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Perspectives of the Global South on the NCQG:

CAN THE CBD FINANCIAL TARGETS MODEL BE REPLICATED FOR THE UNFCCC NEW CLIMATE FINANCE GOAL?

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ABOUT TRANSFORMA

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- Access
- Climate Finance
- Convention on Biological Diversity (CBD)
- Effectiveness, Financial Instruments
- Global Stocktake (GST)
- Kunming Montreal Global Biodiversity Framework (KM GBF)
- Needs
- New Collective Quantified Goal (NCQG)
- Paris Agreement (PA)
- Quality
- Quantum
- Sources of Finance
- Temporal Scope
- Transparency
- United Nations Framework Convention on Climate Change (UNFCCC).

I
INTRODUCTION

The negotiation of the New Collective Quantified Goal on climate finance (hereinafter NCQG) of the Paris Agreement (PA) of the United Nations Framework Convention on Climate Change (UNFCCC) is based on the mandates from Decisions 1/CP.21 (2015), 14/CMA.1 (2018), 9/CMA.3 (2021), 5/CMA.4 (2022); and 8/CMA.5 (2023); and corresponds to a 3-year process under an Ad-Hoc Work Programme that started deliberations in 2021.

This process aims to determine a quantified goal, framed by Article 2 of the PA and relates to developing countries needs and priorities to enhance the global response to climate change within the framework of sustainable development; efforts to eliminate poverty, and aligning financial flows with a trajectory toward low greenhouse gas (GHG) emissions and climate-resilient development. This goal(s) needs to be built upon the floor of the current mobilization goal of USD 100 billion per year as well as on the lessons learned from its negotiation and implementation. It must consider various aspects such as quantity, quality, scope, and access features, along with funding sources and transparency arrangements to track progress (UNFCCC 2015, 2018, 2021 a, 2022 a and 2023 a).

Last year, the first Global Stocktake (GST) was finalized with a comprehensive decision that underscores the imperative for a highly ambitious and sector-specific approach to climate action, defining the pathways to *limiting global warming to 1.5 °C [through] deep, rapid and sustained GHG emissions reductions of 43% by 2030 and 60% by 2035 relative to the 2019 level and reaching net zero carbon dioxide emissions by 2050*" (UNFCCCb, 2023). These pathways include a set of targets for this decade to triple renewable energy capacity, to double energy efficiency global annual rates of improvements, to transition away from fossil fuels in energy systems and to reduce emissions of road transportation, to reduce methane emissions, to phase out inefficient fossil fuel subsidies, to halt and revert deforestation and forest degradation, to reduce climate-induced water scarcity and increase climate resilience to water-related hazards; towards a climate-resilient water supply, climate-resilient sanitation and access to safe and affordable potable water for all; attaining climate-resilient food and agricultural production and supply and distribution of food; climate-resilient health services, and significantly reducing climate-related morbidity and mortality; reducing climate impacts on ecosystems and biodiversity and accelerating the use of ecosystem-based adaptation and nature-based solutions; increasing the resilience of infrastructure and human settlements to climate change impacts; substantial reduction of adverse effects of climate change on poverty eradication and livelihoods; protection of cultural heritage from the impacts of climate-related risks; and the execution of the 4 components of the iterative adaptation cycle: (i) Impact, vulnerability and risk assessment; (ii) Planning; (iii) Implementation; and, (iv) Monitoring, evaluation and learning. All of this must be enshrined in more ambitious Nationally Determined Contributions (NDCs) and long-term strategies to be presented between November 2024 and February 2025 (UNFCCC b, 2023). **There is no room for doubt that the NCQG must be aligned with the GST systemic, transformational, and overarching perspectives and signals to propel advancements and drive an equally transformational financial response that guarantees the operationalization of these energy, transportation, land use, land-use change, and forestry, resilience and adaptation transitions throughout the developing world.**

II

COMPARATIVE ANALYSIS OF THE CBD TARGETS 18 AND 19 FINANCE MODEL AND THE UNFCCC NCQG

Over the deliberations for the definition of the NCQG, it has been argued that the financial Targets 18 and 19 of the Kunming-Montreal Global Biodiversity Framework (KM GBF) of the Convention on Biological Diversity (CBD), can serve as a model for the definition of the new climate finance goal. Therefore, the following analysis is a comparison of these financial targets of the CBD, to determine whether and how this can be used for the NCQG process that is to be finalized in COP29 in Baku, Azerbaijan, following November 2024.

The CBD was adopted in Rio de Janeiro, Brazil, back in 1992, at the same time as the UNFCCC and the United Nations Convention to Combat Desertification (UNCCD), also known together as "the Rio Conventions." The CBD aims to pursue "*the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources, including by appropriate access to genetic resources and by appropriate transfer of relevant technologies, taking into account all rights over those resources and to technologies, and by appropriate funding*" (CBD, 1992). Without entering into the intricacies of this Convention itself or its implementation, we would focus only on its financial principles and goals, thus bringing forward the content of its Article 20 *Financial Resources*, which outlines the following:

Table 1.
Article 20 Financial Resources of CBD

1. ***Each Contracting Party*** *undertakes* ***to provide****, in accordance with its capabilities,* ***financial support and incentives in respect of those national activities which are intended to achieve the objectives of this Convention****, in accordance with its national plans, priorities and programmes.*

2. *The* ***developed country Parties shall provide new and additional financial resources to enable developing country Parties*** *to meet the agreed full incremental costs to them of implementing measures which fulfill the obligations of this Convention and to benefit from its provisions and which costs are agreed between a developing country Party and the institutional structure referred to in Article 21 [Financial Mechanism], in accordance with policy, strategy, programme priorities and eligibility criteria and an indicative list of incremental costs established by the Conference of the Parties. Other Parties, including countries undergoing the process of transition to a market economy, may voluntarily assume the obligations of the developed country Parties. For the purpose of this Article, the Conference of the Parties, shall at its first meeting* ***establish a list of developed country Parties[1] and other Parties which voluntarily assume the obligations of the developed country Parties****. The Conference of the Parties shall periodically review and if necessary amend the list. Contributions from other countries and sources on a voluntary basis would also be encouraged. The implementation of these commitments shall take into account the need for adequacy, predictability and timely flow of funds and the importance of burden-sharing among the contributing Parties included in the list.*

3. *The* ***developed country Parties may also provide, and developing country Parties avail themselves of, financial resources related to the implementation of this Convention through bilateral, regional and other multilateral channels****.*

4. ***The extent to which developing country Parties will effectively implement their commitments under this Convention will depend on the effective implementation by developed country Parties of their commitments under this Convention related to financial resources and transfer of technology*** *and will take fully into account the fact that economic and social development and eradication of poverty are the first and overriding priorities of the developing country Parties.*

Source: CBD, 1992

1 According to UNEP/CBD/COP/DEC/I/2, the list of developed country parties and other parties which voluntarily assume the financial obligations are: Australia, Austria, Canada, Denmark, Finland, France, Germany, Greece, Iceland, Italy, Ireland, Japan, Luxembourg, Monaco, Netherlands, New Zealand, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom of Great Britain and Northern Ireland.

This Article 20 embeds a two-fold approach that covers each Party's responsibility to advance their obligations nationally, including in financial terms, as well as the financial obligation by developed country Parties towards developing countries.

This Article 20 embeds a two-fold approach that covers each Party's responsibility to advance their obligations nationally, including in financial terms, as well as the financial obligation by developed country Parties towards developing countries. It was only after two decades after the adoption of the Convention, up until COP15 in 2022, that the financial obligations derived from Article 20 took the form of quantified goals that reflect the essence of this financial dichotomy. The quantification of these goals was made based on a report prepared by the CBD´s Subsidiary Body on Implementation (SBI) which provided an overview of analyses, underlying methodologies, and resulting estimates of the funds needed for the implementation of the post-2020 global biodiversity framework, proposing *a strategic approach to resource mobilization built around three core components: (a) reducing or redirecting resources causing harm to biodiversity; (b) generating additional resources from all sources to achieve the three objectives of the Convention; and (c) enhancing the effectiveness and efficiency of resource use*" (CBD, 2020).

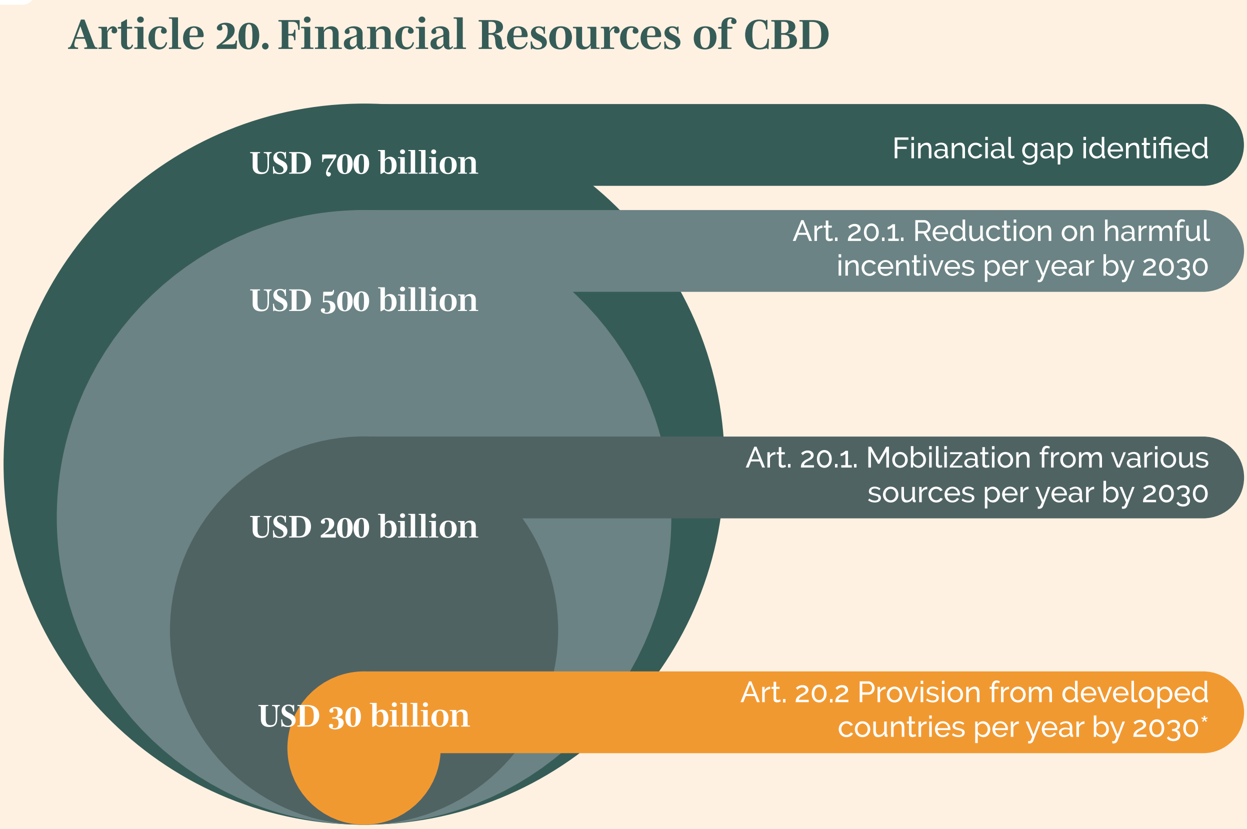
The SBI report on the estimation of biodiversity needs incorporated different scenarios and ranges of costs and funds needed, including global aggregate estimates of between US$ 631 billion and US$ 895 billion annually (CBD, 2020). Hence, as a result of a very complicated negotiation process that ended up with the adoption of the Kunming-Montreal Global Biodiversity Framework, its financial targets were reached with the suggested approach of the SBI and reflecting the combined financial approach of Article 20 of domestic resources of all Parties and the provision of financial resources from developed to developing countries, thus **agreeing that the overarching average estimate for the financial gap of USD 700 billion was to be mobilized through: a) Target 18 which focuses on reducing negative externalities associated with harmful subsidies for biodiversity amounting to at least USD 500 billion; b) Target 19´s Chapeau aiming to mobilize USD 200 billion from various resource mobilization components; and c) a subset of the latter corresponding to the provision of up to USD 20 billion per year by 2025 and USD 30 billion per year by 2030 from developed to developing countries** (CBD, 2022).

Table 2.
Targets 18 and 19 of the CBD KM GBF

SECTION	DESCRIPTION
Target 18	Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least $500 billion per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.
Target 19	Substantially and progressively increase the level of financial resources from all sources, in an effective, timely and easily accessible manner, including domestic, international, public and private resources, in accordance with Article 20 of the Convention, to implement national biodiversity strategies and action plans, mobilizing at least $200 billion per year by 2030, including by:
Target 19 Clause a)	a) Increasing total biodiversity-related international financial resources from developed countries, including official development assistance, and from countries that voluntarily assume obligations of developed country Parties, to developing countries, in particular the least developed countries and small island developing States, as well as countries with economies in transition, to at least $20 billion per year by 2025, and to at least $30 billion per year by 2030;
Target 19 Clause b)	b) Significantly increasing domestic resource mobilization, facilitated by the preparation and implementation of national biodiversity finance plans or similar instruments according to national needs, priorities and circumstances;
Target 19 Clause b)	c) Leveraging private finance, promoting blended finance, implementing strategies for raising new and additional resources, and encouraging the private sector to invest in biodiversity, including through impact funds and other instruments;
Target 19 Clause d)	d) Stimulating innovative schemes such as payment for ecosystem services, green bonds, biodiversity offsets and credits, and benefit-sharing mechanisms, with environmental and social safeguards;
Target 19 Clause e)	e) Optimizing co-benefits and synergies of finance targeting the biodiversity and climate crises;
Target 19 Clause f)	f) Enhancing the role of collective actions, including by indigenous peoples and local communities, Mother Earth-centric actions and non-market-based approaches including community-based natural resource management and civil society cooperation and solidarity aimed at the conservation of biodiversity;
Target 19 Clause g)	g) Enhancing the effectiveness, efficiency, and transparency of resource provision and use.

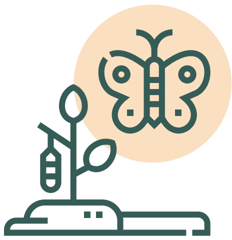
Source: CBD, 2022

Figure 1.
CBD structure of targets



*The provision of financial resources from developed countries is of at least $20 billion per year by 2025, then increasing by 2030 as shown above.

Source: Authors´ own elaboration.



Developed countries have clear financial obligations for the provision of financial resources to developing countries, as per Articles 4.3, 4.4, 4.5, and 4.7 of the UNFCCC and the Paris Agreement´s Article 9.1, alongside related obligations for leading the mobilization of financial resources referred to in Article 9.3.

Understanding the dualism of the financial obligations of the CBD and those of the KM GBF, provides us with one of the major differences between the CBD and the UN climate regime, provided that the latter does not take such an approach. The UNFCCC was negotiated emphasizing the historical responsibilities of industrialized nations over the climate problem as underlined in the overarching principle of common but differentiated responsibilities and respective capabilities (CBDR-RC), in the light of national circumstances, which are enshrined in Articles 3 and 4 of the UNFCCC as well as in Article 2.2 of the Paris Agreement. Furthermore, **developed countries have clear financial obligations for the provision of financial resources to developing countries, as per Articles 4.3, 4.4, 4.5, and 4.7 of the UNFCCC and the Paris Agreement´s Article 9.1, alongside related obligations for leading the mobilization of financial resources referred to in Article 9.3**.

Notwithstanding these central differences, we consider that this CBD model can be a relevant example for the design of the NCQG. Hence, over the course of the following sections, we will compare the GBF financial targets and their potential use on the NCQG. The qualitative methodology used throughout the document includes a comparative analysis of the CBD financial targets to some elements of the NCQG, namely: 1. Determination of the quantum based on needs; 2. Financial Instruments and Sources; 3. Temporal Scope; 4. Quality, Access, and Effectiveness; and 5. Transparency Arrangements[2]. It is to be noted that the Co-Chairs of the Ad-Hoc Work Programme (AWP) of the NCQG identified the following 10 elements that summarize how this goal could be structured: A) Temporal scope; B) Structure; C) Quantum; D) Structure of the quantum; E) Potential sources of finance; F) Relationship between NCQG and 2.1c; G) Qualitative elements; H) Reviewing progress; I) Frequency of reporting; and, J) Options for party-driven periodic revision (UNFCCC c, 2023).

2 The Co-Chairs of the Ad-Hoc Work Programme (AHWP) of the NCQG identified 10 elements that summarize how this goal could be structured, namely: A) Temporal scope; B) Structure; C) Quantum; D) Structure of the quantum; E) Potential sources of finance; F) Relationship between NCQG and 2.1c; G) Qualitative elements; H) Reviewing progress; I) Frequency of reporting; and, J) Options for party-driven periodic revision. These elements in turn, comprise a finite universe of 44 negotiation options as per the Annexes of the 2023 Report of the Co-Chairs of the Ad Hoc Work Programme on the NCQG.

II.1
DETERMINATION OF THE QUANTUM BASED ON NEEDS

A. STATE OF PLAY:

The current climate finance goal under the UNFCCC is a mobilization goal of USD 100 billion per year, which started in 2013 (Decision 1/CP.16) and is valid until 2025 (Decision 1/CP.21) (UNFCCC 2010 & 2015), **unlike the CBD, which did not have quantified financial goals before 2022**. This USD 100 billion goal was not collectively negotiated with developing countries nor defined on the basis of their needs. This goal was further specified in Decision 1/CMA.3, urging developed countries to at least double adaptation finance by 2025 from a 2019 baseline (UNFCCC b, 2021). According to OECD estimations of adaptation finance in 2019, it added up to USD 20.3 billion (OECD, 2023), which would mean a rise from $20 billion to $40 billion annually. Consequently, it could be argued that the current target equates to approximately USD 120 billion per year (ACT2025, 2023).

Moreover, this goal has not been officially met since its adoption and it also has been subject to many shortcomings in terms of its quality, scope and access, hence the need for the NCQG to address these issues. These shortcomings refer to the facts that: a) over 70% of all climate finance mobilized has been composed of concessional and non-concessional loans (OECD, 2023), thus leading to an overall increase in levels of indebtedness of developing countries and a phenomenon of climate-induced debt (OXFAM, 2022); b) around 60% of reported public climate finance has focused on mitigation action, resulting in a clear unbalance in relation to adaptation finance estimated around 33% (OXFAM, 2023), and c) out of the total amount of global climate financial flows, approximately 90% of the resources mobilized have stayed in the Global North and Asia (Buchner et al. 2023), thus leaving behind most of the developing world in accessing private sources.

Notwithstanding that the floor for the determination of the NCQG is the USD 100 billion goal, the needs of developing countries to transition to 1.5°C are estimated at up to $6 trillion annually. The GST acknowledged that needs of developing countries for climate action are currently estimated at up to USD 6 trillion for NDCs for the pre-2030 period (UNFCCC, 2023); adaptation finance needs of developing countries are estimated at up to USD 387 billion annually up until 2030, rising to up to USD 1 trillion in 2040 and USD 1.7 trillion in 2050 (UNEP, 2023) and clean energy investment needs in emerging markets and developing economies must triple by the early 2030s to up to USD 2.8 trillion per year, increasing thereafter to USD 5 trillion per year up until 2050, to be able to reach net zero emissions by 2050 (IEA, 2023). Likewise, the Independent High-Level Expert Group reports that emerging markets and developing nations other than China will need to spend around $1 trillion per year by 2025 (equivalent to 4.1% of GDP, compared to 2.2% in 2019) and around $2.4 trillion annually by 2030 (constituting 6.5% of GDP), corresponding to sector and geographical requirements for investments and actions to keep the target of capping warming at 1.5°C in reach and to meet the goals of the Paris Agreement across all its dimensions (Songwe et al, 2022). Overall, the annual global climate finance necessary from 2031 to 2050 is projected to exceed $10 trillion annually (Buchner et al, 2023).

The CBD financial targets were determined using the SBI report of 2020 as a basis, which included a range of estimations of biodiversity needs. The UNFCCC`s equivalent to such internal documentation is the first Report on the Determination of Needs of developing country Parties related to implementing the Convention and the Paris Agreement, also known as the NDR, presented by the Standing Committee on Finance (SCF) in 2021 with qualitative and quantitative information based on data and evidence from reports at the national, regional and global level. However, the report underlines the fact that there is a clear underestimation of needs in different countries and regions of the developing world, due to the lack of available data, tools, and capacity for determining and costing needs (UNFCCC c, 2021). This report is the source from which the GST drew upon numbers for the pre-2030 needs of developing countries of USD 5.8-5.9 trillion. **By the end of 2024, the SCF will prepare a second needs determination report ahead of the NCQG negotiations.**

B. RECOMMENDATIONS FOR THE NCQG:

The process for quantifying the CBD Financial Targets, in particular, the recognition of an average of the top ranges of biodiversity needs and the definition of a subset of these needs as the public international biodiversity goal, can be a valuable route to determine the NCQG quantum. Acknowledging that not all climate finance needs will be covered by the NCQG, it would be positive that any subset of the total amount of needs of developing countries, and how the goal/s is distributed among developed countries, follows specific and transparent criteria, for further accountability and effectiveness, as well as a basis for future revisions.

In the same sense that the CBD SBI report was used as the most trustworthy source of estimation of needs, the second SCF NDR could play that role if it is better aligned to needs for a 1.5°C transition and recent GST outcomes and challenges, thus providing with a longer-term perspective of needs beyond 2030,

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and covering all regions of the developing world with sufficient detail, and presented before the final stages of definition of the NCQG. It is in any case worth taking into account that there are a number of additional bottom-up and top-down estimates of climate finance needs of developing countries (i.e. UNFCCC, CPI, UNEP, IEA), although most of these share deficiencies and lack quality data for mitigation sectors other than energy, for most adaptation and resilience, for overall loss and damage response, as well as for some developing regions.

Additionally, the CBD financial obligations are based on a list of 22 developed nations[3] that can be subject to periodical review and amendment[4]. In the UNFCCC regime, there is an equivalent list of donors coming from Annex II of the Framework Convention, however, under the PA there is no further reference to the Convention Annexes, rather a generic allusion to developed and developing countries. *De facto*, the original list of Annex II countries has been updated in time since developed countries reporting implementation of the USD 100 billion goal by the OECD already reflect 15 additional developed countries[5] abiding by this goal (complete list in the latest analysis by OECD, 2023). Also, Article 9.2 of the Paris Agreement also encourages other Parties in a position to do so to also contribute to the provision of financial resources. **With this in mind and drawing from the CBD example, the NCQG could define a list of contributors that includes all developed nations currently contributing to climate finance with a burden sharing perspective** (Colenbrander, S. et al., 2023)**. Likewise, there is a possibility for some developing countries to voluntarily join the list so as to be transparent about South - South climate finance specific collaboration as well as for further recognition of their efforts and leadership at the global stage.**

3 This list is mentioned as a footnote in Table 1 above. The main differences between CBD developed nations and Annex II of the UNFCCC are that the CBD list also includes Monaco, but it does not refer to other Annex II countries such as Belgium, the European Economic Community, and the United States of America. The latter is not a Party to the CBD.

4 Notwithstanding the possibility of updating this list, it has remained static from the beginning.

5 Countries that are additional to the original list of Annex II countries are Bulgaria, Croatia, Czechia, Estonia, Latvia, Lithuania, Poland, Romania, Slovakia and Slovenia.

II.2 FINANCIAL INSTRUMENTS AND SOURCES

A. STATE OF PLAY:

Given the recent adoption of the CBD GBF financial Targets 18 and 19 in 2022, available data on their progress is limited. Nonetheless, as of October 02, 2023, 40% of the Target 19 of USD 20 billion has been met, distributed as follows: Governments (USD 6.5 billion); philanthropists (USD 0.9 billion); and corporations and investors (USD 0.6 billion) (Nature Finance Info, 2023). **It is important to note that there is no specific distribution as to a range or percentage for each source, nor priority on how they should be used to achieve the different parts of each GBF financial target (**Dasgupta 2021), although there is an implicit recognition that biodiversity finance comes from various sources including domestic, international, public (incorporating official development assistance (ODA)) and private resources. ODA is the primary channel of international public spending for biodiversity, however, there is a clear objective to broaden this dependency through Target 19 clause d) outlining the use of other financial mechanisms including payment for ecosystem services, green bonds, biodiversity offsets, and credits, and benefit-sharing mechanisms, all subject to environmental and social safeguards.

On the same note, the USD 100 billion mobilization goal enabled the use of a wide variety of sources including public and private, bilateral and multilateral and alternative sources (UNFCCC, 2010), although, as mentioned in the previous section, its delivery shows a clear concentration on a limited number of financial instruments (i.e. over 70% loans) and sources (i.e. an average of 80.5% public finance vs less than average 20% of mobilized finance - OECD, 2023), which emphasizes the need to improve this situation for the NCQG.

Furthermore, the CBD combination of Targets 18 and 19 includes the decision to eliminating, phasing out, or revising incentives, such as subsidies, detrimental to

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biodiversity by a minimum of $500 billion annually by 2030[6]. This has a very clear resonance to the UN climate regime, in particular to the call made in Article 2.1 c) of the Paris Agreement to make all financial flows consistent with low emissions, climate resilient development pathways, as well as with CMA decisions that for the last 3 years have called for the phase out of inefficient fossil fuel subsidies that do not address energy poverty or just transitions, as soon as possible, namely Decision 1/CMA.3, (UNFCCC b, 2021); Decision 1/CMA.4 (UNFCCC b, 2022), and the outcome of the GST (Decision 1/CMA.5), UNFCCC b, 2023). Neither of these decisions nor Article 2.1c) have been operationalized whatsoever. In fact, fossil fuel subsidies represent an obvious untapped source of finance to climate action that reached a record $7 trillion in 2022, equivalent to 7.2% of the global GDP (IMF, 2022), while global climate financial flows represented USD 1.2 trillion in 2021/2022 (Buchner et al, 2023), hence only 1.2% of global GDP and the 100 billion goal is barely 0.1%.

B. RECOMMENDATIONS FOR THE NCQG:

The NCQG could be structured in different layers of action. One of the most interesting features of the KM GBF financial Targets 18 and 19 of a strategic approach to combined resource mobilization can be used as a model to define **a mixture of layers for the NCQG in which there is: a) a core target for the provision of public international climate finance from developed to developing countries; b) a target to mobilize private finance led by developed countries through public interventions and public-private partnerships, and c) a domestic resource mobilization approach to reduce financial sources promoting emission-intensive and non climate-resilient development, in particular the phase-out of fossil fuel subsidies,** echoing NCQG negotiation options that combine an array of financial instruments, sources and layers to achieve the Paris Agreement goals most effectively. This combination of layers can also help address the shortcomings of the current USD 100 billion goal, pursue a more heterogeneous ap-

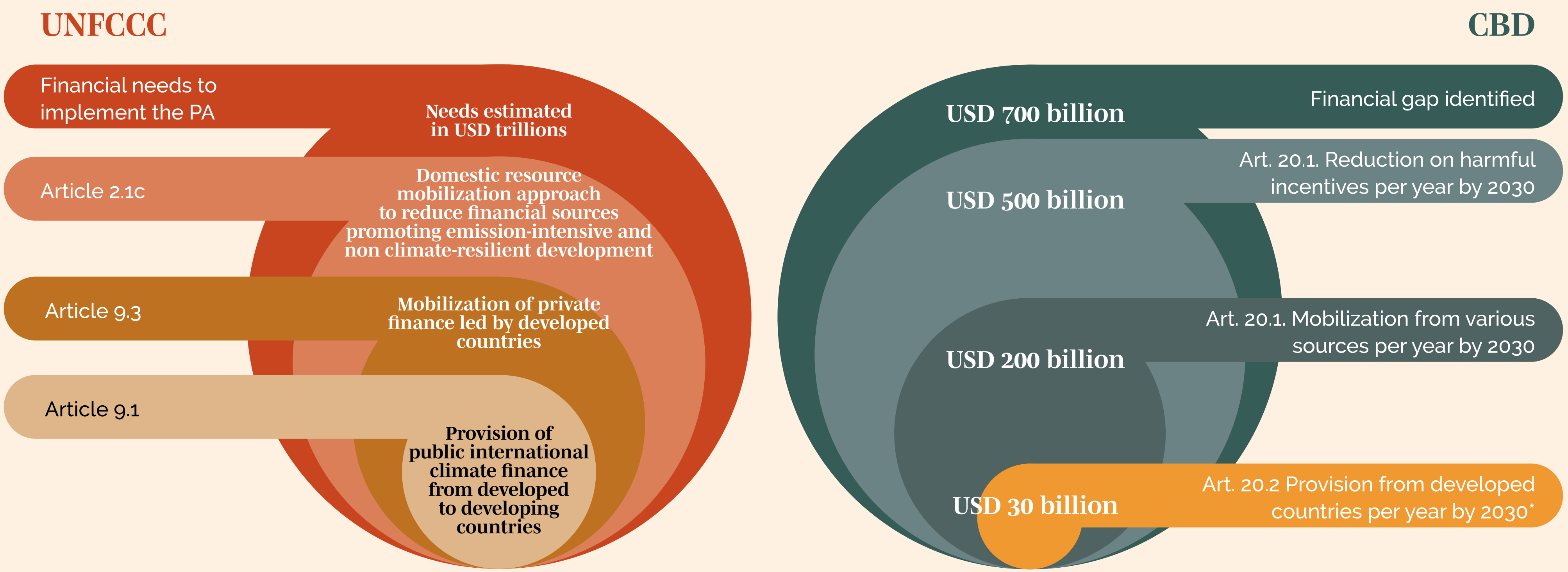
6 The implementation and monitoring of both targets are expected to become more visible through the National Biodiversity Strategies and Action Plans (NBSAPs) to be presented, as well as at COP16.

proach for resource mobilization, and foster, among others, a net climate finance approach (Bodnar et al, 2017) that addresses both, the scaling up of climate finance and reducing financial resources to high-emission intensive activities. This approach could benefit from also defining better the distribution amongst different sources and layers.

The NCQG should allow for the utilization of several financial instruments based on the very nature of the climate intervention and/or thematic areas. In the same fashion, the variety of instruments presented in Target 19 of the CBD could be a source of information for the NCQG with the perspective of pursuing greater effectiveness and complementarity of financial instruments to potentiate their impact amongst different thematic areas and needs, provided that "not all forms of finance are of equal value" (Schäfer et al, 2022). This must take into account the call of the GST for *"scaling up new and additional grant-based, highly concessional finance, and non-debt instruments (...) and accelerating the ongoing establishment of new and innovative sources of finance, including taxation, for implementing climate action and thus enabling the scaling down of harmful incentives"* (UNFCCC b, 2023). Hence, the adequate use of financial mechanisms involves allocating them more strategically. **Grants and non-debt instruments** (i.e. debt swaps, debt canceling mechanisms, debt relief, and other approaches which include, inter alia, minimum mandatory grace periods for repayments, preferential maturity date, policy-based guarantees linked to de-risking investments, and special drawing rights (C2ES, 2023)) **are better suited towards areas that can hardly make a business case and represent a responsibility of governments, such as adaptation and loss and damage** (OXFAM, 2023)**. Highly concessional finance, risk-sharing instruments, and innovative sources fit better in the financing of mitigation efforts, as enablers of private sector investments.** The Glasgow Financial Alliance for Net Zero (GFNAZ) suggests that 30% of investments in mitigation efforts must originate from public channels. This percentage varies from 5% to 50% across regions with varying degrees of market development (OXFAM, 2023).

The NCQG should allow for the utilization of several financial instruments based on the very nature of the climate intervention and/or thematic areas. In the same fashion, the variety of instruments presented in Target 19 of the CBD could be a source of information for the NCQG with the perspective of pursuing greater effectiveness and complementarity of financial instruments to potentiate their impact amongst different thematic areas and needs.

Figure 2.
Comparison between structures of CBD and NCQG



Source: Authors´ own elaboration.

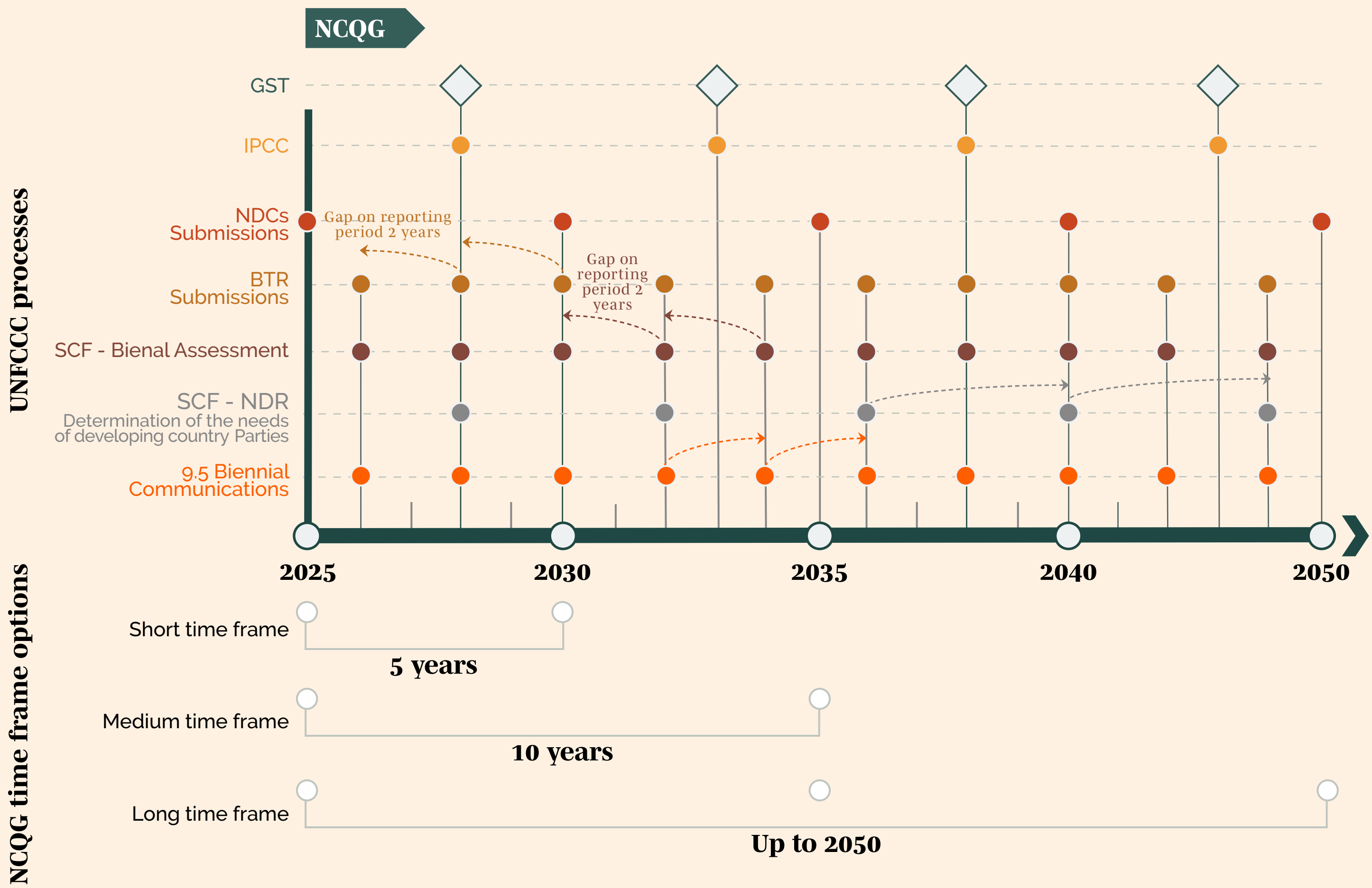
II.3 TEMPORAL SCOPE

A. STATE OF PLAY:

Target 19 of the KM GBF established a yearly mobilization goal by 2030, with staggered targets for 2025 and 2030. Target 18 establishes a target of identification by 2025 and elimination, phase out, or reform of incentives by 2030. The temporal scope of these financial targets for 10 years (and 5-year mid-term goals) aligns with the 2030 Sustainable Development Goals and extends towards a longer-term perspective by 2050, aiming to fulfill a shared vision of living in harmony with nature (CBD, 2022).

Currently, several UNFCCC and external processes and mechanisms provide climate finance inputs. The following Figure presents how the availability of this climate finance information derived from existing UNFCCC processes and the different timeframe negotiation options of 5 and 10 years could align. These processes include a) the **Global Stockate** - GST (backward and forward-looking information, every 5 years); b) **IPCC Assessment Reports** (backward and forward-looking information, every 5-7 years); c) **Nationally Determined Contributions - NDCs** (forward-looking information, every 5 years); d) **Biennial Transparency Reports - BTRs** (backward-looking information, every 2 years with a reporting lag gap of two years); e) **Biennial Assessments and Overview of Climate Finance Flows by the Standing Committee on Finance** (backward-looking information, every 2 years); f) **Biennial communications under 9.5 article of PA** (forward-looking perspective for the next two years, presented every two years); and g) **Report on the Determination of Needs of Developing Country Parties by the SCF** (forward-looking information, every 4 years).

Figure 3.
Relationship between UNFCCC processes and the NCQG time frame options



Source: Authors´ own elaboration.

B. RECOMMENDATIONS FOR THE NCQG:

The NCQG should be aligned with the GST and other UNFCCC processes (i.e. regular processes of national planning and contributions such as NDCs, NAPs, among others) to optimize the ambition and effectiveness of the PA, as previously noted. To establish a relevant financial climate goal that is based on the needs of developing countries, it is necessary to conduct a systematic and ongoing assessment of all available information (Watson, 2023). Similar to the KM GBF, a strategic alignment of the NCQG with existing international frameworks and processes can be crucial to establishing an optimal time frame. The 10-year operational time frame of the KM GBF financial targets with mid-term goals setting clear milestones to ensure a coordinated approach to achieve concerted goals in the short, medium, and long term could be of use for the determination of the NCQG, given that this climate finance goal also endeavors to support the achievement of the PA's long-term vision and goals. Key processes, reports, and planning documents associated with the UNFCCC, such as the GST, IPCC reports, NDCs, BTRs, SCF assessments, and others, are critical sources of information that must be considered in a periodic review system that considers not only the evolving needs of developing countries but also the impacts on mitigation, adaptation and loss and damage of financial flows associated with climate action.

By following the example of the CBD model, adopting a 10-year operational time frame with five-year intermediate goals plus an indicative longer-term target (e.g. for 2040 and/or 2050) could offer a comprehensive approach for the NCQG, facilitating the gathering of sufficient information from various processes and stakeholders to reduce the variability and uncertainty of the quantification and characterization of the needs of developing countries; to decrease the biases in methodologies and definitions of financial flows associated with data inconsistencies, gaps and interpretation; and ultimately, to have an improved assessment of progress over time and an informed iteration of future goal/s.

By following the example of the CBD model, adopting a 10-year operational time frame with five-year intermediate goals plus an indicative longer-term target (e.g. for 2040 and/or 2050) could offer a comprehensive approach for the NCQG.

II.4 QUALITY, ACCESS, AND EFFECTIVENESS

A. STATE OF PLAY:

The negotiation of the CBD KM GBF financial components focused on the quantified financial goals that are enshrined in Targets 18 and 19, as well as its more qualitative side on the establishment of a dedicated, independent fund for biodiversity, namely the Global Biodiversity Framework Fund, a trust fund under the GEF, exclusively committed to aiding the execution of this Framework. The platform facilitates funding access from various sources, including Multilateral Development Banks and Development Financial Institutions and aims to expedite its distribution through streamlined processes, and strives to improve accessibility for indigenous communities and local populations based on their specific needs (GEF, 2023).

The UNFCCC and Paris Agreement Financial Mechanism already aggregates six funds fully or partially dedicated to climate action, i.e. the Green Climate Fund, the Global Environment Facility, the Adaptation Fund, the Fund for Responding to Loss and Damage, the Special Climate Change Fund, and the Least Developed Countries Fund (UNFCCC, 2024). These Funds only represent a small fraction of the total amount of climate finance provided to developing countries (with an annual average of USD 3.2 billion for 2019–2020 (UNFCCC, 2022)) and are complemented with bilateral, regional, and multilateral climate finance sources.

In general, the current climate and development finance architecture is complex and ultimately unequipped to operate efficiently, fairly, and at the speed and scale needed, thus with great limitations that relate to the fact that public agencies in the developing world face major human and technical capacity constraints throughout the project cycle, from project origination to implementation; the climate and development finance systems fail to accommodate the developing world unique needs, realities, and vulnerabilities, resulting in fewer funding opportunities; data limitations for climate projects, high transaction costs, and small project sizes make it difficult for developing countries to attract investments and compete for access to climate finance (UN, 2022); and the long periods of time and lack of harmonization among the requirements of multilateral climate funds and donors. According to the Fifth Biennial Assessment of the SCF, accessing funds from multilateral climate funds posed greater challenges compared to securing financing from private sources, multilateral development banks (MDBs), development finance institutions (DFIs), and bilateral channels (iGST, 2023, UNFCCC c, 2022).

B. RECOMMENDATIONS FOR THE NCQG:

In this particular case, the recent approval of the CBD financial targets and lack of historical precedent in terms of quality standards of their implementation does not make it an optimal reference for the qualitative dimensions of the NCQG. Conversely, the very well-documented inadequacy in quality of the USD 100 billion goal serves as a cornerstone for consideration to enhance access, improve existing funds, and ensure the overall effectiveness and efficiency of climate finance through the NCQG, although it is noteworthy that under the current negotiation options of the NCQG, there is almost no mention as to how to address these issues and it seems to be only limited to the definition of principles for the goal/s.

Transcending the limitations to access and effectiveness of climate finance for the NCQG could start by looking at the SCF recommendations to (i) address adequacy and predictability concerns, such as the types of financial instruments available, and how their differentiated use serves a better purpose either to finance mitigation, adaptation and loss and damage, as well as fostering greater balance between adaptation and mitigation funding; and, (ii) the overall scale of financing; and addressing process-related issues, including project preparation, articulation of needs, fiduciary standards, and the speed and cost of accessing funds (UNFCCC c, 2022). This can be complemented by the NCQG being responsive to the current debt and fiscal constraints of developing countries in the provision and mobilization of climate finance; improving readiness capacity and capability to articulate financing needs, priorities, and the process to prepare, implement, and follow-up projects that are bankable, in line with national policies, and attractive to investors; harmonizing standards, requirements, accreditation and approval procedures of multilateral climate finance funds and banks, starting by the operating entities of the Financial Mechanism of the UNFCCC and the Paris Agreement; safeguarding high environmental, social inclusion, and human rights standards of climate finance; and designing a practicable and meaningful impact framework to formulate indicators that assess the granular impact of climate finance at the local level, while informing national policymaking and long-term climate plans (iGST, 2023, UNFCCC b, 2022).

II.5 TRANSPARENCY ARRANGEMENTS

A. STATE OF PLAY:

The KM GBF does not include any specific references to the transparency arrangements of Target 19 beyond clause g, which refers to increased effectiveness, efficiency, and transparency in the provision and use of resources (CBD, 2022). **However, the monitoring framework of the KM GBF identifies the following headline indicators for its financial goals:**

- International public funding, including official development assistance for conservation and sustainable use of biodiversity and ecosystems.
- Domestic public funding of conservation and sustainable use of biodiversity and ecosystems.
- Private funding (domestic and international) of conservation and sustainable use of biodiversity and ecosystems.

Through metadata factsheets, the indicators will have accessible information on the current level of development, proposed timetable, proposed scale of use, proposed data source, proposed indicator provider, information on reporter, graphs, and diagrams. The basis of the information will be the OECD Creditor reporting system and policy instruments for the environment database, conservation NGO Annual reports, government records, publicly available information, and government records (national budgets and accounts) on public expenditures, and when available, regional/multilateral databases. The successful implementation of the KM GBF requires responsibility and transparency, which will be supported by mechanisms for planning, monitoring, reporting, and review, forming an agreed, synchronized, and cyclical system (CBD,2022).

While the KM GBF is developing its monitoring framework, Article 13 of the PA enabled an Enhanced Transparency Framework (ETF) (Decision 1/CP.21), is built upon

the monitoring, reporting, and verification system under the Convention, and is to be implemented through the presentation of Biennial Transparency Reports (BTRs), starting at the end of 2024. There are 13[7] detailed Common Tabular Formats (CTFs) of these reports which include information on financial, technology, and capacity-building support provided and mobilized by developed countries, as well as support needed and received by developing countries. According to Article 13 of PA and the modalities, procedures, and guidelines of the ETF adopted in Decision 18/CMA.1 (UNFCCC, 2018), reporting responsibilities are differentiated so that developed country parties have an actual obligation to provide this information (concretely Tables III.1, III.2, and III3. related to the financial support provided and mobilized) while developing countries can and are encouraged to provide information on CTFs for the support received and needed (concretely Tables III.6 and III7. related to the financial support needed and received).

In its current configuration, the ETF exclusively refers to governmental information, while the KM GBF monitoring system will have a component on private funding that once developed could also be useful to review. **For the NCQG, however, the exclusion of non-State actors - NSA (i.e. private sector, financial institutions, civil society, philanthropies, and others) climate finance information in the ETF represents a limitation on the comprehensive evaluation and substantial understanding of climate financial flows and their alignment with PA objectives**. Some initiatives have been established to monitor and report non-party stakeholders' contributions to climate change, such as the Global Climate Action Portal, operating under the UNFCCC. The reporting system is a platform for regions, cities, companies, investors, and other organizations to provide information on emissions, commitments, and actions (UNFCCC b, 2024). However, this portal does not include information concerning financial flows or their alignment with the PA. This is the case for most tracking systems, with re-

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7 Annex III Common tabular formats for the electronic reporting of the information on financial, technology development and transfer and capacity-building support provided and mobilized, as well as support needed and received, under Articles 9–11 of the Paris Agreement:
Table III.1 Information on financial support provided under Article 9 of the Paris Agreement in year 2XXX-3: bilateral, regional and other channels
Table III.2 Information on financial support provided under Article 9 of the Paris Agreement in year 2XXX-3: multilateral channels
Table III.3 Information on financial support mobilized through public interventions under Article 9 of the Paris Agreement in 2XXX-3
Table III.4 Information on support for technology development and transfer provided under Article 10 of the Paris Agreement
Table III.5 Information on capacity-building support provided under Article 11 of the Paris Agreement
Table III.6 Information on financial support needed by developing country Parties under Article 9 of the Paris Agreement
Table III.7 Information on financial support received by developing country Parties under Article 9 of the Paris Agreement,
Table III.8 Information on technology development and transfer support needed by developing country Parties under Article 10 of the Paris Agreement
Table III.9 Information on technology development and transfer support received by developing country Parties under Article 10 of the Paris Agreement
Table III.10 Information on capacity-building support needed by developing country Parties under Article 11 of the Paris Agreement
Table III.11 Information on capacity-building support received by developing country Parties under Article 11 of the Paris Agreement
Table III.12 Information on support needed by developing country Parties for the implementation of Article 13 of the Paris Agreement and transparency-related activities, including for transparency-related capacity-building
Table III.13 Information on support received by developing country Parties for the implementation of Article 13 of the Paris Agreement and transparency-related activities, including for transparency-related capacity-building

lated platforms dedicated to disclosing climate-related financial information.

B. RECOMMENDATIONS FOR THE NCQG:

The NCQG should be consistent with the ETF, while proving relevant and specific adjustments, where needed. Despite the fact that the monitoring framework of the CBD Financial Targets is not a good basis for the Transparency Arrangements of the NCQG, given its initial stages, there seems to be a broad consensus over the use of the ETF to track and review progress towards the NCQG. **In particular, the current set of CTFs in use for reporting financial support provided, mobilized, needed, and received can provide a reasonable basis of information with a biennial frequency of reporting, which is essential for reviewing the accomplishment of the NCQG and facilitating an informed review process to adjust as needed**. Arguably, in time, biennial information from the ETF in complement with other sources and processes (i.e. NDCs, the GST, IPCC Assessment Reports, SCF NDRs and SCF Biennial Assessments and 9.5 biennial communications) could provide a good range of backward looking and forward looking information to support a better understanding of climate financial flows directly related to the NCQG and on a wider scale. As stated above, these transparency arrangements are directly related to the timeframe of the goal, hence, the amount of information that will be available for its future review or adjustment. .

At this point in time, it is hard to determine whether current ETF's MPGs need to be further adjusted in line with the NCQG**.** Nonetheless, based on various recommendations outlined in this report and the opportunity that the NCQG offers to improve transparency and clarity of the climate finance system (iGST, 2023), there could be a need for the NCQG´s final decision in Baku to refer to a potential update to those MPGs, which may include the following modifications:

The current set of CTFs in use for reporting financial support provided, mobilized, needed, and received can provide a reasonable basis of information with a biennial frequency of reporting, which is essential for reviewing the accomplishment of the NCQG and facilitating an informed review process to adjust as needed.

1. CTF III.1 to III.13 related to financial support to include Loss and Damage as a category in the type of support, provided that this is one of the three key areas of needs and priorities of developing countries together with mitigation and adaptation.

2. CTF III.1, 2, 3, 6, and 7 to include innovative instruments, including debt management or non-debt instruments, taxation, and risk-sharing instruments, among others, as a financial instrument category.

3. Include an additional CTF to report on the phase-out of fossil fuel subsidies and/or to complete the information provided into the reporting systems from NSA on the alignment of their financial flows with the PA, so that, over time, the assessment of the consistency of financial flows is supported by this additional CTF.

Finally and provided that currently there is no climate finance definition, nor there is one for biodiversity finance, it would be necessary that both, the monitoring framework of the KM GBF and the transparency arrangements of the NCQG, ensure that there is no overlap in reporting financing being provided or mobilized to developing nations for the purpose of implementing the different goals and targets of the CBD and the Paris Agreement, particularly if they are counted as ODA.

III
CONCLUSIONS AND FINAL RECOMMENDATIONS

The process to determine international environmental treaties and derived regulations often results in similarities in their implementation. Throughout this comparative analysis, we have identified the potential use of the CBD KM GBF Financial Targets in the current negotiation of the UNFCCC NCQG, confirming that there are a number of good practices and lessons learned that could be replicated, despite fundamental differences among the biodiversity and climate financial regimes, provided that the CBD holds a dualism in defining financial obligations for the provision of resources by each Party as well as by developed country Parties, while the UNFCCC and its PA restricts these financial obligations to developed countries.

Albeit these differences, we recommend to bring forward several benchmarks of the CBD KM GBF Financial Targets as inspiration to the design of the NCQG, as summarized below:

a. The recognition of an average of the top ranges of biodiversity needs and the definition of a subset of these needs as the public international biodiversity goal can be a useful route to determine the NCQG quantum,

b. The conceptual equivalence between the CBD SBI report as the most trustworthy source of estimation of needs and the upcoming second SCF NDR which could play that role if it is better aligned to needs for a 1.5°C transition and recent GST outcomes and challenges,

c. The strategic approach to combined resource mobilization of Targets 18 and 19 can inspire a mixture of layers for the NCQG in which there is:

    - a core target for the provision of public international climate finance from developed to developing countries;
    - a target to mobilize private finance led by developed countries, and
    - a domestic resource mobilization approach to reduce financial sources promoting emission-intensive and non-resilient development, in particular the phase-out of fossil fuel subsidies,

d. The inclusion of an array of complementary financial instruments to help pursue greater effectiveness, complementarity and potentiate their impact amongst different thematic areas and needs, and

e. The adoption of a staggered timeframe which defines a 10-year operational time frame with five-year intermediate goals plus an indicative longer-term target (e.g. for 2040 and/or 2050).

Provided that this year´s negotiation of the NCQG is based on a series of elements outlined by the co-chairs of the AHWP of the NCQG, the following Table 3 presents our interpretation of how the current draft structure and negotiation options of the NCQG could be conceptually matched if the CBD Financial Targets were used as a guide to its determination. The first two columns are the *verbatim* CBD KM GBF Financial Targets 18 and 19, and the third column introduces our reflection of bracketed draft text coming from NCQG existing elements and options.

Table 3.
Comparative CBD GBF Targets with NCQG draft negotiation options

CBD GBF Targets		Correspondence to NCQG Draft Negotiation Options	
Section	**Description**	**Elements**	**Draft text Options[8]**
Target 18	Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least $500 billion per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.	D) Structure of Quantum, E) Potential Sources of Finance, F) Relationship between NCQG and 2.1c	[integration] [of Article 2 of the Paris Agreement as part of the NCQG] [of the NCQG as part of the broader picture of Article 2, paragraph 1(c)] with [a thematic structure] [for achieving net zero/1.5 ˚C/X GHG emissions reduced, and increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low GHG emissions development, in a manner that does not threaten food production, and making finance flows consistent with a pathway towards low GHG emissions and climate-resilient development] [focusing on reducing fossil fuel finance] [reduction in financial sources promoting emission-intensive and non climate-resilient development]] [with arrangements for tracking finance flows] [quantitative and qualitative targets representing consistency of finance flows with the goals of the Paris Agreement] [and making finance flows consistent with a pathway towards low GHG emissions and climate-resilient development] [with qualitative elements for domestic and international resource mobilization] [No integration of Article 2, paragraph 1(c)]

8 The draft text presented in the fourth column is based on our Brief on simplified negotiation options of the NCQG.

CBD GBF Targets		Correspondence to NCQG Draft Negotiation Options	
Section	**Description**	**Elements**	**Draft text Options**
Target 19	Substantially and progressively increase the level of financial resources from all sources, in an effective, timely and easily accessible manner, including domestic, international, public and private resources, in accordance with Article 20 of the Convention, to implement national biodiversity strategies and action plans, mobilizing at least $200 billion per year by 2030, including by:	A) Temporal Scope, C) Quantum, Structure, E) Potential Sources of Finance.	[Setting a quantum based on [information on the needs and priorities of developing countries] [and a carve-out for the NCQG within those needs] [from developed countries] [from high emitters with higher economic capacities including developed countries] [of [collectively] [and voluntary contributions from] other Parties and non-Party stakeholders, such as private sector entities and philanthropic organizations [mobilized through public interventions by developed country Parties]] [to developing countries] [especially those that are particularly vulnerable to the adverse effects of climate change and have significant capacity constraints, such as the least developed countries and small island developing States] [including a percentage share allocated to vulnerable groupings] [with a sub-goal on minimum floor of finance for the least developed countries] [sets upper financial limits (caps) by geographical regions, countries or country groupings] [from a wide variety of sources in accordance with Article 9, paragraph 3, of the Paris Agreement] [from public, private, domestic and international sources of finance] [including [bilateral] [North-South] [South–South cooperation] [and other areas]] with a core [international public mobilization support target of [USD X] [X% of GNI/ GDP]] [international public climate finance] [international public sources of finance] [particularly grant-based finance] [for adaptation and addressing loss and damage] [and [concessional] loans for mitigation] [a defined quantitative subset to be defined for resources under Article 9 of the Paris Agreement]] under [a time frame of [5 years [2025-2029] [2026-2030]] [10 years [2025-2034] [2026-2035]] [up to 2050] with [milestones] [[aspirational] [indicative] timeframe] [for another five years] [for 2030 and 2040] with [annual targets] [no reference to time frame]
Target 19 Clause a)	h) Increasing total biodiversity-related international financial resources from developed countries, including official development assistance, and from countries that voluntarily assume obligations of developed country Parties, to developing countries, in particular the least developed countries and small island developing States, as well as countries with economies in transition, to at least $20 billion per year by 2025, and to at least $30 billion per year by 2030;		

CBD GBF Targets		Correspondence to NCQG Draft Negotiation Options	
Section	**Description**	**Elements**	**Draft text Options**
Target 19 Clause b)	i) Significantly increasing domestic resource mobilization, facilitated by the preparation and implementation of national biodiversity finance plans or similar instruments according to national needs, priorities and circumstances;	D) Structure of Quantum, E) Potential Sources of Finance, F) Relationship between NCQG and 2.1c	[integration] [of Article 2 of the Paris Agreement as part of the NCQG] [of the NCQG as part of the broader picture of Article 2, paragraph 1(c)] with [a thematic structure] [for achieving net zero/1.5 ˚C/X GHG emissions reduced, and increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low GHG emissions development, in a manner that does not threaten food production, and making finance flows consistent with a pathway towards low GHG emissions and climate-resilient development] [focusing on reducing fossil fuel finance] [reduction in financial sources promoting emission-intensive and non-resilient development]] [with arrangements for tracking finance flows] [quantitative and qualitative targets representing realignment of finance flows with the goals of the Paris Agreement] [and making finance flows consistent with a pathway towards low GHG emissions and climate-resilient development] [with qualitative elements for domestic resource mobilization] [No integration of Article 2, paragraph 1(c)]
Target 19 Clause b)	j) Leveraging private finance, promoting blended finance, implementing strategies for raising new and additional resources, and encouraging the private sector to invest in biodiversity, including through impact funds and other instruments;	E) Potential Sources of Finance	[and USD X from other sources such as [a global investment target] [leveraging private finance] [promoting blended finance] [private sources mobilized through public interventions] [and innovative sources and instruments] as the outer layers]
Target 19 Clause d)	k) Stimulating innovative schemes such as payment for ecosystem services, green bonds, biodiversity offsets and credits, and benefit-sharing mechanisms, with environmental and social safeguards;		

CBD GBF Targets		Correspondence to NCQG Draft Negotiation Options	
Section	**Description**	**Elements**	**Draft text Options**
Target 19 Clause e)	l) Optimizing co-benefits and synergies of finance targeting the biodiversity and climate crises;	G) Qualitative elements.	[Determining the qualitative elements of the NCQG [as a part of a set of principles] and [in the form of an aspirational goal]
Target 19 Clause f)	m) Enhancing the role of collective actions, including by indigenous peoples and local communities, Mother Earth-centric actions and non-market-based approaches including community-based natural resource management and civil society cooperation and solidarity aimed at the conservation of biodiversity;		
Target 19 Clause g)	n) Enhancing the effectiveness, efficiency, and transparency of resource provision and use.	H) Reviewing Progress, I) Frequency of Reporting and J) Party Driven Periodic Revision.	[Tracking and reviewing progress towards the NCQG will be made [through the ETF] [other tracking and reporting systems relevant to the NCQG (IPCC, MDB's, the OECD, and the SCF)] and/or [aggregate reporting using data generated under the UNFCCC process (entities of the Financial Mechanism)]] [Annual] [Biennial] [Periodic] reporting on the implementation of the NCQG [based on milestones] and [A Party-driven [annual] [biennial] [5 years] [10 years] [more than 10 years] [after 10 years] [periodic revision] [review cycles] [to align with net zero targets by 2050]

Source: Authors´ own elaboration.

Finally, the CBD Financial Targets were just adopted in 2022, so there are areas of their implementation that are only in very early stages, for example, in relation to the quality and effectiveness of biodiversity finance and their transparency arrangements. Therefore, we have also included some recommendations along this paper for the NCQG on these areas that are not directly related to the CBD.

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