



Response to the call for views on Work Programme on Climate Finance, including on Article 9, paragraph 1 of the Paris Agreement in the context of Article 9 of the Paris Agreement as a whole

Submission from Concern Worldwide, Mercy Corps, Plan International, and Practical Action

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Introduction

We welcome the opportunity to respond to the call to submit our view on the Work Programme on Climate Finance under Article 9, including Article 9.1, of the Paris Agreement. The Work Programme (WP) represents a critical opportunity to move from high-level commitments to practical implementation of climate finance obligations, particularly in relation to the provision of finance by developed countries based on the core UNFCCC principle of common but differentiated responsibility and respective capabilities. It should serve as a focused, time-bound platform to strengthen accountability, address persistent barriers, and deliver actionable recommendations that support implementation of the New Collective Quantified Goal (NCQG).

Climate finance is the backbone of the Paris Agreement, and a key test of its credibility. Without scaled, equitable, and accessible finance, adaptation action and efforts to address loss & damage will fall short, with disproportionate consequences for vulnerable countries and communities, including women, children and youth. Consistent with the 2025 Advisory Opinion of the International Court of Justice, States have obligations to protect children and future generations from climate harm. This requires climate finance to be explicitly designed to reach, benefit, and empower children and youth—particularly girls—as rights-holders and agents of change.

(a) What are your overall expectations for the climate finance work programme? What concrete outputs and outcomes should the climate finance work programme deliver?

Overall expectations

The WP should maintain a clear focus on Article 9.1, consistent with the genesis of this work programme and the input from developing country Parties at COP30. The obligation of developed countries to provide climate finance should form its central mandate. This clear focus is necessary to help restore trust and confidence in the Paris Agreement multilateral process. This provision obligation should be substantive across all potential themes under the WP, in a way that underscores its legal and political significance.

The WP should also support the implementation and delivery of recent financial decisions: the COP29 NCQG and the COP30 commitment to at least triple adaptation. In particular, the NCQG is a critically important agreement based on several years of deliberations and negotiations, with

broad ramifications for all Parties and several key decisions. Yet there is currently no dedicated and substantive space within the UNFCCC architecture to support, strengthen, and ensure its implementation. This WP is uniquely positioned to fill this critical gap and should serve as a timely and practical pathway for fulfilling these commitments.

As such, our key expectation is that this WP will provide greater clarity on the major UNFCCC decisions of the NCQG and tripling of adaptation, and options for potential action to advance their implementation, with a particular focus on the public provision of these two decisions.

Given the breadth of topics to be covered, focused leadership from the Co-chairs will be essential. The WP should be designed to deliver concrete, actionable outcomes within its two-year mandate. Parties should agree on a structured agenda early on to avoid the first year being consumed by process discussions.

The WP should deliver timely and actionable outputs that can directly inform deliberations and decision-making at COP32. It should also provide an accurate assessment of the collective progress on the delivery of climate finance, including its quantity, quality, and accessibility, to inform the second Global Stocktake (GST2).

It is also important to clarify how the WP relates to the Standing Committee on Finance and other existing mechanisms and processes. It should be designed to ensure coherence and full coverage, whilst avoiding a proliferation of parallel dialogues and taskforces, and instead fill existing gaps in accountability and implementation.

It should also integrate gender equity and social inclusion considerations systematically rather than treating them as add-ons. This means working towards a child- and gender-responsive climate finance framework that builds on and aligns with existing UNFCCC processes, including the Lima Work Programme on Gender and its Gender Action Plan.

In summary, the WP should function as:

1. A mechanism to strengthen accountability to track progress towards the implementation of the NCQG and the tripling adaptation commitment, including financial flows in line with Article 9.1.
2. A problem-solving platform to identify and address barriers, particularly in adaptation finance and access.
3. A recommendation body delivering actionable outputs to inform decisions for future COPs, GST2, and multilateral climate funds.

Expected **outputs and outcomes** should include:

- An analysis of best practice on public provision under Article 9.1, exploring a range of issues including adequacy, predictability, quality, access and the balance of mitigation,

adaptation and loss and damage, considering the different circumstances of LDCs, SIDS, regional groupings, and fragile and conflict affected contexts (FCAS).

- A delivery plan to achieve the NCQG goal of at least USD 300 billion provided and mobilised by developed countries, to be rooted in a fair shares analysis and approach.
- Guidelines for national climate finance delivery plans under the NCQG, covering quantity, quality, access, and accountability mechanisms.
- A delivery plan to achieve the commitment to at least triple adaptation finance, with the provision of clarity on quantity, quality and trajectory.
- A problem-solving platform to identify and address barriers, particularly for adaptation finance and access for those countries most affected by climate impacts.
- A strong accountability mechanism, providing transparency and tracking implementation of the NCQG, including financial flows aligned with Article 9.1 and qualitative aspects. This will inform implementation progress, including the midterm review in 2030. This should incorporate disaggregated data by gender, age, and local access, to help assess not only the quantity of finance delivered but also the quality of finance and the outcomes achieved. Without disaggregation, commitments to equitable and accessible finance will remain difficult to verify, and much harder to enforce.
- Other outputs as required to inform COP decisions and multilateral climate funds deliberations and replenishment processes.
- Concrete outputs within the two-year mandate, including structured inputs into the second Global Stocktake (GST2) and informing related finance discussions under other negotiation streams, including the Global Goal on Adaptation.
- Recommendations for national level actors on how to ensure finance reaches the local level, including youth- and women-led organisations. These are among the most effective delivery partners; however, they remain perpetually underserved by current finance flows.

(b) What are the thematic pillars of the climate finance work programme and the related subtopics that we should address within each pillar?

We propose that the WP be structured around four thematic pillars—Quantity, Quality, Access, and Transparency—with the understanding that each pillar’s specific subtopics will produce actionable measures to scale up the delivery of climate finance, improve its effectiveness, ensure equitable access for developing countries, and strengthen accountability in line with Article 9 of the Paris Agreement and the NCQG.

1. Quantity

New Collective Quantified Goal: The NCQG has provided an important new goal for climate finance: at least USD 300 billion to be delivered by 2035. However, while the financial target is clear, there remains a lack of clarity on how it is to be delivered, and by whom. The WP should support the establishment of developed country climate finance delivery plans, clarifying who

provides what, and by when. This finance should be allocated equitably, prioritising countries and communities with high vulnerability, including LDCs, SIDS and FCAS.

Adaptation finance: The COP30 commitment to at least triple adaptation finance is one key way to better align finance with assessed needs, improve predictability, and enable country-driven adaptation planning and implementation. Current levels of funding remain significantly below identified needs, and incremental increases will be insufficient to support developing countries, particularly LDCs and SIDS, to implement long-term resilience measures. As referenced by the Mutirão Decision adopted at COP30, developed countries should take the lead in delivering this commitment and the WP should provide a delivery timetable. For example, fragile and conflict-affected countries will need at least USD 41.5 billion in climate finance each year up to 2030. In 2022, public bilateral and multilateral sources committed USD 10.9 billion to FCAS, less than 10% of the international climate finance mobilised USD 116 billion in total, and under 2.5% of official development finance.¹

Multilateral climate funds: The WP should provide a clear plan for tripling outflows across multilateral climate funds, including the Green Climate Fund, Global Environment Facility, Fund for Responding to Loss and Damage, Adaptation Fund, Least Developed Countries Fund, and Special Climate Change Fund. Notably, the Adaptation Fund already has a pipeline of over USD 400 million in ready-to-implement projects but remains chronically under-resourced.

New sources of finance (taxes and levies): A key subtopic under the Quantity pillar is the identification and mobilisation of new sources of climate finance. The WP should strengthen international cooperation on taxation to mobilise new and additional climate finance, including through voluntary partnerships between countries. This should include the development of sector-based contributions, levies on highly polluting and greenhouse gas-intensive activities, financial transaction taxes, and taxation measures targeting ultra-high-net-worth individuals, with a view to generating predictable, equitable, and sustainable resources to scale up the delivery of climate finance, particularly for adaptation in developing countries.

Role of public vs private finance: Evidence-based analysis on adaptation finance developed in a key 2025 report from the Zurich Climate Resilience Alliance² shows that funding from the private sector for adaptation finance can increase—from its current 3% to 15-20% of adaptation finance needs. However, it's clear that this leaves a substantial amount that should be publicly funded, consistent with adaptation's primary focus as a public good. This gap is particularly the case for LDCs, SIDS, and FCAS, where private finance has been unable to deliver climate finance at the required scale and accessibility.

Priority actions under the quantity pillar

¹ Yue Cao, 2025. [Small change? Our projections for the conflict blind spot in climate finance by 2030.](#)

² [Adaptation finance and the private sector: opportunities and challenges for developing countries - Zurich Climate Resilience Alliance](#)

- Develop guidance for national climate finance delivery plans under the NCQG, including timelines and indicative burden-sharing approaches.
- Assess progress towards the NCQG and the tripling of adaptation finance, including interim benchmarks for 2030.
- Identify and evaluate new sources of public finance, including taxation and levy mechanisms.
- Exchange of best practices and identify pathways to progress for the delivery of progressive environmental taxation at the national and regional level in developed countries, as well as at the global level under the UN Framework Convention for International Tax Cooperation.
- Identify pathways to scale up funding for multilateral climate funds, including interim targets.
- Ensure the primacy of public finance, particularly for LDCs, SIDS, and fragile contexts.

2. Quality

In delivering the NCQG, and the commitment to at least triple adaptation finance, it will be crucial not only to consider the *quantity*, but also the *quality* of climate finance. This includes using instruments and channels that are appropriate and non-debt-inducing. Quality climate finance should be assessed not only by financial instruments, but by its ability to deliver social resilience outcomes—including education continuity, health access, protection from gender-based violence, and livelihood security—for those people and communities most vulnerable.

Instruments: grants, loans, equity: While a variety of instruments is needed for climate finance as a whole, for adaptation, concessional instruments, in particular grants, remain vital. Non-concessional loans increase debt burdens and undermine development pathways, which is ultimately detrimental to the achievement of adaptation goals. Exploring this issue fully is a crucial aspect of the WP.

Channels: multilateral, bilateral, domestic: Identifying the appropriate channel for the delivery of adaptation finance is also important and the multilateral climate funds have a key role, in particular the Adaptation Fund and the Least Developed Countries Fund. These funds can provide key resources for the development and implementation of NAPs yet they are grossly underfinanced. The commitment to triple the outflows of these funds by 2030 represents the first key test of the NCQG and the WP should develop a delivery plan.

Locally led: Although climate change is a global challenge, its impacts—and the solutions to address them—are fundamentally local. Community ownership is a foundational element of effective adaptation planning, as local actors understand the nuanced and specific contexts in which they operate.³ For adaptation to be locally led, climate finance systems should become

³ [Principles for locally led adaptation | International Institute for Environment and Development](#)

more accessible, equitable and responsive. This should be a key focus of discussions under Article 9 WP, to ensure LLA is no longer marginal but a cornerstone of climate action.

Rights-based and inclusive: Climate finance should be understood as a matter of human rights and intergenerational equity. Consistent with the 2025 Advisory Opinion of the International Court of Justice, States have obligations to protect children and future generations from climate harm. This requires climate finance to be explicitly designed to reach, benefit, and empower children and youth—particularly girls—as rights-holders and agents of change. However, currently, only a small share of climate finance is explicitly gender-responsive, and less than 1% reaches youth-led ⁴.² To deliver on the Paris Agreement, finance should be designed to reach children, youth, and communities most at risk—particularly girls—through grant-based, accessible, and participatory mechanisms, ensuring that finance is both effective and equitable in its outcomes.

Priority actions under the quality pillar:

- Define minimum quality criteria for climate finance, including concessionality.
- Explore the role of grants and highly concessional finance in practice for different areas of climate action (mitigation, adaptation, and loss and damage), and for LDCs, SIDS and other Parties.
- Develop guidance on aligning finance with debt sustainability, avoiding debt-inducing instruments for adaptation.
- Recommend targets for grant-based finance, particularly for LDCs and SIDS.

3. Access

The Access pillar should focus on delivering practical, implementable steps to reduce barriers that limit developing countries' and communities' ability to access adaptation finance, particularly LDCs and SIDS. In line with Article 9 of the Paris Agreement, this pillar should prioritise actionable measures to improve access to public and concessional finance, strengthen locally led approaches, and address systemic constraints—including risk aversion, fragmented delivery channels, and limited institutional capacity—that delay or prevent finance reaching vulnerable countries and communities. The Work Programme could also consider innovative models from other domains, including peacebuilding and vaccine delivery, which offer useful lessons that could be applied to improve access to climate finance particularly in fragile and conflict-affected contexts.⁵

Simplifying access and reducing procedural barriers: Reducing procedural complexity is central to improving access to adaptation finance. Practical discussions should focus on

⁴ From 2006 to 2023, just 2.4% of climate finance from major multilateral climate funds was child-responsive. Of the USD 28 billion reported by developed countries, only 3.4% targets gender equality as a principal objective, and around 40% is not screened for gender at all.

⁵ See Tilly Alcayna and Yue Cao (2022) [Breaking the Cycle: Practical solutions to unlock climate finance for fragile states](#).

continued harmonisation of requirements across funds, strengthening direct access modalities such as those now included under the Barbados Implementation Mechanism (BIM), and improving transparency around funding windows and eligibility criteria to reduce fragmentation and administrative burdens. Enhanced coordination across funding channels would also help countries navigate the adaptation finance landscape more effectively. Strengthening institutional capacity to access finance, alongside simplified approval processes and proportionate fiduciary requirements, would support smaller, locally driven adaptation programmes and improve country ownership. Particular consideration should be given to specialised access features for LDCs and SIDS, especially those that are also fragile or conflict affected (FCAS). In FCAS settings, where climate impacts exacerbate drivers of instability and the cost of inaction is high, dedicated funding windows and participatory grant mechanisms should be established to ensure direct access for displaced communities, host communities, youth-, girl-, and Indigenous-led organisations, which currently receive a negligible share of global climate finance.

Innovative access mechanisms for adaptation finance: Innovative access mechanisms offer practical pathways to reduce delivery barriers, particularly in fragile and complex contexts. Risk-tolerant and flexible funding approaches—such as those used by the UN Secretary-General’s Peacebuilding Fund—demonstrate the value of supporting local actors and enabling adaptive programming in high-risk settings. The use of crisis modifiers, which embed contingency financing within adaptation programmes, can improve responsiveness to shocks and stressors without requiring new approvals. Similarly, coordinated delivery models such as the COVAX Readiness support mechanism, including the COVID-19 Vaccine Delivery Partnership (CoVDP), highlight how joint planning, simplified funding structures, and flexible financing can accelerate delivery in countries facing the greatest access challenges and strengthen accountability for scaling direct access.⁶

Priority actions under the access pillar:

- In line with the NCQG (paras 21-26), examine barriers to access and establish baselines and indicators of progress to improve access, including funding reaching local actors, particularly in FCAS.
- Recommend simplified and harmonised access requirements across climate funds.
- Develop and scale flexible, risk-tolerant access mechanisms for adaptation finance, including crisis modifiers and coordinated delivery models, to enable rapid, simplified, and direct access for local actors—particularly in FCAS.
- Promote dedicated funding windows and participatory mechanisms for underrepresented groups, including women, youth, people with disabilities, and minority groups.

4. Transparency

⁶ See Tilly Alcayna and Yue Cao (2022) [Breaking the Cycle: Practical solutions to unlock climate finance for fragile states](#).

Transparency is essential to ensure accountability, trust, and effective delivery of climate finance under the NCQG and the tripling of adaptation finance. Strengthened transparency systems are needed to track financial flows, assess progress, and verify that finance is reaching those most affected in line with Article 9. The WP should therefore enhance clarity, comparability, and accessibility of climate finance data across all providers, while ensuring that transparency systems also capture the equity and effectiveness of finance delivered.

National delivery plans for the NCQG: Given the large number of actors involved in the delivery of the NCQG, and the tripling of adaptation finance, enhanced transparency and accountability is needed. This includes the need for national delivery plans for the NCQG and the tripling of adaptation finance for developed countries. National delivery plans will clarify the quantity and quality of the contributions to be provided and mobilised by developed countries, which will enhance transparency and predictability, and identify resource gaps for the NCQG.

Harmonised transparency and accountability standards for Multilateral Development Banks and bilateral climate finance: In addition, with **Multilateral Development Banks (MDB)** outflows counted as climate finance under the NCQG, MDBs will need to adhere to the same transparency and accountability standards as bilateral finance. This can include, among other things, the use of the Rio Marker to identify climate relevance and the use of the OECD definition for concessionality. Transparency systems should include mandatory disaggregated reporting by gender and age to track whether climate finance is reaching children, youth, and marginalized groups, and to assess equity and effectiveness.

Tracking financial flows and accessibility of data: Transparency systems should enable the tracking of financial flows provided and mobilised, ensuring clarity on who provides what, and on what terms. This is critical to assess progress towards the NCQG and to strengthen accountability of developed countries' obligations. Climate finance data should be publicly accessible, timely, and user-friendly, enabling developing countries and stakeholders to track flows, identify gaps, and engage meaningfully in planning and implementation processes.

Inclusion, local leadership, and transparency: Adaptation finance should be designed, delivered and tracked in ways that reflect gender equality, social inclusion, and local priorities, rather than defaulting to top-down models. Inclusion must go beyond cursory consultation to meaningful influence over decision-making, priorities, design, and implementation, ensuring that finance reaches those who need it most in ways that are responsive to local contexts. Decision-making processes should ensure that women, Indigenous peoples, young people, people with disabilities, displaced and conflict affected, host communities and marginalised communities have meaningful leadership and the ability to shape priorities and access resources. This should be supported by transparent and accountable tracking and reporting systems, including disaggregated data by gender, age, and local access, to verify that finance reaches intended beneficiaries and delivers equitable outcomes. Across all pillars, climate finance should integrate child- and gender-responsive, and locally led approaches, ensuring that investments reach those most affected by climate change and deliver measurable improvements in resilience, equality, and well-being.

Priority actions under the transparency pillar:

- Develop national climate finance delivery plans under the NCQG, clarifying quantity, quality, timelines, and sources, making a clear distinction between provision and mobilisation reporting, and specifically including grant-equivalent approaches.
- Ensure the tracking of financial flows in line with Article 9.1, including who provides what, through which channels, and on what terms.
- Establish harmonised transparency standards across all providers, including MDBs and bilateral finance, using common methodologies (e.g. ETF, Rio Markers, OECD concessionality).
- Require disaggregated reporting by gender, age, and local access to assess equity and effectiveness.
- Promote transparent and inclusive tracking systems that reflect locally led approaches.

(c) How should the climate finance work programme be organized to ensure that the format is inclusive, balanced, and technically robust, while addressing climate finance comprehensively and delivering outcomes that are actionable and meaningful?

The WP should be organised to ensure inclusive participation, balanced representation, and technical robustness, while delivering actionable and meaningful outcomes that respond to the needs of all countries and contexts. It should ensure balanced representation between developed and developing countries, alongside the meaningful inclusion of LDCs, SIDS, and the African Group, recognising their specific vulnerabilities and priorities. Formal observer engagement should be strengthened, including participation from civil society, Indigenous peoples, and fragile and conflict-affected contexts (FCAS). This should be complemented by institutionalised participation mechanisms for youth, civil society, and frontline communities, including advisory groups and funded participation, to ensure that those most affected by climate change can meaningfully contribute to discussions and decision-making processes.

The WP should include practical and accessible modalities, such as hybrid participation formats that combine in-person and virtual engagement, to maximise accessibility across different regions and contexts. This should be complemented by the organisation of regional dialogues in advance of global sessions, as well as dedicated “frontline perspectives” segments to ensure that diverse experiences and priorities are meaningfully represented.

The agenda should ensure balanced and comprehensive coverage across all areas of climate finance. This includes equal weighting of adaptation finance alongside mitigation, the inclusion of loss and damage finance within the scope of discussions, and balanced consideration of multilateral climate funds, bilateral finance flows, domestic resource mobilisation, and private finance. The WP should also recognise disparities in how finance is accessed and distributed across countries, including within and across LDCs and SIDS, and ensure that these differences are reflected in discussions and outcomes.

The organisation of the WP should follow a structured and sequenced process, building on the approach taken in the development of the NCQG, to ensure that technical discussions effectively inform political decision-making. Technical work should be brought forward in a timely manner to feed into political engagement at COP31 and COP32, rather than taking place in parallel or being left to the final stages. This is critical to avoid the challenges experienced in processes such as the Global Goal on Adaptation, where insufficient alignment between technical and political tracks resulted in outcomes that did not fully meet expectations.