Submission by the Like-Minded Developing Countries on the Belém Mission to 1.5
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INTRODUCTION

1. The Like-Minded Developing Countries (LMDC) welcome the opportunity to provide views on the Belém Mission to 1.5. For the LMDC, representing over half of the world's population and two-thirds of the world's poor from Africa, Asia, and Latin America and the Caribbean, the Mission's primary purpose is to identify what is required of developed countries in terms of their actions to undertake immediate ambitious emission reductions and their provision of adequate means of implementation to developing countries consistent with their obligations under the Convention and its Paris Agreement to enable implementation of NDCs and NAPs by developing countries. The Mission should not become a parallel process through which existing commitments are reinterpreted, new expectations are placed on developing countries, unilateral accountability mechanisms target developing countries, or nationally determined pathways are assessed against externally defined benchmarks. It should focus on enabling implementation, not setting new targets and conditionalities for developing countries.

2. The Belem Mission to 1.5 questions posed by the COP29, COP30, and COP31 Presidencies to Parties are closely linked. The action areas and solutions capable of delivering the greatest impact will depend, above all, on whether the international enabling conditions for implementation are put in place in terms of new and additional means of implementation by developed countries to support developing countries in implementation of country-led actions defined under their NDCs and NAPs in pursuance of the Paris Agreement temperature goals. This is important because for developing countries such as those represented by the LMDC, ambition cannot be separated from the availability of commensurate finance, technology development and transfer and capacity-building, which remain the most significant barriers to the implementation of national climate actions. The focus should be on enabling

implementation, rather than new targets.

3. This relationship is grounded in the Convention and its Paris Agreement, such as in Articles 4.3,4.4, 4.5, 4.7, 4.8 and 4.10 of the Convention, which underscore the link between developing countries' national climate actions with the obligatory support by developed countries to implement the Convention and its Paris Agreement. Nationally determined climate action must be pursued based on equity and common but differentiated responsibilities and respective capabilities (CBDR-RC), in the light of different national circumstances, and in the context of sustainable development and efforts to eradicate poverty. These provisions of the Convention must shape the Mission's understanding of ambition, implementation, investment and international cooperation.
4. Developing countries are already undertaking significant climate actions, often largely through their own resources, while facing severe and escalating climate impacts, persistent development deficits, poverty-eradication priorities, debt and fiscal constraints, and an increasingly fragmented international economic environment marked with an increase in climate related unilateral trade measures. These realities determine both the scale of action that can be undertaken and the type and level of support required.
5. The Mission must therefore seek to operationalize equity in mitigation, adaptation, and investment approaches to climate action. This requires recognition of historical cumulative emissions, the unequal use of atmospheric space, the rapid exhaustion of the remaining carbon budget, and the continuing development needs of developing countries. Article 3.1 of the Convention and Article 4.4 of the Paris Agreement provide that developed country Parties have to lead in climate action, including by undertaking economy-wide absolute emission reduction targets. In fulfillment of this obligation, developed countries must bring forward their net-zero timelines into this decade well ahead of mid-century, and move thereafter towards net-negative emissions. At the same time, they must provide developing countries with means of implementation at the scale, quality and speed required, keeping in view the specific needs and vulnerabilities of developing country Parties.
6. The Mission should remain Party-driven, transparent, inclusive, facilitative and non-prescriptive. It should not establish new global or sectoral targets, conduct a progress assessment, create new conditionalities, or place pressure on developing countries to enhance ambition. Its practical value will lie in alleviating the barriers that hamper implementation, in recommending how the international enabling environment can be strengthened, and in establishing clear accountability of developed country obligations. It must avoid shifting the burden of action and support to developing countries.

ACTION AREAS AND SOLUTIONS WITH THE HIGHEST IMPACT POTENTIAL

7. There is no one-size-fits-all template for the ambition or implementation of NDCs and NAPs. National determination means that priority actions must be identified by each

Party in the light of its national circumstances, development priorities, institutional capacities, resource endowments and chosen pathways. The Mission should therefore avoid turning examples of action into universal prescriptions.

A. Priority Action Areas

8. The most consequential action area is the immediate, deep, sustained and much more ambitious climate action by developed countries under the Convention and its Paris Agreement and avoiding any backsliding. This includes the strengthening of developed country NDCs, in particular the mitigation component and the provision of support component, in line with historical responsibility, and the preservation of all existing commitments under the Convention and its Paris Agreement. The LMDC notes with serious concern that some developed country Parties are revising their mitigation commitments downward, cannot realize their 2030 NDC mitigation targets based on the current official emission projections, have either withdrawn from both the Convention and its Paris Agreement or are otherwise retreating from previously undertaken climate obligations. Furthermore, pre-2020 climate action is the fundamental basis for post-2020 climate actions. The LMDC notes with strong concern that pre-2020 gaps in both mitigation ambition and implementation by developed country Parties and that the IPCC had earlier indicated that developed countries must reduce emissions by 25–40 per cent below 1990 levels by 2020, which was not achieved. Such gap of Developed Countries' pre-2020 actions will delay the global collective progress; such actions consume the remaining carbon budget faster and transfer a growing mitigation, adaptation and economic burden to developing countries. Ambition cannot be measured only by what developing countries are asked to do; it must be measured against the extent to which developed countries are fulfilling their obligations in line with their greater historical responsibility. The Mission must consider this essential required action by developed countries.

9. Developing countries must be supported (while ensuring strengthening of national and sub-national capacities of developing countries), to translate their NDCs, NAPs, LT-LEDS, TAPs, TNAs, and other climate-related plans or actions under the Convention or Paris Agreement into action. It must, however, remain voluntary and country-driven and should not become an additional reporting requirement, an eligibility condition for finance or a means of prescribing domestic policy reform.

10. Adaptation and mitigation must receive equal priority. The implementation of NAPs requires sustained support for climate-resilient infrastructure and settlements, food and water security, public health, disaster risk reduction and early warning, glacier resilience, ecosystem protection, coastal resilience, climate information and locally led adaptation. As temperatures and impacts increase, vulnerability and risks of developing countries will escalate, as would their adaptation needs. The scale of finance, technology and capacity-building support therefore must evolve accordingly. Efforts to respond to loss and damage could also form part of a response to escalating impacts.

11. Mitigation action should address emissions regardless of the sector and source of emissions through a range of policy and technological options in gradual country-led

approaches, rather one-size-fits-all approaches. The Mission should not single out particular energy sources, technologies or sectors for universal treatment. Article 3.1 of the Convention, read in conjunction with Article 4.4 of the Paris Agreement, establishes that developed countries bear the primary obligation to reduce emissions, as they bear primary historical responsibility for the problem and have the greatest capabilities to address it. Any universal mitigation timelines or sectoral approaches imposed without differentiation across all Parties are inconsistent with equity and CBDR-RC, the Paris Agreement and its agreed decisions. Energy and development pathways differ; cooperation should facilitate the widest possible range of solutions while safeguarding energy access, affordability, reliability, energy security, the sovereign right of countries to exploit their natural resources and the right to development.

12. Depending on national circumstances, national priority solutions may include expansion and modernization of energy systems; energy efficiency; storage; renewable energy and other low-emission technologies; carbon capture and storage and carbon dioxide removal technologies; decentralized systems and clean cooking; resilient transport and urban infrastructure; industrial upgrading; climate-resilient agriculture; sustainable water management; conservation of forests; ecosystem protection; sustainable waste management; and improve resource efficiency. The important point is not to prescribe a common list, but to enable developing countries to select, adapt and implement the solutions most suited to their specific circumstances, capacities and needs.

13. Climate action must also support broader sustainable development priorities, including economic diversification and removal of trade barriers. Investments should build domestic productive capacity, support economic diversification and value addition, strengthen small and medium-sized enterprises, create decent work and enhance technological capabilities. Developing countries should not be locked into the role of suppliers of raw materials or markets for imported technologies while higher-value production, intellectual property and technological control remain concentrated elsewhere.

14. Just transition approaches must be nationally determined. Just transitions should ensure the justice among nations, and narrow down, rather than widen the Global North and Global South divide. Approaches to 1.5°C must be just, inclusive, and not compromise development goals or poverty eradication for developing countries. It should protect workers and communities, strengthen social protection, address informality and ensure that the costs of transition are not shifted to those least able to bear them. There can be no single model or timetable for just transition, including for fossil-fuel-dependent developing countries with limited alternative livelihood options in the near term. All action for developing countries will depend on the provision of finance, technology and capacity-building and on the preservation of national policy space. Innovation should be understood to include not only the deployment of imported technologies, but also the development of endogenous capabilities. Developing countries require support for research, design, engineering, manufacturing, operation, maintenance and adaptation of technologies, including through public institutions, universities and domestic

enterprises. This is essential for durable implementation and for avoiding new forms of technological dependency.

B. Finance, Technology, Capacity-Building and Institutional Opportunities:

15. A key enabling condition is the provision of adequate, predictable, accessible and new and additional financial resources by developed countries under Articles 4.3, 4.4, and 4.5 of the Convention and Article 9.1 of its Paris Agreement. The Mission should identify the gap between the needs expressed by developing countries and the finance actually provided and mobilized. Aggregate investment needs or estimates of private financial flows should not be presented as substitutes for the fulfillment of developed country obligations. The New Collective Quantified Goal (NCQG), as adopted at COP29, established a floor of USD 300 billion per year by 2035 from developed country Parties. The LMDC considers this figure to be grossly insufficient relative to the needs expressed by developing countries in their NDCs, NAPs and national communications. The Mission must quantify the full gap between this committed floor and actual developing country needs and must not be used to suggest that developed country finance obligations have been discharged while the underlying needs gap remains. The Mission must be directly linked to the delivery of the NCQG by developed country Parties.

16. It is essential to clarify that the obligation in Article 9.1 of the Paris Agreement which requires developed country Parties to provide financial resources to assist developing-country Parties with respect to both mitigation and adaptation in continuation of their existing obligations to do so under Articles 4.3, 4.4 and 4.5 of the Convention is legally and conceptually distinct from the encouragement in Article 9.2 of the Paris Agreement for "other Parties" to provide contributions on a voluntary basis. Finance from developing country sources, or private finance, does not discharge Article 9.1 obligations and are complementary and voluntary in nature separate from the USD 300 billion goal. The NCQG process must be implemented in a manner fully consistent with this distinction. Climate finance must also be genuinely new and additional to existing official development assistance (ODA) commitments and must not be counted twice across development and climate finance budgets.

17. The quality of finance is as important as its quantity. Public, grant-based and highly concessional resources are indispensable for adaptation, public services, capacity-building, technology development and transfer, and other activities that may not generate commercial returns. Climate finance should not deepen debt distress, impose macroeconomic conditionalities, shift excessive risks to developing-country public budgets or require governments to guarantee private profits. The structural inequity of international arrangements that effectively require developing countries to incur debt to finance climate action, even as those bearing primary historical responsibility for the problem shoulder no proportionate financial burden, must be recognized and reversed.

18. Access to the operating entities of the Financial Mechanism and other climate funds should be simplified and made more responsive to national institutions. Direct access, readiness support, programmatic approaches and predictable multi-year funding should be expanded. Country ownership must not be displaced by developed country preferences, external intermediaries or narrow assessments of bankability.

19. Where developing countries choose to prepare NDC or NAP implementation and investment plans, they should receive full financial and technical support. These plans should serve national planning and resource mobilization, with developing countries retaining full ownership over investment priorities, sector choices and sequencing. They should not become a precondition for access to finance, a vehicle for imposing policy reforms or a mechanism for transferring implementation risks to developing countries. Preparation of such plans through externally contracted consultants, under the influence of multilateral development bank preferences or bilateral channels conditions, risks redirecting domestic planning towards externally preferred sectors and instruments and must be guarded against.
20. Technology cooperation must move beyond market-based dissemination, and barrier-free transfer of mitigation and adaptation technologies on concessional and preferential terms. Most developing countries have already undertaken technology needs assessments (TNAs) or developed technology action plans (TAPs) under the Convention. Parties are also in the process of implementing the Belem Technology Implementation Programme (BTIP). These processes are important and should be effectively supported and implemented. In this context, technology cooperation under the Convention and its Paris Agreement should support joint research, development, demonstration, production and deployment; access to know-how and technical information; the encouragement and use of TRIPS flexibilities such as compulsory licensing, patent exceptions, parallel importation, patent transition periods, flexibility in standards of protection; open or concessional licensing; patent pools and other collaborative arrangements; and the development of regional and domestic manufacturing capabilities. Technologies developed with substantial public support should be made widely available for climate action in the public interest.
21. Restrictive intellectual property practices, high intellectual property royalty costs (the payments for which go predominantly to developed countries), export controls, trade secrets, concentrated supply chains and discriminatory standards can all impede access to climate technologies and inputs. These barriers should be identified and addressed. Technology transfer should enable local production, repair, maintenance, interoperability and adaptation to developing-country conditions, rather than being limited to the sale of finished equipment.
22. Capacity-building should be long-term, country-led and institution-building. It should strengthen the ability of developing countries to design policies, generate and use climate data, prepare and implement programmes, manage finance and procurement, undertake monitoring and evaluation, and develop technical and negotiating expertise. It should not rely primarily on short-term projects or externally contracted consultants.
23. The operating entities of the Financial Mechanism, the Technology Mechanism, the Paris Committee on Capacity-building, the Adaptation Committee, the Least Developed Countries Expert Group, the Warsaw International Mechanism and other relevant bodies should respond more effectively to country-identified needs, within their respective mandates. Coordination should reduce fragmentation and transaction costs but must not

dilute mandates or developed country obligations.

C. Principal Barriers to Ambition and Implementation

24. The principal barrier remains the persistent shortfall in the provision of means of implementation by developed countries. This adversely impacts both the implementation of existing NDCs and NAPs and the capacity of developing countries to consider further ambition. The issue is not a lack of national climate action plans or the political willingness of developing countries to adopt and implement these; rather, the issue is the continuing gap between agreed obligations, identified needs and actual delivery. Poverty eradication and sustainable development remain a key challenge for the developing countries, which cannot be compromised in the name of 1.5°C.

25. Debt burdens, high costs of capital, limited fiscal space, currency risks, unequal access to liquidity and methodologies used by credit-rating agencies make climate investment far more expensive in developing countries. These structural inequities are compounded when climate finance is delivered predominantly through loans, blended-finance structures or instruments that transfer risk to the public sector, or when climate finance mobilization and provision is scaled down or reduced in order to shift the repayment of historical debt to developed countries' domestic priorities at the expense of developing countries.

26. Barriers to technology access and control also remain significant. Intellectual property restrictions, royalty payments, technology monopolies, limited access to know-how and components, export controls and concentrated supply chains weaken the ability of developing countries to deploy technologies at scale and to build their own endogenous productive and technological capabilities.

27. Unilateral and protectionist trade-restrictive climate-related measures are an increasing and serious barrier to implementation. Carbon border adjustment measures, discriminatory subsidies, restrictive standards, due-diligence requirements and other extraterritorial instruments shift transition costs to developing countries, reduce export earnings, fragment markets and supply chains and constrain domestic policy space. Consistent with Article 3.5 of the Convention, measures taken to combat climate change must not constitute arbitrary or unjustifiable discrimination or a disguised restriction on international trade. Impact assessments conducted by or at the behest of the imposing Party are not a substitute for genuine international assessments of the projected impacts of these proposed measures, particularly given the profound power asymmetry between developed country economies and developing-country exporters. The LMDC calls for the effective operationalization of the dialogue on climate-related and trade-restrictive unilateral measures to address the systemic impacts of unilateral trade-restrictive climate-related measures, with the objective of developing a multilateral framework grounded in equity and CBDR-RC and consistent with Article 3.5 of the Convention. Practical requirements for addressing these impacts are set out in Section III below.

28. One-size-fits-all sectoral pathways, uniform timelines and policy conditionalities disregard national circumstances and often undermine energy security, food security,

employment, industrial development and poverty eradication efforts. The Mission should not reinforce and should avoid such approaches.

29. Fragmented international initiatives, complex access procedures, duplicative reporting, consultant-driven project preparation and multiple inconsistent standards impose high transaction costs on developing country institutions. They consume scarce capacity that should instead be directed towards implementation.

30. Escalating climate impacts are themselves a growing barrier. Developing countries are increasingly required to divert limited public resources from development and planned climate action towards emergency response, recovery and reconstruction. Inadequate mitigation by developed countries and insufficient adaptation support today will increase future losses and damages to the developing countries.

31. Climate-related and trade-restrictive unilateral measures and restrictions on finance, technology and essential goods undermine the trust and stability required for climate cooperation. When climate finance is channeled through bilateral mechanisms subject to policy conditionalities or structured in ways that link access to external considerations, it ceases to fulfill its function under the Convention and its Paris Agreement and compounds the confidence deficit in the multilateral system. The response to climate change must be based on intensified multilateral cooperation, not intensified economic competition. This must be highlighted explicitly within the Mission.

32. Finally, excessive reliance on private finance and voluntary corporate action risks excluding countries, sectors and activities that do not offer commercially attractive returns. Private finance may complement public finance, but it cannot replace public investment or the fulfillment of developed country obligations.

STRENGTHENING INTERNATIONAL COOPERATION

33. The key to strengthening international cooperation is the full implementation of existing commitments under the Convention and its Paris Agreement which contain multilaterally agreed principles, institutions and processes. What is lacking is adequate implementation, delivery and trust. The Mission should focus on closing these gaps rather than creating new layers of expectation for developing countries. It should come with a concrete support package for the developing countries on finance, technology transfer and capacity building to drive multilateral cooperation on keeping 1.5^0 C within reach.

34. International cooperation must remain anchored in equity and common but differentiated responsibilities and respective capabilities. Developed countries must lead in reducing emissions and must provide finance, technology and capacity-building. Cooperation that treats all Parties as having equivalent historical responsibility, capabilities or access to resources will not be equitable and will not produce effective outcomes.

35. Developed countries should provide credible, transparent and predictable pathways for the delivery of finance, with a substantial increase in public and grant-based resources

under Article 9.1. Support should respond to the needs and conditional components identified by developing countries in their NDCs, NAPs and other national plans. Greater clarity is required on the consistent implementation of the legally mandated differentiation between the obligatory provision in Article 9.1 and mobilization in Article 9.3.

36. A stronger framework for international technology cooperation is required to facilitate joint development and production, remove intellectual property and other access barriers, share know-how and strengthen regional innovation and manufacturing networks. Developing countries should be enabled to participate in higher-value segments of climate-related supply chains, rather than remaining dependent on imported technologies and inputs.

37. International economic cooperation must support, rather than obstruct, climate action and sustainable development. This is the essence of Article 3.5 of the Convention. In addressing the adverse impacts of unilateral trade-restrictive climate-related trade and economic measures, Parties must ensure: prior consultation with affected developing countries before the adoption of any such measure; transparent and genuinely participatory impact assessments conducted independently of the imposing Party; full consideration of developing country circumstances and development priorities; avoidance of extraterritorial prescriptions that override nationally determined policy choices. These requirements are not satisfied by ex-post notification or by unilateral compliance determinations. There should also not be any assumption that these policies will be implemented as a matter of fact. If these measures are inconsistent with the principles of the UNFCCC and its Paris Agreement, they should be actively opposed, including within the Belem Mission 1.5, and a full reverting to multilateral approaches.

38. Developing countries must retain the policy space to pursue nationally appropriate industrial, agricultural, energy, technology and social policies. International rules and cooperation arrangements should facilitate diversification, local value addition, universal access to essential services and the development of domestic capabilities. They should not lock in existing technological and economic asymmetries.

39. Cooperation across the UNFCCC system should link country-identified needs more directly to the work of the constituted bodies, operating entities and relevant programmes. Existing institutions within the UNFCCC system intended to catalyze and provide support to developing countries should be adequately resourced and made more responsive. These include, inter alia, the Green Climate Fund, the Adaptation Fund, the Fund for Responding to Loss and Damage, the Climate Technology Centre and Network, the Paris Committee on Capacity Building, the LDC Expert Group, the Santiago Network and its secretariat.

40. The Mission should not create a parallel implementation architecture or duplicate work already mandated for negotiations among Parties. Mission’s report must not be cited, cross-referenced, or otherwise treated as an input into, or basis for, decisions or benchmarks under the Global Goal on Adaptation (Belém–Addis Vision indicator process) or the Baku Adaptation Road Map.

41. International cooperation on adaptation must reflect the evolving scale of impacts. It should include predictable finance for NAP implementation, access to climate data and modeling, cooperation on observation and early warning, technologies for resilient infrastructure and public services, and support for responding to loss and damage.

42. Climate cooperation must replace unilateralism, protectionism and economic competition with multilateral solidarity and cooperation within the framework of the Convention and its Paris Agreement. This is the international enabling environment required to enhance the implementation of NDCs and NAPs effectively.

EXPECTATIONS FOR THE MISSION'S PROCESS AND OUTCOME

43. The Mission's report should clearly consider:

a. action undertaken by developed countries, particularly those listed under Annexes I and II of the Convention, and show how they should be taking the lead in combating climate change;

b. required support for conditional actions planned by developing countries to implement nationally determined climate actions under the Convention and its Paris Agreement;

c. support provided and mobilized by developed countries to developing countries;

d. remaining implementation and support gaps; and

e. international barriers that constrain action.

Combining these different elements into collective or aggregate narratives of investment or implementation would obscure responsibility and weaken accountability.

44. The report should give balanced treatment to mitigation, adaptation and means of implementation and should reflect the increasing adaptation and loss and damage needs arising at different levels of warming. It should also recognize that inadequate developed country mitigation and support directly increase the burdens faced by developing countries.

45. The report should reflect the diversity of national circumstances, technologies and pathways. It should not identify a single set of preferred technologies, prescribe sectoral outcomes, establish new collective or individual targets, or convert voluntary initiatives and proposals from non-Party stakeholders into expectations for Parties. The report should not create any requirements to Parties on following up implementing any specific decisions. Any such interpretation is a prescriptive approach for Parties' nationally determined actions.

46. The Mission should enable all Parties to overcome the barriers on implementation, especially to explicitly address the principal international barriers identified by developing countries: inadequate developed country mitigation and support, including by Parties that have revised their commitments downward or withdrawn from the Paris Agreement; barriers to technology access; debt, fiscal and financial constraints; inequities in the international financial architecture; and climate-related and trade-restrictive unilateral measures. A report focused primarily on domestic policy reforms

in developing countries would not respond to the central implementation challenge.

47. The process should be transparent and Party-driven, with balanced regional participation and meaningful opportunities for Parties to contribute to this voluntary process. The Presidencies should reflect the full range of views expressed and should not present contested proposals as agreed solutions.

48. The Mission should conclude by reaffirming that the route to effective climate action, enhancement of climate resilience and achievement of sustainable development is the faithful implementation of the Convention and its Paris Agreement through:

a. developed countries fulfilling their obligation under the Convention and its Paris Agreement to take the lead without delay or backsliding;

b. the urgent, adequate and unconditional delivery of public finance, technology and capacity-building support by developed countries to developing countries in fulfillment of their support obligations under the Convention and its Paris Agreement, at a scale that responds to actual needs rather than to the floor established by the NCQG;

c. respect for the national determination by developing countries of their sustainable development and poverty eradication priorities and climate pathways in accordance with CBDR-RC; and

d. the strengthening of multilateral cooperation founded on equity, trust and the recognition of historical responsibility.