
- Steps to at least triple adaptation finance by 2035, in line with decision 1/CMA.6, including discussions on methodological tools to measure the scale up of adaptation finance.
- Progress on the quality of adaptation finance, including the share of grant-based resources in total adaptation finance flows, as well as measures to ensure that the tripling does not increase the debt burden and considers the available fiscal space of developing countries.

Articles 9.5 and 9.7: transparency

- Improving the consistency and effectiveness of *ex ante* and *ex post* communications to better support planning and implementation of climate action in developing countries.
- Development, under the UNFCCC, of agreed methodologies for reporting climate finance on a grant-equivalent basis, avoiding double counting and ensuring that the accounting of provided, mobilized and received resources reflects the actual financial effort borne by contributing Parties and the actual benefit accruing to recipient Parties, independently of methodologies developed outside the Convention.

Article 9.9: efficient access to financial resources

- Enhanced access to climate finance through concrete measures to address identified constraints, challenges, systemic inequities and barriers, including high cost of capital, co-financing requirements, and burdensome application procedures.
- Harmonization of access procedures and eligibility criteria.
- Specific challenges faced by middle-income developing countries in accessing climate finance at adequate scale and concessionality, including constraints stemming from graduation thresholds, sovereign credit ratings and debt sustainability considerations.
- Contribution of ongoing discussions on the reform of the international financial architecture and of the multilateral development banks to the delivery of climate finance under Article 9, including their role in expanding concessional resources, mobilizing private finance, and reducing the cost of capital for climate action in developing countries.

Other topics

- **Article 9 and Article 2.1(c)**: exploring how the implementation of Article 9 can contribute to making finance flows consistent with pathways towards low greenhouse gas emissions and climate-resilient development.
- **Climate finance and the GST**: examining how climate finance can support developing countries in a balanced implementation of the Global Stocktake.
- **Effectiveness and impact of climate finance**: ensuring that available resources generate tangible impacts on the ground, benefiting vulnerable communities and groups, including women and girls, children and youth, people of African descent, persons with disabilities, Indigenous Peoples, local communities, migrants and refugees, climate-vulnerable communities, and people in vulnerable situations.
- **Methodological convergence** on approaches to assess the amount of resources provided, mobilized and received.

- The contribution of the “**Baku to Belém Roadmap to 1.3T**” to the goal of scaling up of financing to developing country Parties for climate action from all public and private sources to at least USD 1.3 trillion per year by 2035, in line with Article 9.

How should the climate finance work programme be organized to ensure that the format is inclusive, balanced, and technically robust, while addressing climate finance comprehensively and delivering outcomes that are actionable and meaningful?

To achieve the best possible outcomes, the Climate Finance Work Programme should function as a facilitative and cooperative space. It should draw on lessons learned from previous work programmes under the Paris Agreement, with a view to avoiding deadlocks and ensuring practical results.

Without duplicating existing CMA processes, such as the GST, the NCQG, and the Veredas Dialogue on Article 2.1(c), the Climate Finance Work Programme can serve as a facilitative platform to enhance coherence across the climate finance agenda and to accelerate the delivery of resources needed for climate action in developing countries. Its work should be closely coordinated with relevant ongoing negotiation processes. It should also explore possible synergies with the action agenda, where applicable.

Meetings should be held in hybrid format and, where possible, organized in conjunction with existing events, such as Climate Weeks and the sessions of the Subsidiary Bodies, to ensure broad participation. While fully respecting the Party-driven nature of the Work Programme, there should also be structured opportunities for observers and non-Party stakeholders to contribute.

To conclude, Brazil reaffirms its strong commitment to working together with Parties and non-Party stakeholders to advance concrete steps towards the implementation of the Paris Agreement, particularly for the most vulnerable within and among countries. We are confident in the ability of the co-chairs of the Climate Finance Work Programme to guide this critical discussion and stand ready to support their work.