Submission 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

By the Latin American and Caribbean Network for a Sustainable Finance System (REDFIS)

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1. Introduction

The **Climate Finance Group for Latin America and the Caribbean (GFLAC), Climate Action Network Latin America (CANLA) and its Adaptation as a Priority Task Force,** as member organizations of the **Latin American and Caribbean Network for a Sustainable Financial System (REDFIS)**, welcome the opportunity to respond to the invitation of the Co-Chairs to submit further 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 (hereinafter, the "climate finance work programme" or "CFWP").

REDFIS considers the CFWP a key process for shaping how Article 9 of the Paris Agreement is implemented in practice, including in relation to the New Collective Quantified Goal (NCQG) on climate finance. Its design and outcomes over the coming year will be critical in ensuring that the work programme strengthens —rather than dilutes— the obligation of developed country Parties to provide public climate finance under Article 9.1.

Building on our earlier submission[1] and on the outcomes of the sixty-fourth sessions of the Subsidiary Bodies (SB64, Bonn, June 2026)[2], this submission sets out: (i) our views on the vision, modalities and elements to be addressed in the next year of the CFWP, and (ii) additional inputs in response to the guiding questions on provision and mobilization, access and transparency.

2. Vision, modalities and elements for the next year

a) Vision

The CFWP should play a central role in implementing Article 9.1, in the context of Article 9 as a whole. This includes discussions on how Article 9.1. will be implemented in the context of the NCQG, and other relevant climate finance decisions.

In the coming year, the work programme should move from the procedural discussions on scope and modalities toward substantive work that helps close the gap in the provision of public finance from developed to developing countries.

For developing countries, Article 9.1 has become the central reference point precisely because the NCQG is framed as a mobilization goal drawn from a wide variety of sources, including private finance, without clarifying how much public, bilateral provision will effectively flow. The CFWP's added value lies in bringing clarity to that public share, improving predictability, accountability and transparency, while ensuring that finance responds to the needs and priorities of developing countries.

b) Modalities

The manner in which the CFWP is carried forward at the 31° Conference of the Parties (COP31) / 8° Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA8) will largely determine its capacity to deliver substantive outcomes. **Three broad scenarios** are currently on the table:

- **Scenario A — Continuation or "business as usual" (BAU):** The current two-year work programme runs its course without a dedicated formal anchor and concludes with a Co-Chairs' summary at COP32 (2027). Although the least demanding procedurally, this scenario would leave the programme without a negotiating hook; its outcomes would not be formally anchored in the UNFCCC process, and the treatment of Article 9.1 would risk remaining a procedural exercise, with no clear pathway to a CMA decision. This is the highest-risk option.
- **Scenario B — Formal but discontinuous:** A new mandate for the work programme is created at COP31, opening a formal negotiating space for 2027–2028. This scenario secures political weight and a decision pathway, but at the cost of a one-year gap before the programme resumes, with the attendant risk that the inputs from SB64 and the 2026 submissions are set aside.

[1] For more information, see https://unfccc.int/documents/656865

[2] For more information, see GFLAC. (2026). *Resultados de las sesiones intersesionales de la CMNUCC (SB64) en materia de financiamiento climático: visiones hacia la COP31.* https://a1f7a9c2-c300-4bce-a10a-f8410b8932f0.filesusr.com/ugd/32948d_faccc37a134c494d9d01c90c9b2fd668.pdf

- **Scenario C — Hybrid:** The scope and mandate are agreed at COP31, building on the inputs from SB64, to shape a stronger and better-defined two-year programme that runs from 2027 to 2028 and concludes at COP33 (2028), in alignment with the second Global Stocktake (GST2). This scenario combines formal anchoring with continuity —avoiding the gap of scenario B while providing the negotiating hook that scenario A lacks— and positions the CFWP outcomes to feed into GST2.

Table 1

Possible scenarios for the CFWP at COP31

Scenario	What it entails	REDFIS assessment
A — Continuation or BAU	The programme runs its course with no formal anchor and concludes with a Co-Chairs' summary at COP32 (2027).	No negotiating hook; Article 9.1 stays procedural.
B — Formal but discontinuous	A new CMA mandate is created at COP31 (2027–2028), after a one-year gap.	Formal weight, but SB64 inputs and *momentum* are at risk.
C — Hybrid	Scope and mandate agreed at COP31 building on SB64; a two-year programme (2027–2028) concluding at COP33, aligned with GST2.	Formal anchoring, continuity and a link to GST2.

Note. REDFIS, drawing on GFLAC (2026).

Based on these scenarios, REDFIS supports the **hybrid option (scenario C),** which would comprise:

- **A Co-Chairs' summary consolidating the inputs received since COP30, to inform the establishment of a formal CMA agenda item:** The aim is to draw on the SB64 discussions to enrich the deliberations on the agenda item. In this context, and to reconcile differing views on scope and timing, REDFIS proposes that the inputs from SB64 and from the submissions be translated into a more comprehensive CFWP design, to be agreed at COP31 under a CMA agenda item.
- **A dedicated, formal CMA agenda item:** The CFWP should be anchored in a formal agenda item at CMA8, with modalities established by Parties —not solely by the Co-Chairs— and a clear pathway toward a substantive outcome that the CMA can consider and, in due course, translate into a decision. A work programme consisting only of dialogues, without an output that feeds into decision-making, risks becoming a procedural exercise.

- **A phased mandate:** Taking into account the diverse views on the scope of the CFWP, we propose a phased discussion that addresses the proposed topics in successive stages:
  - **First year:** Structure the discussions around the treatment of Article 9.1, guided by questions such as: how has Article 9.1 been implemented? How has it been measured? How will it be accounted for in the context of the NCQG? How does it relate to the other provisions of Article 9?
  - **Second year:** Structure the discussions around the critical debates within Article 9; for example, how can articles 9.1 and 9.5 together support a better implementation of the NCQG?
  - **Possible extension (2029 onward):** Should Parties agree to extend the work programme, establish a dedicated track for Article 9.1, embedding it as a guiding reference across the broader set of climate finance discussions under the Paris Agreement.
- **Article 9.1 as a principle:** Because Article 9.1 carries forward the mandates established in Article 4 of the UNFCCC, it is important for developing countries to ensure that Article 9.1 is treated as a guiding principle across all climate finance mandates, goals, tracks and discussions. That is, no decision on climate finance should be taken without accounting for the role of Article 9.1 —including the NCQG, but also other discussions within and beyond Article 2.1—.

Table 2

Possible thematic phased mandate for the CFWP

Year 1 (2027)	Year 2 (2028)	Possible extension (2029+)
Discussions about the implementation of Article 9.1., including in the context of the NCQG.	Discussions about the implementation and synergies across articles within Article 9, such as 9.1, 9.3, 9.5 and others.	Define a specific track for Article 9.1., and its transition as a key principle.

Note. REDFIS, drawing on GFLAC (2026).

Important considerations:

- **Clear delimitation:** The CFWP should serve as a space to debate unresolved topics and mandates, such as the implementation of Article 9.1, while also supporting discussions that need to take place, such as the follow-up on the implementation of the NCQG. The aim, however, is not to reopen past debates but to clearly delineate where agreements are still missing.
- **Connection to the GST2:** Whether the CFWP is understood to have started this year or to begin formally at COP31 determines its capacity to connect its outcomes more effectively to

GST2 (2028). REDFIS considers this connection important and encourages a timeline that enables the CFWP findings to inform GST2.

- **Inclusive and balanced participation:** A combination of in-person and virtual discussions should be used to broaden participation, particularly from developing countries and observers, taking capacity constraints into account. Structured opportunities for input from civil society and technical experts should be ensured.
- **Each year could include:**
    - **Formal and technical in-person sessions:** Held at the SBs and COPs (at least two formal in-person sessions).
    - **Formal and technical virtual sessions:** Virtual technical sessions can be organized to complement the in-person debates (at least two virtual sessions). These sessions should be technical in character.
    - **A high-level ministerial session:** An additional high-level ministerial session during COPs, to provide high-level direction on this matter (at least one each year, in the context of COPs).
- **Periodic synthesis and reporting:** The CFWP should produce periodic synthesis reports identifying key findings, areas of convergence and remaining gaps for consideration by the work programme, building on and complementing existing processes —including the work of the Standing Committee on Finance (SCF), the Enhanced Transparency Framework, and the Financial Mechanism—, while avoiding duplication and enhancing coherence.

c) Elements

The substantive work should address the scale, composition and effectiveness of climate finance, with a clear focus on the provision of public finance, specially under Article 9.1, organized around three elements: (i) scale and public finance obligations; (ii) quality of climate finance and access; and (iii) transparency, comparability and accountability. These are developed below in response to the guiding questions.

3. Additional inputs on the guiding questions

a) Provision and mobilization

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?

Scaling up provision and mobilization requires, first, clarity on what is being scaled. Discussions should clarify:

- How Article 9.1 has been implemented so far, and what gaps remain to achieve its full implementation.
- What share of the NCQG —including both the USD 300 billion and the USD 1.3 trillion goals— corresponds to public finance, and how this reflects the responsibilities of developed country Parties under Article 9.1. Public provision is the only component that can be quantified with certainty; the private mobilization component is, by its nature, uncertain.

- How the rest of Article 9 can be better tracked to ensure a clear understanding of the balance between the provision and mobilization of climate finance to support mitigation and adaptation actions in developing countries.

At the same time, the CFWP should serve to track progress on other key components of Article 9, such as the NCQG, for instance:

- How the tripling of outflows from funds under the UNFCCC and the Paris Agreement from 2022 levels by 2030, set out in paragraph 16 of the NCQG decision, can be achieved.
- How the qualitative elements included in the NCQG can be better addressed.
- How to ensure proper compliance with the commitment to at least triple adaptation finance by 2035, taken at COP30.

Provision and mobilization should be sequenced so that public finance anchors the effort and private mobilization is complementary, not the reverse. The "Baku to Belém Roadmap to 1.3T" of the NCQG offers some avenues but does not, on its own, serve as an implementation plan; a plan is needed that specifies how the USD 300 billion will be mobilized and how the ground will be prepared toward USD 1.3 trillion —ideally linked to tracking under the CFWP—, and that distinguishes public provision from private mobilization so that the public component remains visible and accountable.

b) Access
What are the concrete procedural, institutional and capacity barriers that prevent developing countries from accessing available climate finance, and how can these be addressed?

REDFIS draws attention to the quality and characteristics of climate finance —predictability, accessibility, concessionality and alignment with country needs— as decisive for whether finance is usable and responsive or, instead, exacerbates existing fiscal and institutional constraints. Quality and access should be addressed along two dimensions: the elements already mandated by the NCQG, and those that fall outside it but still require improvement.

- **Qualitative finance within the NCQG:** The NCQG already includes several elements aimed at improving the quality of, and access to, finance, which the CFWP could build upon. These include, inter alia:
  - The recognition of the need for public, grant-based and highly concessional resources, particularly for adaptation and loss and damage (para. 14).
  - The call to reduce barriers to access —including the high cost of capital, co-financing requirements and burdensome application processes—, and to eliminate conditionalities, as appropriate (para. 21).
  - The call on multilateral climate funds to scale up and prioritize direct access, and to simplify and harmonize pre- and post-approval requirements and disbursement processes (para. 24).
  - The access enhancements requested of bilateral providers, such as support for locally led approaches, demand-led readiness and capacity-building, and multi-year, country-led programmatic approaches (para. 22).

- The invitation to international financial institutions, including multilateral development banks, to deploy non-debt-inducing instruments, scale up highly concessional finance, and increase grant financing to least developed countries and small island developing States (para. 23).
- The decision to undertake a special assessment of access to climate finance in 2030, which is anchored to the access mandates referred to above (para. 34).

The CFWP must ensure a discussion on how to implement these mandates.

- **Qualitative finance beyond the NCQG:** The NCQG does not, however, capture all the critical elements related to quality and access. Notably, it lacks clear mandates on the role of public finance provision and on the need to improve access, allocation and delivery.
  This conversation is urgent in the context of the CFWP, because a central barrier is the growing reliance on debt-creating instruments, which erode fiscal space and debt sustainability in developing countries. Debt-creating instruments should not be the primary modality for the provision of climate finance under Article 9.1, as they risk shifting the burden of climate action onto developing countries. This is particularly acute for agendas that require more accessible and predictable finance, such as adaptation and loss and damage, where grant-based finance and direct access are essential. The value that developing countries place on funds such as the Adaptation Fund derives precisely from their grant-based, direct-access nature.
  Addressing access therefore requires, in REDFIS's view:
  - Prioritizing better access to grant-based and concessional public finance for adaptation, loss and damage and just energy transition.
  - Strengthening and simplifying direct access for national entities, harmonizing requirements across channels, and considering dedicated windows for local communities and Indigenous Peoples.
  - Debating and agreeing new and improved access policies across the different sources of finance —multilateral development banks, bilateral cooperation and private actors.
  - Linking access improvements to the identification of gaps between reported finance and the needs estimated in Nationally Determined Contributions (NDCs), particularly for developing countries, as an input to relevant processes under the Paris Agreement, including the GST2.

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?

Transparency and reporting should be treated as a cross-cutting priority. Strengthening the comparability and consistency of reported information is essential to enhance accountability and to provide a clearer understanding of climate finance flows, and in particular to distinguish public provision under Article 9.1 from private mobilization, so that the public component remains visible and accountable.

REDFIS sees a concrete and timely opportunity:

- The Secretariat could prepare, by 2027, a dedicated report comparing the findings of the biennial communications under Article 9.5 of the Paris Agreement (forward-looking, *ex-ante*) with those emerging *ex-post* from the Biennial Transparency Reports (BTRs). Such an exercise would help identify areas of convergence, divergence and potential gaps in reported public climate finance. The latest round of Article 9.5 communications was submitted in 2024, and the second round of BTRs is due by the end of 2026 —allowing these *ex-ante* and *ex-post* streams to be compared as their cycles align. This coincides with the submission of new NDCs (3.0) from 2025, some of which include financing strategies and cost estimates, and with the publication of the Seventh Biennial Assessment and Overview of Climate Finance Flows by the SCF. Together, these processes offer a valuable opportunity to enhance coherence between ex-ante and ex-post perspectives and to support informed decision-making on climate finance.
- The SCF has an important role to play in collecting data to assess the implementation of the NCQG —including by distinguishing public provision related to Article 9.1 from private mobilization— in identifying information gaps, and in flagging further requests that could be taken up in formal CMA discussions.

4. Conclusions

The CFWP represents an important opportunity to enhance clarity, coherence and accountability in the implementation of climate finance commitments. Its effectiveness over the coming two years will depend on its ability to remain focused on substantive issues, deliver practical and evidence-based outputs and support informed decision-making by Parties.

In this regard, REDFIS recommends that Parties prioritize:

- Securing a dedicated CFWP agenda item at CMA 8, with a Party-driven decision that defines its scope and modalities.
- Giving priority attention to Article 9.1, addressed in the context of the public finance needed to implement the NCQG as a first step, while treating Article 9.1 as a critical element of any future climate finance decision.
- Adopting a phased mandate —year 1: implementation of Article 9.1, including in the context of the NCQG; year 2: synergies across other unresolved issues within Article 9— with a potential extension connecting the CFWP's outcomes to the GST2.
- Ensuring that the CFWP delivers a report that the CMA can consider, rather than exhausting itself in dialogues that do not feed into decision-making.

Without these elements, the CFWP risks becoming a procedural exercise rather than a driver of meaningful progress in the implementation of climate finance commitments under the Paris Agreement.