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8

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Call for scaled up resources for national adaptation plans

Antalya, 16 Nov (Jinghann Hong and Eqram Mustaqeem)- The **G77 and China** called on developed countries to fulfil their commitments and scale up the provision of adequate, predictable and accessible financial resources, technology transfer and capacity-building support, so that developing countries can formulate and effectively implement their National Adaptation Plans (NAPs). This call was made during the informal consultations on NAPs held since Nov 11, during ongoing climate talks in Antalya. The Group also said that both the process of formulating and implementing NAPs "must receive equal attention."

Co-facilitated by **Audrey Bernard (Canada)** and **Pepetua Latasi (Tuvalu)**, Parties at the 65th session of the Subsidiary Body for Implementation (SBI 65) were requested to continue consideration of NAPs, taking into account the 2026 report on progress in the process to formulate and implement NAPs (dated 27 Oct 26), as well as an overview by the LDC Expert Group (LEG) in an addendum (dated 2nd Nov) which provides "an overview of climate finance flows and financial support provided by developed country Parties to developing country Parties for formulating and implementing NAPs".

[At COP 30 in Belém, via para 12 of decision 8/CP.30, Parties requested the LEG to compile from relevant reports, in collaboration with the Adaptation Committee (AC) and the Standing Committee on Finance (SCF), an overview of the climate finance flows. This overview was to be included in the 2026 report on progress in the process to formulate and implement NAPs.]

There was stark divergence among Parties on the contents of the addendum and on how to take the matter the way forward.

Many developing countries were of the view that the Belem mandate had not been adhered to and that the addendum did not adequately address key elements. The **G77 and China,** supported by the **Like-Minded Developing Countries (LMDC)**, the **Arab Group**, the **Independent Alliance of Latin America and the Caribbean (AILAC), Group of Sur** and the **Least Developed Countries (LDCs)**, stressed that the addendum introduces other sources of finance (including on South-South cooperation), thereby deviating from the focus on contributions from developed countries to developing countries. They also noted the shortcomings of existing reporting arrangements, which limit the evidence base underpinning the addendum, and called for improved tracking of support provided by developed countries for NAP implementation, particularly through their Biennial

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Transparency Reports (BTRs). Developing countries were also united on the need for and accessibility of finance for NAPs, particularly highlighting disparities in access to finance and the various barriers faced in moving from NAPs formulation to implementation.

In response to this, the **Umbrella Group (UG),** the **European Union (EU)**, **Norway**, and **Japan** maintained that there is a need to look at the whole finance landscape and that discussions on these issues would be better placed in the finance-related negotiations, with the **UG** further suggesting to address the matter under the Climate Finance Work Programme (CFWP), in the broader context of the New Collective Quantified Goal (NCQG). [See TWN Update 4 'Climate Finance Work Programme Must Focus On Implementing Article 9.1, Say Developing Countries' for updates on the CFWP.]

At the closing plenary meetings of the Subsidiary Bodies, followed by the plenary meetings of the COP (Conference of Parties to the UNFCCC), CMP (Conference of Parties to the Kyoto Protocol) and CMA (Conference of Parties to the Paris Agreement) held in the early hours of Sunday, 15 Nov, the SBI agreed to forward this matter to COP 31 for further consideration, on the basis of the draft text developed during the first week. A second round of interventions on this draft text had taken place over the final days of the first week but these were not able to be reflected in a further iteration, as time had run out to produce a revised draft.

The **COP31 President of Negotiations**, **Chris Bowen (Australia)** re-appointed **Audrey Bernard (Canada)** and **Pepetua Latasi (Tuvalu)** to continue facilitating further technical discussions on the matter, with the work expected to conclude on Tuesday, Nov 17.

KEY HIGHLIGHTS OF PARTIES' INTERVENTIONS FROM THE FIRST WEEK

Sri Lanka for the **G77 and China** expressed importance of NAPs as a key instrument for advancing adaptation action in developing countries, and stressed that both stages of formulation and implementation require adequate, predictable and accessible means of implementation (MOI) from developed countries. It observed that the 2026 progress report confirms developing countries' experience where "the main bottleneck lies in moving from a plan to a fundable proposal."

On the addendum, the Group said that the addendum goes beyond that mandate and the report fails to conduct a comprehensive analysis of the progress made by developed countries in fulfilling their obligations to provide finance to developing countries, but instead brings in South-South climate finance flows, contributions from developing countries and non-Party entities and information on the Fund for responding to Loss and Damage (FRLD), thus blurring the distinction the mandate draws between developed country providers and developing country recipients.

On tracking support, the Group stressed that reporting on support for NAPs remains very limited and that only eight Parties referred to NAP specific support provided in their first BTRs. On national ownership, it said that NAPs must remain country driven and nationally determined, reflecting national circumstances, priorities and approaches to adaptation, and that the process must not introduce additional reporting burdens, assessment requirements or process steps for developing countries.

The Group called on developed countries to fulfil their commitments which must be explicitly reflected in the COP 31 NAPs decision text. It also called for NAPs to be established as a permanent agenda item under the SBI, "so that progress in both formulation and implementation is considered regularly", as "the NAP process touches every part of the adaptation agenda".

Pakistan for the **Like-Minded Developing Countries (LMDC)** underscored that the formulation of NAPs cannot be considered successful without their effective implementation and that the widening gap between planning and implementation reflects persistent challenges in accessing adequate, predictable and accessible MOI. It expressed concerns that the addendum did not adequately address key elements of the mandate relating to the fulfilment of developed country obligations, including "the provision of new and additional, predictable and adequate financial resources, the share of grant-based financing, and transparency in tracking the

delivery of such support."

It highlighted that South–South cooperation is voluntary and complementary and "must not be presented as a substitute for the financial obligations of developed country Parties." The LMDC proposed requesting the AC in collaboration with the SCF and the LEG, to refine the report and its addendum in accordance with the agreed mandate, with particular emphasis on tracking the provision of support by developed countries. It said that the revised work should be finalized at the next AC's meeting in the first half of 2027, for consideration at SB 66 and subsequent adoption at COP 32.

On access to adaptation finance, the LMDC observed that the report confirms persistent disparities in access to financial resources despite the availability of funding mechanisms, which hinders developing countries in moving from national adaptation priorities to funded implementation. It emphasized the need for simplified access procedures, enhanced direct access, and increased grant-based and concessional public finance, particularly for developing countries. On tracking financial support, it acknowledged the importance of improving the transparency and traceability of support provided for NAP implementation, and cautioned that any improvements in tracking must be undertaken without imposing additional reporting requirements or administrative burdens on developing countries.

Also emphasizing that developed countries must fulfil their commitments to provide MOI, the LMDC said that NAPs must remain country-driven, nationally determined and responsive to national priorities and circumstances, and that their implementation must not be linked to additional conditionalities or externally imposed assessment requirements. It also supported establishing NAPs as a permanent agenda item under the SBI to ensure sustained attention to both formulation and implementation.

Panama for **AILAC** said that it was not in a position to welcome the 2026 progress report, given the content of the addendum. In the interest of transparency, it asked after the composition of the task force formed by the LEG for the report, noting that "the task force will benefit from expanded membership to bring more information and analysis about progress in other developing countries that are not LDCs or SIDS", so as to prevent imbalance in the report. It observed that the AC has a NAPs Task Force [established at the AC's fourth meeting to support developing countries in formulating and implementing NAPs], and inquired as to whether there is an opportunity for coordination and complementarity between the two.

It also expressed concern on the way climate finance flows and support provided by developed countries to developing countries for formulation and implementation of NAPs is presented in the addendum, and said it had questions on the methodologies used to assign values that are attributable to adaptation financing of climate funds. On the COP 31 NAPs decision, AILAC said that it would like to reflect the above, as well as request SCF as part of next Biennial Assessment and Overview of Climate Finance Flows (BA) to develop overview of climate finance flows and support provided by developed countries to developing countries for formulation and implementation of NAPs.

On discussions under the NAPs agenda item in Antalya, it wanted to consider other relevant issues for the NAP process that fall outside the report. It wanted the AC and the LEG to enhance their work on addressing the gaps and needs towards the achievement of the objectives of the process to formulate and implement NAPs.

Ghana for the **African Group** underscored that the central challenge remains in ensuring countries have "necessary financial, technical and institutional means" to implement adaptation priorities; not just form plans but to ensure that plans are adequately financed and translated into actions. Acknowledging the 2026 progress report and its addendum to be useful compilations, it noted some limitations including insufficient geographical coverage and regional analysis which does not adequately capture the diversity of adaptation finance needs and support across the African continent; that the scale reported does not reflect resources reaching countries or the extent to which it assesses developing country needs; and that the limitations of the evidence base and the need to systematically track support, citing that of the 104 BTRs of Parties with relevant support

information, only 34 refer to NAPs, and only 8 report on support provided in relation to NAPs, and 26 reported on support received or needed.

It pointed out that the persistent gap between NAP formulation and implementation is "fundamentally linked to inadequate MOI" as developing countries face significant barriers, including "inadequate and unpredictable adaptation finance, limited resources for project preparation, complex accreditation and approval processes, high transaction costs and delays in disbursement as highlighted in progress report." It called for grants or highly concessional finance, observing that the growing reliance on bonds for adaptation finance is not appropriate given the debt vulnerability of many African countries. On the COP 31 decision in this regard, it wanted a "more explicit and accountable approach" where the commitment to triple adaptation finance by 2035 must translate into substantial increase in resources reaching developing countries.

Kuwait for the **Arab Group** emphasised that the analytical framework presented in the 2026 progress report must not become the basis for new obligations, comparisons between developing countries, or increasing conditions for accessing support. It also stated that the report and the addendum required further refinement to ensure consistency with the agreed mandate. It proceeded to highlight several priorities for outcomes in the COP 31 decision, amongst these: addressing the persistent gap between formulation and implementation while ensuring continued support for countries still developing plans, particularly overcoming barriers to accessing finance including through simplified access procedures, enhanced direct access, and readiness capacity; strengthening the MOI by developed countries. It maintained the NAP process as country-driven, flexible, non-prescriptive, and reflecting national circumstances, priorities and capacities. It also emphasised the importance of establishing NAPs as a permanent agenda item under UNFCCC.

The **Dominican Republic** for **Alliance of Small Island States (AOSIS)** said that only 17 SIDS had formulated NAPs with 22 AOSIS members still working towards their first one. AOSIS stated that "finance reaches SIDS in small shares, 4% of bilateral finance and 12% of the Green Climate Fund portfolio", where both formulation and implementation required targeted financial support. It also wanted to highlight the third stage of NAPs, that is Monitoring, Evaluation, Accountability, and Learning (MEAL), where Learning has to "step up" now given scarce resources. It requested that support for NAPs include support for MEAL from outset, as SIDS need to know which adaptation measures work in small islands and why so.

It welcomed the analytical framework in the 2026 progress report, stating that tracking progress via stages would be a useful way to pinpoint blockages and where challenges are occurring and where targeted support is needed. AOSIS also stressed that future reports should reflect the reality that climate impacts continue to occur while NAP formulation is ongoing and finance is being mobilised, with countries repeatedly facing shocks that set them back into recovery, and called for this reality to be established as a baseline and suggested asking the LEG how support could be provided to keep the NAP process moving forward despite these recurring shocks.

It also said that the addendum did not adhere to the clear mandate given and that this should be corrected to report on flows from developed to developing countries. It called on developed countries in their second BTR to identify support by recipient and stage and disagreed on removing disaggregated analysis for SIDS and LDCs as these groups face the "widest support gaps" and that "disaggregated analysis serves every developing country because it shows where every country falls short."

Uruguay for **Group of Sur [Argentina, Ecuador, Paraguay, Uruguay]** proposed that the SBI invite the LEG, in collaboration with Green Climate Fund (GCF) and relevant partners, to strengthen guidance and technical support for costing adaptation measures and developing concept notes and project pipelines. On the 2026 progress report, it expressed concern over the LEG's approach to preparing the addendum, particularly its mixing of Annex I and non-Annex I Parties, adding that this was unacceptable as it reinterpreted financial obligations established under the UNFCCC and accordingly said it could not welcome the report and could only take note of it.

It noted that the GCF, as a major source of funding

for NAPs, often combines adaptation and mitigation in a single project, which constrains the ability of developing countries to address their actual needs in formulating, updating and completing the iterative adaptation process. It stressed that access to GCF support should reflect how countries plan and implement adaptation in practice, without conditionalities.

Burkina Faso for the **LDCs** noted that only 15 of the 44 LDCs have a national direct access entity accredited by the GCF or a national implementing entity accredited by the Adaptation Fund (AF), a situation that persists alongside significant barriers to accessing finance for adaptation implementation. The LDCs called for a dedicated mandate for the GCF to provide readiness and project preparation support to LDCs, including to cost adaptation measures, develop their own project pipelines and connect them with accredited delivery partners, stressing that this must be accompanied by finance for implementation and stronger access for national institutions.

On the addendum, the LDCs reiterated the mandate under para 12 of decision 8/CP.30 and called for South-South Cooperation to be removed from the overview, and proposed that the addendum be jointly refined by the LEG, AC and SCF into a comprehensive report, under a clear mandate, and circulated at least eight weeks before SBI 66 for further consideration.

The LDCs also stressed that the decision text should reflect four priorities: first, scaling up adequate, predictable and grant-based public finance from developed countries, alongside technical and capacity-building support, with simplified access to climate finance and recognition of the special circumstances of SIDS and LDCs; second, supporting the costing of adaptation measures, project and programme preparation, and the development of national pipelines, with particular attention to SIDS and LDCs; third, improving the tracking of support for NAP formulation and implementation, with clear accounting of who provides and receives support, and the amounts disbursed and fourth, strengthening country-owned MEAL and providing the LEG with adequate resources to carry out its mandate.

Bhutan, for the **Landlocked Developing Countries (LLDCs)**, highlighted the structural disadvantages faced by LLDCs including mountainous countries where glaciers are retreating and landslides and flash floods are occurring with relatively little warming, as well as dryland countries where drought is the norm. It said that these challenges, coupled with limited institutional and technical capacities, mean that planning and programming for NAPs compete for the same scarce resources. The LLDCs stressed the challenge was one of "capacity, not ambition." They further noted that access procedures designed for countries with larger administrations were themselves a barrier.

It identified three priorities for the outcome: first, to note with concern the needs identified in NAPs and the support received, as well as the uneven access to finance; second, to call for scaled-up grant-based finance and simplified access to finance for implementation, rather than planning alone; and last, to invite the GCF and AF to fast-track projects that implement NAPs, while providing greater support to national institutions to cost projects and access funding directly. As the LLDCs stressed, "a plan that cannot be financed protects no one."

The **EU** said that "NAPs should be guided by best available science", noting NAPs as a cornerstone of international adaptation architecture. It said that the clear trajectory of 81 developing countries produced and published NAPs in the past reporting period demonstrated the fastest increase of NAP submissions on record. It noted challenges that remain in the process, including turning plans into fundable proposals; priorities rarely being costed at intervention level; and many LDCs lacking delivery partners.

On the scope of the 2026 progress report, the EU expressed concerns on the limited scope given its exclusive focus on access to climate finance, and that the chosen method of reporting was "extremely complicated". It also said that the report shows the significant difficulty of tracking NAP-specific finance given the methodological challenges outlined, and so it is difficult for Parties to get a clear updated picture. The EU also stressed that there is disaggregated data that is NAP-specific, and disagreed with any extension or alteration of mandate as this would be duplicative of work the SCF is already undertaking. It added

that Parties should instead focus on technology transfer and capacity-building, alongside good governance and institutional arrangements, which it called "key enabling factors" to support adaptation action on the ground, and ensure adequate implementation of NAP plans. It said that it was crucial to mainstream adaptation into national budgets and development plans to improve the overall "enabling environment", so as to facilitate climate risk consideration and translate into policy and investment plans.

It also said that there is need to encourage countries to prioritise interventions identified in their NAPs and translate these into investment pipelines; strengthening matchmaking, including through the NAP Expo; and providing targeted support to LDCs and SIDS that have yet to access readiness support. According to the EU, these proposals aim to address critical gaps in the NAP process, improve the financing of NAPs, and bring vulnerable countries together with potential delivery partners. The EU also said that when we speak of MOI, it is important to capture the full landscape of finance, including the NCQG, and that it is about the whole flows of finance, and not just public financing.

The **United Kingdom** for the **UG** said it desired to send strong signals on the importance of NAPs and reflect on progress made, and thus wanted to recognise the 14 countries who have submitted NAPs and that this "demonstrates in the report that access to finance is improving". It also said that the outcomes of the 2026 progress report are limited and that other relevant reports from other bodies were also available and could be used to capture the full picture when considering the topic.

On adaptation finance, it firmly believed that the best home for discussions should be within the finance room and in the broader context of the NCQG, which it said was "a major adaptation finance decision". On references to the private it maintained that considering all financial flows was important, while making clear that this did not negate the role of public finance.

Norway said that it recognised that the challenge is increasingly shifting from planning to implementation, including translating current allocation priorities into fundable proposals and securing access to support. It highlighted the importance of community-driven and inclusive adaptation processes, particularly ensuring the participation of Indigenous Peoples, local communities, children and youth, as well as the importance of monitoring, evaluation and learning.

Mexico for the **Environment Integrity Group (EIG)** said that finance is essential though not enough on its own, highlighting "institutional factors" that governments need to strengthen to translate priorities into measures on the ground. These include legal and policy frameworks, clear mandates, coordination of across sectors and levels of government and stakeholder participation, monitoring and accountability, as well as knowledge exchange. It said that progress on the NAP should be measured by implementation, which means "project bylines that can attract investment and match national realities, robust monitoring, evaluation, and learning, and coherence between NAPs, NDCs, and the Global Goal on Adaptation." It also called for cross-cutting lens throughout NAPs processes: gender equality and social inclusion, attention to local context, including Indigenous Peoples and vulnerable populations and ecosystems.

Japan said that strengthening NAP implementation requires broader and more comprehensive efforts beyond project preparation and access to finance. It emphasised the importance of strengthening "enabling conditions", including institutional arrangements, policy, data, knowledge and inclusive governance, as well as mainstreaming adaptation into national and subnational policies and development planning, fostering synergy across sectors and government, and engaging diverse actors, particularly the private sector, to make use of adaptation technologies and services. It wanted the draft decision to recognise the importance of these broader efforts in strengthening NAP implementation.

In response to developed countries' interventions that discussions on finance should remain within the finance agenda, the **Arab Group** reminded Parties that decision 8/CP.30 had requested an overview of financial flows and support provided. It stressed that "finance is not an additional issue being introduced under this agenda item; it is an integral part of the mandate before us." On suggestions to expand the contributor base, it

recalled that the provision of financial support by developed countries to developing countries is grounded in the Convention and the Paris Agreement, particularly Article 9.1, and stressed that this agenda item should not be used to reinterpret or expand existing obligations. The Arab Group also recognised the progress made by developing countries in advancing their NAPs, but cautioned against conflating the number of NAPs submitted with progress in implementation, stressing that persistent gaps in predictable, adequate and accessible financial support remained a central challenge.

PARTIES CALL FOR EXTENDING WORK ON NAP AGENDA INTO THE SECOND WEEK

Following the first round of informal consultations in week one, which lasted two hours, the Co-facilitators prepared a draft text based on Parties' interventions. Parties were then provided with a further two sessions to deliberate on the text.

In the closing stages of the NAP agenda, Parties across the room expressed frustration at the limited number of informal consultation slots, which prevented them from reaching a decision. In an effort to continue deliberations on the NAP agenda, Parties agreed to forward the matter to the second week of COP31 as reflected in the conclusions below;

"The SBI agreed to forward this matter to the 31st session of the Conference of the Parties for further consideration, on the basis of the draft text that was published on 14 of November on the UNFCCC website.

It should be noted that the NAP item is an SBI agenda item and, under the governance arrangements, concludes in the first week of the COP, when the SBI ends its work. However, given the momentum and progress made, Parties agreed to forward the matter to the COP, for further deliberations during the second week of the talks which end on Nov. 20.