Submission by Ireland and the European Commission on behalf of the European Union and its Member States

Dublin, 16/9/2026

Subject: CFWP

Introduction

The EU and its Member States welcome the opportunity to provide input on the vision, modalities, and elements to be addressed in the next and final year of the work programme on climate finance to be concluded at COP32. We acknowledge the work plan put forward by the co-chairs and welcome the engagement workshops held during SB64 in Bonn, Germany. We appreciate the opportunity to provide additional input on the questions considered during the workshop.

Tackling climate change calls for global, societal and sustainable transformations to happen at an increasingly rapid pace to keep the 1.5-degree target within reach and build resilience and adapt to the adverse impacts of climate change, which are already materializing. Achieving the goals of the Paris Agreements for a low-emission and resilient sustainable development requires making finance flows consistent with low GHG emissions and climate resilient development pathways, more investments and more finance. As the largest contributor of climate finance, the EU acknowledges the need to deliver on our collective goals on international climate finance. As such, the EU sees the WP as an opportunity to make progress on implementation of the NCQG, including the call for efforts to triple adaptation finance by 2035, as well as putting the overall climate finance agenda into practice.

Vision

The work programme on climate finance, including Article 9, paragraph 1, in the context of Article 9, offers an opportunity to discuss climate finance as a whole. The EU and its Member States prefer a holistic approach towards the scope of the work programme. A good point of departure could be the Standing Committee's report on Finance Biennial Assessment and Overview of Climate Finance Flows.

In its second year, the Work Programme on Climate Finance, including Article 9, paragraph 1 in the context of Article 9, should continue to focus on broad, comprehensive discussions on all aspects of the climate finance agenda, including a clear focus on the implementation of the NCQG. Its full implementation requires Parties and Stakeholders to further unpack Decision

1/CMA.6 , which is a substantive, and detailed decision. In particular, various aspects of public and private finance, as well as enabling conditions, such as cost of capital and access to finance, should be further addressed. It is beyond doubt that public finance, as per Article 9.1, will continue to play an essential role, not only in providing predictability, but also in as a lever for catalysing and mobilising private investments. However, to ensure a comprehensive approach to climate finance, the EU and its Member States cannot accept that the work programme focuses exclusively on Art 9.1.

Modalities

The EU and its Member States stress the necessity to uphold the mandate as provided in the Mutirao decision in Belem at COP30, which established the work programme. As per the mandate, the work programme is to be facilitated by the co-chairs, on whose guidance and stewardship the work programme relies. The EU and its Member States therefore express their full confidence in the co-chairs' facilitation in an open, transparent, and inclusive manner. The EU and its Member States consider the two-year work programme to have started and to be a time-bound activity that will therefore ends at COP32.

To enable a forward-looking and constructive space, the EU and its Member States consider it crucial that the modalities allow focussed discussions on different aspects of the broader climate finance landscape, in particular related to the NCQG framework to advance its implementation.

Based on the strong interest in the discussions at SB64, it is recommended to provide more space for a larger number of smaller breakout groups, to ensure strong inclusivity while keeping the breakout groups at an appropriate size.

Elements

The EU and its Member States continue to hold the view that the work programme could conclude with recommendations on:

1. Actions by Parties to ensure the full implementation of the NCQG, advancing the overall implementation of the broader climate finance agenda, including Article 9.1, in the context of Article 9, and contributing towards the overarching goal of making financial flows consistent with pathways towards low greenhouse gas emissions and climate resilient development.
2. How the UNFCCC can contribute to strengthening the climate finance landscape from within and engage with stakeholders beyond.

3. Streamlining the existing climate finance negotiation agenda.

The EU and its Member States firmly underline that Article 9.1 continues to operate as a legal obligation within the framework of the Paris Agreement. While Decision 1/CMA.6 recalls Article 9.1, the USD 300 billion per year by 2035 mobilization goal represents a distinct, multilaterally negotiated collective target. It therefore does not constitute a direct quantification or legal redefinition of Article 9.1.

The USD 300 billion goal reflects a collective mobilization effort from a wide variety of sources, instruments, and channels. While actions contributing toward the implementation of Article 9.1 form an integral part of this broader ambition, the USD 300 billion target encompasses these efforts without being defined by or restricted to them. The EU and its Member States consider that discussions would be most productive if they remain focused on the overarching objectives of the work programme, rather than on individual contributor quotas, prescriptive disaggregation's or sub-targets linked to specific provisions.

Discussions on climate finance cannot isolate Article 9.1 from its context. The financial architecture of the Paris Agreement must be viewed as an indivisible package. The work programme is also clearly mandated to consider the entire Article 9 context. Any technical or political engagement on the provisions of Article 9.1 must encompass Article 9 in its entirety, including the mobilization efforts and evolving contributor landscape reflected in Article 9.2, the broad mobilization pathways of Article 9.3, and the transparency and predictability provisions across Articles 9.4 and 9.5.

The EU and its Member States remain committed to engaging constructively, in a way that protects the integrity of the Paris Agreement, respects the carefully negotiated balance of Decision 1/CMA.6, and prioritises effective and scalable implementation.