

UNFCCC Submission - Climate Finance

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

This programme should clarify how Parties shall meet their obligations under Article 9 through climate finance that is predictable, sufficient and accessible for countries and communities most vulnerable to climate change. The programme must also clarify that any climate finance must be aligned with international human rights law, with reference to the International Court of Justice's consideration that states must "take their obligations under international human rights law into account when implementing their obligations under the climate change treaties and other relevant environmental treaties and under customary international law."¹ Given that offset-based mechanisms carry high integrity risks, far greater attention must be played to Non-Market Approaches (Article 6.8) that deliver public goods, such as Indigenous and community-led forest protection. Further, in order for climate finance to be new and additional, as directed by article 4.3 of the UNFCCC, states must strive to move from the heavy reliance on loans, which exacerbate debt burdens and reduce fiscal space for developing countries. The programme should produce actionable recommendations that inform implementation of the New Collective Quantified Goal (NCQG).

Outputs

A clear definition of the scope and value of non-market approaches under Article 6.8, including their role in delivering climate finance under Article 9.

Proposals for predictable financing to support Article 6.8 activities, with an emphasis on direct support for Indigenous Peoples and local communities.

Strengthened governance of Article 6.8, including review of the online platform, enhanced profile within the UNFCCC and enhanced coordination with finance, adaptation, and loss and damage bodies etc.

Outcomes

Increased political visibility and operational relevance of Article 6.8 within the UNFCCC architecture.

Address the complementarity between Article 6.8 of the Paris Agreement and Article 9.1, exploring the potential of non-market approaches for the implementation of article 9.1.

Greater uptake of rights-based, community-led non-market approaches delivering public goods such as forest and peatland protection.

¹ International Court of Justice. (2025). Obligations of States in respect of Climate Change. <https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf>

Enhanced trust between developed and developing countries through climate finance that is more predictable, accessible, and effective.

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

Pillar 1: Identification of sources of public finance:

Facilitate dedicated discussion and exploration of the different tools available to developed countries to generate climate finance, in line with their human rights obligations and the principle of common but differentiated responsibilities (e.g. including fiscal policies that redirect harmful subsidies and that tax heavily polluting actors without relegating finance generation to private sector voluntary actions incentivised by profit-making and relying on volatile markets).

Topics to be explored under this pillar include:

- Options for taxing wealth
- Options for permanent taxation of excessive fossil fuel profits
- Closing corporate tax loopholes
- Improving tax and financial transparency (including by implementing country-by-country reporting and adopting (or improving existing) national beneficial ownership registries)
- Adoption of progressive solidarity levies, and reforming, eliminating and redirecting harmful subsidies

Pillar 2: Role and Scope of Non-Market Approaches in relation to Article 9

Definition and typology of non-market approaches under Article 6.8 and their role in delivering public goods (e.g. adaptation, forest and biodiversity protection, just transition)

Added value of Article 6.8 compared to market-based approaches (Articles 6.2 and 6.4)

Pillar 3: Financing Non-Market Approaches

Eligibility of Article 6.8 activities as climate finance under Article 9

Grant-based and concessional finance for non-market approaches

Direct and simplified access to finance for Indigenous Peoples, local communities, and civil society

Pillar 4: Governance and Institutional Support

Review and improvement of the Article 6.8 online platform

Integration of Article 6.8 into decision making and UNFCCC workstreams and coordination with relevant UNFCCC bodies on finance, loss and damage etc.

Enhancing political visibility and high-level engagement

Pillar 5: Implementation, Piloting, and Scaling

Linking non-market approaches to design and implementation of NDCs

Replication and scaling of successful non-market approaches, based on knowledge-sharing across Parties and stakeholders

(c) 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?

The process should be organised around the above thematic pillars and subtopics with clearly defined objectives, timelines, and outputs for each. There must be meaningful and structured participation of developing country Parties, Indigenous Peoples, local communities, women, civil society etc. as well as strong coordination with existing UNFCCC bodies including on finance and loss and damage.