GREENPEACE

Greenpeace submission on the Baku to Belém Roadmap to 1.3T

March 2025

We welcome the opportunity to respond to the call for Parties and Observer Organizations to submit views on the "Baku to Belém Roadmap to 1.3T" being taken forward under the guidance of the COP29 Presidency and incoming COP30 Presidency.

(a) What are your overall expectations for the "Baku to Belém Roadmap to 1.3T"?
(b) Which topics and thematic issues should be explored to inform the Roadmap, within the scope of the mandate?

The Roadmap needs to make progress in addressing major inadequacies of the New Collective Quantified Goal agreed at COP29. To address both the quality and quantity of climate finance and ensure climate finance is more inclusive, effective, and equitable.

In order to achieve those aims, the following topics and thematic issues should be explored to inform the Roadmap:

- The Roadmap should include a **clear plan for achieving both the $300bn target as well as the wider $1.3 trillion ambition**, and the Roadmap's priority should be scaling up provision of **public finance to developing countries**, with a clear focus on **developed countries' leading role** in delivering climate finance.
- The roadmap should recognise the importance of **protecting and restoring high integrity carbon-rich ecosystems** for the fight against climate change and promote innovative solutions to mobilise finance accordingly, such as the Tropical Forest Forever Facility. These initiatives should be in line with 1.CMA/5 paragraphs 33 and 34.
- Noting that the mandate for the Roadmap agreed at COP29 has a clear focus on '*grants, concessional and non-debt-creating instruments, and measures to create fiscal space'*, the Roadmap must demonstrate how **grants and highly concessional finance - new, additional, predictable, and adequate** - will be scaled up.
- It should also identify sub-goals for public finance allocated to mitigation, adaptation, and addressing loss and damage, in order to address the **historical neglect of finance for adaptation and loss and damage.** Noting that while the COP29 outcome recognised adaptation and loss and damage finance would be included in the scope of the NCQG, it provided no assurance they would be adequately scaled up.

- Secure an endorsement for **making polluters pay**, in particular through taxing and fining the fossil fuel industry, to help raise additional public money for international climate finance and climate-impacted communities around the world.
- The Roadmap needs to include steps to prioritise **direct access funding mechanisms that empower Indigenous Peoples and Local Communities (IPs and LCs)**, ensuring that a significant proportion of annual climate finance is allocated to IPs and LCs through dedicated and simplified channels.
- The Roadmap should also explore links and help advance the ongoing work of the The Sharm el Sheikh Dialogue on **Article 2.1c - aligning global finance flows with the goals of the Paris Agreement**. This includes phasing-out fossil fuel subsidies and other harmful activities, and redirecting investment towards renewables and climate resilient development.

Two of the areas outlined above - making polluters pay and direct access for IPs and LCs - are critical to scaling up and disbursing public climate finance in a fair and equitable manner. These are key priorities in Greenpeace's work; therefore, we have provided a more detailed explanation below of how these issues should be addressed in the Roadmap.

SCALING UP PUBLIC FINANCE BY MAKING POLLUTERS PAY

New equitable sources of climate finance, such as taxes and levies on big polluters like the fossil fuel industry and the super-rich and shifting fossil fuel subsidies, must be identified and scaled up.

The costs of climate change should be borne by those with most responsibility for causing it – the most polluting countries, corporations and individuals - and those most able to pay. In the face of blockbuster fossil fuel company profits, rising emissions and vast human suffering linked to climate induced extreme weather, the moral, economic and environmental case for making the fossil fuel industry and other high emitting sectors pay has never been stronger. Along with increasing taxes on the world's highest polluting individuals - the super-rich.

Revenues raised in developed countries should be channelled into multilateral funds for climate and development, alongside using a portion of the revenues to support climate action and impacted communities at home. Developed countries should also lead in delivering polluter pays mechanisms at the national, regional and local level to generate climate finance for developing countries.

The Baku to Belém Roadmap must serve as a pathway for making fossil fuel and other polluters pay - in particular as a way to unlock significantly greater public finance from developed countries to help deliver on their international climate finance obligations. It should address the urgent need for significantly scaled-up international public climate finance by recognizing the polluter pays principle and advancing discussions on financing sources rooted in this principle to strengthen the global response to climate change. Additionally, the Roadmap should endorse decisions in this area towards the UN Framework Convention on International Tax Cooperation (UNFCITC).

DIRECT ACCESS FUNDING MECHANISMS THAT EMPOWER INDIGENOUS PEOPLES AND LOCAL COMMUNITIES

IPs and LCs are frontline defenders of biodiversity and critical actors in climate mitigation, adaptation, and efforts to address loss and damage. However, they continue to face systemic barriers in accessing financial resources, including bureaucratic constraints, financial intermediaries, and a lack of tailored mechanisms that acknowledge their governance structures and knowledge systems.

The Roadmap should integrate non-market solutions grounded in rights-based and community-led approaches. It must ensure that a significant portion of annual climate finance reaches IPs and LCs through dedicated and simplified channels. By strengthening the role of IPs and LCs in ecosystem protection, climate action, and land restoration efforts, the Roadmap can support synergies between the Rio Conventions and lead on driving synergistic solutions in the implementation of projects that serve multiple benefits to NDCs, NBSAPs, NAPs and overall SDGs. However, this can only be achieved if financial instruments are reformed to eliminate restrictive eligibility criteria and if Indigenous rights are upheld as central elements in financial decision-making.

Several key thematic issues should be addressed within the Roadmap, particularly those that emphasize direct access to funding and the empowerment of IPs and LCs:

1. **Direct Finance for IPs and LCs:** The roadmap must help advance dedicated funding mechanisms for simplified and enhanced direct access by Indigenous-led and other traditional and local community organizations. Funding should support Indigenous institutions, land tenure security, and the co-development of climate solutions based on Indigenous knowledge and scientific research.
2. **Rights-Based Approaches:** Climate finance must align with international human rights standards, respecting the principle of FPIC (Free, Prior and Informed Consent) and, where applicable, shall support IPs and LCs to have autonomy over their land, resources, and financial decision-making.
3. **Accountability and Transparency:** Establishing clear mechanisms for tracking the disbursement and impact of finance flows directed toward IPs and LCs will be crucial.

(c) What country experiences, best practices and lessons learned can be shared related to barriers and enabling environments; innovative sources of finance; grants, concessional and non-debt creating instruments, and measures to create fiscal space?

SCALING UP PUBLIC FINANCE BY MAKING POLLUTERS PAY

On the subject of making polluters pay for climate damages and helping to unlock public finance for developed countries' international climate finance obligations, huge political momentum is growing on this issue - for example:

- 17 countries and groups of countries have joined a coalition (Global Solidarity Levies Task Force) focused on taxing polluting industries for climate and development, including France, Kenya, Barbados, Spain and Colombia.
- Governments are about to begin official negotiations for a new United Nations global tax agreement that could make polluters pay their fair share.
- Politicians from the US States of Vermont and New York have inspired other states and governments around the world through agreeing new laws to force oil and gas corporations to pay for their climate damages.

More than half a million people across the world, including from Africa, the Middle East, Europe, North America, and South East Asia, have signed a Greenpeace petition calling on governments to force fossil fuel companies to "stop their climate wrecking activities" and "repair and pay for the damage they have caused." Over 100 climate groups around the world are supportive of the idea of a 'Climate Damages Tax' on extraction. And public polling across a range of geographies has consistently demonstrated the strong popularity of increasing taxes on oil and gas profits:

- Polling by Ipsos in June 2024 across all G20 countries found that on average 71% of people support the idea that "people and companies that pollute the environment for example by causing greenhouse gas emissions should pay higher taxes, with the money raised shared out among people and companies who pollute less".
- Similarly, 2024 polling by Money Talks across a range of countries found that "Taxing the profits of large national or multinational companies who rely on burning fossil fuels" was consistently supported by well over 50% of the public in France, Germany, Kenya, Brazil, South Africa, the UK and the USA.
- A survey conducted in eight countries across five continents by strategic insight agency, Opinium in 2024 also found that making oil and gas companies pay was the most popular option when people were asked who should bear the most responsibility for climate change impacts. High-emitting countries and global elites ranked second and third.

Depending on national circumstances, extraction levies and/ or higher taxes on profits are both strong options that should be implemented without delay by governments around the world. For example, a fossil fuel extraction levy introduced by OECD countries alone, beginning at a low rate of $5 per tonne of CO_2e and increasing by $5 per tonne each year, could raise $900 billion by 2030.

DIRECT ACCESS FUNDING MECHANISMS THAT EMPOWER INDIGENOUS PEOPLES AND LOCAL COMMUNITIES

Many countries have implemented successful models that can inform the Roadmap, particularly in ensuring direct access to climate finance for IPs and LCs. However, several shortcomings remain in these approaches:

- **Brazil: The Amazon Fund**, administered by the National Bank for Economic and Social Development (BNDES), has provided financing for the protection of forests and indigenous lands. Although it is a pioneering initiative, IPs and LCs often find it difficult to access the funds directly due to eligibility criteria and dependence on intermediaries. Political changes, as seen in the past, have also threatened the continuity of funding. Relevant community-led funds, such as **Podáali**, administered by the Coordination of Organizations of the Indigenous Peoples of the Brazilian Amazon (COIAB), have been established to direct funding to IP and LC initiatives, considering their social and economic needs. However, these funds receive mainly philanthropic resources and could benefit from access to broader international funding.
- **Norway's International Climate and Forest Initiative (NICFI)**: Norway has supported results-based finance mechanisms that recognize Indigenous land rights as a critical climate mitigation strategy. However, its approach is still largely performance-based, which can disadvantage IPs and LCs due to administrative burdens in demonstrating measurable carbon reductions.
- **Germany:** Germany has championed several initiatives, such as the **International Climate Initiative (IKI) and contributions to the UN's REDD+ programs**. While these funds have supported conservation efforts, they have been criticized for prioritizing large NGOs and national governments over direct funding to IPs and LCs. Additionally, Germany's Climate Finance Architecture, while progressive, still lacks a strong mechanism for ensuring that IPs and LCs can access finance without intermediaries.

Key lessons learned include the need to simplify application and reporting processes for IPs and LCs, deliver on web based platforms that empower communities through participation on mobile devices (as it is demanded in the development of the Non-Market Platform for Joint Implementation of Article 6.8 of the Paris Agreement), ensure participatory decision-making, and reduce reliance on intermediaries that dilute funding effectiveness. Many existing finance programs remain top-down and fail to fully recognize Indigenous governance structures.

(d) Which multilateral initiatives do you see as most relevant to take into account in the Roadmap and why?

SCALING UP PUBLIC FINANCE BY MAKING POLLUTERS PAY

The UN Framework Convention on International Tax Cooperation (UNFCITC) offers an opportunity to secure a global agreement to create a new tax on the global profits of international oil and gas companies, channelling the revenues directly into multilateral funds for climate and development. It also offers an opportunity to clamp down on oil and gas companies' use of tax havens so that they are no longer able to get away without being made to pay.

The Fourth International Conference on Financing for Development (FfD4) is also a key opportunity to secure an endorsement for solidarity levies on polluters to generate new and additional revenues for international climate finance and development, to endorse the delivery of a strong outcome in support of scaling up public finance for developing countries via the Baku to Belém Roadmap, and to reinforce the mandate of the UNFCITC to deliver global tax reform in the interests of people and planet.

The Global Solidarity Levies Task Force work to advance taxes and levies on polluting industries to raise revenues for climate and development could be usefully recognised and amplified in the Roadmap, along with a call and process for more countries and groupings to join solidarity levy coalitions of the willing.

DIRECT ACCESS FUNDING MECHANISMS THAT EMPOWER INDIGENOUS PEOPLES AND LOCAL COMMUNITIES

Several multilateral initiatives are relevant to shaping the Roadmap, as they have demonstrated the potential for directly supporting IPs and LCs and fostering non-market solutions:

- **Green Climate Fund (GCF) Enhanced Direct Access (EDA)**: This initiative prioritizes devolved decision-making, allowing national and subnational entities to manage climate finance tailored to local needs.
- **Global Environment Facility's (GEF) Indigenous Peoples and Local Communities Engagement Strategy**: Aims to enhance IP and LC participation in biodiversity and climate projects.
- **The Forest and Climate Leaders' Partnership** (FCLP): Aims to increase financial flows to forest conservation efforts, including direct funding for IPs and LCs.

Integrating these multilateral initiatives into the Roadmap will help ensure that financial mechanisms are designed in a way that prioritizes IPs and LCs, respects their rights, and promotes sustainable, community-led, non-market-based climate solutions. The Roadmap must align global finance structures with climate justice principles, ensuring that those who have historically protected the planet receive the financial support needed to continue their crucial contribution through their way of life.

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