

WOMEN & GENDER CONSTITUENCY

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Submission by the Women and Gender Constituency (WGC) on the “Baku to Bélem Roadmap to 1.3T”

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General overarching comments

The Women and Gender Constituency (WGC) appreciates the opportunity to provide input on the development of the “**Baku to Bélem Roadmap to 1.3T**” (**B2B Roadmap**) in response to [the call for input](#) and a set of specific questions by the Presidencies of the sixth and seventh sessions of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement. This invitation to engage is appreciated, especially in light of a [cross-constituency letter](#) sent to the Presidencies in February calling for early, iterative, transparent and comprehensive participation of non-party stakeholders in the process.

Please, find below the WGC’s responses to the specific questions posed, as well as some general comments for the Presidencies’ consideration. We hope that this is the first of many meaningful opportunities to provide further input, and pledge the interest of the WGC as well as civil society more broadly in being involved in every step of the B2B Roadmap development going forward. It will be of particular importance to guarantee the meaningful engagement of all stakeholders throughout the entire process, including communities vulnerable to climate impacts, Indigenous Peoples, women, children, youth, people with diverse sexual orientation, gender identity and expression and sex characteristics (SOGIESC), people with disabilities, and workers.

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About the Women and Gender Constituency: *The Women and Gender Constituency (WGC) is one of the nine stakeholder constituencies of the United Nations Framework Convention on Climate Change (UNFCCC). Established in 2009, the WGC now consists of 64 members (women’s and environmental civil society organizations accredited to the UNFCCC framework), and an advocacy listserv with more than 1,000 advocates. The Constituency works to ensure that human rights and gender equality are firmly anchored in all climate actions under the UNFCCC and to challenge the extractive, exploitative and patriarchal economic model which has resulted in the climate crisis.*

We welcome the establishment of a [dedicated webpage](#) and call for all submissions from Parties, non-party stakeholders and others, as well as updated information on further procedural steps and summaries of activities undertaken under the B2B Roadmap process to be collected and published in a timely manner.

On process, with respect to the suggested workplan for the B2B Roadmap, we would suggest to share a synthesis of the submissions received in this first round as quickly as possible. This synthesis would allow for structured outreach and engagement, including with non-party stakeholders, well before the meeting of the Subsidiary Bodies (SB62) in Bonn in June, so that a first approach paper on the B2B Roadmap could be delivered for further consultation in Bonn. Such consultations, to which some significant time should be devoted in Bonn, must draw from the constructive experience of the technical expert dialogues (TEDs) during the NCQG negotiation process, allowing for the engagement of non-party stakeholders, including from experts from the WGC and other UNFCCC constituencies, on equal footing with Parties during deliberations. A revised draft should follow as soon as possible after SB62, then additional rounds of comprehensive consultations and submission inputs ahead of the pre-COP. This approach will ensure the transparency, inclusion and participation in the process as promised in the Presidencies' cover letter.

(a) What are your overall expectations for the “Baku to Belém Roadmap to 1.3T”?

The [CMA6 decision](#) on the New Collective Quantified Goal on Climate Finance (NCQG) at COP29 was a disappointment to many, including the WGC, which had tirelessly advocated as part of broader civil society efforts for an ambitious goal based on science and the needs of developing countries and rooted in equity and the common but differentiated responsibilities and respective capabilities (CBDR-RC) as the core principles of collective climate action under the UNFCCC and Paris Agreement.

Based on current efforts of determining needs, including in the second [Needs Determination Report](#) released just before COP29, where only a subset of required actions under developing countries Nationally Determined Contributions covering mitigation, adaptation and addressing loss and damage are costed; in light of [annual finance outflows of more than USD 2 trillion](#) from countries of the Global South due to the prevailing unjust global financial and economic system; and acknowledging the accumulated climate debt the Global North owes to the Global South of [annually USD 5 trillion](#), the adopted USD 1.3 trillion annual target by 2035 is fully inadequate.

CBDR-RC and equity have to be the guiding principles in developing the B2B Roadmap. In light of this, and the overall inadequacy of the USD 1.3 trillion annual quantitative target by 2035, the B2B Roadmap has to focus specifically on the **quality of finance** mobilized under this goal and deliver high-quality climate finance that is new, additional, predictable and measured in grant-equivalent terms, with the majority of at least USD 1 trillion annually provided and mobilized by developed countries to developing countries in grants and highly concessional finance to cover developing countries' needs and priority climate actions for mitigation, adaptation and addressing loss and damage.

The B2B Roadmap must be more than just a report presented at COP30 to CMA7 for the consideration of Parties and then not acted upon (as happens unfortunately to many of the finance reports provided regularly by the Standing Committee on Finance to the COP and CMA). It must articulate a clear action plan to achieve the USD 1.3 trillion—separately including the USD 300 billion goal as an integral element—with actors, actions and in particular obligations of developed

countries clearly identified, and targeted yearly milestones transparently set to scale up finance from the current level as quickly as possible, and ideally well in advance of 2035, including by delivering continued assessment on both the quantity and quality of finance provided and mobilized along the way. To accomplish this, a B2B Roadmap action plan must be clear on sources, contributors and avenues to scale up finance, starting with public finance provision, and allocate clear responsibilities to different actors. This action plan, with a clear follow up process for accountability and transparency in monitoring implementation, must be adopted by Parties at COP30.

In order to increase the accountability and transparency of its implementation, the B2B Roadmap action plan should elaborate the baseline of current finance flows that could be counted under the NCQG in order to be able to track new and additional finance, including public finance provided and mobilized. The B2B Roadmap action plan must also clearly articulate how it interacts with, relates to and/or informs other ongoing transparency and accountability frameworks, work programs, assessments and reports under the UNFCCC and Paris Agreement, including: the Global Stocktake (with the second GST in 2028 and the third in 2033); the work program on the Sharm-el-Sheikh dialogue on Article 2.1.c; relevant SCF reports such as a new biennial assessment report from 2028 onward on collective progress on all elements of the NCQG as well as future NDRs; and the mandated NCQG special assessment report on access to climate finance in 2030.

(b) Which topics and thematic issues should be explored to inform the Roadmap, within the scope of the mandate?

The B2B Roadmap process will be a core opportunity to address series shortcomings of the NCQG decision as adopted, by exploring and integrating core elements into the B2B Roadmap action plan to be adopted by CMA7 at COP30.

Chief among these core elements must be the integration and mainstreaming of a human-rights based and gender-transformative approach in the B2B Roadmap process and an action plan as its main outcome. This is to ensure that scaled up climate finance in quantity and quality used for funding climate actions in mitigation, adaptation and for addressing loss and damage is respecting, promoting and considering all actors' obligations on human rights, the right to health and a healthy environment, the rights of Indigenous Peoples, local communities, migrants, children, youth, persons living with disabilities and people in vulnerable situations, and the right to development and just transitions, as well as gender equality, empowerment of women and intergenerational equity. This approach must also recognize the crucial roles of these affected groups in addressing and responding to climate change, including through the application of Indigenous and traditional knowledge and by prioritizing community-driven and locally-owned and locally-led actions.

In particular topics and thematic issues that need to be addressed include, *inter alia*, the following:

Sources of climate finance: The B2B Roadmap must analyze and explore sources of finance and identify barriers to scaling up finance, with a focus on the provision of public finance from developed countries to all developing countries in grants, and highly concessional non-debt creating instruments to support mitigation, adaptation, addressing loss and damage and enabling just transitions. It should in particular explore how grant support for adaptation and addressing loss and damage can be scaled up, including by looking at additional sources of public support from developed countries through innovative or alternative sources of finance that are new, fair, redistributive, without net incidence on developing countries and based on the polluter pays

principle. For example, a Climate Damages Tax (CDT) on the extraction of fossil fuels could generate USD 44.6 billion from developed countries in its first year and grow over the years. Several recent CSO studies, including by [Oil Change International](#) and [ActionAid International](#), have also shown that around USD 5 trillion per year could be mobilized by developed countries for climate finance through redirecting existing resources (including for fossil fuel subsidies or military expenditures) or changing financial or taxation rules (such as by focusing on tax justice through the introduction of a wealth tax).

Quality of climate finance: In addition to inclusivity, gender-responsiveness and adherence to and promotion of human rights as mentioned above, a number of other qualitative elements under the NCQG have to be explored centrally and incorporated under a B2B Roadmap action plan. They relate in particular to a clear focus on grants, highly concessional and non-debt creating instruments for the implementation of NDCs and National Adaptation Plans (NAPs), in line with the mandate for the B2B Roadmap in para.27 of the NCQG decision, where the B2B Roadmap action plan must commit to provide grant finance exclusively for adaptation and for addressing loss and damage. With a new round of NDCs submitted this year, a growing number of developing country NDCs articulate adaptation and loss and damage actions as priority, such as [Vanuatu's revised and enhanced NDC](#). This requires in particular a clear quantification in grant-equivalent terms of the public finance components of the USD 1.3 target trillion and the USD 300 billion core goal and a clear commitment to the overwhelming share to be delivered in the primary non-debt-inducing instrument, namely grant-based finance, including respectively with specified targets for mitigation, adaptation and for addressing loss and damage.

In this context, the **role of the UNFCCC and Paris Agreement multilateral climate funds (MCFs) highlighted in para. 16 of the NCQG decision**, which includes the three operating entities of the Financial Mechanism and the Adaptation Fund, with the mandate to at least triple their outflows from 2022 to 2030, is of special importance. The B2B Roadmap should ensure in its action plan as the desired process outcome that this target is not only met, but met early and exceeded as the funding these MCFs provide is of much higher concessionality (with the Adaptation Fund, the Special Climate Change Fund, and the Least Developed Countries Fund providing funding exclusively in the form of grants, while the Green Climate Fund and the Global Environment Facility provide their largest share of finance as grants). These funds also have existing policies, practices and safeguards to ensure that financing disbursed is more gender-responsive, provided with environmental and social safeguards, and more responsive to the rights and needs of Indigenous Peoples than funded climate measures by actors outside of the UNFCCC. These funds also disproportionately benefit small island developing states (SIDS) and least developed countries (LDCs), which are often disadvantaged in accessing other sources of climate finance, recognizing their special circumstances and vulnerability, including high levels of indebtedness.² This action item must include a clear commitment to increase public funding for the Fund for responding to Loss and Damage, currently with only USD 741 million in pledges versus hundreds of billions annually in funding needs, as an operating entity as part of this mandate.

Access to climate finance: The B2B Roadmap action plan must focus on pathways for steadily increasing and enhancing access to climate finance, including with a minimum allocation guarantee for SIDS and LDCs, in particular for developing countries (such as through direct budget

² *Grant-based climate finance from a subset of MCFs, including all UNFCCC funds, reached 53% in 2024; this illustrates their critical role in the climate finance architecture in the face of mounting indebtedness and limited fiscal space in most developing countries. This is particularly true for LDCs and SIDS where grants comprised 100% of the funding from the subset of MCFs singled out in the para.16 of the NCQG decision in 2024. Hbs Washington (2025).* [10 Things to Know About Climate Finance in 2025.](#)

support), sub-national authorities, local non-governmental organizations and affected frontline communities. The identification and growth of such mechanisms for enhancing and facilitating direct access, including through devolved climate finance decision-making, should be specifically included in the action plan to ensure that a significant portion of the USD 1.3 trillion annually is allocated through such simplified and devolved mechanisms. The operationalization of the principle of subsidiarity in this context is crucial to ensure that climate finance is provided to the most local level feasible and in financing tranches at a scale and quality (such as via small grant mechanisms) that increases the participation and agency for climate finance decision-making of grassroots groups, Indigenous Peoples' organizations, and organizations led by women, gender-diverse people, youth, and/or disabled people. Feminist and women's groups' climate solutions have not been adequately recognized nor compensated, as some estimates suggest they receive only 0.1% of climate finance.³ Significantly enhancing and simplifying direct access to grant-based finance for marginalized and disenfranchised groups, including Indigenous communities, women & gender diverse groups, children, youth, workers, refugees, persons with disabilities and frontline communities, centers climate financing in human rights, intersectionality and gender equality and climate justice.

Definitional clarity on what is counted as climate finance: While the NCQG decision did not include a mandate to establish a universally accepted definition of climate finance, the B2B Roadmap process must elaborate strict criteria related to quality of support and climate impact in developing countries as the basis of what can be considered as climate finance under both the USD 1.3 trillion target and the USD 300 billion goal. This should at minimum include an exclusion list of what cannot be considered as climate finance, such as carbon credits, financing at market rates or financing whose benefits flow backward toward developing country contributors through clauses and procedures to promote contracting with contributor country institutions and corporations⁴, or fossil fuel oriented investments.

(c) What country experiences, best practices and lessons learned can be shared related to barriers and enabling environments; innovative sources of finance; grants, concessional and non-debt creating instruments, and measures to create fiscal space?

Debt sustainability and increasing fiscal space: the indebtedness crisis with unsustainable debt burdens in many developing countries – with the majority of LDCs already in or facing imminent debt distress – reduces their fiscal space and the ability of developing countries to invest their own domestic resources for climate actions. Many developing countries are trapped in an indebtedness spiral exacerbated because the majority of climate finance is delivered as loans, often at non-concessional market rates. Some of the most climate vulnerable countries are already paying more for debt service annually than they can invest in health and education at home.⁵ This is often aggravated after climate disasters, with the cost of recovery, rehabilitation and reconstruction overwhelming many developing countries' financial capacity due to lack of fiscal space. For example, more than 90 percent of the support Pakistan was able to secure after its devastating floods in 2022 were loans – aggravating the situation for a country already facing a debt crisis

³ <https://www.awid.org/news-and-analysis/only-1-gender-equality-funding-going-womens-organisations-why>

⁴ <https://www.reuters.com/investigates/special-report/climate-change-loans/>

⁵ <https://www.theguardian.com/world/article/2024/jun/03/debt-payments-by-countries-most-vulnerable-to-climate-crisis-soar>; <https://www.wri.org/insights/debt-climate-action-developing-countries>

before the floods.⁶ Restricted fiscal space and indebtedness in developing countries undermines investments in social safety nets and support systems that are crucial to build resilience and for addressing loss and damage. Ensuring climate finance does not perpetuate indebtedness is thus key to operationalizing the NCQG through the B2B Roadmap action plan in a way that is gender-just and respects human rights, given the gendered impacts of debt and the perpetuation of unpaid and informal care work through lack of public investment in social protection systems in the face of increasingly devastating climate impacts. Grant-based public finance not only prevents exacerbation of indebtedness but also creates fiscal space for developing country national and sub-national governments to invest in and increase the capacity of social protection systems which are key to increase the resilience and capacity of communities and most affected people to implement climate action and respond to climate impacts.

Contingency credit lines or loans with debt suspension clauses provide at best a temporary breathing space and do not address the issue of debt unsustainability. Instead, the dramatic increase of provision of grants and high concessionality and non-debt creating instruments must be massively up scaled under the B2B Roadmap action plan; this could in some circumstances include highly concessional loans (such as with minimal, below 1% long-term fixed interest rates and additional grace periods)⁷ with climate resilience debt clauses, where debt forgiveness is baked into the terms when climate shocks, such as extreme weather events, hit.

While comprehensive debt cancellation for developing countries, especially those most vulnerable to the impacts of climate change and facing already debt distress, must be pursued as part of the broader discourse on the systems reform needed in the global economic and financial system (see also the points raised under question (d)), financial flows through debt cancellation should not be reported or counted as climate finance delivered under the NCQG as a matter of developed countries' obligations under CBDR-RC.

Addressing barriers to access: The track record of most existing publicly supported climate finance mechanisms (dedicated climate funds, bilateral providers, multilateral development banks) showcases that despite much rhetorical focus on supporting and benefiting the most vulnerable countries and communities important barriers to access are not addressed. For example, in the Green Climate Fund, despite the majority of implementing entities being direct access entities from developing countries, only 20 percent of GCF funding is programmed through them. Complex requirements, including co-financing and private sector leverage expectations, a push for use of more complicated financial instruments, even for adaptation measures, or detailed data-based justifications laying out the 'climate rationale' for a measure and a lack of local currency financing, are some of the reasons. Access to climate finance is even worse for directly impacted communities and groups, which due to minimum scale requirements and restrictive accreditation procedures of most funds cannot directly access their resources, while existing accredited entities are not mandated to work with local entities as implementing partners, such as community-based organizations. In general, too little of the programming proposed focuses on locally-led and locally-owned initiatives, despite evidence that projects and measures led by women, gender diverse groups, youth & children, Indigenous Peoples and other often marginalized groups increase sustainability and impact of funded actions through context-specific traditional and Indigenous

⁶ *Economic Times India*. (2023). [Pakistan minister says 90% pledges by international community at Geneva conference in form of loans](#)

⁷ See for example elaboration in an NCQG submission by the AOSIS and LDCs. AOSIS & LDC. (2024). [Joint Statement & Submission By The Least Developed Countries and Alliance Of Small Island Developing States Groups On The New Collective Quantified Goal On Climate Finance \(NCQG\)](#).

knowledge and solutions. Targeted allocations and related reporting and accounting requirements for locally-led climate actions are needed.

Enabling environments and the private sector: the discourse on ‘enabling environments’ for climate finance in developing countries is overly and unhelpfully focused on attracting private sector finance for market-based solutions, including by utilising scarce public climate finance to leverage and de-risk additional private sector investments, instead of looking at the policy mix required for [public-sector led green transition](#). IMF- and MDB-mandated austerity measures that prioritize debt services over domestic climate investments, privatization strategies or inflation targeting further constrain the public sector ‘enabling environment’ for climate actions, including just transitions. However, the reality has shown that most leverage expectations through blended finance are massively overblown, additionality of private sector finance is often not ensured, and only a very limited number of emerging market economies are even attracting private sector investments at a significant scale. For example, a [report by ODI Global](#) estimates that overall global leverage ratios for MDBs and development finance institutions (DFIs) are very low, showing that one public dollar only mobilizes 37 cents of private investment in low-income countries and only 65 cents in upper-middle income countries, while transferring risks, including for the repayment of loans, to the developing country public sector. A [Eurodad/ActionAid report](#) finds that in addition to the risk of blended finance adding to developing countries’ debt burden, blended finance climate projects risk perpetuating neo-colonial extraction of natural resources and raise serious issues around a continued lack of transparency and accountability of private sector flows.

The discourse about ‘enabling environments’ additionally overwhelmingly focuses on de-risking external private finance, to the detriment of local financial sectors. To the extent that highly concessional public climate finance is used to incentivize private sector investments, it should prioritize primarily domestic micro-, small- and medium-sized enterprises (MSMEs) in developing countries, which form the backbone of developing country economies and are key for an inclusive and just transition, not subsidize multinational private sector corporations. Such investments must focus especially in the micro- and small-sized enterprise categories, which are still largely excluded from accessing climate finance, and where women-led and women-owned enterprises have a disproportionately high share.

Innovative and additional sources of finance: The B2B Roadmap action plan should suggest a commitment for developed countries to raise additional climate finance, including from innovative sources and through the redirection of existing resources, such as for fossil fuel subsidies or military expenditures. Globally, [according to the IMF](#), in 2022, fossil fuel subsidies were USD 7 trillion or 7.1 percent of GDP in 2022 (and increased USD 2 trillion since 2020), with fossil fuel companies making record profits and earning more than 2.4 trillion in 2023 alone. A 90% tax on these windfall profits could raise USD 382 billion [according to ActionAid](#). The [6th Biennial Assessment Report](#) also highlights that close to USD 1 trillion per year is still invested into fossil fuels directly, with an additional USD 530 billion per year flowing to environmentally harmful agricultural, fishery and forestry subsidies. Changing financial and taxation rules, such as setting a 25% corporate tax rate, could generate USD 395 billion, according to an analysis by [Oil Change International](#), while tackling tax evasion could generate a further USD 363 billion and the introduction of a wealth tax on billionaires could raise USD 1.7 trillion annually. Efforts by the [Global Solidarity Levies Task Force](#), with a report back due at COP30, are looking at how developed countries can take the lead on levies, although equity and no-net incidence for developing countries (such as for example for SIDS on any efforts on maritime levies) must be taken into account. A Financial Transaction Tax (FTT), for example, is already applied in a number

of European countries, where resources generated could be committed in support of developing countries' climate actions.

(d) Which multilateral initiatives do you see as most relevant to take into account in the Roadmap and why?

Within the UNFCCC/Paris Agreement context:

The B2B Roadmap action plan should be looking at the **Sharm-el-Sheikh Dialogue on Article 2.1(c)** and its efforts with a view to clearly articulate and differentiate accounting efforts towards Art.2.1(c) from those under the NCQG. In particular, while the NCQG B2B Roadmap action plan will have to focus on mobilizing finance, the Sharm-el-Sheikh Dialogue will be focusing more broadly on the need to phase out fossil fuel funding and on addressing broader systemic fiscal, monetary, development and industrial policy issues than can be addressed in the B2B Roadmap action plan.

Outside of the UNFCCC/Paris Agreement context:

The **Financing for Development Fourth Conference (FfD4)** in Seville, Spain, in July is a key opportunity to look at the global governance and systemic changes necessary for achieving the 17 Sustainable Development Goals (SDGs) and to bring stronger alignment between development and climate finance and actions, including through the SDGs on gender equality, climate action and the global partnership for action, as well as to improve coordination around global debt relief efforts, such as reinvigorating talks for a global sovereign debt restructuring mechanism.

Negotiations for a **United Nations Framework Convention on International Tax Cooperation** are critical for the generation of new and additional public resources, which would enable developed countries to meet their climate finance obligations, while also increasing fiscal space in developing countries by combating tax evasion and avoidance.