Philippines DOF - CFPG Additional Submission to the Climate Finance Work Programme under the UNFCCC Paris Agreement (as of 14 August 2026)

General Views

The Philippines welcomes the Brazilian Presidency's initiative to include a dedicated agenda sub-item on Finance under CMA 8 and CMA 9, on the Climate Finance Work Programme (CFWP) and Article 9.1 of the Paris Agreement in the broader context of Article 9 as a whole. We firmly expect that it remains on the agenda coming into COP 31.

The Philippines supports a CFWP that is focused, implementation oriented and capable of producing concrete, decision ready outcomes, with the delivery of Article 9, paragraph 1, of the Paris Agreement as a central priority. The next phase of the CFWP should translate existing discussions and submissions into concrete recommendations, implementation arrangements and, where appropriate, draft decision text to advance the full implementation of Article 9.1.

The CFWP should consider Article 9.1 in the context of Article 9 as a whole and its linkages with other provisions of the Paris Agreement, including Article 4 on mitigation, Article 7 on adaptation, Article 9.3 on the mobilization of climate finance, and Article 9.5 on transparency and predictability of financial resources. It should also consider transparent burden-sharing arrangements that can translate collective climate finance goals into measurable contributions by developed country Parties, while ensuring that climate finance does not exacerbate the debt and fiscal vulnerabilities of developing countries.

Its modalities should provide sufficient space for Parties, relevant financial institutions, operating entities of the Financial Mechanism, multilateral development banks and other stakeholders to present evidence on what is working, where delivery is falling short and what reforms are required. The process should result in a consolidated basis for further consideration by Parties, including concrete options for improving the provision, accessibility, predictability, quality and transparency of climate finance.

On Provision

Scaling up climate finance requires a significant advancement in both the quantity and quality of financial resources reaching developing countries. The CFWP should examine how public finance can be increased and used more effectively in leveraging additional resources, while maintaining a clear distinction between the obligations associated with Article 9.1 and the broader mobilization of finance under Article 9 and the New Collective Quantified Goal.

Discussions should consider the respective roles of public resources, multilateral and bilateral channels, development finance institutions, multilateral development banks and other relevant sources. Particular emphasis should be placed on whether existing financial instruments are appropriate to the

circumstances of developing countries and whether they are delivering resources at the scale, speed and terms required for implementation.

The CFWP should also assess the predictability of future financial flows. Developing countries require greater visibility over support in order to plan and implement long-term climate strategies, including NDCs, NAPs and other priorities under their national development plans.

In addition, the CFWP should examine how the international financial architecture can be better aligned with climate objectives without transferring excessive risks, costs and debt burdens to developing countries. This should include a re-evaluation of the conditions attached to finance, the primacy of grants and highly concessional finance, the concessionality of resources, and measures to prevent climate finance from accumulating debt.

On Access

Access should be assessed not only as a question of developing-country capacity, but also as a question of whether the international climate finance architecture is designed to provide efficient and equitable access.

We are painfully aware of the persistent difficulties including lengthy approval procedures, complex accreditation and application requirements, high transaction costs, fragmented processes, __ operational policies, limited flexibility and insufficient technical support. The CFWP should already identify which of these barriers have actually been addressed in recent years and which continue to prevent finance from reaching countries in a timely manner.

A particular focus should be placed on possible reforms that can shorten project preparation and approval timelines, reduce unnecessary administrative requirements, strengthen direct access, and improve coherence and coordination among funds, financial institutions, and implementing entities. We must acknowledge that capacity constraints should not be treated as the sole explanation for limited access where institutional or procedural features of the international finance system themselves create obstacles.

The CFWP should invite operating entities of the Financial Mechanism, MDBs, DFIs and other relevant institutions to provide concrete information on reforms already undertaken, their results, remaining bottlenecks and measures that could further improve access and lead to impacts.

Access should also be considered in relation to the particular circumstances of climate vulnerable developing countries (regardless of its income classification), where climate related disasters compounded with other social, economic, and development challenges can simultaneously increase financing requirements, create debt burdens, and reduce fiscal space. Climate finance arrangements should therefore support, rather than constrain, countries' ability to pursue their development priorities and implement ambitious climate action.

On Transparency

On transparency, a central issue is the absence of a common and universally accepted definition of climate finance, which creates inconsistencies in reporting, permits the potential double-counting of financial flows, making it difficult to distinguish genuinely new and additional climate finance from existing official development assistance and other sources.

For the CFWP, it must consider that transparency encompasses both outcomes and impacts. There must be a development of robust methodologies to assess whether climate finance is reaching developing countries in a timely and accessible manner, whether it is aligned with country-driven priorities and frameworks such as NDCs and National Adaptation Plans, and whether it is delivering measurable adaptation, mitigation, and loss and damage outcomes.

Developed country Parties should also provide clear, forward-looking information on projected levels of public financial resources, supported by transparent reporting and tracking systems that allow Parties to monitor progress toward collective commitments and identify gaps in delivery in compliance with obligations under Articles 9.1 and 9.5 of the Paris Agreement.

Overall vision for the CFWP

In conclusion, the overall objective should be to establish a more reasoned, measured, and implementation oriented approach to climate finance that strengthens delivery under Article 9.1 while providing the needed enabling environment for climate action in developing countries based on the following:

1. **Assessment of the Delivery of Finance:** There is a need to establish a clearer picture of progress, remaining gaps and constraints affecting the implementation of Article 9.1.
2. **Identification of Possible Reforms:** We must develop practical options for addressing institutional, procedural and systemic weaknesses in the climate finance architecture.
3. **Improvement of Climate Finance Access:** There must be a recognition of reducing unnecessary complexity, transaction costs and delays while strengthening country ownership and institutional capacity.
4. **Enhancement of the quality of Climate Finance:** A focus in promoting finance that is appropriate to developing countries' circumstances, including adequate grants and highly concessional resources where appropriate.
5. **Rejection of Debt Accumulation:** We must ensure that climate finance supports development and climate objectives without aggravating debt vulnerabilities.

6. **Improvement of transparency:** There must be more consistent approaches to reporting, accounting and tracking while strengthening measurement of results and impacts of climate finance.
7. **Supporting implementation:** We must ensure that the CFWP produces decision ready outputs capable of informing future discussions and further work under the Convention and the Paris Agreement.

Ultimately, the CFWP must provide Parties with a clearer basis for determining not only what climate finance should achieve, but also what changes in institutions, policies, instruments and reporting arrangements are necessary to deliver it. This would allow the CFWP to contribute meaningfully to implementation and to strengthen confidence in the overall climate finance architecture.