

Submission on Work Programme on Article 9.1

The LMDCs align with the views expressed in the G77+China submission.

At the outset, our group reiterates the submission made in response to the first letter from the Co-chairs on **23 March 2026**, *ahead of the work plan published by the Co-chairs, as well as the engagement workshops held alongside SB64 in June 2026*.

The meetings convened in Bonn in June 2026 were not mandated by the CMA and accordingly should not be characterised as mandated events. In this regard, it is our considered view that any informal summary, note, or other document prepared by the Co-Chairs that takes stock of the June 2026 workshops or other consultations and sessions should not be submitted to the CMA, given the lack of consensus-based support for both the work plan and the organisation of these events and thus, no mandate from parties for such documents by Co-Chairs.

The views and suggestions expressed in the previous submission still hold valid for our group. The request for submissions, once again, coupled with a lack of clarity on how our previously expressed views have been considered, raises concerns about this process.

Further, LMDCs expect that the Work programme must be on the agenda under the **CMA for its eighth, ninth and tenth sessions**, and are of the view that submissions made during this round should not prejudice the inclusion of the Work Programme in the Agendas for CMA8, 9 and 10.

Our views on the climate finance work programme and the recent call that seeks additional views of parties are as follows:

1. We reiterate that our group **does not support the work plan** by the co-chairs as it does not capture the priorities of our member countries. In this regard, the engagement workshop held by the Co-chairs in June 2026, both calls for submissions and other consultations, cannot be seen as the beginning of the work programme. We strongly believe that the Work Programme will begin only after the modalities and scope are decided by the Parties under CMA8. Work under the WP cannot be initiated without processes being set right in terms of party-driven decisions on modalities and scope.
2. In this regard, we request co-chairs to **facilitate discussions on the modalities and scope of the WP** in a Party-driven and transparent manner under the CMA8.

Suggested Modalities of the WP

1. The Mutirãõ decision from CMA7 established a two-year work programme. Therefore, as a natural next step, the CMA8 decision should clearly state the objective of the work programme. **The objective** is to enhance ambition and strengthen the implementation of Article 9.1, ensuring that progress in the provision of climate finance demonstrates

progress beyond previous efforts, in line with the growing mitigation, adaptation, and loss & damage finance needs in developing countries.

2. **LMDCs are of the strong view that the work programme should be operationalised in an inclusive and Party-driven manner, guided by the draft rules of procedure being applied.**
3. **CMA 8 must decide the format of the engagements under the WP**, the process of taking into account the discussions in furtherance of the deliberations and the substantive thematic pillars on which the work will be focused.
4. CMA 8 must launch the **Antalya-COP33 Action Plan on the implementation of Article 9, paragraph 1 of the Paris Agreement** as a key deliverable of the Work Programme. **The Action Plan would operationalize the obligation of developed-country Parties to provide financial resources to assist developing-country Parties, including, inter alia, by setting out fair burden-sharing arrangements amongst developed country Parties included in Annex II of the Convention.**
5. The value of the **Antalya-COP33 Action Plan on the implementation of Article 9, paragraph 1 of the Paris Agreement** lies in the link that this would create between Article 9.1 and the implementation of the relevant provisions of the Paris Agreement and the Convention.
6. The basis of the **Action Plan** should be set by **CMA8**, and subsequently, the work carried out under the WP should be accounted for by **CMA9 and CMA10**.
7. LMDCs are of the view that the WP should include the conduct of four **technical dialogues in its first year of work (2027) to allow for continuous and rigorous technical discussions on the issues related to the implementation of Article 9.1.**
8. Further, there should be **at least one high-level roundtable dialogue** on the key political issues on the implementation of Article 9.1.
9. **COP31/CMA8 must mandate annual reports from SCF to provide substantive inputs, with relevant recommendations, on the needs, gaps, quality, and quantity of climate finance provided to developing country Parties under Article 9.1, for the Parties' consideration** at its subsequent sessions. The Standing Committee on Finance is crucial for the work programme. Being party-driven, the SCF is best suited to provide substantive input and recommendations for the Parties' consideration when discussing matters relating to the Work Programme on Article 9.1.
10. **Co-chairs of the WP should develop informal summaries of each technical dialogue and high-level roundtable dialogues before the session of CMA and COP for Parties' consideration.**
11. **Further, Co-chairs of the Work Programme should facilitate the focused deliberations among Parties to determine the barriers and opportunities for effective implementation of Article 9.1, in the context of the Antalya-COP33 Action plan, including using the Co-chairs' summary of the technical discussions held in the first year of the Work Programme (2027) and the reports of the SCF.**

12. **All deliverables must ultimately feed into other processes, including the 2nd Global Stocktake and review of the MPGs.** The work programme would serve as the medium through which negotiations are translated into implementation, recognising that the Parties resolved to decisively move to a focus on implementing the Paris Agreement and the decisions adopted since its first session.

Scope of the Work Programme:

The work programme should aim at enhancing ambition and strengthening the implementation and delivery of Article 9.1 of the Paris Agreement. The parameters of the work programme will form the thematic and procedural scope of the work programme.

At the first COP, we must launch the work programme with an ambitious scope, modalities, and work plan, supplemented by the aforementioned action plan. Following the launch of the work programme, Parties will engage with the following topics, with a view to arriving at substantive reports, decisions and inputs for the different processes laid out in this submission.

Thematic Scope for technical dialogues and high-level engagements:

- Role of Article 9.1 in Implementation of Paris Agreement with a focus on the interlinkages of Article 9.1 with other provisions of the UNFCCC and its Paris Agreement - Articles 4.3 and 11 of UNFCCC, Article 4.5, 7.13, 8, 10 and 11 of Paris Agreement.
- Quantitative and qualitative review of finance provided by developed country Parties under Article 9.1: Instruments, channels, and concessionality of the finance provided by developed countries under Article 9.1
- Disbursement processes in developed countries for implementing Article 9.1
- Legal character of Article 9.1 as a mandatory provision and its implementation
- Interlinkages of Article 9.1 with other provisions of the UNFCCC and the Paris Agreement, including UNFCCC Articles 4.3 and 11, and Paris Agreement Articles 4.5, 7.13, 8, 10 and 11
- Role of Article 9.1 in replenishments and contributions to the operating entities of the Financial Mechanisms

Thematic Scope for Parties' focused deliberations and implementation:

- Barriers and opportunities in the implementation of Article 9.1
- improvement in developed countries' reporting under Articles 9.5 and 9.7.
- Follow up on the implementation via the Antalya-COP33 Action plan.

Procedural Scope of the Work Programme:

- Since the focus of the Work Programme is Article 9.1 — which establishes a legal obligation specific to developed country Parties — the discussions are best anchored in this Party-driven mandate. Broadening participation beyond this frame risks diluting the obligation into a broader, voluntary discourse that the Article does not itself provide for.

Reflecting on the reports and deliverables laid out in the work plan and modalities, each subsequent meeting of the COP/CMA should aim to ratchet up ambition and strengthen the implementation of Article 9.1, including through the Antalya-COP33 Action Plan.