

SUBMISSION TO THE UNFCCC

Work Programme on Climate Finance

Including Article 9.1, in the Context of Article 9 of the Paris Agreement

September 2026

This is the second submission to the Work Programme on Climate Finance, to be read in conjunction with our joint submission of April 2026, and it was jointly developed by the following organizations: Observatório do Clima, WWF-Brasil, Institute for Socioeconomic Studies (Inesc)

Summary

We welcome the opportunity to contribute further to the Work Programme on Climate Finance as Parties prepare for CMA8. Six months into this process, the growing body of submissions from Parties and non-Party stakeholders confirms significant common ground on the quality and accessibility of climate finance, alongside two unresolved and consequential divergences: the balance between public provision and private mobilization, and the scope of the contributor base under Article 9.1. This submission reaffirms the principles set out in our April submission, proposes modalities to anchor the Work Programme politically at CMA8, and sets out substantive priorities for its two-year workplan, with a view to a credible and actionable outcome at CMA9/COP32.

Key Messages

- The Work Programme should be formally anchored on the CMA8/CMA9 (2026-2027) agendas, with a time-bound calendar of deliverables feeding into the 2028 NCQG progress report, the SCF's 8th Biennial Assessment, the ETF guidelines review and the second Global Stocktake (GST-2).
- Article 9.1 public, grant-based provision remains the non-negotiable foundation of this Work Programme; private mobilization is a necessary complement but cannot substitute for it.
- The comparative analysis of previous submissions¹ shows broad, cross-regional convergence on concessional finance for adaptation, direct and simplified access, and debt as a structural barrier to climate action. This common ground should be captured in decision text at CMA8, not merely reiterated in further dialogues.
- Indigenous Peoples, people of African Descent and Local Communities (IPADLCs) should be recognized as implementing partners of climate finance, with simplified and direct access, not merely as beneficiaries.
- Progressive international taxation and debt-related measures should be explicitly included among the sources and instruments considered under the Work Programme's elements on additional sources and structural barriers.

I. Context: Convergence Should Now Translate Into Text

Since our first contribution in April 2026, the Work Programme has received a substantial and diverse body of submissions from developed and developing country Parties, negotiating groups and non-Party stakeholders. Read together, these submissions reveal a pattern that should inform how Parties structure the remainder of the two-year workplan.

There is significant convergence — cutting across the traditional donor/recipient divide — on three points: (i) a preference for grant-based and highly concessional finance, particularly for adaptation; (ii) the need for direct and simplified access to the Green Climate Fund, the Global Environment Facility, the Adaptation Fund and the Fund for Responding to Loss and Damage; and (iii) recognition, at least implicit, that unsustainable

¹ A total of 71 submissions were analyzed: 57 were reviewed in full, and 14 were assessed with the assistance of artificial intelligence. The analysis covers 20 Parties and negotiating groups—15 countries or blocs and five formal coalitions—and 51 non-Party stakeholders (NPS), including civil society organizations, private-sector entities, intergovernmental organizations, and academia.

debt constrains developing countries' capacity to act on climate change. We urge Parties to treat this convergence as ripe for decision at CMA8, rather than as a subject for further rounds of dialogue.

At the same time, two divergences remain unresolved and will determine whether the Work Programme delivers a credible outcome:

First, whether public finance provision under Article 9.1 remains the primary obligation of developed countries, or whether mobilized private finance — through blended finance, guarantees and de-risking instruments — is treated as an equivalent contribution toward the USD 1.3 trillion Baku to Belém Roadmap goal. This workstream should provide a common platform for addressing finance-related issues emerging from other processes, including the GGA, JTWP, MWP, and GST-2, and help avoid fragmented or repetitive discussions on Article 9.1.

Second, whether the legal obligation to provide climate finance should remain with developed country Parties, in accordance with the principle of common but differentiated responsibilities and respective capabilities (CBDR-RC), or whether the contributor base should be broadened — and, if so, **to which countries, on what basis, and through what process**. We consider that resolving the Work Programme's mandate in favour of the first position in each pairing is a precondition for a meaningful outcome at CMA9.

II. Reaffirming Article 9.1 as the Non-Negotiable Foundation

We reaffirm the analysis set out in our April submission: the dominant derisking paradigm, in which public finance is used chiefly to adjust risk-return profiles for private institutional capital, is structurally insufficient for the scale, speed and equity demands of the climate transition, particularly in the Global South. Developing countries face compounding constraints — financial subordination, an elevated cost of capital, and debt burdens partly caused by climate vulnerability itself — that a derisking-centred architecture does not resolve and, in some configurations, deepens.

Scaled-up, grant-based and highly concessional public finance provision under Article 9.1 is therefore the non-negotiable foundation of a credible outcome. Private mobilization under Article 9.2, and the exploration of additional and innovative sources under Article 9.3, are legitimate and necessary complements, but neither can substitute for the fulfilment of developed countries' existing legal obligations, at the risk of deepening already existing inequalities and vulnerabilities.

III. Modalities and Process: Priorities for CMA8

Formal political anchoring

The Work Programme should be reflected as a sub-item under “Matters relating to finance” on the provisional agenda for CMA8, with decisions on its modalities and scope taken at that session. Absent this anchoring, the Work Programme risks remaining a series of informal exchanges without a clear route to political consideration.

Party-driven process, rights-based participation

Institutional arrangements should remain Party-driven while guaranteeing full, effective and meaningful participation of non-Party stakeholders — in particular Indigenous Peoples, people of African Descent and Local Communities, women, peasants, youth and civil society organizations — through accessible, multilingual and adequately resourced modalities. These constituencies should be recognized as interlocutors in the design and delivery of finance that affects their territories and livelihoods.

Interface with Article 2.1(c) and the Diálogo Veredas

We recognize the value of coordination between the Work Programme and other Paris Agreement finance-related processes to avoid duplication of effort. Such coordination should not, however, be used to dilute the distinct and mandatory character of the Article 9.1 obligation, nor to conflate public provision with

the broader consistency of financial flows addressed under Article 2.1(c). We encourage the convening role exercised through the Diálogo Veredas and the “Mutirão” agenda to be carried out in a manner that reinforces, rather than blurs, this distinction.

A time-bound calendar of deliverables

We support a structured calendar of at least three technical expert dialogues per year and one high-level ministerial event per COP session, converging on the following outputs:

Deliverable	Timeline / purpose
Annual co-chairs' synthesis	Interim synthesis by end-2026 (CMA8); final synthesis by end-2027 (CMA9), capturing convergence and remaining gaps.
Delivery-oriented framework on public provision under Article 9.1	By CMA9/COP32: a CMA decision operationalizing the public provision component of the NCQG, with a floor for grant-based finance and grant-equivalent reporting.
Methodological reflections on transparency and reporting	By end-2027, to inform the SCF 8th Biennial Assessment, the ETF guidelines review, the NCQG progress report and GST-2.
Recommendations on additional and equitable sources	By COP33/CMA10, for consideration in the political phase of GST-2, including progressive environmental taxation consistent with CBDR-RC.

IV. Substantive Priorities for the Two-Year Workplan

A. Delivery and quality of public finance

- Each developed country Party should submit a transparent national plan detailing its contribution to delivering the USD 300 billion goal by 2035, specifying the public finance component provided under Article 9.1 and setting interim milestones for 2028 and 2030.
- A credible pathway to at least triple adaptation finance, reaching a minimum of USD 120 billion per year by 2035, delivered primarily through grants and highly concessional instruments.
- Grant-equivalent reporting and a clear methodological distinction between provision (Article 9.1) and mobilization (Article 9.2), to prevent double counting.

B. Debt, fiscal space and cost of capital

- Recognition of the cycle by which climate vulnerability raises sovereign borrowing costs, which in turn constrains climate investment and deepens vulnerability.
- A systematic assessment of financial instruments against developing countries' debt levels, and options to delink access to Article 9.1 finance from broader debt-conditionality frameworks.
- Engagement with multilateral development banks, the International Monetary Fund and credit rating methodologies as determinants of the cost of capital for climate-vulnerable countries.

C. Additional and innovative sources

- Concrete steps to advance progressive environmental taxation on polluting corporations and high-net-worth individuals, including through the UN Framework Convention on International Tax Cooperation, to increase public resources for international climate finance.
- Phase-out of fossil fuel harmful subsidies paired with compensating public investment, to avoid regressive adjustment costs for populations least able to absorb them.

D. Rights-based governance and direct access

- Recognition of Indigenous Peoples, people of African Descent and Local Communities (IPADLCs) as implementing partners of climate finance, with simplified and direct access modalities and free, prior and informed consent as a governing principle.

- Safeguards aligning financial flows with human rights, gender-responsiveness and biodiversity objectives across all thematic workstreams of the Work Programme.

V. Toward COP31: Building on Common Ground

We note with encouragement the degree of convergence emerging from the submissions of a wide range of Parties, negotiating groups and constituencies around grant-based finance for adaptation, direct access and the treatment of debt as a structural barrier to climate action. As Brazilian organizations engaging with a Work Programme shaped in significant part by the legacy of COP30/Belém, we encourage all Parties who share this reading — including those exercising a bridging or convening role between negotiating groups — to anchor their engagement in the structural critique of the current finance architecture set out above to work to consolidate it into decision text at CMA8, rather than allow the process to conclude with a procedural report alone.

VI. Conclusion

The Work Programme on Climate Finance offers a genuine opportunity to close the gap between the ambition of the Paris Agreement and the reality of its financing — but only if it moves beyond the recitation of positions toward decisions that are actionable, time-bound and verifiable. It is an opportunity to restore trust between developed and developing countries through demonstrable progress on the fulfillment of article 9.1 obligations. We stand ready to continue contributing evidence, analysis and proposals in support of a climate finance architecture that is public, adequate, equitable and accountable to the people and ecosystems it is meant to protect.

Key References

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