

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

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1. Introduction

The **Climate Finance Group for Latin America and the Caribbean (GFLAC)** and **Climate Action Network Latin America (CANLA)**, as member organizations of the **Latin American and Caribbean Network for a Sustainable Financial System (REDFIS)**, welcome 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 (hereinafter referred to as the “climate finance work programme”).¹

REDFIS considers that this work programme will be 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 will be critical in ensuring that it strengthens –rather than dilutes– the obligations of developed country Parties, particularly regarding the provision of public climate finance under Article 9.1.

¹ For more information, see paragraph 54 of decision -/CMA.7, “Global Mutirão: Uniting humanity in a global mobilization against climate change”, available at: <https://unfccc.int/documents/655095>

2. Overall expectations, outputs and outcomes

The climate finance work programme should play a central role in advancing a shared understanding of how the NCQG will be operationalized, particularly with regard to the obligation of developed country Parties to provide public climate finance to developing countries under Article 9.1.

It should contribute to improving predictability, accountability and transparency in the provision of climate finance, while ensuring that finance effectively responds to the needs and priorities of developing countries.

The process must be inclusive and balanced, enabling effective participation of both developed and developing countries, as well as sustained engagement of non-Party stakeholders, including civil society and technical experts.

The work programme should build on and complement existing processes under the UNFCCC and the Paris Agreement—including the Standing Committee on Finance (SCF), the Enhanced Transparency Framework, and the Financial Mechanism— while avoiding duplication and enhancing coherence.

In terms of outputs, the work programme should generate practical, evidence-based and policy-relevant outcomes to inform ongoing negotiations and decision-making. In particular, it should produce periodic synthesis reports identifying key findings, areas of convergence, and remaining gaps for consideration by the CMA.

Early agreement on the modalities, structure and timeline of the work programme will be essential to ensure that discussions focus on substantive issues from the outset.

3. Thematic focus

The work programme should address key issues related to the **scale, composition and effectiveness** of climate finance, with a clear focus on the provision of public finance under Article 9.1.

a) Scale and public finance obligations

Discussions should clarify what share of the NCQG—including both the USD 300 billion and USD 1.3 trillion goals— corresponds to public finance, and how this reflects the responsibilities of developed country Parties under Article 9.1 of the Paris Agreement.

They should also contribute to tracking progress in the implementation of paragraph 16 of the NCQG decision, including progress towards tripling outflows from funds under the UNFCCC and the Paris Agreement.

In addition, discussions should assess progress towards the commitment to at least triple adaptation finance by 2035 decided at COP30², ensuring that such efforts are clearly reflected in future finance flows.

b) Quality of climate finance

The work programme should give due attention to the quality and characteristics of climate finance, including predictability, accessibility, concessionality and alignment with country needs. These dimensions are critical in determining whether climate finance is usable and responsive, or whether it exacerbates existing fiscal and institutional constraints.

Particular attention should be given to the increasing reliance on debt-generating instruments, which may undermine the effectiveness of climate finance and further constrain fiscal space and debt sustainability in developing countries.

Debt-generating 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 and undermining long-term debt sustainability.

c) Transparency, comparability and accountability

Transparency and reporting should be addressed as a cross-cutting priority. Strengthening the comparability and consistency of reported information is essential to enhance accountability and provide a clearer understanding of climate finance flows.

In this context, the Secretariat could prepare, by 2027, a dedicated report comparing the findings from the biennial communications under Article 9.5 of the Paris Agreement with those emerging from Biennial Transparency Reports (BTRs), with a view to informing discussions. Such an exercise could contrast the forward-looking (ex-ante) information in Article 9.5 communications with the ex-post information reported in BTRs, helping to identify areas of convergence, divergence and potential gaps in reported public climate finance.

This comparison is particularly timely given that the latest round of Article 9.5 communications was submitted in 2024, while a new round of BTRs is being submitted in 2026, enabling, for the first time, a comparison across these reports. It also comes in the context of the submission of new Nationally Determined Contributions (NDCs 3.0) in 2025, some of which include financing strategies and/or cost estimates, as well as the publication of the Seventh Biennial Assessment and Overview of Climate Finance Flows by the SCF this year. Together, these processes provide a valuable opportunity to support informed decision-making on climate finance, as well as enhancing the coherence between ex-ante and ex-post perspectives.

² For more information, see paragraph 53 of decision -/CMA.7, “Global Mutirão: Uniting humanity in a global mobilization against climate change”.

The work programme should also support the identification of gaps between reported finance and estimated needs in NDC, particularly in developing countries, and provide inputs to relevant processes under the Paris Agreement, including the Global Stocktake, to enhance accountability over time.

4. Organization of the work programme

The organization of the work programme should ensure inclusivity, balance and technical robustness, while delivering practical and actionable outcomes. Technical inputs should be systematically captured and reflected in the outputs of the work programme, ensuring that scientific and evidence-based findings effectively inform political discussions and decisions.

A combination of in-person and virtual formats should be used to broaden participation, particularly from developing countries, taking into account capacity constraints. Structured opportunities for input from civil society and technical experts should also be ensured.

Discussions should be organized to enable both in-depth technical exchanges and higher-level reflection, ensuring that technical findings effectively inform political decision-making. Regular synthesis of discussions and clear communication of outcomes will be essential for the consideration by the CMA.

5. Conclusions

The climate finance work programme represents an important opportunity to enhance clarity, coherence and accountability in the implementation of climate finance commitments.

Its effectiveness 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, Parties should prioritize:

- Early agreement on modalities, structure and timeline.
- A clear focus on Article 9.1 and the provision of public climate finance.
- Strengthened arrangements for transparency, comparability and accountability.

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