

*Expectations on Sweden and the EU ahead of COP29, by 19 member organisations in CONCORD  
Sweden's working group for Environmental and Climate Justice.*

# **COP29: PAY UP, PHASE OUT AND INCLUDE**

As world leaders prepare to go to Baku, we are witnessing how the climate crisis drives people from their homes, destroys their livelihoods and deprives them of their human rights. The climate crisis will affect us all, but countries and communities with the least resources to adapt and protect themselves will pay the highest price. Meanwhile, the gap between the needs and finance delivered is enormous and widening. At COP29, also known as the finance COP, these are four areas where Sweden and the EU need to take action:

- ➔ **Finance for the most affected groups and countries.**
- ➔ **Cut emissions and put an end to fossil fuels.**
- ➔ **Step up adaptation.**
- ➔ **Inclusive decision-making and broad participation.**

## COP29: PAY UP, PHASE OUT AND INCLUDE

As COP29 convenes in Baku, the world stands at a critical juncture where the accelerating impacts of climate change – floods, droughts, hurricanes and heatwaves – are becoming increasingly severe. These effects are felt most acutely in the poorest and most vulnerable nations and communities, which lack the resources to adapt and protect themselves. Yet, global mitigation efforts remain far from adequate to prevent the worsening and unjust consequences. Rich countries have a historical responsibility for the climate crisis and must take leadership to increase collective ambitions, as current actions have fallen short of maintaining global warming within the safe planetary boundary. The urgency of this moment demands a collective and bold response from all governments, businesses and individuals, as the choices made today will shape the future for generations.

This year's COP will be a pivotal meeting to respond to the needs of our planet and its inhabitants. COP29 is deemed "the finance COP", as it is time for parties to agree on a *New Collective Quantified Goal on climate finance* (NCQG) to replace the current climate finance goal of mobilising 100 billion USD annually. COP29 is also the last opportunity to set clear expectations on the scope of the second Nationally Determined Contributions (NDCs), which are to be submitted in 2025. Furthermore, outstanding issues on the Global Goal on Adaptation (GGA) will need to advance significantly, and the final review of the *Enhanced Lima work programme on gender* and its Gender Action Plan is to result in a new gender programme at COP29.

The inclusiveness of this year's COP is seriously challenged by the conference being hosted in a country known for its attacks on an independent free civil society and the silencing of critical voices. Ahead of COP29 we are witnessing increased attacks on journalists, human rights defenders and political opponents. Although Article 12 of the Paris Agreement requires that civil society be included in climate negotiations and their outcomes, this is the third year in a row that the COP is taking place in a repressive state with human rights violations.

The actions we take this decade will affect the planet for thousands of years to come.<sup>1</sup> At COP29, we expect Sweden and the EU to show honest leadership in promoting global environmental and climate justice, human rights, gender equality and children's rights in the implementation of the Paris Agreement. This entails the following ambitious commitments and measures for climate finance, mitigation, adaptation and inclusion:

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<sup>1</sup> The IPCC's Sixth Synthesis Report 2023, [Summary for Policymakers](#), page 24.

## 1. FINANCE FOR THE MOST AFFECTED GROUPS AND COUNTRIES

There is a vast and growing gap between climate finance needs of countries and communities in the Global South and the climate finance delivered. The 2021 Needs Determination Report from the Standing Committee on Finance estimates that nearly USD 6 trillion will be required to implement developing countries' climate action plans by 2030<sup>2</sup>.

The current finance goal of 100 billion USD annually for mitigation and adaptation in developing countries was finally met in 2022, but there is still a deficit from previous years.<sup>3</sup> Adaptation continues to receive comparatively less support<sup>4</sup> despite the commitments to double climate adaptation finance by 2025.<sup>5</sup> Pledges for new and additional finance for loss and damage are still small and nowhere enough of what the affected countries and communities need to face escalating devastation caused by weather extremes.<sup>6</sup>

To date, large parts of climate finance has been delivered in the form of loans, adding to the already unsustainable debt burden of the most climate-vulnerable countries, particularly for Small Island Developing States (SIDS) and Least Developed Countries (LDCs), many of them also ravaged by conflicts<sup>7</sup>. This raises serious questions of inequality and justice, as these nations are forced to bear the financial burden of addressing a climate crisis they did little to cause. This directly contradicts SDG 10: Reduce inequality within and among countries.

Furthermore, climate finance contributions are rarely “new and additional”<sup>8</sup> to ODA commitments, thus competing with other development priorities within countries' ODA budgets. Studies also show that climate finance efforts are largely gender blind<sup>9</sup> and insensitive to indigenous peoples'<sup>10</sup> and children's rights<sup>11</sup>, and most of the finance is difficult to access, especially for indigenous peoples, local initiatives and CSOs.<sup>12</sup>

Since the current climate finance goal was set in 2009, it has become abundantly clear that this target is both low and not based on the actual needs of climate vulnerable countries. As parties agree on a new goal at COP29, the finance gap and the well-documented challenges of the quality of finance delivered must be addressed.

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<sup>2</sup> This figure does not fully account for adaptation costs, see page 6 in the [Executive summary](#) of the Needs Determination Report.

<sup>3</sup> In 2020 and 2021, 83.3 and 89.6 billion USD were delivered. Even though the 2022 figure was 115.9 billion USD, the total amount for the three years was still 11.2 billion USD short of the committed amount of 300 billion USD. Source: OECD-DAC, [Climate Finance and the USD 100 billion goal | OECD](#).

<sup>4</sup> OECD-DAC, 2023: [Trends of climate finance for adaptation in developing countries | OECD](#)

<sup>5</sup> Agreed in the [Glasgow Climate Pact](#) from COP26.

<sup>6</sup> Loss and damage contributions as of COP28: [Pledges to the Loss and Damage Fund\\* | UNFCCC](#)

<sup>7</sup> See for example Oxfam's work on the connection between conflict, debt and climate finance: [Conflict-ravaged countries pushed into “debt traps” by climate funding | Oxfam International](#)

<sup>8</sup> In several UNFCCC agreements, it is stated that climate finance should be new and additional to previous commitments.

<sup>9</sup> See for example Oxfam's [Climate Finance Shadow Report 2023: Assessing the delivery of the \\$100 billion commitment \(openrepository.com\)](#), page 30.

<sup>10</sup> UN Special Rapporteur on the Rights of Indigenous Peoples, 2023: [A/HRC/54/31: Green financing – a just transition to protect the rights of Indigenous Peoples - OHCHR](#)

<sup>11</sup> Children's Environmental Rights Initiative, 2023: [Falling Short: Addressing the Climate Finance Gap for Children – CERi \(ceri-coalition.org\)](#)

<sup>12</sup> See for example the work of IIED: [The G20 climate funds review must help finance reach the local level | International Institute for Environment and Development \(iied.org\)](#)

## In negotiations, Sweden and the EU should

- **Ensure an ambitious and just New Collective Quantified Goal (NCQG)** that consists of:
  - a quantum that responds to the real needs of vulnerable developing countries', particularly SIDS and LDCs,
  - a core of public finance – ensuring funds for climate action even when it is not a profitable investment – to be delivered as grants or highly concessional loans to prevent further debt burden, and to be clearly defined as new and additional to ODA,
  - sub-goals for mitigation, adaptation and loss and damage, to adjust for the current imbalance, and to secure sufficient funding for the implementation of the Global Goal on Adaptation and for the Loss and Damage Fund,
  - targets and safeguards for rights-based and gender transformative approaches, including mandatory reporting to the UNFCCC on gender integration in climate finance through the consistent use of gender and Rio markers<sup>13</sup>,
  - mechanisms for increased access for, and consultation with, organisations by and for affected communities, including Indigenous Peoples and Local Communities, small-holder farmers and fishers, women's rights groups, children and youth, trade unions, refugees and displaced persons, conflict-affected communities, and people living with disabilities.
  - a clear timeframe, ensuring predictability of funding, and a transparent structure for monitoring and assessing progress on meeting the targets.
- **Explore innovative sources:** In the context of the NCQG, work for the introduction of innovative sources of climate finance, including global, EU and national taxes and levies, designed in a way that promotes global and social equity and adheres to the Polluter Pays Principle.<sup>14</sup>
- **Encourage more actors to contribute:** Under the UNFCCC Article 4, the main obligation to provide climate finance lies with the developed countries listed in Annex II. In the 30 years since this list was created, however, the world's per capita income has tripled and some countries not listed in Annex II have had a rapid economic development with large cumulative emissions as a result<sup>15</sup>. It is reasonable to encourage all countries with the capacity to pay to contribute to the NCQG, but without diverting attention from the obligations of Annex II countries.
- **Cautiously include private finance:** Private finance will be required alongside public sources, to meet the enormous monetary needs. However, private finance is rarely suitable for adaptation and loss and damage projects in the most vulnerable countries as investments are unlikely to be profitable. This should be recognised in the context of the NCQG by ensuring sufficient grant-based public financing for these purposes, and by separating targets for mobilisation of private finance from parties' commitments for public contributions.

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<sup>13</sup> The system of gender and Rio markers in ODA reporting is explained in the CONCORD Sweden brief [Swedish and international climate finance](#), 2022, page 6 and 16.

<sup>14</sup> For suggestions on equitable innovative funding sources, see [New Sources for Public Climate Finance and for the Loss and Damage Fund - CAN Europe](#)

<sup>15</sup> On cumulative emissions, see for example: [Analysis: Which countries are historically responsible for climate change? - Carbon Brief](#)

- **Separate climate finance from emissions trading:** Financing of projects under Article 6 must not be classified as climate finance or climate assistance, since the purchasing country uses the emission reductions to meet its national goals. Financing of projects under Article 6 must therefore be clearly separated from reporting of climate finance within the framework of the NCQG.

### **In their own international climate finance, Sweden and the EU should**

- **Scale up predictable and long-term contributions** to the annual USD 100 billion climate finance goal, disbursed on average over 2020-2025 to make up for shortfalls in earlier years, and to the NCQG from 2026 and onwards.
- **Deliver grants-based public climate finance** that complements and is additional to, rather than replaces or undermines, other development finance priorities, and does not contribute to increasing the debt burden on countries vulnerable to both debt and climate crises.
- **Prioritise adaptation** finance so that required funds are available for implementing the Global Goal on Adaptation, especially targeting communities and countries hardest hit by the climate crisis. A larger portion of adaptation finance should support gender-transformative and locally-led initiatives.<sup>16</sup>
- **Commit to loss and damage finance** that is new and additional to other climate finance and ODA and is delivered in the form of grants.

### **Sweden should also**

- **Provide predictable and timely pledges to the Green Climate Fund**, as one of the key finance mechanisms under the UNFCCC. Sweden did announce continued support during the pledging conference in October 2023 and has still not formally committed to a contribution or disbursed any funds under GCF2.

## **2. CUT EMISSIONS AND PUT AN END TO FOSSIL FUELS**

The emissions cuts promised in the current NDCs submitted by parties will not put the world even close to on track to meet the goal of limiting global warming to 1.5°C<sup>17</sup>. Instead, it will take us towards 2.5 to 2.9<sup>18</sup> degrees warming by the end of the century<sup>19</sup>. Under the Paris Agreement, each party needs to submit an updated, more ambitious NDC every five years. NDCs must align with the state's national adaptation plans, the targets under the GGA, and ideally with the findings of the Global Stocktake reported at COP28.

The EU has taken important steps through the *Fit for 55* package, but its emissions reduction targets are still insufficient and will result in the Union exceeding its fair share of emissions.<sup>20</sup> The Swedish government's climate action plan and budget are insufficient to meet national and EU climate targets,

<sup>16</sup> [Principles for Locally Led Adaptation](#), as of November 2022 endorsed by over 100 organisations.

<sup>17</sup> According to the IPCC 2023 Synthesis report, global greenhouse gas emissions need to peak before 2025 at the latest, and be reduced by at least 43% by 2030, and by at least 60% by 2035, compared to 2019 levels.

<sup>18</sup> 2,5 if fully implementing conditional NDCs and 2,9 if fully implementing unconditional NDCs.

<sup>19</sup> [UNEP Emissions Gap Report 2023](#).

<sup>20</sup> Climate Action Tracker: [EU | Climate Action Tracker](#)

departing from the country's reputation as a climate action champion.<sup>21</sup> Climate action must be scaled up in both Sweden and the EU, while also ensuring a just transition that safeguards workers' rights and benefits marginalised or socio-economically disadvantaged communities and people. In line with the Polluter Pays Principle, high-emitting sectors, business actors, and behaviours must be more strongly regulated, alongside incentivising climate action by the private sector. Climate measures must also address the interconnected triple crisis of climate change, pollution and biodiversity loss.<sup>22</sup>

### Sweden and the EU should

- **Set rapid and drastic emissions reduction targets:** The EU should encourage all parties to submit significantly more ambitious NDCs in 2025, and lead by example by committing to reducing its own emissions by at least gross 65% by 2030, relative to 1990 levels, and reach near zero emissions by 2040 at the latest.<sup>23</sup>
- **End fossil fuels:** Parties must reach agreement on a concrete, binding plan to end the expansion of new coal, oil and gas projects and manage a global just transition away from fossil fuels.<sup>24</sup>
- **Regulate large emitters:** Mandatory target-setting and reporting for the climate impact of sectors with large emissions should be introduced, including military production and activities, and international aviation and shipping.
- **Avoid false solutions:** Parties must refrain from promoting net-zero pathways that rely on uneconomic and technical solutions such as CCS and CCU<sup>25</sup> that have not been proven to work at the scale and speed required. The parties should instead focus on existing and proven solutions for emission reductions and energy transition, e.g. regulating sectors with large emissions, abolish fossil fuel subsidies, and reduce consumption-based emissions. Electrification as a solution requires careful consideration of any negative social or environmental effects.
- **Take a cautious approach towards Article 6:** Emissions trading involves significant risks, e.g. double counting of emission reductions and climate finance, increased cost for the host country to meet its own climate goals, and adverse social and environmental impacts of the underlying projects<sup>26</sup>. The mechanisms to operationalise Article 6 trading must therefore contain adequate safeguards to eliminate the risks.

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<sup>21</sup> For a review of Sweden's national climate policies, see for example CONOCDR Sweden's [Barometer 2024](#) p 39.

<sup>22</sup> [What is the Triple Planetary Crisis? | UNFCCC](#)

<sup>23</sup> [2024.09.24 Updated-Position-Paper-on-EU-climate-targets-and-equitable-GHG-budget.docx \(caneurope.org\)](#)

<sup>24</sup> [The Fossil Fuel Non-Proliferation Treaty Initiative \(fossilfueltreaty.org\)](#)

<sup>25</sup> Carbon capture and storage (CCS) and carbon capture and utilisation (CCU).

<sup>26</sup> [Indigenous people rush to stop 'false climate solutions' ahead of COP29 - High Country News \(hcn.org\)](#)

## Sweden must also

- **Urgently prioritize more ambitious national climate policies**, including measures in all sectors, to reduce emissions in the short and long term to meet both national and European climate targets.<sup>27</sup> A strong voice internationally requires strong policies and action at home.
- **Avoid using emissions trading to meet its climate targets.** Sweden and other countries that can achieve near zero emissions through domestic measures should not use emissions trading to achieve their climate goals. The purpose of Article 6 is not to reduce the cost of emission reductions, but to raise the level of ambition in the countries' climate work.

### 3. STEP UP ADAPTATION

The Paris Agreement established the Global Goal on Adaptation (GGA) to enhance adaptive capacity, strengthen resilience and reduce the vulnerability of those most affected by the climate crisis. Yet progress on adaptation to date has been slow and limited. According to the 2023 Adaptation Gap Report by UNEP, the adaptation finance gap is currently between 196–366 billion USD per year, and the gap keeps widening. This means the needs are 10-18 times higher than the currently available finance.

At COP28, a framework for the GGA was established<sup>28</sup>, which included global time-bound targets for specific themes<sup>29</sup> and the policy cycle. However, the parties failed to agree on indicators for measuring progress towards achieving these targets and consequently established the two-year UAE-Belém work programme to instead agree on this by COP30. Additionally, the COP28 decision does not include any specific finance<sup>30</sup> or means of implementation commitments to support the implementation of the GGA.

Time is short, as adaptation is one of the most pressing needs of those most affected by the climate crisis. COP29 must significantly advance the work on indicator development. Likewise, the GGA cannot be discussed in a silo but needs to be incorporated into the NCQG negotiations. This is fundamental for constructive deliberations and a successful outcome at COP30 in Brazil.

## In negotiations, Sweden and the EU should

- **Close the climate adaptation finance gap.** EU's and Sweden's negotiators for the NCQG and the GGA must take leadership amongst the developed countries and coordinate between the two negotiation tracks. Previous siloed approaches to the negotiations must be left behind and concrete links between the negotiations must be identified and committed to, as encouraged in the decision from COP28<sup>31</sup>.
- **Establish ambitious target indicators through an inclusive process.** Ensure that the thematic and policy-cycle target<sup>32</sup> indicators are ambitious and developed based on the latest

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<sup>27</sup> See for example [Barometer 2024](#) page 39-41 for more details on the failures of current policies and what needs to be strengthened.

<sup>28</sup> The UAE Framework for Global Climate Resilience (UAE FGCR).

<sup>29</sup> Including water and sanitation, food and agriculture, health, and ecosystems and biodiversity among others.

<sup>30</sup> While it refers to the need to scale up finance in several paragraphs and encourages parties to take the UAE FGCR into account in the NCQG deliberations.

<sup>31</sup> Decision 2/CMA.5, paragraph 37.

<sup>32</sup> Paragraphs 9-10 of decision 2/CMA.5

science and practical experience. The process of determining the indicators must be inclusive of the expertise of non-state actors and incorporate the knowledge of Indigenous peoples and local communities (IPLC), small-holder farmers, women, youth and other underrepresented groups.

- **Commit to providing support for implementation.** Commit to supporting means of implementation, including finance, technology transfer and capacity-building, that correspond to the specific needs and priorities of the most vulnerable and affected countries, as recognised in the COP28 decision.<sup>33</sup>

#### 4. INCLUSIVE DECISION-MAKING AND BROAD PARTICIPATION

Inclusive, transparent and accountable decision-making is imperative to achieve a just transition for everyone. Like most global negotiations, those on climate action risk being dominated by powerful countries and interests. Representatives of local communities most affected and rights-based civil society organisations – including those focused on the rights of women, workers, IPLCs, children, youth and people with disabilities – need to be included in climate negotiations and processes at all levels. These are often the voices that emphasise human rights, gender equality, participation, intergenerational equity and a just transition, while also representing hugely diverse groups of people and interests that all must have influence in decision-making, in defining the problems and in the creation of sustainable solutions. Religious actors with a strong grassroots base have a particular responsibility and role to play.

Rights-groups have raised concerns about the restrictions of civic space in COP host countries for several years in a row.<sup>34</sup> This is very much the case for this year's COP in Baku, Azerbaijan, where independent actors and civil society organisations have alerted about the crackdown on critical voices. There are also practical barriers for meaningful civil society participation in the negotiations.<sup>35</sup> Finally, COP29 is taking place at a time marked by escalating geopolitical divisions, hostility and conflict within and between nations, where the absence of peace threatens to derail negotiations. Civil society is now needed more than ever to ensure accountability, advocating for justice and upholding the rights of all those affected by interconnected crises of climate change and conflict.

#### Sweden and the EU should

- **Be a strong voice for justice and inclusion in climate action.** This includes promoting human rights, gender equality, participation, and equity perspectives in climate commitments, decision-making, implementation and reporting processes at all levels, ensuring a just transition.
- **Guarantee civic space at COPs:** We expect Sweden to push the UNFCCC to ensure safe spaces and participation of civil society at COP29, to publicly condemn any attempts from Azeri government to silence civil society, call for the immediate release of all human rights defenders, journalists and political prisoners, and to work for human rights criteria for the selection of upcoming COP hosts.
- **Enable meaningful participation at COPs:** Civil society participation at COP29 and future COPs should be supported through financial assistance and removal of practical barriers for meaningful

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<sup>33</sup> Decision 2/CMA.5, paragraph 32.

<sup>34</sup> See comments by [Amnesty International](#) and [OHCHR](#) about COP27 and Human Rights Watch about [COP28](#) and [COP29](#).

<sup>35</sup> Global Focus: [Ensuring Civil societys Vital role in global climate policy.pdf \(globaltfokus.dk\)](#)



participation, especially for civil society from the Global South. This includes providing spaces for meetings and demonstrations on site, improving access to information and transportation at the venue, and ensuring access to affordable lodging and food.<sup>36</sup>

- **Promote digital participation at COPs:** To further ensure inclusion, as well as to limit the climate impacts of the meeting itself, digital participation should be enabled and promoted at this and future COPs.
- **Be a champion for gender equality:** Sweden and the EU must push for stronger commitments to ensuring systematic integration of gender equality in all climate action at all levels through the adoption of a strong and ambitious gender programme and action plan, based on lessons learnt from the Enhance Lima Work Programme and its Gender Action Plan.<sup>37</sup> Measures for gender transformative action should also be integrated in all UNFCCC decisions and gender-equal participation at COPs be ensured by all parties.
- **Support children and youth:** All parties should ensure youth voices and participation in the negotiations, and offer meaningful opportunities for children and youth to demand justice and accountability for climate related rights violations at all levels. Children and youth must be recognised as important actors in addressing the climate crisis, while ensuring that they do not have to shoulder the burden of solving it.<sup>38</sup>
- **Avoid corporate capture<sup>39</sup>** of climate negotiations that risk shaping commitments by private interests, instead of global interests. This would include limiting accreditations for fossil fuel lobbyists and companies in favour of civil society participation, ensuring civil society access to all spaces where corporate actors are allowed, demanding full transparency of all financial sponsoring of sessions, exhibitions, and other visible or invisible forms of presence.

Endorsing organisations:

*Act Church of Sweden*

*ActionAid International Sweden*

*Afrikagrupperna*

*Barnfonden*

*Framtidsjorden*

*Friends of the Earth Sweden*

*LM International*

*Olof Palme International Center*

*Oxfam Sweden*

*Plan International Sweden*

*PMU*

*Swedish Society for Nature Conservation*

*Swedish Mission Council*

*Swedwatch*

*The Kvinna till Kvinna Foundation*

*The Swallows India Bangladesh*

*The Swedish Peace and Arbitration Society*

*WaterAid Sweden*

*We Effect*

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<sup>36</sup> Report from Global Focus on how to improve meaningful participation at COPs: [Ensuring Civil societys Vital role in global climate policy.pdf \(globaltfokus.dk\)](#)

<sup>37</sup> [The Enhanced Lima Work Programme on Gender | UNFCCC](#)

<sup>38</sup> The urgency of addressing the climate crisis to safeguard children's rights are outlined here: [General comment No. 26 \(2023\) on children's rights and the environment with a special focus on climate change | OHCHR](#)

<sup>39</sup> About Corporate Capture, see for example <https://www.ohchr.org/sites/default/files/2022-03/UN-WG-Expert-Meeting-Summary-Responsible-Coporate-Political-Engagement.pdf>

