

Submission – Substantive Framework for a draft negotiating text on the NCQG

Save the Children and United Nations Children's Fund welcome the opportunity provided by the co-chairs to make a submission following the conclusion of the first Ad hoc Work Programme (AHWP) meeting on the New Collective Quantified Goal (NCQG) on climate finance. We commend the efforts of the co-chairs in keeping the discussion focused and structured and look forward to seeing an ambitious NCQG outcome at COP29 that has climate justice and human rights, including children's rights at its core and delivers adequate climate finance to developing countries and the most vulnerable children and their communities in an affordable, accessible, inclusive, and predictable manner.

As organisations dedicated to child rights, we are seeing the climate crisis impacting children's daily lives, wellbeing and development and eroding their rights. Children's unique physiology, behavioural characteristics and developmental needs render them disproportionately vulnerable to climate impacts, including through adverse effects on their rights to life, survival, development, health, food and water, and education, amongst others. The climate crisis is also contributing to a rise in incidents of child labour, child marriage and forced migration which put children at risk of human trafficking, gender-based violence, abuse and exploitation. [One billion children](#) are at extremely high risk of the impacts of the climate crisis and [774 million children](#) face the double burden of climate change and poverty.

Despite the distinct and heightened vulnerabilities children face from the climate crisis, they have been left out and not sufficiently addressed in climate finance decision-making and flows at every level. Over a 17-year period, less than [2.4% of finance from key multilateral funds](#) could be categorised as supporting projects that incorporated child-responsive interventions. Some funders have recently acknowledged this gap, for example the Green Climate Fund is actively working with partners to bridge child-focused climate finance particularly in the areas of health and education. The NCQG should correct this long-standing and glaring omission. Investment in protecting child development outcomes is both cost-effective and critical for strengthening human capital and the resilience of communities more broadly, as highlighted by the [World Bank](#) and a large body of evidence.

In 2023, the UN Committee on the Rights of the Child issued the [General Comment 26 on children's rights and the environment with a special focus on climate change](#), constituting authoritative guidance for member states. The general comment underscores the need for developed countries to provide climate finance for children, as well as to close the finance gaps for adaptation and loss and damage to fulfil children's rights:

- "Developed States should cooperate with developing States in providing climate finance for climate action that upholds children's rights, in line with the international climate-related commitments that States have made..." (Paragraph 112)
- "Developed States need to urgently and collectively address the current climate finance gap. The current distribution of climate finance, which is overly slanted towards mitigation at the cost of adaptation and loss and damage measures, has discriminatory effects on children who reside in settings where more adaptation measures are needed and children who are confronted with the limitations of adaptation. States should bridge the global climate finance gap and ensure that measures are financed in a balanced manner with consideration given to measures on adaptation, mitigation, loss and damage and broader means of implementation, such as technical assistance and capacity-building." (Paragraph 113)

We were pleased to hear several Parties and constituencies refer to the inclusion of children and their rights in the NCQG in their interventions at the 9th Technical Expert Dialogue and the first meeting under the AHWP. We would like to take this opportunity to reiterate the importance of integrating children's rights, needs, challenges, voices, and equity in the NCQG. Within the draft structure for the substantive framework developed by the co-chairs, we propose the inclusion of language on children in the following elements:

Context

- The context should include an explicit reference for the NCQG and its principles to respect human rights, including the rights of children, Indigenous Peoples, and gender equality and intergenerational equity.
- The NCQG should respect the 'polluter pays' principle, which is integral to achieving climate justice through climate finance and contributions on the basis of equity and the principle of common but differentiated responsibilities and respective capabilities, as set out in the 1992 Rio Declaration and the 1992 United Nations Framework Convention on Climate Change (UNFCCC).

Quantitative elements

- At the core of the NCQG must be the provision of significantly scaled-up finance flows that reflect the assessed urgent and long-term needs including the climate finance needs of the worst affected communities, particularly women and children. Climate finance should be new and additional and delivered primarily in the form of grants, particularly for adaptation and loss and damage.
- The NCQG must include additional provision for loss & damage finance as the third financing pillar, prioritising targeted and significant allocation of funds to rebuilding and recovering child-critical services.
- The NCQG should include thematic subgoals on mitigation, adaptation and loss and damage to ensure a balance between the three finance categories, to deliver on the needs of children and communities on the frontlines of the climate crisis.
- The thematic subgoal on adaptation must deliver an urgent increase in adaptation finance, prioritising investment in the climate resilience of essential services that are critical for children's survival, health and wellbeing. Specifically, the linkage of the NCQG with the UAE Framework for Global Resilience must be recognised and the finance needs for the thematic targets agreed under the framework on health, water and sanitation, food security and nutrition, and adaptive social protection must be considered. Children's education for climate action and child protection must also be prioritised.

Qualitative elements

- Qualitative elements should be determined as part of a set of principles and in the form of an aspirational goal. Principles around the rights and role of stakeholders, including children, youth, women, and Indigenous Peoples should be operationalised throughout the NCQG.
- The NCQG should incorporate a goal on delivering child- and gender- responsive climate finance at the scale required.
- The NCQG should also consider the voices of children on the frontlines of the climate crisis, including through enabling their meaningful participation in decision-making processes.
- The linkage of qualitative elements with quantum particularly around the principles of access, affordability, and transparency must be recognised.

Reviewing progress/Transparency

- The NCQG should include metrics for monitoring and reporting that capture outcomes for recipient groups of climate finance, especially the most vulnerable, including children, women and Indigenous Peoples. For children, this could include child-sensitive indicators to

measure impact of funding on outcomes such as child health, educational attainment, nutritional status and access to essential services, particularly in climate-vulnerable areas. Global data on the overlap between children's exposure to climate risk and their vulnerability based on access to essential services is available in the [Children's Climate Risk Index](#).

- Regular and transparent reporting should be conducted to ensure ongoing accountability and to adjust strategies as necessary in order to respond to children's evolving needs in a changing climate.

Contacts:

- **Jack Wakefield, Global Policy & Advocacy Lead - Climate Change, Save the Children International, jack.wakefield@savethechildren.org, +44 7429 544135**
- **Joni Pegram, Global Climate Policy Lead, UNICEF, jpegram@unicef.org +44 7922 767 171**