

## **SUBMISSION BY THE INTERNATIONAL ORGANIZATION FOR MIGRATION**

### **ON THE CLIMATE FINANCE WORK PROGRAMME**

**April 2026**

#### **INTRODUCTION**

The International Organization for Migration (IOM) welcomes the opportunity to contribute to the climate finance work programme and submits its views in response to the questions posed by the co-chairs.

This submission is based on the recognition that current climate finance delivery does not yet fully reflect the scale and nature of emerging needs, particularly those related to climate-related human mobility. The work programme, therefore, provides an important opportunity to examine how the climate finance architecture can become more inclusive of emerging and systematically overlooked needs. It is an opportunity to be more responsive to evolving country-driven and community priorities as well as cross-border challenges, and to be able to improve the effectiveness of existing finance flows in addressing priority needs, through stronger coherence, efficiency, and complementarity across financing streams and institutions. Climate mobility illustrates how emerging needs can remain underfinanced even when they are recognized in policy frameworks, highlighting the need for financing models that translate priorities into implementation at scale.

#### **A. WHAT ARE YOUR OVERALL EXPECTATIONS FOR THE CLIMATE FINANCE WORK PROGRAMME? WHAT CONCRETE OUTPUTS AND OUTCOMES SHOULD THE CLIMATE FINANCE WORK PROGRAMME DELIVER?**

The climate finance work programme should help close systemic blind spots in the climate finance landscape that are not yet adequately reflected, leading to an inaccurate reflection of the true scale of needs and the financing pathways required to address them. For example, climate mobility, despite being increasingly recognized as a priority in many NAPs and in the scope of loss and damage, is not yet adequately reflected in current assessments of climate finance needs, delivery models, and programming approaches. However, the needs are already significant, and early action and investments can substantially reduce costs for addressing displacement, forced migration and losses and damages.

The climate finance work programme is expected to provide a results-oriented two-year vision that delivers tangible outcomes. IOM's views on the outcomes and outputs are informed by experiences with climate mobility. With that framing, the climate work programme should have a particular focus on:

- Advancing actions to scale up financing for climate action from all public and private sources, with an emphasis on grant-based resources and highly concessional finance, particularly for adaptation;
- Enhancing the implementation of Nationally Determined Contributions (NDC), as well as National Adaptation Plans (NAP), local adaptation plans, and sectoral adaptation plans,

including through appropriate investment planning, and alignment with broader economic and sustainable development strategies;

- Addressing existing constraints, challenges, and barriers in relation to access to climate finance for developing countries, especially for the Least Developed Countries (LDCs) and the countries affected by conflict and fragility;
- Advancing the implementation of the New Collective Quantified Goal (NCQG), while also recognizing the need for increasing ambition and addressing persistent challenges related to the gap between existing finance needs estimates and actual needs, as well as the continued insufficient attention to adaptation and to loss and damage.

In this context, the work programme should generate concrete technical and operational outputs that help climate finance providers and their recipients, including the UNFCCC Financial Mechanism, major climate funds, Multilateral Development Banks (MDBs), and public and private finance institutions. It should support the delivery of climate finance at the required scale and align with country-based priorities and needs.

#### **a) Operational recommendations to providers of climate finance**

Firstly, a set of operational recommendations for climate finance providers would be useful, including:

- Improved financing pathways for emerging needs that have historically been left behind;
- Stronger complementarity between public, private, and concessional finance channels; and
- Optimization of delivery models to mobilise climate finance at scale and in the most vulnerable contexts, including through country-driven investment planning, regional financing approaches and locally led implementation mechanisms

Climate mobility provides an important example in this regard as a critical adaptation and loss and damage priority that is underfunded. As of 2024, 45.8 million new displacements were registered due to weather-related hazards,<sup>1</sup> and without concerted efforts, up to 216 million people could become internal migrants by 2050 in the worst case scenario and in six regions of the world.<sup>2</sup> These projections underscore the urgency of recognizing climate mobility as an explicit climate finance need that requires tailored technical solutions. The Climate Mobility Investment Plan, developed by the Government of the Philippines with technical assistance from IOM, addresses the findings of the country needs assessment, which indicates that, at a minimum, USD 158 million is required in the short to medium term to address essential needs arising from the impacts of climate change on human mobility. Climate mobility investment planning provides an example of a country-driven, needs-based approach that translates NAP

---

<sup>1</sup> IDMC, Global Report on Internal Displacement (GRID) 2025.

<sup>2</sup> World Bank, Groundswell Part 2: Acting on Internal Climate Migration (2021).

priorities into financeable interventions, offering a clear entry point for climate finance providers to support people-centred investments that deliver impact at scale across adaptation and loss and damage. In countries such as Grenada, climate mobility programming has enabled the identification of priorities, and the country's national adaptation plan includes a programme of action on climate mobility amounting to USD 16 million. Furthermore, Morocco's NDC 3.0 includes an annex of adaptation projects addressing climate-related drivers of migration through water security, rural livelihoods, ecosystem restoration, and risk-informed territorial planning, collectively tackling root causes of displacement and forced migration and enabling communities to remain safely and sustainably in their areas of origin.

#### **b) Structured technical dialogue to address the key pillars of the climate finance programme**

A second key output should be a structured technical dialogue designed to generate practical recommendations, technical guidance, and tools for Parties, climate finance providers, and delivery partners across the key pillars of the climate finance work program (as proposed below), including access, allocation, transparency, and accountability. Also, one of the purposes of this dialogue should be to improve the responsiveness of the climate finance landscape and support the delivery of people-centred climate finance at scale. The structured dialogue should therefore focus on:

- Strengthening rights-based and inclusive needs assessments, including for the implementation of the NCQG at the required scale;
- Improving allocation, access, and delivery systems, particularly for LDCs, SIDS, and fragile and conflict-affected settings;
- Examining how diversified funding channels can complement existing accreditation-based access under the UNFCCC Financial Mechanism; and
- Identifying practical pathways to improve financing visibility for emerging and systematically overlooked needs.

In addition, a dedicated technical segment focused on financing climate mobility would be a valuable initiative, given the current systemic gaps in the visibility of needs, allocation, and delivery pathways. Despite its growing relevance to adaptation, loss and damage and just transition pathways, it remains inconsistently integrated into the climate finance architecture and allocation pathways.

#### **c) Technical tools and practical recommendations for recipients of climate finance**

A third output should be technical tools and practical recommendations for countries and recipients of climate finance. There should be a focus on not only augmenting existing tools and guidance but ensuring that the tools that do exist are being shared and utilized. Furthermore, the climate finance program should advocate principles of integrated, bottom-up, rights-based, and inclusive assessments of climate finance needs, and on improving delivery through fit-for-purpose financing pathways and country coordination platforms.

Needs-based finance is a central element of Article 9, which calls for the provision of scaled-up financial resources, taking into account country-driven strategies and the priorities and needs of developing country Parties, especially those that are particularly vulnerable and have significant capacity constraints, such as LDCs, SIDS and the countries affected by conflict and fragility. However, there is no standardised guidance, and current approaches to assessing climate finance needs remain predominantly focused on adaptation and mitigation, resulting in partial, often under-costed assessments that limit countries' ability to translate needs into actionable, financeable investment pipelines. Therefore, there is a need to develop guidance for the assessment of climate finance needs that takes a more holistic and integrated approach, including across adaptation, mitigation, and loss and damage, which captures cross-sectoral and emerging priorities.

This type of guidance exists and can be further utilized for the assessment of broader climate finance needs. For example, guidance on climate mobility assessments is provided in the recently published [UNFCCC guidance on accessing finance for addressing displacement in the context of climate change](#). It enables countries to translate evidence into costed, investment-ready pipelines and enhance their access to climate finance.

## B. WHAT ARE THE THEMATIC PILLARS OF THE CLIMATE FINANCE WORK PROGRAMME AND THE RELATED SUBTOPICS THAT WE SHOULD ADDRESS WITHIN EACH PILLAR?

Thematic discussions under the work programme should be organized around four mutually reinforcing pillars: access, allocation, transparency and accountability, and people-centred climate finance.

### **Pillar One: Access**

- This pillar is anchored in Article 9, paragraphs 1 and 4, which affirm the obligation of developed country Parties to provide financial resources and recognize the importance of public and grant-based instruments, particularly for adaptation. The proposed sub-topics include:
  - **Finance for adaptation and loss and damage:** the climate work programme should respond to mobilization and scaling of, not only adaptation finance, but also loss and damage finance to meet countries' needs, with a focus on enabling access to grant-based instruments for the most vulnerable countries and communities, including to displacement.
  - **Addressing systemic barriers to access:** in response to the call for existing constraints, challenges, systemic inequities, and barriers related to climate finance to be addressed. The work programme is an opportunity to identify concrete pathways for enhancing access for the most vulnerable countries, including LDCs, SIDS, affected by displacement and countries affected by conflict and fragility.

### **Pillar Two: Allocation**

This pillar speaks to the heart of what the climate finance programme should enable: the allocation of finance to address countries' needs by supporting the implementation of climate change priorities in line with NDCs and NAPs. The following subtopics are recommended:

- **Needs-based approaches** should ensure that needs assessments are integrated, people-centred, gender-sensitive and responsive to the needs of the most vulnerable, including

migrants and displaced populations as well as communities at risk of displacement, while moving beyond purely quantitative analysis of needs.

- **Coherence and complementarity** should place greater emphasis on the gaps and blind spots in the existing allocation frameworks. In addition, improved coherence between adaptation and loss and damage is needed to ensure cross-cutting needs are meaningfully addressed and not left unfunded.
  - Climate finance allocation frameworks should better reflect cross-boundary climate mobility risks by supporting regional and multi-country approaches, including through established frameworks such as the Kampala Ministerial Declaration on Migration, Environment and Climate Change (KDMECC). Many climate impacts on water scarcity, food security, ecosystems, and livelihoods transcend national borders, and addressing them effectively requires targeted climate finance to enable regional coordination, joint investments and harmonized responses that reduce displacement risks and support climate-resilient development.
- **Innovative finance** should be part of the allocation framework of the climate work programme, with explicit guidance on the applicability of instruments in various contexts. For example, financing for high-priority adaptation needs, particularly in the most vulnerable settings, will require de-risking and innovation. The work programme should explore and promote the use of innovative instruments where appropriate, including pooled funds,<sup>3</sup> matching mechanisms,<sup>4</sup> social impact bonds,<sup>5</sup> and diaspora finance<sup>6</sup> to meet community needs.

### **Pillar Three: Transparency and Accountability**

This pillar is foundational as it enables financing to reach its intended beneficiaries and achieve its intended outcomes. The needs of communities may not be adequately addressed unless tracking, transparency and accountability are made integral to the climate work programme. The following sub-topics are proposed:

---

<sup>3</sup> Fiji's Climate Relocation of Communities (CROC) Trust Fund, established under Fiji's Climate Change Act 2021.

<sup>4</sup> IOM Climate Catalytic Fund, Climate Mobility Innovation Lab: <https://environmentalmigration.iom.int/CMIL-AP/CCF>.

<sup>5</sup> WIM ExCom Technical Guide on Accessing Financial Resources for Displacement (2025), social impact bond model piloted in France.

<sup>6</sup> IOM Jamaica Diaspora Engage platform: <https://jdiasporaengage.mfaft.gov.jm/diaspora4climate>.

- **Disaggregated and people-centred** measurement of climate finance outcomes, including disaggregated by migrant/displacement status, including within countries, allowing for more impactful finance tracking, metrics, and evaluation.
- **Accountability for adaptation finance commitments**, including a review mechanism for the goal of tripling adaptation finance, with a clear baseline and triggers for corrective action.
- **Accountability for loss and damage finance**, including transparency around the provision, allocation of loss and damage finance, and improved visibility of needs, and mechanisms to ensure that resources reach affected communities in a timely and effective manner, including those at risk of displacement.

#### **Pillar Four: People-centered and locally led climate finance**

This pillar focuses on ensuring that climate finance is inclusive, accessible, and responsive to the needs of people and communities most affected by climate change. It is intended as a cross-cutting area that should speak to the other pillars of the climate finance work programme, including allocation, access, transparency, and accountability. The following sub-topics should be considered:

- **Participation of affected communities in climate finance governance and decision making**, including identification, prioritization and implementation of climate finance priorities and the design of climate finance instruments. Additionally, ensuring that climate finance frameworks explicitly recognize and respond to the needs of populations affected by climate-related mobility, including people at risk of displacement, migrants, internally displaced persons, refugees, host communities, and trapped populations.
- **Integration of people-centred priorities in allocation and access** by embedding people-centred considerations into allocation frameworks and access criteria, ensuring that finance is directed towards interventions that respond to the needs of vulnerable and underserved populations.

#### **C. HOW SHOULD THE CLIMATE FINANCE WORK PROGRAMME BE ORGANIZED TO ENSURE THAT THE FORMAT IS INCLUSIVE, BALANCED, AND TECHNICALLY ROBUST, WHILE ADDRESSING CLIMATE FINANCE COMPREHENSIVELY AND DELIVERING OUTCOMES THAT ARE ACTIONABLE AND MEANINGFUL?**

- Inclusive participation should be institutionalized through formal channels that enable the meaningful engagement of affected constituencies, including youth, migrants, displaced persons and persons with disabilities.
- A balanced approach should be ensured across adaptation, loss and damage, and mitigation finance streams. Given that the majority of climate finance continues to support mitigation, the work programme should pay particular attention to the implications of this imbalance for the needs and priorities of developing countries. Article 9 of the Paris Agreement recognizes the need for a balanced allocation between adaptation and mitigation; thus, the work

programme should provide an opportunity to strengthen this balance while also giving adequate attention to loss and damage pathways.

- Technical robustness can be ensured through technical expert dialogues, integration of evidence from relevant stakeholders, as well as the involvement of relevant technical expert groups, including those already established under the Task Force on Displacement, and the Santiago Network on Loss and Damage.

#### D. Conclusions

The IOM submits that the Climate Finance Work Programme presents a critical opportunity to strengthen the responsiveness, coherence and effectiveness of the global climate finance architecture in addressing emerging and systematically underfinanced needs. Drawing on operational experience across regions, IOM highlights climate mobility as a clear example of how climate impacts are already generating significant adaptation and loss and damage costs that are not yet fully reflected in current financing models. The Climate Finance Work Programme should therefore prioritize practical measures to improve access to grant-based and concessional finance, strengthen needs-based investment planning, and enhance coordination across adaptation, loss and damage and development financing streams. Delivering people-centred climate finance at scale will require integrated approaches that link policy commitments with operational delivery, scalable solutions and country-driven investment pipelines, particularly for Least Developed Countries, Small Island Developing States and fragile and conflict-affected contexts.