



# FIGHTING FOR JUST TRANSITION IN TIMES OF INJUSTICE

ANNUAL POLICY DOCUMENT 2025

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## Glossary

**AF:** Adaptation Fund  
**AIM:** Arrangements for Intergovernmental Meetings  
**BAM:** Belém Action Mechanism  
**BAR:** Baku Adaptation Roadmap  
**BIM:** Barbados Implementation Modalities  
**BTR:** Biennial Transparency Report  
**CAN:** Climate Action Network  
**CBD:** UN Convention on Biodiversity  
**CBDR-RC:** Common but Differentiated Responsibilities in light of Respective Capacities  
**CCD:** Convention on Combating Desertification  
**CMA:** Conference of the Parties serving as the meeting of the Parties to the Paris Agreement  
**CFS:** Committee on World Food Security  
**COP:** Conference of Parties  
**ETF:** Enhanced Transparency Framework  
**FGCR:** UAE Framework for Global Climate Resilience  
**FPIC:** Free, Prior and Informed Consent  
**FRLD:** Fund for responding to Loss and Damage  
**GGA:** Global Goal on Adaptation  
**GST:** Global Stocktake  
**HCA:** Host Country Agreements  
**ICJ:** International Court of Justice  
**IPCC:** Intergovernmental panel for Climate Change  
**JTWP:** Just Transition Work Programme  
**L&D:** Loss and Damage  
**LDC:** Least Developed Countries  
**LT-LEDs:** Long-Term Low Emission Development Strategies  
**Mol:** Means of Implementation  
**MWP:** Mitigation Work Programme  
**NAPs:** National Adaptation Plans  
**NCQG:** New Collective Quantified Goal  
**NDCs:** Nationally Determined Contributions  
**ODA:** Official Development Assistance  
**SCF:** Standing Committee of Finance  
**UNEP:** UN Environment Programme  
**UNFCCC:** United Nations Framework Convention on Climate Change  
**WHO:** World Health Organization  
**WIM:** Warsaw International Mechanism on Loss and Damage

## Introduction and summary of demands

COP30 represents a definitive test for the relevance of the multilateral climate regime. Third generation NDCs (NDCs 3.0), first iteration after the Global Stocktake (GST) reveal a devastating ambition gap placing the world on a trajectory for catastrophic levels of warming. This failure is not incidental but systemic, rooted in an economic order that fuels corporate plunder and inequality, leading to national plans heavy with accounting tricks and false solutions rather than genuine plans to transition away from fossil fuels, and fuelling a crisis in multilateralism and international cooperation. If COP30 cannot catalyze a course correction that is both rapid and equitable, it will signal the inability of the UNFCCC process to manage the core drivers of climate injustice, rendering it increasingly irrelevant to the lived realities of a planet in distress.

COP30 is the first UNFCCC COP since the International Court of Justice (ICJ) delivered its historic advisory opinion on the legal obligations of States in respect of climate change. Following a consensus request from the UN General Assembly to the ICJ, the Court affirmed earlier this year that States are duty bound to prevent climate harm, meaning that ambitious climate action is not a political option but legal obligations rooted not only in the climate treaties but also in other multilateral environmental agreements, human rights law, and customary international law. The advisory opinion opens up avenues for legal action against countries if they fail to act in accordance with equity and CBDR-RC to prevent climate harm and limit warming to 1.5°C - by curbing production, licensing, and subsidization of fossil fuels - and uphold the right to a clean, healthy, and sustainable environment. Outcomes of COP30 must demonstrate alignment with this ruling as a clear signal that Parties have heard this, and will act accordingly.

This climate crisis already describes the new normal, with climate impacts consistently exceeding projections and costing hundreds of billions annually. The losses are disproportionately borne by people made poor and vulnerable through marginalization, shattering lives and ecosystems and condemning generations to instability. This reality fuels a parallel crisis of legitimacy for global governance. Public faith in institutions is declining, and civic space is shrinking, precisely when solidarity and robust public pressure are most needed. A failure in Belém to deliver a response that is perceived as just and effective will further erode trust, undermining the very collaborative foundations upon which multilateralism is built and discrediting the process in the eyes of the world.

Across the world, from union halls to Indigenous communities, there is a unified demand for climate action to work for people, not against them. It is in this context that a just transition agenda becomes the essential connective tissue binding technical climate action and real-world legitimacy among people. How Parties respond to this demand will be the barometer of success at COP30.

In order for COP30 to restore the relevance of multilateral climate governance, it must formally embed principles of inclusion, workers' rights, and social protections within the energy transition and climate action, in addition to equity between countries, as a core component of climate justice. To this end, Parties must agree on shared principles of just transition and establish the Belém Action Mechanism (BAM) for a Global Just Transition. This mechanism would unify fragmented efforts, create accountability, and provide the means, particularly for developing countries to build fair, climate-safe economies. BAM would anchor the principles that bind rights, consultation, and real support together in implementation. By doing so, COP30 can demonstrate that the international community is capable of delivering a response that is not only scientifically rigorous but also socially equitable. A just transition is no longer a side-note; it is the true measure of seriousness and the only way to build the broad, durable public mandate required for the transformation ahead.

## Summary of demands

### Chapter 1: Just Transition to secure climate justice and equity

- **Establish the Belém Action Mechanism (BAM):** CAN demands that at COP30, Parties agree to establish the BAM, a new UNFCCC mechanism designed to coordinate fragmented global Just Transition efforts, provide direct support to and mobilize finance for countries, especially those in the Global South.

The BAM would have three core functions

- To ensure global efforts are coherent and aligned with Paris Agreement goals and the principle of Common But Differentiated Responsibilities and Respective Capabilities (CBDR-RC)
  - To act as a knowledge hub for sharing best practices
  - To provide a facilitative platform to match projects with non-debt-creating finance and technology transfer.
- Parties must agree on a **set of guiding principles** within the UNFCCC process to ensure all Just Transition actions are equitable, inclusive, and rights-based:
    - These principles must guarantee human, labour, and Indigenous rights, including the Right to Free, Prior, and Informed Consent (FPIC), and establish robust, inclusive social dialogue and consultation processes for all affected communities and workers.
    - Just Transition must be designed to reduce, not deepen, inequalities. This involves creating decent work, ensuring gender-transformative social protection, recognizing the care economy, and upholding the right to quality public services like health and education.
    - The principles must be backed by international cooperation, including access to new, additional, and non-debt-creating climate finance to enable developing countries to implement Just Transition pathways and diversify their economies.
  - CAN demands that Parties **integrate comprehensive Just Transition plans**, aligned with the agreed principles, directly **into their core national climate policy and legislation**, such as NDCs and Long-Term Strategies.



- Parties must take a formal **mandate to Finance Just Transition** by recognising the design and implementation of Just Transition policies, plans, programmes and practices as supportive of climate ambition and therefore eligible to be supported with means of implementation.

## Chapter 2: Addressing the Vulnerability of people and Protecting Ecosystems to Build a Just and Resilient World

- **Global Goal Adaptation (GGA) Indicators:** At COP30, Parties must adopt a comprehensive package of robust GGA indicators. This list must include clear, actionable Means of Implementation (MoI) indicators that measure the provision of finance, technology, and capacity-building from developed to developing countries. These MoI indicators must exclude private finance and ODA, be used as cross-cutting metrics, and the overall list must integrate gender, human rights, and Indigenous perspectives.
- **New Adaptation Finance Commitment:** Parties must agree to establish a **new, predictable public-grant based adaptation finance commitment under the GGA decision at COP30 that responds to the needs of developing countries, estimated to be over US\$ 300 billion per year.** Additionally, developed countries must increase provision of adaptation finance to meet the Adaptation Fund's minimum resource mobilization target of US\$300 million on a multi-year basis.
- **Baku Adaptation Roadmap (BAR):** COP30 must ensure the BAR is an effective implementation tool by giving it a clear structure. Its mandate must include creating pathways for action, facilitating access to MoI for developing countries, and integrating procedural justice to ensure the meaningful participation of vulnerable groups.
- **Scale up Loss and Damage Finance:** Developed country Parties must drastically scale up grants-based finance for the Loss and Damage Fund (FRLD), in line with their legal obligations. COP30 must follow up the initial US\$ 250 million needed to launch the Fund with clear signals that the Fund's long-term resource mobilization strategy will be aligned with the scale of needs, estimated at hundreds of billions annually.
- **Guidance to the Loss and Damage Fund (FRLD):** COP30 must provide direct guidance to the FRLD Board to ensure it operates justly. This includes prioritizing direct community access (e.g., small grants), developing a public participation framework, creating strong human rights and safeguards policies, and fully integrating the ICJ Advisory Opinion into its work.
- **Permanent Agenda and Tracking for Loss and Damage:** Parties at COP30 must agree to a permanent agenda item on Loss and Damage to maintain political focus. CAN also calls for better tracking and accountability of all L&D finance flows to ensure it meets the scale required, including through a dedicated Loss and Damage Gap Report.

## Chapter 3: Addressing needs-based climate finance

- **Prioritize Public Finance & Accountability:** COP30 must establish a **dedicated negotiation track to implement the NCQG**, focusing on the **quality and provision of public finance from developed countries**. This includes harmonizing reporting and defining climate finance, and setting time-bound milestones to increase the share of public grants, particularly for adaptation and loss and damage, but also for mitigation, including through progressive environmental taxation rooted in the polluter pays principle and CBDR-RC as a way to significantly scale up public finance.
- **Clarify Developed Country Obligations and Article 9.1 of the Paris Agreement:** CAN supports the G77's call for an agenda item on Article 9.1 of the Paris Agreement. This is essential to reinforce the **legal obligation of developed countries to provide public climate finance** and to secure new, increased pledges from them by COP31.
- **Baku to Belém Roadmap:** The Presidency-led Roadmap must **identify gaps in the climate finance architecture**. It should clarify the qualitative elements of the NCQG (e.g., grants, predictability) and **connect UNFCCC discussions with external processes** tackling systemic issues like tax reform, sovereign debt, and the cost of credit for developing countries.
- **Article 2.1c:** The mandate on Article 2.1c must be renewed with a more action-oriented approach. This work should lay the foundation for a COP31 decision with **time-bound targets to end fossil fuel finance and shift flows to climate-resilient development, reflecting CBDR,, and focus on taxing big polluters**. It must also address global "disablers" like debt distress and unfair tax rules that undermine climate action.
- **Targets for UNFCCC Funds & Loss and Damage:** As part of the NCQG follow-up, Parties must **adopt a clear plan to triple the outflows of UNFCCC climate funds** by 2030 (as per the NCQG decision) and establish a coherent architecture for loss and damage finance that goes beyond the current fund to meet the full scale of needs.

## Chapter 4: Enhancing ambition and accountability

- **Deliver a Global Response to the Ambition Gap:** CAN demands that COP30 conclude with a strong, formal outcome that presents a credible global response to close the glaring ambition and implementation gap. This response must be based on equity and common but differentiated responsibilities (CBDR-RC), alongside scaled-up climate finance to enable greater ambition.
- **Deliver Fair Shares NDCs:** Developed and G20 countries, whose climate plans are not in line with their fair shares, should revise their inadequate NDCs before COP31, aligning them with their fair share and the 1.5°C limit.
- **Process to formulate an equitable Fossil Fuel Phase-Out Roadmap:** Parties must agree to a process to formulate a just and equitable roadmap for the global fossil fuel phase-out, which would include an assessment of how to lift the systemic barriers to the transition. This should be done by mandating the COP30 and

COP31 Presidencies to lead this work, ensuring the transition away from fossil fuels is planned and executed in line with equity and CBDR-RC.

- **Reject Carbon Markets as Offsetting Tools:** CAN strongly rejects carbon offsetting and insists that revenues from Article 6 do not count as climate finance from developed countries. The rules for the Article 6.4 mechanism and supervisory body must not be weakened at COP30, and the Presidency must ensure a balanced, critical discussion on the risks carbon markets pose to NDC ambition.
- **Ensure an Effective GST-1 Follow-Up Process (UAE Dialogue):** Parties must agree at COP30 to operationalize the UAE Dialogue to review the implementation of GST-1. This dialogue must start by June 2026, have a substantive scope addressing barriers and international cooperation, and result in a formal output. If this fails, the COP Presidency must ensure an alternative high-level follow-up process is established.
- **Adopt Robust and Inclusive Modalities for GST-2:** The decision on the second GST cycle (GST-2) must be finalized at COP30. CAN demands it includes new inclusive tools, such as citizens' assemblies, and is fully aligned with the best available science. It must also be better coordinated with the finance agenda, including the first review of the new climate finance goal (NCQG).
- **Integrate Just Transition into Climate Ambition:** The outcomes of the Just Transition Work Programme (JTWP), including the establishment of the Belém Action Mechanism (BAM), are essential for enabling higher climate ambition and must be a core part of the response to the ambition gap.

## Chapter 5: Climate justice through meaningful multilateralism

- **Adopt an Accountability Framework and address Conflict of Interest at the UNFCCC:** CAN demands the UNFCCC strengthen its policies to address the undue influence of polluting industries. This must go beyond current disclosure rules for observers and explicitly address conflicts of interest among Parties and Presidencies, particularly those with plans to expand fossil fuel production.
- **Guarantee Freedom of Expression and Peaceful Protest:** CAN calls on the UNFCCC, the COP30 Presidency, and the Brazilian government to publicly commit to and ensure the full protection of freedom of expression and peaceful assembly. This includes safeguarding protests on all issues, including those related to fossil fuels, militarization, and human rights situations in Palestine, Sudan, the DRC, Ukraine, and the host country, among others.
- **Ensure Logistical Arrangements Enable Inclusive Participation:** CAN demands that logistical arrangements actively facilitate broad and meaningful participation. This includes providing affordable accommodation, effective remote participation options, adequate meeting space, and full accessibility for people with disabilities and children, addressing the specific challenges faced in Belém.



## Chapter 1:

### Just Transition to secure climate justice and equity

The pace and depth of the transformation needed to respond to the climate crisis makes the discussion about Just Transition more critical than ever. At a time where multiple unjust transitions are hitting our societies, globally, many are still to be convinced that solid economic planning, public services, and social protection systems can be put in place to generate job and income creating opportunities for them when addressing the climate crisis. that governments can act in support of economic diversification and global cooperation, and that peoples' interests and rights can be protected while phasing out fossil fuels, deploying renewable energy, reshaping heavy industry and waste, and supporting sectors hit hardest by climate impacts such as agriculture, transport, energy, tourism and industry. These are fundamental conversations that must find common ground if we are to deliver on what humanity needs: to live in dignity within planetary boundaries.

The Paris Agreement recognised Just Transition nearly a decade ago, but it has largely remained on paper - sidelined, underfunded, and fragmented. COP30 in Belém must change that and ensure Just Transition efforts benefit climate, people and countries. Parties must deliver a breakthrough by committing to social justice and equity and signalling that the UNFCCC is ready to respond to people's needs.

Keeping justice and equity at the heart of Just Transition requires recognizing that a majority of countries lack the policy and fiscal space to absorb or compensate for disruptions to labour markets, government revenue, or to implement the economic diversification and just transition activities that are needed to transition away from polluting industries, in the energy and other sectors. Achieving the pace and ambition required by the Paris Agreement therefore requires a new wave of multilateral cooperation and solidarity, where attention is given to both: 1) the policy space, by challenging global rules that allow double standards when it comes to industrial policy capacity and environmental and social protection levels, and 2) the fiscal space, by taking a courageous multilateral approach to funding a Just Transition.

This is why the Just Transition Work Programme (JTWP) at COP30 puts the world on a new course for climate action that puts people and their rights at the heart.

### The Belém Action Mechanism (BAM)

Firstly, we need to move towards making just transition real, by **establishing the Belém Action Mechanism (BAM) for a Global Just Transition** to orient the multilateral system in support of those trying to make a Just Transition happen at national and local levels, make sure people themselves are in charge of decisions that affect their lives, keep communities alive with new livelihoods, and secure fairness and finance. The BAM will be based on agreed UNFCCC principles and guidance, currently under negotiation in the JTWP, and apply to Just Transition pathways - international and national- including in transitioning away from fossil fuels, advancing agriculture and food systems transitions, industrial processes, deploying renewable energies, managing demand for transition minerals, and the role of care, public services and social protection in advancing Just Transition strategies among other key areas.

## Box 1 | About the Belém Action Mechanism for a Global Just Transition

The BAM is a proposed new institutional arrangement<sup>1</sup> under the UNFCCC designed to address the current fragmentation and inadequacy of global Just Transition efforts. While Just Transition initiatives are proliferating worldwide, they remain uneven, lack alignment with climate goals, and are often poorly contextualized and not fit for purpose, leading to duplication, confusion among stakeholders, and the risk of not contributing to social equity.

The BAM aims to transform Just Transition principles currently under negotiation (see *Section 3*), into a coherent, practical, and actionable system by fulfilling three core functions:

- **Coordination and Coherence** : A central Coordination Entity will map existing Just Transition initiatives, identify gaps, steer the overall mechanism, and ensure Just Transition efforts are aligned with the Paris Agreement objectives and the principle of Common But Differentiated Responsibilities and Respective Capabilities (CBDR-RC).
- **Knowledge Sharing and Generation**: An enhanced version of the existing Just Transition Work Programme (JTWP) will serve as a global hub for practitioners, facilitating dialogue, sharing best practices, and generating new knowledge to inform policy.
- **Action and Support**: A dedicated component will provide direct support through a helpdesk or facilitative platform for countries, matchmaking between projects and funders, and work to mobilize and channel non-debt-inducing finance and technology transfer, particularly for the Global South.

Governed with meaningful inclusion of both Parties and Non-Party stakeholders, the BAM would be established modularly from COP30 to COP32. Its launch at COP30 would signal a decisive step towards a coordinated global effort that firmly links climate action with social justice, equity, and sustainable development for all.<sup>2</sup>

In addition to the launch of the BAM, COP30 must deliver the following additional concrete outcomes to ensure an ambitious Just Transition package:

- **Agree on Just Transition Principles in the UNFCCC Process**, applicable to all dimensions where a Just Transition is needed (energy, food systems, adaptation, industry) and covering
  - Rights and participation (including human and labor rights, Free Prior Informed Consent, social dialogue with workers and engagement of affected people);
  - Addressing - not deepening - inequalities (through decent work, skills development, gender and age responsiveness);
  - Means of Implementation through international cooperation;

<sup>1</sup> Institutional Arrangement is a formalized structure or body (i.e. mechanism, taskforce, platform) to carry out specific functions or mandates. It has an operational and implementation function.

<sup>2</sup> For more information, see CAN, [Discussion Paper: The Belém Action Mechanism for a Global Just Transition: Why and How](#), 2025.

- Legal commitments under the Convention and its Paris Agreement, based on equity and the principle of CBDR-RC and fair shares approach (see Box 2)
- This shared guidance would foster policy coherence nationally and internationally, support implementation, and serve as a point of reference for other constituted bodies (within and outside the UNFCCC), national climate plans (i.e.NDCs, NAPs and LT-LEDs), and for the BAM.
- **A Mandate to Finance Just Transition** by recognising the design and implementation of Just Transition policies, plans, programmes and practices as supportive of climate ambition and therefore eligible to be supported with means of implementation. This must be followed with the provision of new, additional, adequate, non debt-creating, and predictable climate finance. Examples of such policies, plans, programmes and practices include social dialogue and consultation mechanisms, social protection policies such as those related to care, ecosystem restoration, skills and re-skilling policies, and economic diversification.
- **Just Transition pathways must be reflected in National Climate Planning:** Nationally Determined Contributions (NDCs), national adaptation plans, and long-term development strategies must be delivered with Just Transition pathways at the core, in order to align long-term development and climate goals with social justice and equity. Further, these plans should be in line with the above principles, the UN Charter, and the ILO Guidelines.
- On **trade and trade-related issues**, CAN believes that its intersections with climate action have a place for discussion under the Just Transition Work Programme, but these should go beyond unilateral trade measures, and **address the inequities embedded in global trade rules, recognise that these are a disabler of just transition, especially in developing countries, and respond to the need to change them** to enable Just Transition.
- **National institutions must be created for People's Participation in Just Transition Measures/Policies**, with the COP calling on countries to establish national mechanisms and representative platforms for people's participation in Just Transition measures and policies. Such institutionalisation would enable the involvement and agency of workers, affected communities, women, youth, Indigenous Peoples and all other stakeholders in the planning, implementation, monitoring, and evaluation of just transition policies and efforts at the national and local levels.

COP30 is the moment for Parties and the UNFCCC process to deliver concrete actions to advance and accelerate Just Transition pathways, showing that the multilateral system can deliver for the people of the world, shifting us from a harmful system to one that values people and planet, and making COP30 in Belém worthy of the world's attention by establishing the BAM.

## Box 2 | Principles for Just Transition Pathways

These principles should be drawn from existing frameworks (e.g., ILO fundamental rights) as a basis, while establishing shared expectations under the UNFCCC and protecting the core values of Just Transition. These principles would ensure Just Transition actions are equitable, inclusive, rights-based and aligned with the Paris Agreement goals, including:

Being designed and implemented at country level, and aimed at securing dignity for all within planetary boundaries:

1. Set national and sectoral objectives that are aligned with the Paris Agreement and decision 1/CMA.4, para. 51, and encompass pathways that include energy, socioeconomic, workforce and other dimensions.
2. Include a focus on sufficiency, efficiency and circular economies, avoiding green extractivist approaches that put undue pressure on the environment, land, resources, Indigenous Peoples, Afrodescendant and communities.

Being built with workers, communities and all rights-holders' voices (based on peoples' realities, needs and inputs) through:

3. Robust and inclusive consultation institutions and processes and participation in planning and decision making processes at the national, regional and local level. This should include on the one hand tripartite social dialogue involving government, employers and workers to shape labour policies, and on the other hand engagement with rights-holders and relevant stakeholders on all other aspects of Just Transition.
4. The respect, protection, and fulfilment of human rights, which include economic, social, environmental and cultural rights, people of African descent and Indigenous Peoples' rights, gender equality, labour rights, the right to a clean, healthy and sustainable environment, the right to health, rights of persons with disabilities, rights of future generations, the rights of minorities and other marginalised groups, and the right to development.
5. Upholding the Right to Free Prior Informed Consent (FPIC) of all Indigenous Peoples, and ensuring all affected communities are consulted and have access to grievances mechanisms and fair compensation.
6. Robust and transparent assessment mechanisms and identification of social, economic, and environmental impacts, with intersectional considerations and the integration of the most diverse social realities, including but not limited to gender, race, ethnicity, class, disability, age, income, taking measures to avoid and mitigate them, with full accountability mechanisms and remedy for damages done.

Increasing prosperity and reducing rather than entrench inequalities, via:

7. Decent work, labour rights, safe and dignified lives for all with active participation of all workers in transition plans, including formal and informal, popular, women and gender-diverse, young, senior, care, subsistence and domestic workers.

8. Universal, disability-responsive and gender-transformative social protection programs/policies, with particular attention to those marginalized and with the establishment of universal social protection floors as the priority.
9. The care economy as a central axis towards a Just Transition, including a systematic, institutional and domestic recognition, reorganization and redistribution of the labor that enables social provisioning and reproduction, primarily undertaken by women and gender-diverse people.
10. Governments provide quality public services meeting their obligations to fulfill economic, social and cultural rights, including rights to sustainable, stable and affordable energy, food, education, health care, housing, water, and sanitation, and put in place food sovereignty policies.

Generating an enabling environment for Just Transition to happen in all countries through international cooperation, including:

11. Access to non-debt-creating climate finance for supporting the realization of the above principles in countries with limited capacity to undertake those.
12. New forms of investment, partnerships, and trade agreements away from unequal, extractive and/or neo-colonial exchange dynamics and terminating and/or circumscribing trade deals that do not align with the Paris Agreement. Measures must ensure fair terms of trade, protecting policy space, preventing exploitative practices, and upholding labour and other human rights, including economic, social and cultural rights such as the right to health, and environmental standards to create a more balanced, equitable, and inclusive global trade system.
13. Facilitation of broad-based access to human rights compliant renewable energy and other climate-related technology goods for the Global South.
14. Enabling developing countries to diversify their economies, build alternative economic models and facilitate the establishment of domestic ownership and industrial capacity.



## Chapter 2:

# Addressing the Vulnerability of People and Protecting Ecosystems to build a Just and Resilient World

The impacts of climate change are intensifying, and the effects are undeniable. Countless communities have been displaced, ecosystems damaged and lives threatened. The response from governments however has been wholly inadequate. In 2024, flooding displaced 600,000 people in Brazil<sup>3</sup>, a climate-related event caused 7.8 million displacements in Africa<sup>4</sup>, while a total of 13 million people were impacted by typhoons in the Philippines<sup>5</sup>. These are not exceptions but the markers of a new normal that is as relentless as it is widespread in the world. Adaptation and resilience are no longer a secondary concern, but a top political priority. CAN and its constituencies believe adaptation to be a matter of rights — the right to survival, to sustainable development, and to human security.

At the core of this battle for rights are justice and equity. Communities least responsible for the climate crisis are bearing the greatest burdens. Climate adaptation efforts must thus prioritise those who are most vulnerable, recognising historical injustices and the structural inequalities that exacerbate climate impacts. Adaptation is a global responsibility that demands locally-led and community-owned solutions, recognising that the most effective responses are participatory, inclusive and grounded in local knowledge and contexts.<sup>6</sup>

In its Advisory Opinion, the ICJ clarifies that developed countries are duty-bound to scale up the provision of adaptation finance and cooperate on L&D under the UNFCCC and the Paris Agreement, which entails the provision of financial support as well as capacity-building and technology transfers. The Court has also made clear that States are obligated to adopt appropriate measures to enhance adaptive capacity and strengthen resilience.

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<sup>3</sup> Oxfam, [Climate Finance Shadow Report 2025: Analysing progress on climate finance under the Paris Agreement](#), 2025.

<sup>4</sup> IFRC, [As climate change in Africa forces more people from their homes, a new IFRC report says people can — and must — have more and better choices when it comes to their future](#), 2025.

<sup>5</sup> World Weather Attribution, [Climate change supercharged late typhoon season in the Philippines, highlighting the need for resilience to consecutive events](#), 2024.

<sup>6</sup> CAN, [Narrative on Adaptation](#), 2025.

## Global Goal on Adaptation

With the adoption of the UAE Framework for Global Climate Resilience (UAE FGCR) at COP28 in Dubai, the Global Goal on Adaptation (GGA) has, for the first time, been given a political foundation that corresponds to the entirety of the Paris Agreement rulebook. The operationalization of the GGA will determine if it becomes a real political lever for ambitious and equitable adaptation policy or remains a mere symbol. To ensure the former, Parties must adopt a robust and equitable list of no more than 100 indicators, including clear Means of Implementation (MOI) indicators. Further, the GGA decision at COP30 should include a clear way forward on Adaptation finance and Baku Adaptation Roadmap (BAR).

**1. Adoption of Indicators:** agreeing on a final list of robust and fit-for-purpose indicators is an essential outcome from COP30 **for the full operationalisation of the Global Goal on Adaptation (GGA). In particular,** the inclusion of Means of Implementation (MOI) Indicators is essential and central for measuring progress achieved towards the targets agreed in UAE in 2023.<sup>7</sup> CAN appreciates the efforts of the experts in refining the current list of final potential indicators and discussion during the last mandated workshop of the UAE-Belém work programme, and calls for:

- The adoption of the full list of 100 indicators, which includes balanced and well represented **Means of Implementation (MOI). The MOI indicators should be clear and actionable** measuring both the *provision* and *receipt* of support, including finance, technology transfer, and capacity-building from developed to developing countries. It is essential to track means of implementation, since without it, progress on all other thematic and dimensional areas will be severely undermined.
  - i. Means of Implementation, especially finance, are essential to achieving the GGA, especially in developing countries. Any effort to measure progress under the GGA is fundamentally limited if the framework does not clearly account for the resources that make implementation possible. Absence of MOI targets leaves the framework incomplete and impedes progress on other indicators
  - ii. MOI indicators on finance should not account for private finance, and domestic contributions, and ODA as it is not in line with the Paris Agreement and creates incoherence in assessing accountability and responsibility.
- Since including MOI sub-indicators under each thematic target is not feasible within the 100-indicator limit the MOI indicators listed under 10c of the report must be disaggregated and used as **cross-target indicators** (as proposed by the experts in their report). This needs to be clearly stated in the decision text and highlighted in the adopted list of

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<sup>7</sup> [Decision 2/CMA.5, Global Goal on Adaptation](#), 2023.

indicators to avoid misinterpretations by Parties.

- Indicators should encourage adaptation progress and should **not present risks of incentivizing maladaptation**.
- The final adopted indicators list must include a manageable number of applicable indicators in the context of climate adaptation, that properly reflect **cross-cutting aspects** such as gender, ethnic and racial perspectives, Afro-descendant peoples, persons with disabilities, Indigenous Peoples, traditional and local communities, human rights, children and youth, and migrants.<sup>8</sup>

**2. A new Adaptation Finance Commitment:** Although the Paris Agreement calls for a balance in the finance provision for mitigation and adaptation, adaptation finance lags considerably behind finance for mitigation. According to the Climate Finance Shadow Report of 2025, adaptation received only 33% of the total public climate finance in 2021-22 while mitigation received 59% of the pot.<sup>9</sup> As per the 2024 UNEP Adaptation Gap Report, developing-country adaptation finance needs are estimated at US\$ 215–387 billion per year. Even if the developed countries meet the Glasgow pledge to double the provision of adaptation finance from 2019 levels by 2025<sup>10</sup>, the scale will still remain far below needs. The NCQG decision at COP29 failed to address needs of adaptation finance, while pledges from many developed countries are due to expire in 2025 and 2026. Adding to the risk of chronic underfunding and poor quality of available adaptation finance are the current and planned ODA cuts which have jeopardised an estimated US\$ 28 billion in adaptation finance in 2025.<sup>11</sup>

Parties at COP30, must respond to this urgent need by **adopting a new, predictable and public grant-based adaptation finance commitment under the GGA in line with the informal note produced at SB62 in June 2025**. (Read CAN's brief here<sup>12</sup>)

**CAN urges Parties to agree and deliver an outcome under the GGA decision at COP30 which,**

- **New Adaptation Finance Commitment:** Parties must agree to establish a new, predictable public-grant based adaptation finance commitment

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<sup>8</sup> CAN, [Preliminary Assessment of the final list of potential Global Goal on Adaptation Indicators](#), 2025

<sup>9</sup> CARE Climate Justice and OXFAM, [Climate Finance Shadow Report](#), 2025.

<sup>10</sup> Acknowledging all data and methodological challenges, according to the technical report from the UNFCCC Standing Committee on Finance, adaptation finance from developed to developing countries in 2019 was between USD 7.1 billion and USD 20.3 billion, implying a doubling to between USD 14.2 billion and USD 40.6 billion by 2025.

<sup>11</sup> CARE Climate Justice and OXFAM, [Climate Finance Shadow Report](#), 2025.

<sup>12</sup> CAN, [Briefing on A New Adaptation Finance commitment under the Global Goal on Adaptation](#)

under the GGA decision at COP30 **that responds to the needs of developing countries, estimated to be over US\$ 300 billion per year.**<sup>13</sup>

- Developed countries must, at a minimum, be urged to increase provision of adaptation finance by at least six times by 2030 compared to 2019 levels (this amounts to a tripling of the commitment under the Glasgow Pact to double adaptation finance by 2025).
- The proposal of “at least tripling the Glasgow Pledge of doubling the provision of adaptation finance by 2030” should not come, or be instrumentalised by contributor countries, at the expense of establishing a robust process to set a longer-term needs-based target which echoes the costs of the GGA framework’s targets, well ahead of 2030.
- Establishes a standing agenda item on adaptation finance to continually assess developing country needs, implementation of the UAE Framework for Global Climate Resilience and define the role of the Adaptation Fund in serving the Global Goal on Adaptation
- Mandates the Standing Committee of Finance (SCF) to annually report on the needs of developing countries and progress toward meeting adaptation finance commitments

#### **Additional elements to be considered for adaptation finance**

- ❖ Renewed national pledge for Adaptation Finance. Many developed countries’ national pledges expire in 2025 or 2026. They must be asked, at a minimum, to make renewed commitments specifically on adaptation finance by COP30. Without this, developing countries will be left with no predictable finance flows from 2026. For negotiations to deliver a new adaptation finance commitment, they must be backed by national commitments. The World Leaders’ Summit should serve as an important platform for raising the profile and ensuring new finance pledges on adaptation and making a link with GGA.
- ❖ Paragraph 16 of the NCQG outcome establishes that developed countries must pursue efforts to at least triple annual outflows from those Funds from 2022 levels by 2030. Hence, at COP30,

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<sup>13</sup> These figures are minimum amounts required for each thematic area based on needs, and it would be inappropriate to apply a 40-30-30 percentage split to a sum below \$1 trillion. As useful starting points in the literature for each thematic area, see Markandya and Gonzalez-Equino (2019) on loss and damage, UNEP Adaptation Gap Report (2023) on adaptation, and IEA Net Zero Roadmap (2023) on mitigation. CAN’s figures for thematic support needs are based on a technical exchange on the literature on needs assessment, looking at a variety of publications pertaining to each of the three thematic areas, applying assumptions about which costs should be borne by developed countries and what levels of grant equivalence would be appropriate, for each area. Specifically, it is assumed that loss and damage and adaptation must be financed by grants and not loans, and mitigation necessitates provision of grants as well as affordable concessional finance for developing countries. It is also assumed that developing countries should generally not have to shoulder the costs of coping with impacts from historic climate change for which they are essentially not responsible, but that there is an economic logic, unrelated to climate change, to developing countries taking on some of the investment cost in mitigation-aligned areas such as energy transition; [Climate Action Network \(CAN\) submission on the New Collective Quantified Goal \(NCQG\)](#), 2024

Parties must adopt a clear delivery plan to effectively triple those flows by 2035. In that context, Parties could adopt new pledges on adaptation on a multi-year basis and a plan for implementation of Paragraph 16 with respect to the Adaptation Fund.

3. **Baku Adaptation Roadmap:** The Baku Adaptation Roadmap (BAR) should be a tool for gradual implementation, bringing coherence across adaptation agenda and scaling up of global adaptation policy. The BAR is expected to put the UAE FGCR into practice by advancing outstanding from the COP28 decision on the GGA.<sup>14</sup> However the BAR remains vague and without a clear vision for implementation that goes beyond the predominantly reporting and monitoring. In order to be an effective tool, its mandate should extend to creating a structured, multi-year process that clearly defines responsibilities, avoids duplication of effort, and ensures coordination with existing adaptation bodies. Adoption of the roadmap is urgently needed to keep structurally neglected adaptation issues on the political agenda in the long term. At COP30, Parties must establish a clear common vision and structure, with a strong emphasis on implementation for the Baku Adaptation Roadmap, by:

- Providing clear pathways for implementing adaptation action and support to achieve GGA thematic and dimensional targets
- Facilitating mechanisms for ensuring the availability of and access to means of implementation when and where needed for adaptation action in developing countries and amongst the most marginalised and vulnerable populations
- Further refining of indicators that remain under development, and setting out roles for experts and custodian agencies to support in the refinement and reporting of data. BAR should also clearly outline how FGRA will contribute to GST-2
- Identifying concrete actions and support mechanisms to strengthen monitoring and evaluation systems to track progress and facilitate future reporting
- Establishing clear guidelines for post-2025 adaptation action and support, and linking up with other mechanisms relevant to adaptation under the UNFCCC and the Paris Agreement, including the NCQG
- Promoting complementarity and coherence to the adaptation architecture across the Convention and the Paris Agreement by reinforcing and coordinating the work of existing bodies and ongoing mandates
- Integrating recognitional and procedural justice components into the design and operationalisation of the Baku Adaptation Roadmap to ensure meaningful representation and participation of climate vulnerable groups including women, children and youth, people of African descent, Indigenous peoples, local communities, persons with disabilities, displaced peoples, farmers, and fisherfolk

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<sup>14</sup> Referring Primarily to paragraph 38 of [Decision 2/CMA.5, Global Goal on Adaptation](#).



- Acknowledging and reviewing international barriers that undermine equitable participation in adaptation negotiations and decision-making processes

## National Adaptation Plans

The first Global Stocktake calls on Parties to put in place national adaptation plans, policies and planning processes by 2025 and to have progressed in implementing them by 2030.<sup>15</sup> However till date, only 68 NAPs have been submitted to the UNFCCC.<sup>16</sup> While over 100 developing countries currently have a NAP process underway, significant challenges and barriers remain for developing countries to formulate and implement their NAPs, including challenges relating to the availability and access to NAP Readiness funding and public adaptation financing for adaptation planning and implementation. The COP30 decision on the NAP assessment should call on developed countries to significantly scale up their provision of the MoI for both formulation of NAPs but also implementation. Furthermore, Parties should formulate and/or update their NAP documents in line with the outcomes of the first global stocktake.

Additionally at COP30, a decision to strengthen local capacities for implementation of NAP is critical. Countries leading the integration of Locally Led Adaptation (LLA) within their NAPs such as Bangladesh, Nepal, Kenya, and the Philippines have operationalised the LDC Expert Group (LEG) technical guidelines and the vertical integration approach. Countries reviewing their plans should be supported in integrating LLA into NAPs with a view to increase the legitimacy, ownership and flexibility of adaptation-oriented interventions.

## Adaptation Fund

The Adaptation Fund (AF) was established in 2001 to finance concrete adaptation projects and programmes in developing country Parties to the Kyoto Protocol. In 2023 and 2024, the Fund set a minimum target of US\$300 million. However, over the past two years, developed countries have clearly failed to meet even this modest target. As a result, the AF lacks the financial reliability it needs to expand its important role in the international climate finance framework.<sup>17</sup>

At COP30:

- Developed countries should pledge and provide funds to AF to meet the minimum resource mobilisation target of US\$ 300 million on a multi-year basis for provision and planning, including a replenishment mechanism, in line with Para 16 with respect to the Adaptation Fund

<sup>15</sup> Paragraph 59, [Decision 1/CMA.5](#), 2023.

<sup>16</sup> NAP Central, [Submitted NAPs](#).

<sup>17</sup> German Climate Finance, [The Adaptation Fund at COP30: A credibility test for the new climate finance target](#), 2025.

- Parties must resolve the governance issues in the transition of the AF from the Kyoto Protocol to the Paris Agreement and its board composition. Developing countries currently hold the majority on the AF decision-making body (Board) – which is a key element that distinguishes the AF from other funds and contributes significantly to its high level of acceptance. Hence, at COP30, this issue should be resolved and must agree to ensure the retention of majority of developing countries on the board

Finally, on the matter of ‘transformational adaptation’, Parties must continue their consideration of the Transformational Adaptation Report prepared by the secretariat, which proved somewhat divisive at COP29 and was subsequently deferred to the SBs. While the UAE framework underscores the necessity of “long-term transformational and incremental adaptation”, it notably leaves the crucial question of means of implementation unaddressed.

## Addressing Loss and Damage

Even though the Paris Agreement anchors Loss and Damage (L&D) as one of its pillars, and despite the escalating climate from the impacts of climate change, it took until COP27 in 2022 to establish the Fund for responding to Loss and Damage (FRLD). Despite the urgency on addressing L&D, the COP29 outcome on NCQG failed to acknowledge and create a sub-goal on the provision of finance for L&D. It is estimated that only about 1% of total bilateral climate finance in 2022 (US\$ 0.5bn) was used to finance loss and damage interventions<sup>18</sup>. Currently, pledges to the FRLD are insufficient, with many not yet delivered.<sup>19</sup>

The ICJ Advisory Opinion on the legal obligations of States in respect of climate change settled it for once and for all: developed country Parties have a duty to cooperate on L&D under the UNFCCC and the Paris Agreement, and this entails financial support as well as capacity-building and technology transfers. It clearly lays out that L&D finance is not merely a matter of solidarity or voluntary assistance but of legal responsibility. At the first COP since this historic legal opinion was delivered, Parties need to take steps to implement it, including by committing to drastically scaled up, new and additional, grants-based finance for addressing loss and damage and send a strong political signal to the world that the Parties are taking the legal clarification by ICJ seriously. In order to do so, COP30 must:

- **Agree on a permanent agenda item on L&D** in view of the increase in climate impacts/extreme weather events and the corresponding human and economic losses and damage

<sup>18</sup> Oxfam, [Climate Finance Shadow Report 2025: Analysing progress on climate finance under the Paris Agreement](#), 2025.

<sup>19</sup> As per the “Report by the interim Trustee on the status of FRLD Trust”, the current pledges account to 790.24 USD Eq, of which 561.78 USD Eq is the total agreement signed, but only 397.74 USD have been. For details, see [Report by the interim Trustee on the status of FRLD Trust Fund resources](#), 2025.

- **Deliver scaled-up resources for L&D, including through the newly operationalised** Barbados Implementation Modalities (BIM) with an initial amount of \$250 million
- The COP30 Presidency and all Parties must **make filling the Fund a priority**. COP30 needs to deliver a clear political signal to the Board of the FRLD that the Resource Mobilisation Strategy to be finalised in 2026 will be at the scale of L&D needs, meaning at least US\$ 400 billion per year, and provide clarity on the pathways to achieve this scale
- The NCQG outcome<sup>20</sup> acknowledges the significant gaps that remain in responding to the increased scale and frequency of L&D. To recognise the provision of finance for L&D, CAN calls for **better tracking and accountability of the finance flow to L&D as part of the USD 300 billion per year by 2035** for developing country Parties for climate action. COP30 must also enable a process to guide operational entities, such as the FRLD, on scaling up resources.
- **Provide guidance to the Board of the FRLD to course-correct towards centering justice and communities.** With the launch of the Barbados Implementation Modalities (BIM), the FRLD has taken a first step in its operationalisation and is starting to implement activities. However, key elements in the Governing Instrument are not reflected in the BIM, and it will be important that the COP/CMA gives guidance to course-correct the Board of the FRLD in the direction of climate justice. Additionally, the Board should not lose sight of the necessary long term modalities to ensure that the FRLD can operate at the scale of and in line with frontline communities' needs, while respecting and promoting their human rights. The COP/CMA guidance to the FRLD must:
  - Stress that **community access to funding, including small grants support, is meant to be a central modality** in the context of the FRLD's long term functions, and that the Board should prioritize setting up such modalities in its 2026 work plan
  - Urge the Board to **develop a comprehensive framework for public participation** for the FRLD covering the Board proceedings as well as the design and implementation of the FRLD's activities, and in that context remind the Board of the Governing Instrument's provision that Active Observers from youth, women, Indigenous Peoples and environmental non-governmental organizations will be invited to participate in its meetings and related proceedings
  - Remind the Board that the FRLD must **ensure that best practice environmental and social safeguards policies are applied to all activities**, in line with the Governing Instrument, and clarify that this entails the development of a dedicated framework as well as specific policies related to human rights, including on gender, Indigenous Peoples, and persons with disabilities.
  - Urge the Board to **fully consider, integrate and adhere to findings of the ICJ Advisory Opinion** on the Obligations of States in respect of Climate

<sup>20</sup> [Decision 1/CMA.6](#), 2024.

Change into its resource mobilisation approaches and the development of the long-term operational modalities of the Fund.

- Provide clarity on the role of the World Bank as the host of FRLD, which in a manner that secures an Rapid Response component as urged by civil society.
- **Make the WIM fit for purpose and mandate a L&D gap report.** The ongoing review of the Warsaw International Mechanism for Loss and Damage (WIM) provides an opportunity to ensure adequate coordination and coherence among loss and damage entities, strengthen the alignment with international law, including human rights law, across loss and damage institutional arrangements, and address the knowledge and finance gaps related to loss and damage and human rights by:
  - Preparing a **decision mandating a Loss and Damage gap report** documenting aggregate financial and technical assistance needs of developing countries related to L&D, L&D funding available and the finance gap resulting from both
  - Tasking the WIM to produce, in close collaboration with relevant UN institutions and consultation of rights holders, **guidance on human rights and equity-based approaches for all UNFCCC L&D mechanisms and institutions**, taking into account the UN Secretary General's analytical study prepared for the Human Rights Council on this topic
  - The WIM review should go beyond the mere acknowledgement of the gaps remaining in the response to L&D and **call on developed country Parties to substantially increase the provision of public and grant-based resources for addressing loss and damage**, including for the FRLD and the Santiago Network for Loss and Damage.
  - **Give the WIM the mandate to enhance the alignment of L&D institutions with international law** while considering the applicability of state responsibility rules related to the adverse effects of climate change, including the provision of effective remedy, reparations measures and mechanisms must be implemented.

## Transforming Agriculture and Food Security

With a host country such as Brazil, which has long made the Right to Food a priority, COP30 must be an opportunity for Parties to support a Just Transition of food systems. Agroecology, as well as the human rights to land, to food and to food security for peasants and other people working in rural areas (UNDROP) and for Indigenous Peoples (UNDRIP), must be at the heart of negotiations on agriculture, but also be integrated in other items on the COP30 agenda.

- **Agroecology must be back at the center of the Sharm El Sheikh joint work on implementation of climate action for agriculture and food security.** Agroecology is the approach most favoured by small-scale food producers, who must be at the heart of a Just Transition. It has been agreed in a

multilateral context, with the FAO's 10 elements of agroecology,<sup>21</sup> the policy recommendations of the Committee on World Food Security (CFS)<sup>22</sup>, and defined by its High Level Panel of Experts on food security and nutrition (HLPE). It is also the only approach that presents almost no trade-offs, with co-benefits for climate adaptation and mitigation, biodiversity, nutrition or human and environmental health.

- It is also necessary to push for the integration of healthy, resilient and equitable **food systems into the future of the Just Transition Work Programme**. Agriculture is the livelihood of at least 2.6 billion people on the planet, and 48% of the world's population lives in households that depend on livelihoods linked to food systems. This large portion of humanity cannot be left behind in the Just Transition. Even though our ability to feed ourselves depends on those who work the land, such as farmers, Indigenous Peoples, food system workers, pastoralists and artisanal fishers, they are the first to suffer from hunger, poverty, systemic marginalisation and the blunt force of climate impacts. More than ever, their voices matter, as exemplified by the historic Nyéléni 2025 conference<sup>23</sup>, and will be elevated in the autonomous space of the People's Summit<sup>24</sup>. At **COP30, smallholder farmers should be visible and be included in key discussions** and initiatives, especially around finance for agriculture and food systems.
- Two important levers of the Just Transition for agriculture and food systems are the need to **unlock new public finance for agroecology** and the need to **uphold land rights**. Despite its advantages, agroecology remains largely underfunded<sup>25</sup>. COP30 is an important moment to redirect public finance and investments towards agroecology and resilient food systems, with a focus on ensuring access to finance for smallholder food producers. The **Green Climate Fund (GCF)**, is a key mechanism that could play a greater role in supporting agroecology policies and projects. For a Just Transition, the importance of access to land is also key through **agrarian reforms**, including recognition, restitution, redistribution, and restoration.
- Finally, the Just Transition in agriculture and food requires the adoption of clear **political signals for the phasing out of industrial agriculture and fossil fuel-based agricultural inputs, and for the promotion of agroecology, including through the adoption of a policy against conflicts of interest**.

## Protecting the Ecosystem

At COP30, Parties should ensure that key decisions and commitments on climate, biodiversity, forests and human rights coming out of the GST-1, the UN Convention on

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<sup>21</sup> Food and Agriculture Organization, [The 10 Elements of Agroecology: Guiding the Transition to Sustainable Food and Agricultural Systems](#), 2018.

<sup>22</sup> Committee on World Food Security, [Agroecological and other innovations for sustainable agriculture and food systems that enhance food security and nutrition](#), 2021.

<sup>23</sup> See [Nyéléni Global Forum website](#).

<sup>24</sup> See [Cúpula dos Povos website](#).

<sup>25</sup> [Un potentiel inexploité : Une analyse des flux de financement public international de la lutte contre le changement climatique destinés à l'agriculture durable et aux agriculteurs familiaux](#), 2023 (in French)



Biodiversity (CBD), and the UN Convention on Combating Desertification (UNCCD) are actively reinforced and implemented through the UNFCCC. These should centre on the importance of protecting and restoring the ecological integrity of natural ecosystems for achieving the goals of the Paris Agreement and driving forward just, ambitious, integrated and equitable implementation of the three Rio Conventions while delivering human well-being for all within planetary boundaries. Halting ecosystem collapse by 2030, reaffirming the moratorium on geoengineering passed at the CBD COP16<sup>26</sup> and upholding the recognition and protection of Indigenous People's rights and territories, as well as the safety of environmental defenders must be a political priority in this "Amazon COP". In addition to environmental gains, protecting ecosystems also reduces the risk of zoonotic disease spillover.<sup>27</sup>

COP30 represents a pivotal opportunity for Parties to renew collective ambition and reinforce multilateral cooperation through greater policy alignment and synergistic implementation of climate and nature commitments. At COP30, CAN is calling for:

- **Ambitious outcomes on nature-climate synergies under SBSTA item on Cooperation with Other International Organisations<sup>28</sup>:** Parties must place synergies across the three Rio Conventions at the core of this negotiating track and support a substantive COP/CMA decision that calls for ambitious action and establishes a clear process to advance policy coherence and cooperation between these conventions. A bold decision requires the SBSTA Chair and the COP30 Presidency to secure sufficient time for negotiations under this agenda item at SBSTA 63 and should include:
  - enhanced cooperation between the Executive Secretaries of the Rio Conventions and a strengthened role for the Joint Liaison Group;
  - a new Ad-hoc Technical Expert Group to provide guidelines and advice, with a view to moving towards a Joint Work Programme across the Conventions and/or a dedicated SBI/SBSTA work programme within the UNFCCC
- Parties to ensure the adoption of a robust set of indicators for target 9.d of the GGA's UAE-Belém work programme on indicators that capture the critical role of ecological integrity, connectivity, and risk of ecosystem collapse measures
- Parties must put **implementation and progress on the GST commitment to halt and reverse deforestation and forest degradation by 2030** at the forefront of the political agenda and negotiations, including in any cover decision. Voluntary initiatives alone cannot deliver the scale of change needed. Meeting these goals requires renewed approaches that are equitable and transparent, drive action across all forest biomes (not only tropical forests), fully recognize and uphold the leadership, rights, and demands of Indigenous Peoples and forest communities, and transform economic systems to enable just transitions.

<sup>26</sup> UN CBD, [Decision 16/22](#), 2024

<sup>27</sup> Plowright et al., [Land use-induced spillover: a call to action to safeguard environmental, animal, and human health](#), The Lancet Planetary Health, 2021.

<sup>28</sup> Agenda item 15 of the [provisional agenda for SBSTA 63](#).

CAN is also concerned about the COP Presidency's drive for biofuels including a possible declaration at COP30. Biofuels largely remain risky and counterproductive as they increase emissions in the long run in most cases, further deplete carbon sinks, have harmful environmental impacts, are long-gestational and divert much needed finance and focus from proven and scalable technologies like wind and solar energy developed in adherence with principles of justice, equity and sustainability.<sup>29</sup>

## Climate change and Health

Ambitious climate decisionmaking at COP30 is imperative to protect human health. Climate change is recognised by the World Health Organization to be the greatest health threat of the 21st century.<sup>30</sup> As such, climate action is the greatest opportunity to protect the human right to health and the right to a clean, healthy, and sustainable environment. In Belém and beyond, Parties should therefore:

- **Adopt indicators for physical and mental health**, including means of implementation indicators, as part of the Global Goal on Adaptation, and support implementation of the Belém Health Action Plan for health adaptation, especially in settings where the health hazards of climate change are already especially severe.
- In addition, Parties must **act across sectors to protect health through ambitious mitigation, finance, and responses to loss and damage**. Without accelerated emissions reductions and finance, in particular by developed countries, climate induced health hazards will exceed the limits of adaptation, leading to widespread health losses and damage.
- Apply lessons from addressing health harming industries and commodities in considering engagement and regulation of polluting industries in UNFCCC decisionmaking and national implementation, including fossil-fuel dependent industries and big agriculture, for example when considering measures relating to conflict of interest and just subsidy reform, prioritising the needs and priorities of people over commercial profits.
- Seek to maximise the health gains of transitions across sectors, including through support for **accelerated action on affordable access to renewable energy** powered clean cooking, cleaning and lighting to address health harms of household fossil fuel and biomass use. Just energy transition offers massive potential to prevent the millions of deaths caused by air pollution,<sup>31</sup> both indoor and outdoor. Similarly, just transitions in agriculture and other sectors, such as phasing out petrochemicals including pesticides, fertilisers and plastics, offer clear health gains, while also improving nutrition security.

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<sup>29</sup> CAN, [Position Paper on Bioenergy](#), 2025.

<sup>30</sup> World Health Organization, [COP26 special report on climate change and health: the health argument for climate action](#), 2021.

<sup>31</sup> International Energy Agency, [Net Zero Roadmap: A Global Pathway to Keep the 1.5 °C Goal in Reach](#), 2023.



## Chapter 3:

### Addressing needs-based Climate Finance

The Advisory Opinion issued recently by the International Court of Justice<sup>32</sup> clarifies that the provision of climate finance at levels needed to meet the goals of the Paris Agreement is a legal obligation of developed country Parties to the Convention.

Despite this, developed countries have chronically under-committed and under-delivered on their obligations.<sup>33</sup> Not only have they faulted on the delivery of even the inadequate US\$100 billion goal<sup>34</sup> that preceded the New Collective Quantified Goal (NCQG), there is no sign of any course correction. Many developed countries are shrinking their overseas development assistance<sup>35</sup>; fiscal policies are increasingly moving away from ensuring the delivery of quality climate finance, and instead shifting toward military and defence spending. A resultant reduction in public grant-based climate finance seems likely while needs grow rapidly.<sup>36</sup>

The NCQG on climate finance adopted last year at COP29 in Baku sets a goal of US\$ 300 billion per year by 2035 and the wider US\$ 1.3 trillion per year aspirational target. These goals are highly insufficient to address the growing unmet needs of developing countries for the next 10 years but also leave many gaps and uncertainties in terms of real delivery, accountability, transparency and quality. Significant questions persist regarding how historical emitters will ensure the timely provision of adequate, predictable, and grant-based public finance in the context of delivering these goals.

Belém must set out the way to implement the NCQG decision in a way that ensures **progress on accountability, tracking** and building a framework for increasing **ambition** (both on quality and quantity). COP30 must also create a **dedicated space** to discuss the future of the climate finance landscape in a coherent and integrated manner, in particular for **public finance provided** by developed countries.

Climate finance will be an important element across different negotiations in Belém. Beyond the finance tracks, climate finance is likely to be a critical aspect in negotiations such as those on adaptation or in the Just Transition Work Program (see *other chapters*).

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<sup>32</sup> International Court of Justice, [Obligations of States in respect of Climate Change. Summary of the Advisory Opinion of 23 July 2025](#), 2025.

<sup>33</sup> [Civil Society Equity Review: Fair Shares, Finance, Transformation](#), 2024.

<sup>34</sup> Oxfam, [Climate Finance Shadow Report 2025: Analysing progress on climate finance under the Paris Agreement](#), 2025.

<sup>35</sup> OECD, [Cuts in official development assistance: OECD projections for 2025 and the near term](#), 2025.

<sup>36</sup> CARE Denmark, [Hollow Commitments 2025: An Analysis of Developed Countries' Climate Finance Plans and Targets](#), 2025.

## NCQG follow-up: Centering public provision

One of the biggest un-answered questions in the NCQG decision is around the quality of finance that will count towards the goal. It is therefore essential to secure a **dedicated, negotiated space to address public provision** elements within the NCQG in order to uphold and accelerate the full implementation of developed parties' public provision obligations (according to Article 9.1 of the Paris Agreement), and clarify gaps in transparency, predictability, concessionality, and additionality. To this end, the G77 has called for an agenda item on implementation of Article 9.1 which represents one of the clearest avenues to ensure that the public provision dimension of climate finance is properly addressed.

COP30 must articulate how the NCQG will be implemented moving forward, in a way that clarifies and prioritizes **quality, access, and equity** and preserves **differentiation** while enhancing collective ambition and gives a central place to public finance in that context.

The decision must bring together different elements:

- **Harmonize reporting and accounting methodologies used by developed countries**, including on additionality, concessionality, grant equivalence, and on reporting finance to support addressing and responding to loss and damage separately from adaptation. Work around the adoption of an **operational definition and an exclusion list** of what counts and does not count as climate finance must be picked up again by Parties. As a continued effort to **improve transparency**.
- Parties must also work towards the inclusion of grant-equivalents to be reported on a mandatory basis and an agreed methodology to assess concessionality within the Enhanced Transparency Framework (ETF). These improvements need to be connected to the Standing Committee on Finance's (SCF) Biennial NCQG Progress Review and GST-2 (scheduled in 2028). Consistent and transparent data on **mobilized private finance** is still lacking. In addition to reporting their accounts of mobilized private climate finance in their BTRs, developed countries must make reporting practices consistent, leading to realistic estimates and expectations of the role of private finance.
- **Adopt time-bound outputs to increase quality** with milestones ahead of the NCQG reviews, including undertaking work to define public provision and grant based components of the \$300bn and the \$1.3tn goals and guidance on provision tracking, especially for adaptation and loss and damage needs. An important milestone will also be for Parties to adopt a clear plan indicating how they will deliver on **paragraph 16** of the NCQG decision, which calls for Parties to triple the outflows of the UNFCCC climate funds by 2030 (compared to 2022).
- **New public finance pledges by developed countries by COP31**. Developed countries need to adopt new targets beyond 2025 and lay out concrete plans on how they project their climate finance contributions moving forward, starting



with the 2025-2030 period. Therefore, developed country obligations to provide public finance must be clarified and reinforced at COP30, with agreement to significantly increase pledges by COP31, including through an affirmation of progressive environmental taxation rooted in the **polluter pays principle** and CBDR-RC (such as taxes on fossil fuel profits). Space under a new NCQG accountability and delivery agenda item should also be given to advance these mechanisms.

- **Work towards establishing a solid foundation and coherent architecture for loss and damage action and financing** to meet the needs of developing countries, including but also going beyond the Fund for Responding to Loss and Damage (FRLD).

## Baku to Belém Roadmap

At the time of writing, the Report on Baku to Belém Roadmap to \$1.3T has not yet been published, and it is still unclear how the Roadmap will be discussed at COP30. Since this is not a negotiated outcome but an initiative led by the COP29 and COP30 Presidencies, its future scope and its potential implementation also remain unclear, based on the Presidencies' and Parties willingness to further deliberate on this. The Roadmap must articulate clearly the gaps/opportunities of the current climate finance landscape and suggest ways to address them (both within and outside the UNFCCC).<sup>37</sup>

CAN is, however, of the opinion that the Roadmap and a possible decision based on it must address 2 main elements:

- **To help identify the current gaps and ambiguities in the current climate finance architecture and articulate ways to address those gaps.** This must be done using existing spaces and initiatives under the UNFCCC regime and wider national and international initiatives to unlock public finance. It includes clarifying the qualitative elements of the NCQG and especially the provision of new, additional, predictable, adequate public grants, and measured in grant-equivalent terms, embedding the principles of CBDR-RC, equity, human rights. It must also be based on scientific evidence and articulate a clear plan for how developed countries will take the lead on delivering on the US\$ 300 billion target and identify actors, actions and avenues to deliver on the wider US\$ 1.3 trillion goal while also connecting with other negotiating tracks where finance is discussed..
- **It should connect the UNFCCC discussions with ongoing initiatives happening outside the UNFCCC remits.** Given the urgent need for and lack of meaningful progress to date on the intersections of climate with tax governance, sovereign debt, cost of credit, , and the nexus of debt and climate. The Roadmap should also acknowledge and coordinate with initiatives targeting disenablers outside of the UNFCCC. Supporting the connection between the UNFCCC and other relevant fora (such as the UN Tax Convention).

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<sup>37</sup> CAN, [Submission on the Baku to Belém Roadmap](#), 2025.

## Article 2.1c

Article 2.1c of the Paris Agreement establishes that finance flows should be consistent with a pathway towards low greenhouse gas emissions and climate resilient development. The Sharm el Sheikh Dialogue on Article 2.1c has debated this over the last 3 years, and the mandate ends at COP30. CAN encourages Parties to continue the work with a more action-oriented approach, embedded in equity and CBDR-RC. Continued work must:

- Lay the foundations for a decision at COP31 with time-bound targets for **shifting financial flows away from fossil fuels and other harmful, large-emitting sectors and increasing finance at scale into climate resilient low-carbon development** in a just, equitable and human rights compliant manner (i.e by ending fossil fuel support, subsidies, and any other public and private finance flows into these sectors as soon as possible). Developed countries must take the lead, while developing countries with the capabilities to do so should move swiftly in the same direction.
- Fulfil its mandate to **convene and send signals to other actors and decision-making fora** that are part of the international financial architecture (such as IFIs, the FSB, the FFD process, the UN tax convention), to define their role and necessary contribution in implementing Art 2.1c. **This should include a focus on global disenablers and their links with climate finance.**
- **Assess and address the harmful role of debt**, debt distress and debt repayment finance flows in undermining climate action and perpetuating extractive economic models, including their contribution to the expansion or lock-in of climate-harming industries such as fossil fuels. Address the role of climate impacts in deepening the vicious cycle of debt and vice versa, and raise the ambition for debt restructuring and cancellation, and a sovereign debt workout mechanism under UN auspices.
- **Focus on taxing big polluters** including fossil fuel profits, aviation and high net worth wealth, and changing tax and fiscal systems to properly operationalize the “polluters pay” principle and the need to phase out fossil fuels, tackling tax abuse and unfair global financial rules, and recognising the role of a new UN Framework Convention on International Tax Cooperation.<sup>38</sup>

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<sup>38</sup> See UN Department of Economic and Social Affairs, Financing for Sustainable Development, [Intergovernmental Negotiations for UN Framework Convention on International Tax Cooperation](#).

## Chapter 4:

### Enhancing Ambition and Accountability

COP30 marks the 10 years of the Paris Agreement, and hence a milestone moment in the international climate regime. While the Agreement has shifted the world from a trajectory of 3-4°C of warming to a projected 2.1-2.6°C, there are now worrying and dangerous signs of stagnation. The first Global Stocktake was expected to catalyze a new round of national climate pledges (NDCs) that would finally align with the 1.5°C limit and climate justice, as even current warming projections are a death sentence for vulnerable communities. However, this has not materialized; climate action is falling devastatingly short, with most NDCs either missing, inadequate, or failing to deliver on the promised transition away from fossil fuels. For every incremental increase in temperature, it increases risk for human health, disrupts food and water security, causes significant economic damage, and threatens ecosystems and biodiversity; all jeopardizing the limits of adaptation. This persistent ambition gap deepens the crisis as nations, especially developed ones, continue to shirk their responsibilities under the principles of equity and common but differentiated responsibilities.

Bridging this ambition gap is a legal and practical necessity, making it a make-or-break issue for COP30 and the integrity of multilateralism. The International Court of Justice has affirmed that achieving the 1.5°C target is a binding legal obligation for all countries, not merely an aspiration, and requires enhanced NDCs every five years in line with justice and fairness. This ruling underscores that states must act in line with equity and provide scaled-up finance and technology to developing nations. Consequently, the failure of developed countries to lead has put the Paris Agreement at risk, prompting calls from the UN Secretary-General for COP30 to produce a credible global plan to get on track. A robust response at COP30 is now essential, not optional.

### Responding to the ambition gap

Aligned with the UN Secretary General, CAN asks countries to conclude COP30 with a strong global response plan to the glaring ambition and implementation gap, built on the principles of equity and CBDR-RC.

This response plan must include the following elements:

- COP30 must highlight the glaring ambition and implementation gap that lead to loss of lives, a perpetuation of injustice and destruction of ecosystems, even as it acknowledges the progress made under the Paris Agreement in terms of global trajectory of emissions and warming. Any political response to these gaps would be incomplete if planned climate action fails to center people, communities, and nature in order to deliver a just transition rooted in respect of human rights.

- COP30 must discuss, either in a formal dedicated space or through ministerial roundtables, the NDC and BTR synthesis reports. Given the critical urgency, Parties – especially those representing developed countries and G20 member states, must agree to **fix NDCs that are not in line with countries' fair shares responsibilities**<sup>39</sup>. As with the entirety of climate action, this must be in accordance with the principles of CBDR-RC and equity, alongside scale-up climate finance to enable greater ambition. These revised NDCs are to be submitted before COP31.
- **The revised NDCs need to implement the guidance from the first Global Stocktake and the International Court of Justice Advisory Opinion in good faith** and include plans and timelines to phase-out fossil fuels. They must also outline contributions to the global goals on renewable energy and energy efficiency, and measures to halt deforestation and reverse ecosystem destruction by 2030, in line with equity and the fair shares of each country. Developed countries should include information on their public grants-based finance for developing countries in their NDCs.
- Parties must agree a **process to develop a schedule for transitioning away from fossil fuels** in line with CBDR-RC and equity. This could be done by mandating COP30 and COP31 Presidencies to lead a process to set up a global fossil fuel phase-out roadmap.
- Parties, especially those representing developed countries and G20 member states, should enhance their national climate frameworks, including laws and policies, in accordance with the principles of CBDR-RC, equity and human rights in order to speed up implementation and go beyond current NDC pledges.
- Just transition forms an important part of the architecture for enabling climate ambition. The JTWP must **reach agreement on the principles of a just transition and establish the Belém Action Mechanism for Just Transition (BAM)** to support the implementation of NDCs, among other measures.
- Climate finance is a key enabler for implementation. COP30 must bring clarity on provision of quality climate finance at scale (*see Chapter 3*).
- The Action Agenda at COP30 should build momentum and help close the implementation gaps, presenting concrete and implementable global actions/initiatives, including those from credible actors and non-party stakeholders, that can strengthen climate action in a measurable and accountable manner.

#### **Spaces and Process for the political response:**

- The Leaders' Summit ahead of COP30 must recognize the need for a global response plan, preparing the ground for fruitful discussions.
- It is crucially important that the global response plan is reflected as a part of a formal outcome of COP30 in order to uphold the integrity of the UNFCCC and strengthen multilateralism.
- In case of a cover decision at COP30, space for these elements must be ensured.

<sup>39</sup> [Civil Society Equity Review: Fair Shares, Finance, Transformation](#), 2024.

## Mitigation Work Programme (MWP)

The MWP has thus far failed to deliver on its mandate to close the emission gap pre-2030. To strengthen the relevance of the MWP, we suggest redirecting the MWP to technical conversations on mitigation related outcomes from the first GST, especially paragraphs 20 to 42 of 1/CMA.5. Therefore, the technical discussions in the global dialogues and investment-focused events should focus on accelerating action on those global commitments.

In this sense, the MWP decision should include implementation-focused high-level messages from the global dialogues 2025, which were on forests and circular economy & waste. We believe that the digital platform can be interesting, but must not be used to divert negotiations on the substance of high-level messages.

The revision of the MWP in 2026 is an opportunity to make it effective in its purpose and process. CAN urges parties to find an appropriate format as soon as possible to fulfil this crucial mandate and to adjust/create the needed space to do so.

## Carbon Markets

CAN strongly advocates for fair and equitable finance for climate action, including for the protection and restoration of carbon-rich and biodiverse ecosystems, but **CAN rejects the practice of offsetting to tackle the climate crisis.**<sup>40</sup> Moreover, CAN underscores that **revenues resulting from the trade of mitigation outcomes authorised under Article 6.2 and Article 6.4 neither represent climate finance nor replace the climate finance commitments of developed countries.**

Although Article 6 negotiations at the CMA-level concluded at COP29, some stakeholders – namely carbon market actors with financial interests – are unacceptably calling for the Article 6.4 Supervisory Body's rules to be weakened at COP30 (e.g. on baseline-setting, leakage and permanence). **CAN stresses that the Article 6.4 Supervisory Body's decisions must not be watered down at COP30.** Further weakening the Article 6.4 Supervisory Body's standards is wholly inappropriate for many reasons, including the realistic probability of Article 6.4 carbon credits being used for offsetting purposes to "achieve", on paper, NDCs and corporate climate targets.

**CAN also calls on the UNFCCC Secretariat to ensure that the "Article 6.2 Ambition Dialogue"**<sup>41</sup>, scheduled on 10 and 12 November, reflects a diversity of stakeholder views and presentations, notably from ENGO, IPO, WGC, RINGO and YOUNGO representatives. It is far from a given that Article 6.2 actually raises the climate ambition of countries – in fact, it actually risks undermining the ambition of NDCs,<sup>42</sup> for

<sup>40</sup> CAN, [Position on Carbon Offsetting](#), 2022.

<sup>41</sup> UNFCCC, [Article 6.2 Ambition Dialogue Concept Note](#), 2025.

<sup>42</sup> Climate Action Tracker, [Why Article 6 should increase climate action – not delay it](#), 2025.

example in the European Union where this may currently occur.<sup>43</sup> There should be space within the Ambition Dialogue to critically discuss the current state of Article 6.2 and look at what is not working rather than being a space for big announcements and self-promotion that take time away from a much-needed critical discussion.

Finally, in the context of the COP Presidency's 23rd key objective for COP30, "Harmonization of carbon markets and carbon account standards", **CAN calls on the COP Presidency to ensure that any carbon market related initiatives or announcements are nuanced, such that they accurately reflect the pitfalls and risks surrounding carbon credits.** CAN is concerned by the overall framing of the COP Presidency's 23rd objective and the fact that the entities associated with the activation group involve many carbon market actors with financial interests that are unlikely to demonstrate nuance on this topic.<sup>44</sup> For example, **CAN is very concerned by the COP Presidency's seeming endorsement of "the Coalition to Grow Carbon Markets"**, which has an explicit aim to "rapidly boost demand for carbon credits"<sup>45</sup> and which is expected to be formally platformed at COP30.<sup>46</sup> Initiatives such as these, focusing explicitly on scaling demand for carbon credits, appear to conveniently ignore robust research underscoring immense quality shortcomings of carbon credits,<sup>47</sup> which have persisted for decades and are tied to systemic flaws.<sup>48</sup>

## Global Stocktake: Between implementation and preparation for the next cycle

COP30 is a crucial moment for the Global Stocktake. It is the moment to effectively launch the implementation of its first version, decided in 2023. It is the moment to finalise the modalities of its next version, planned to happen from 2027 to 2028. Both need the full attention and good faith of the Parties.

### The UAE dialogue

There is a need to discuss how to implement GST-1 and to respond to the ambition and the finance gaps we expect to be facing in Belém. This is a question of credibility for the next GST, but more generally for the Paris Agreement. A GST-1 that is not fully implemented will create a precedent that undermines and weakens the architecture of the Paris Agreement. Accountability must be the priority of COP30. Parties need to find where and how the GST-1 implementation will be covered.

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<sup>43</sup> CAN Europe, [Open letter against international credits integration into the EU 2040 climate target and NDC](#), 2025.

<sup>44</sup> See COP30 website, Action Agenda, [Activation Groups](#).

<sup>45</sup> Voluntary Carbon Markets Integrity Initiative, [The Coalition to Grow Carbon Markets](#).

<sup>46</sup> Voluntary Carbon Markets Integrity Initiative, [First-of-its-kind government coalition to issue shared principles on carbon credit use by COP30 to boost climate finance](#), 2025.

<sup>47</sup> Probst et al., [Systematic assessment of the achieved emission reductions of carbon crediting projects](#), Nature Communications, 2024.

<sup>48</sup> Romm et al., [Are Carbon Offsets Fixable?](#), Annual Reviews (Vol 50), 2025.



One possible place for Parties to discuss GST-1 implementation is the still pending UAE Dialogue. Parties have been locked in disagreements over its scope and modalities since SB60 in June 2024. CAN strongly calls for a decision at COP30, so that the dialogue can commence by SB64 June 2026 in Bonn.

CAN expects the UAE Dialogue to answer the questions of international cooperation, barriers and disenablers to implement GST-1. Its modalities need to be ambitious — a one-time dialogue without any follow up provisions, report or possibility of formalization through a decision will be unacceptable to CAN's constituencies.

If Parties fail to land the UAE Dialogue for June 2026, the COP30 Presidency and its successors up to 2028 must ensure the establishment of an effective follow up process, including through high-level roundtables.

On another aspect, the follow-up of the implementation of GST-1 must be inclusive and ensure the safe, meaningful and systematic participation of rights stakeholders. Dialogues, workshops or roundtables organised in that regard must allow the discussion on cross-cutting elements of the GST-1 implementation, such as the respect of human rights, synergies with the biodiversity agendas or the need to integrate gender equality into climate policies.

### **The Second Global Stocktake (GST-2)**

Negotiations for the second cycle of the GST are slated to take place over 2027 and 2028. For the process to maintain relevance for peoples' lived realities, it is crucial that GST-2 enables Parties to shift to implementation mode in a manner that is just, inclusive and comprehensively responds to the climate crises. This should be done through new tools such as citizens' assemblies. CAN proposes the inclusion of such consultative processes in the decision so the UNFCCC Secretariat is mandated to organise such citizens' assemblies with the support of the right-based constituencies in the GST-2 cycle.

An important issue that is dividing the Parties is the alignment between the IPCC AR7 publication and the second GST. CAN believes that the impasse between Parties on the timeline of the AR7 reports is detrimental to the credibility of intergovernmental collaboration of climate. For progress in negotiations on GST-2 in Belém, Parties must resolve the issue of the AR7 timeline in line the provisions of the Paris Agreement<sup>49</sup> and provide definitive clarity when they meet in Peru for the 63rd Session of the IPCC at the end of October 2025.

Concerning other agenda items, the next GST needs to be better coordinated with the UNFCCC finance agenda than its first cycle. 2028 is also the year of the first review of the NCQG. The decision text of GST-2 must integrate the findings of the review and be able to support any improvements mentioned in the review.

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<sup>49</sup> Article 14.1, [Paris Agreement](#), 2015.

## Chapter 5:

### Climate justice through meaningful multilateralism

The contemporary global landscape is defined by profound insecurity, marked by geopolitical strife, resource conflicts, and a deepening concentration of wealth and power<sup>50</sup> as well as a rise in right-wing nationalism. This has created a crisis where governments and people around the world are losing faith in multilateralism and its ability to solve global problems. The failure of the UN climate regime to deliver effective action after decades of negotiations further contributes to this crisis. But global problems need global solutions and it is therefore critical that COP30 concludes with credible outcomes on addressing the climate crisis, and gives a clear signal that the climate regime will be reformed to make it more effective, inclusive, and just.<sup>51</sup>

This global landscape also fosters a widespread shrinkage of civic space, where freedom of expression is increasingly constrained. This repression disproportionately targets those advocating for justice, from environmental human rights defenders to voices in the global pro-Palestinian solidarity movement, which has faced systematic restraint and bans, particularly in the Global North.<sup>52</sup> This crackdown directly undermines global solidarity, making it more difficult for communities to build united fronts against interconnected polycrises like climate change. This erosion of civic space poses a direct threat to the efficacy of global climate governance. The independent monitoring and moral pressure exerted by activists and frontline communities are intrinsic to the success of the UNFCCC process, holding parties accountable for their commitments.<sup>53</sup>

With public faith in governments and multilateral institutions already in decline<sup>54</sup>, a failure by COP30 to mount a credible and just response to the climate crisis will further undermine collaborative efforts, risking the irrelevance of the entire international climate regime and ceding ground to the very forces of corporate capture and political inaction that fuel the current polycrisis.

The undue influence at COPs of fossil fuel and other industries whose profit-making depends on activities that harm the climate also contributes to the shrinking of civic space and poses a major obstacle in achieving ambitious outcomes. The curtailment and ending of this influence would mark a significant measure in making the UNFCCC aligned with public interest and climate justice. Rigorous protocols and guardrails have been developed by WHO and others to limit undue commercial influence from undermining protective policies with successful results, including conflict of interest disclosures and transparency mechanisms that could inform an enhanced

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<sup>50</sup> Oxfam International, [Survival of the Richest](#), 2023.

<sup>51</sup> CAN et al., [United Call for an Urgent Reform of the UN Climate Talks](#), 2025.

<sup>52</sup> Amnesty International, [Under Protected and Over Restricted The State of the Right to Protest in 21 European Countries](#), 2024.

<sup>53</sup> UN Environment Programme, [Environmental Rule of Law](#), 2021.

<sup>54</sup> [Edelman Trust Barometer](#), 2024.

Accountability Framework<sup>55</sup> in the UNFCCC space<sup>56, 57</sup>. To this end, CAN appreciates and supports the first step<sup>58</sup> in this direction taken recently by the UNFCCC through the explicit expectation for all non-government participants at COP30 to:

- Disclose sources of direct funding for participation at the UNFCCC; and
- Provide written confirmation that their individual objectives are in full alignment with the UNFCCC, Paris Agreement, and Kyoto Protocol

CAN and its constituencies, however, call on the UNFCCC to go further and also address the conflicts of interests among Parties including Presidencies. Despite Brazil's credentials as a diverse democracy and a critical ecological lynchpin in planetary systems, it is also a significant producer of fossil fuels with plans for expansion – ironically not far from COP30 venue Belém. This marks the fifth year in a row that COP is overseen by a Presidency with fossil fuel interests that potentially undermine progress at the COP. CAN is calling for the adoption of a rigorous UNFCCC Accountability Framework to protect against undue influence of polluting interests, and ending commercial partnerships, in particular with polluting industries and actors, including fossil fuel-dependent industries and agro-industrial multinationals, enabling and working with them.

The conclusions on Arrangements for Intergovernmental Meetings (AIM) issued at SB62 in June 2025 confirms that Host Country Agreements (HCA) should reflect obligations under international human rights law and enable inclusive and effective participation of Parties and observer organizations to ensure that human rights and fundamental freedoms are promoted and protected at UNFCCC meetings. With respect to the HCA for COP30, CAN appreciates the UNFCCC Secretariat and Brazilian Presidency's role in making the agreement publicly available<sup>59</sup> and urges the Secretariat to mandate public availability of the HCA as standard practice, in line with current and past AIM conclusions

Considering the shrinking civic space at UNFCCC events and its implications for human rights including the right to freedom of expression and to peaceful assembly, CAN recommends:

- The UNFCCC and the COP30 Presidency should ensure that logistical arrangements actively facilitate participation, including, access to adequate affordable accommodation, full, effective, and meaningful remote participation modalities, adequate seating in meeting rooms, accessibility for people with disabilities and guaranteeing the participation and safeguarding of children in all COP30 spaces. Accommodation in Belém has been especially challenging, particularly for observers, given high prices and low availability.

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<sup>55</sup> Corporate Accountability, [Joint civil society submission on establishing a UNFCCC Accountability Framework to protect against undue influence of polluting interests](#), 2022.

<sup>56</sup> WHO, [Framework Convention on Tobacco Control](#), 2003.

<sup>57</sup> WHO, [Guidelines for implementation of Article 5.3](#), 2013.

<sup>58</sup> [Observed Handbook for COP30](#), 2025.

<sup>59</sup> [Host Country Agreement for COP30](#), 2025.

- The UN, the UNFCCC Secretariat and government of Brazil should guarantee the full respect of the freedom of expression and of peaceful protest for all participants, including those wishing to peacefully express views on the human rights costs of fossil fuels extraction, the impacts of militarisation, wars and conflict, including in Palestine, Sudan, DRC and Ukraine and on the human rights situation in the host country, and that these rights will be protected at COP30, and in all future UNFCCC meetings.

## Annexure

### CAN Regional and National Nodes

The CAN-International Secretariat works closely with our regional and national nodes. For specific information on regional activities and projects, please contact the appropriate coordinator directly.

Regional nodes
CAN Africa
CAN Arab World (CANAW)
CAN-Eastern Africa (CANEA)
CAN Eastern Europe, Caucasus, and Central Asia (CAN-EECCA)
CAN Europe
CAN Latin America (CANLA)
Pacific Islands CAN (PICAN)
CAN South Asia (CANSA)
CAN Southeast Asia (CANSEA)
Southern African Region CAN (SARCAN)
CAN West and Central Africa (CANWA)
National nodes
CAN Australia (CANA)
CAN China
CAN-RAC Canada
RAC France
CAN Japan
New Zealand Climate Action Network (NZCAN)
South Africa CAN (SACAN)
CAN Tanzania (CAN-TZ)
CAN-Uganda (CAN-U)

CAN-UK
US Climate Action Network (USCAN)
CAN Zimbabwe



## CAN Working Groups

CAN Working Groups are designed based on the thematic priorities of CAN's work particularly across the UNFCCC negotiations. For specific information on working groups, please contact the appropriate coordinator directly.

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