

To
The Co-chairs
The Work Programme on Climate Finance
The United Nations Framework Convention on Climate Change (UNFCCC)

Subject: Inputs on the vision, modalities and elements for the next year of 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’

The Council on Energy, Environment and Water (CEEW) thanks the co-chairs for the opportunity to provide further views on the ‘Work Programme on Climate Finance’, following the engagement workshops held during SB 64 in Bonn.

CEEW – a homegrown Indian institution with headquarters in New Delhi – is among the world’s leading climate think tanks. The Council is also often ranked among the world’s best-managed and independent think tanks. It uses data, integrated analysis, and strategic outreach to explain – and change – the use, reuse, and misuse of resources. It prides itself on the independence of its high-quality research and strives to impact sustainable development at scale in India and the Global South.

CEEW reiterates the position set out in its [earlier submission](#) of March 2026: the implementation of Article 9, paragraph 1, which entails the provision of financial resources by developed to developing country Parties, should be central to the Work Programme. Building on the outcomes of COP 30 and the discussions at SB 64, CEEW offers the following inputs on the vision, modalities and elements for the coming year, and on the three guiding questions posed in the [message](#) dated 16 July 2026.

1. Views on the vision, modalities, and elements to be addressed in the next year of 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

Vision: The Work Programme should aim to translate the momentum of COP 30 into the concrete implementation of Article 9.1, which should be central to the discussions held under the work programme. The provision of public resources is a prerequisite for the mobilisation of additional private capital which would be necessary to cover as much ground as possible towards the 1.3 tn target. Therefore, Article 9 discussions should focus on 9.1 primarily and discussions should not be diluted by, or conflated with, the aspirational discussions on aligning financial flows under Article 2.1(c) and the Veredas Dialogue, which are complementary and not a substitute for the provision of finance under Article 9 of the Paris Agreement.

Elements: The coming year should carry forward the discussion on the three thematic elements identified through the engagement process: provision and mobilisation, access, and transparency.

Modalities: The Programme should be Party-driven, balanced, and transparent, with predictable annual outcomes in the form of summary reports for Parties' consideration. It should draw on the work of the Standing Committee on Finance (SCF) and other constituted bodies, avoid re-opening the settled architecture of Article 9 (including the contributor base), and inform other discussions on the review of the New Collective Quantified Goal (NCQG), the review of the modalities of the Enhanced Transparency Framework (ETF), and the second Global Stocktake (GST) in 2028.

2. Additional inputs in response to the guiding questions posed on:

a. Provision and mobilisation: How can we scale up the provision and mobilisation of climate finance from a wide variety of sources, instruments and channels to support climate actions in developing countries?

- Distinguish provision from mobilisation. Article 9.1 (provision) is a legal obligation of developed countries and the enabler of Article 9.3 (mobilisation). Scaling both begins with honouring the former. Public, grant-based, and concessional finance should form the core of finance flows.
- Public finance should constitute the majority of the at least USD 300 billion per year by 2035 that developed countries are to take the lead on under the NCQG, deployed catalytically to crowd in private finance. The at least USD 1.3 trillion per year mobilisation aspiration must not displace the core provision obligation.
- Enhance predictability through multi-year pledges and forward-looking, indicative trajectories, and through timely replenishment of the operating entities of the Financial Mechanism, the Adaptation Fund and the Fund for Responding to Loss and Damage, at a time of declining official development assistance.¹
- Scale adaptation finance in line with the COP 30 call to at least triple adaptation finance by 2035, with a clear baseline and a dedicated sub-target.

¹ https://unfccc.int/sites/default/files/resource/Relatorio_Roadmap_COP29_COP30_EN_final.pdf

- Diversify instruments and channels: grants and concessional finance, non-debt-creating instruments for countries facing elevated sovereign debt (Article 6 approaches, debt-for-climate swaps, re-channelling of Special Drawing Rights, climate-resilient debt clauses), and guarantees and blended finance that crowd in private capital without shifting risk onto recipient countries.²
 - Address the structural drivers of the finance gap – the high cost of capital and foreign-exchange risk – through de-risking instruments, local-currency financing and hedging solutions, and multilateral development bank reforms to expand their concessional lending headroom.²
- b. Access: What are concrete procedural, institutional and capacity barriers that prevent developing countries from accessing available climate finance, and how can these be addressed?**
- As documented by the SCF, the gap between the needs articulated by developing countries and the provision of finance remains large. Closing it shall require addressing access challenges alongside the scaling of flows.³
 - **Procedural barriers:** fragmented and duplicative accreditation across operating entities, high transaction costs, long approval timelines and burdensome fiduciary and reporting requirements.¹ Address these simplifying and harmonising accreditation across the GCF, GEF, Adaptation Fund, and the Fund for Responding to Loss and Damage, mutual recognition of accreditation, and simplified windows for small-scale activities.
 - **Institutional barriers:** over-reliance on international intermediaries and limited devolution for access. Enhanced direct access provisions should be pursued, including local-access windows that empower regional, national, and subnational institutions.
 - **Capacity barriers:** limited project-preparation, pipeline-development and MRV capacity, most acute for SIDS and LDCs, and marginalised communities. These call for predictable, programmatic funding, and dedicated readiness and project-preparation support, consistent with capacity-building measures under Article 11 of the Paris Agreement.
 - 13 countries/regions announced plans to develop country platforms at COP 30, alongside a 'Country Platforms Hub' to coordinate delivery of finance and connect national platforms to technical assistance, concessional finance, and blended instruments.⁴ These country platforms could be provided simplified, enhanced access by accredited entities to fast track delivery, while safeguarding country ownership and aligning with their identified priorities.
- c. Transparency: How do we enhance the transparency of climate finance and the measurement of progress on the impacts, results and outcomes of climate finance, including Article 9, paragraph 1, of the Paris Agreement in the context of Article 9 of the Paris Agreement as a whole?**

² <https://www.ceew.in/gfc/publications/climate-investment-baku>

³ https://unfccc.int/sites/default/files/resource/UNFCCC_NDR2_Report_Apr2025_Web.pdf

⁴ <https://www.financeministersforclimate.org/node/1288>

- CEEW's analysis of the first Biennial Transparency Reports (BTRs) and CTF-S submissions made alongside them found that the 6 largest donor Parties – Japan, Germany, France, USA, the EU, and the UK – contributed 88% of total bilateral finance flows reported by UNFCCC Annex II Parties for the year 2022 (USD 36.85 bn of USD 41.85 bn).
- Reporting inconsistencies were observed in several instances across the CTF-S submissions in terms of:
 - Incomplete or missing details pertaining to project names, their sector and sub sectoral classification, and the financial instruments utilised,
 - No specification of country-wise shares for multi-bilateral and regional projects, and
 - Limited reporting of grant equivalent values (prescribed as voluntary to report for donor Parties).
- To strengthen transparency and traceability of reported flows, provide additional guidance to capture instrument type, sector (mitigation, adaptation, cross-cutting), the point of measurement (committed, disbursed, received), and country-specific allocation under multi-bilateral or regional projects. In addition, to enable the assessment of real value of finance provided, pursue the development of a common methodology to report grant equivalence, through a party-driven process to derive consensus.
- Draw on and strengthen Party-driven SCF products (the Needs Determination Report and the Biennial Assessment and Overview of Climate Finance Flows), and mandate periodic SCF reporting on the needs, gaps, quality and quantity of finance under Article 9.1, to feed into the discussions under various workstream relating to finance.
- Operationalise the Global Climate Finance Accountability Framework announced by the COP 30 Presidency, which aims to 'improve transparency, credibility and trust in the delivery of climate finance by moving from scattered, hard-to-verify pledges toward coherent, measurable and equitable finance'.⁵ Additionally, consider a standing follow-up mechanism under the CMA to monitor and review the implementation of Article 9.1 beyond the two-year Programme.

⁵ <https://cop30.br/en/news-about-cop30/cop30-approves-belem-package1>