EIG Submission on the Work Programme on Climate Finance

9th September 2026, updated 18th September 2026

The Environmental Integrity Group (EIG), comprising of Georgia, Liechtenstein, Monaco, Mexico, South Korea and Switzerland, is pleased to share its views 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".

We are providing inputs to the item raised by the 2 Co-Chairs of the Work Programme in their letter from 16th July, 2026, as follows;

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

- **Scope**: The work programme should cover climate finance as whole: all climate finance flows globally, as covered in the Biennial Assessment and Overview of Climate Finance Flows (BA) reports by the Standing Committee on Finance, both domestic and international, related to mitigation and adaptation, including all sectors and geographies
- **Output**: The formal output at the end of the 2-year Work Programme (launched at the end of 2025 in Belém) should be a report of the Co-Chairs to the CMA.9 (in 2027)
- **Outcomes**: At the end of 2027, we expect that Parties will have new insights on:
    - Opportunities for climate finance mobilization and effectiveness, across the different types of climate finance flows, internationally and nationally, for both mitigation and adaptation including through more inclusive and gender-responsive, approaches, respecting human rights. This includes an improved understanding of how the quality and effectiveness of climate finance, including its accessibility and concessionality, can better support developing countries in implementing their climate priorities.
    - An improved rationalization of climate finance, both in terms of the climate finance negotiations (streamlining of agenda items, modalities) and the efficiency of the funding landscape (improving synergies and coherence, avoiding overlaps and duplications)

Modalities

We see the following way of working;

- Inclusiveness: the sessions of the work programme should be open to all parties and observers, including the private sector. All sessions of the work programme should be in session meetings at SBs and COPs to ensure broad participation.
- Balanced and addressing climate finance comprehensively: the co-chairs should ensure that all relevant elements of global climate finance flows are discussed (see our answers to questions 1 and 2)
- Technically robust: The work programme should use insights from recognized information sources, such as the IPCC, the SCF, the OECD or UN reports as inputs for the discussion while also drawing on relevant UNFCCC workstreams, including the enhanced Lima Work Programme on Gender and its Gender Action Plan.

- Delivering outcomes that are actionable and meaningful: we suggest having in-session workshops at UN climate conferences in 2026 as well as SB sessions in 2027 respectively, to advance outcomes toward conclusion of the 2-year work programme at CMA.9

Elements

We see the three following pillars of the Work Programme (assuming the safeguards outlined above are assured)

- **1) International climate finance,** with the following sub-pillars:
  - Mobilizing private finance, from various sources, through various instruments
  - Innovative sources of finance
  - Enabling environments to attract international finance
  - Access to finance and building capacities, including in complex contexts with significant access constraints
- **2) Domestic climate finance**, with the following sub-pillars
  - Economic opportunities in mitigation, adaptation and other areas of climate finance
  - Enabling environments for mitigation (e.g. carbon pricing), adaptation (e.g. closing the insurance gap) and other areas of climate finance, including to increase absorption capacity.
- **3) Rationalization of the climate finance architecture**
  - Rationalization of the climate finance negotiations, including the adjustment of modalities (e.g. draft negotiation texts ready before sessions), the streamlining of agenda items, following the principle that for any new agenda item on finance, several existing ones should be integrated or ended.
  - Rationalization of the implementation landscape, including complementarity and coherence, and avoiding overlaps between the different entities of the Financial Mechanism, also to ensure enhanced access

Safeguards

- We need assurances that the ongoing provision and mobilization of climate finance to developing countries is recognized. Unless there is recognition that finance is actively being provided and mobilized in furtherance of Article 9 of the Paris Agreement, and in pursuit of the New Collective Quantified Goal (NCQG), it is difficult to expect meaningful outcomes from any work programme focused on climate finance. We also need recognition that the NCQG is the expression of the Article 9 commitment under the Paris Agreement for the years up until 2035.
- Furthermore, we need assurances that there is no renegotiation of the NCQG or any discussions on new financial commitments or quantified goals under the work programme

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

A multi-pronged strategy should be followed to scale up the provision and mobilization of climate finance. First of all, all sources of finance, from a variety of actors and channels beyond traditional ones, should be considered to scale up finance. Public finance continues to play an important role for countries and sectors where private finance is difficult to mobilize at sufficient scale or on appropriate terms. Second, scarce public resources can where appropriate play a catalytic role to create high leverage and to de-risk and mobilize investments from private sources as well as state-owned enterprises at scale. Successful instruments for mobilization have been tested and now stand ready for

scaling and replication. In addition, a variety of innovative instruments should be considered, and domestic enabling environments can be strengthened to improve the investment climate for climate investments. Further, multilateral, bilateral and national development banks as well as financial institutions should be engaged to the extent possible to scale up climate finance, following their own commitments. Finally, building capacity for various actors and institutions, further helps to achieve scale.

Access to “climate finance, including Article 9, paragraph 1, of the Paris Agreement in the context of Article 9 of the Paris Agreement as a whole”: What are concrete procedural, institutional and capacity barriers that prevent developing countries from accessing available climate finance, and how can these be addressed?

We see three main barriers for access to climate finance: limited domestic capacity, fragmentation of the climate finance architecture, and incomplete harmonization of procedures and systems among climate finance providers, including climate funds and development banks.

First of all, the knowledge and resources to develop funding proposals and structuring bankable projects is often limited in many countries, particularly in LDCs and SIDS where institutional capacities are often under additional strain due to multiple and overlapping vulnerabilities: Such capacity has to be further strengthened through both domestic and international channels.

Secondly, the climate finance landscape has become more fragmented through the continued creation of new institutions and funds that channel scarce resources. This leads to higher transaction costs and the difficulty for recipients and private entities to navigate an ever more complex architecture. So, one of the most successful measures to improve access to climate finance is to enhance coherence and simplify navigation across the climate finance architecture, including by strengthening complementarity and avoiding unnecessary duplication among channels and institutions and ensuring, that no additional funds and financing entities that duplicate existing institutions are created.

Finally, the limited harmonization of procedures and systems among climate funds and institutions is driven by their different historical origins and their different mandates. Climate finance institutions, particularly multilateral climate funds, have implemented successful steps towards simplification and harmonization of systems and processes but there is still room for improvement, using synergies among funds, ensuring complementarity and fully implementing the Climate Fund’s Action Plan on Complementarity and Coherence. The calendars for policy, standards and operational process reviews by the funds (such as E&S standards, gender policy reviews, etc.) could be better aligned to facilitate harmonization. We encourage innovative arrangements such as mutual reliance agreements that recognize the interoperability of other funds’ standards, where they are substantially equivalent. We see in particular potential for further alignment of results management frameworks, impact assessment criteria and practices, and evaluations, with the aim of joint indicators and evaluations across the funds. Coordination and collaboration at country level should also be strengthened, in order to enhance country engagement, pipeline planning, and enabling environments.

Transparency 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”: 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?

We have already seen major progress in transparency through the biennial transparency reports (BTRs) as well as the 2-yearly submissions on 9.5 as well as various reports by the Standing Committee on Finance (SCF). We see that further progress could be made on transparency through clear instruction to SCF on its mandates, reports and further analytical work. Furthermore, operating entities of the financial mechanism could be instructed to advance their impact measurement, while other climate finance institutions could be strongly encouraged to do the same. Finally, the upcoming review of the Modalities, Procedures and Guidelines (MPG) for the Enhanced Transparency Framework (ETF) under Article 13 of the Paris Agreement offers important opportunities to further improve transparency. However, transparency has to be advanced not just for finance but along all major topics of the Paris Agreement, including mitigation and adaptation**.** Lastly, the reporting structure should be optimized as much as possible to ensure that, while the most important elements are monitored, the reporting burden is kept at a reasonable level.