

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

Subject: Inputs 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’

The Council on Energy, Environment and Water (CEEW) welcomes the establishment of the two-year 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, as decided at CMA 7, and thanks you for your invitation to Parties and non-Party stakeholders to share their views.

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 commends the co-chairs’ commitment to conduct the work programme in an inclusive, participatory, comprehensive, balanced, and transparent manner. We trust that this process will provide a meaningful opportunity to advance the implementation of Article 9 of the Paris Agreement and meaningfully support developing countries in scaling their climate action.

In response to the three questions set out by the [message](#) to Parties and observers on 23 March 2026, CEEW submits its inputs for consideration.

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

a. Expectations

- Implementation of Article 9.1 should be central to the work programme
- Maintain distinction and avoid conflation with discussions under the Veredas Dialogue on Art 2.1(c) which is aspirational in nature, and must be viewed as complementary, and not a substitute for Art 9 which lays down the obligations of developed countries to provide and mobilise finance
- Avoid deliberations/renegotiation of the settled architecture of Art 9, including re-litigating the question of the contributor base
- Emphasise linkages of Art 9.1 with other articles of the Paris Agreement, the achievement of whose goals are contingent on Art 9.1:¹
 - Art 3 (setting of ambitious climate goals) hinges on finance provided under Art 9.1
 - Linkages with Art 4 (mitigation action): which sets the overall objective to limit the global temperature rise. Art 4 defines the ‘what’ (mitigation action) and Art 9.1 provides the ‘how’ (financial support) for developing countries²
 - Art 4.5 explicitly mandates that support be provided to developing country Parties for the implementation of Art 4, in accordance with Art 9, 10 and 11²
 - Art 4 also emphasises equity and climate action in the context of sustainable development and poverty eradication (Art 4.1), as well as the principles of CBDR-RC in setting NDCs (Art 4.3), which necessitates the provision of climate finance under Art 9.1²
 - Linkage with Art 7 (adaptation action): provision of public finance under Art 9.1 is crucial to enable adaptation action by developing countries (as outlined in Art 7.13)²
 - Besides the direct provision of climate finance (Art 9.1), finance from developed countries is also crucial to mobilise resources from the private sector (Art 9.3)²
 - Art 9.1 is also essential to support other means of implementation: technology transfer (Art 10) and capacity building (Art 11)²

¹ https://unfccc.int/sites/default/files/resource/LMDC%20Supplementary%20note%20on%209.1_DEA.pdf

² https://unfccc.int/sites/default/files/english_paris_agreement.pdf

b. Outcomes

- Definition of what constitutes climate finance:³ specifying that it must be new and additional (beyond ODA), primarily public and concessional or grant-based, and flowing from developed to developing countries⁴
- Fair burden-sharing mechanisms among developed country Parties⁵ (with mechanisms to encourage Parties that have not paid their fair share to make up arrears)
- Enhanced predictability pertaining to multi-year pledges for finance flows⁶
- A standard accounting and reporting methodology for the provision of climate finance by developed country Parties⁷
- Sub-targets for mitigation and adaptation finance: guidance on striving for a balance between the two, with the recognition that adaptation finance must increase manifold

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

Pillar 1: Laying the foundation for the implementation of Art 9.1

- Emphasis on implementation – practical pathways to scale up predictable, public climate finance
- Fair burden-sharing among developed country Parties⁵
- Enhanced predictability pertaining to multi-year pledges for finance flows⁶
- Public finance flows should constitute the majority of the USD 300 bn that the developed countries will take a lead on (as per the NCOG decision). These concessional resources should be deployed in a catalytic manner to maximise private finance mobilisation

Pillar 2: Quality of finance, access and delivery modalities

- Shift composition of climate finance provision toward grants and highly concessional finance (vs loans); reduced reliance on non-concessional MDB lending
- Provision of public finance is key for climate adaptation and it must increase manifold – establish a dedicated sub-target for adaptation finance (besides mitigation)
- Integrate SDGs, just transition pathways, and developing countries' goals and needs outlined in NDCs and NAPs into the end-uses for climate finance provision⁸

³ https://unfccc.int/sites/default/files/resource/202402131316---India_NCOG%20submission%20%281%29.pdf

⁴ <https://www.ceew.in/gfc/solutions-factory/publications/CEEW-CEF-Climate-Finance.pdf>

⁵ <https://unctad.org/news/new-climate-finance-goal-horizon-how-can-developing-countries-benefit>

⁶ https://unfccc.int/sites/default/files/resource/cma2025_02_adv.pdf

⁷ https://unfccc.int/sites/default/files/resource/cp2024_06a04_cma2024_08a04.pdf

⁸ https://unfccc.int/sites/default/files/resource/cma2024_L22_adv.pdf

- Deliver climate finance through innovative, non-debt creating instruments for countries struggling with elevated levels of sovereign debt (such as Art 6 carbon markets, debt-for-climate swaps, re-channelling of SDRs, climate resilient debt clauses, etc.)⁹
- Simplify access for climate finance – including by streamlining access for local communities, SIDS and LDCs – by reducing transaction costs and harmonising approvals across Operating Entities of the Financial Mechanism¹⁰
- Strengthen enabling conditions – empower national and regional institutions, advance the reform of MDBs, emphasise mechanisms to address structural barriers such as high cost of capital and currency risks, and encourage cross-country exchange of learnings on policies and mechanisms⁹

Pillar 3: Transparency and accountability

- Definition of climate finance
- Standard accounting and reporting methodologies,⁷ with standardised templates for detailed reporting on climate finance provided and mobilised (instrument, timeline, concessionality, other terms and conditions of financing, etc.)

3. *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?*

- Must be organised in an open, transparent, and inclusive manner, accessible to all Parties and engage a broad range of actors and non-party stakeholders, including civil society organisations, particularly from developing countries
- Engagement of the private sector must not dilute the emphasis on Art 9.1
- Seek observer submissions from constituted bodies (SCF, Least Developed Countries Expert Group, Adaptation Committee, etc.) in a structured manner to inform technical work
- Consider the thematic work undertaken by other multilateral platforms (such as the G7 or the G20, UN Tax Convention), including on reform of the international financial architecture (while avoiding duplication of work)
- Ensure interlinkage of the work programme's outcomes with the review of the NCQG and conclusion of the second Global Stocktake (GST) in 2028 (CMA 10/COP 33)

⁹ <https://www.ceew.in/gfc/publications/climate-investment-baku>

¹⁰ <https://unfccc.int/sites/default/files/resource/GEF%20report%20to%20COP30.pdf>