

### **Baku to Belém Roadmap to 1.3T**

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#### Context

[Decision 1/CMA.6](#) (2024), New collective quantified goal on climate finance (NCQG)

NCQG decision paragraph “27. Decides to launch, under the guidance of the Presidencies of the sixth and seventh sessions of the CMA, in consultation with Parties, the “Baku to Belém Roadmap to 1.3T”, aiming at scaling up climate finance to developing country Parties to support low greenhouse gas emissions and climate-resilient development pathways and implement the nationally determined contributions and national adaptation plans including through grants, concessional and non-debt creating instruments, and measures to create fiscal space, taking into account relevant multilateral initiatives as appropriate; and requests the Presidencies to produce a report summarizing the work as it concludes the work by [CMA 7] (November 2025);”

#### **Query**

1. Does this paragraph establish a mandate for COP 30/CMA 7 on the “Baku to Belém Roadmap to 1.3T”?
2. What is precisely this mandate? Could it include a CMA decision?
3. Given that the roadmap is launched “under the guidance” of the CMA 6 and CMA 7 Presidencies (Azerbaijan and Brazil, respectively), if your view is that the mandate does not include a CMA decision, what latitude do the Brazil and Azerbaijan presidencies have on this? What can they propose in terms of discussions and texts in Belém, including but not exclusively proposing an agenda item? What alternatives are there to discuss this roadmap (i.e. informal consultations, presidential events, etc.) and what outcomes could emerge from each of these?
4. What negotiations might take place at SB 62 and COP 30 in relation to this roadmap given that it does not for now appear on the provisional agendas of [SBI](#) and [SBSTA](#)?

## Analysis

### 1. Background and Summary

- 1.1. On 24 November 2024, as set out in paragraph 27 of Decision 1/CMA.6 (the **NCQG decision**) on the new collective quantified goal on climate finance (the **NCQG**),<sup>1</sup> the CMA decided to launch the “Baku to Belém Roadmap to 1.3T” (the **Roadmap**). Paragraph 27 states that such Roadmap shall be under the guidance of the Presidencies of CMA 6 (Azerbaijan) and CMA 7 (Brazil) (together, the **Presidencies**) and in consultation with Parties.
- 1.2. Following the Presidencies’ invitation for submissions, there have been over 100 submissions from Parties and non-Party stakeholders about the Roadmap.<sup>2</sup>
- 1.3. A work plan for the Roadmap (the **Work Plan**), dated 13 May 2025, sets out the Presidencies’ plan regarding work to be carried out, timeline and outputs.<sup>3</sup> The Work Plan was last updated on 6 August 2025 which indicates that:
  - 10 September 2025 is the deadline for further submissions in response to calls for input (with virtual consultations with Parties and non-Party stakeholders taking place across August and September).
  - On 27 October 2025 (two weeks prior to the commencement of CMA 7 / COP 30) the Roadmap and the Presidencies’ report will be published.
  - At CMA 7 / COP 30, there will be a “high level event” on the Roadmap.
- 1.4. The Work Plan signposts the following web page that is intended to be updated with further information about the Presidencies’ work (the **Web Page**): <https://unfccc.int/topics/climate-finance/workstreams/baku-to-belem-roadmap-to-13t>
- 1.5. Whilst the wording used in paragraph 27 of the NCQG decision (“Decides to launch (...) the Baku to Belém Roadmap ...”) might suggest that immediate action is being taken based on a roadmap, subsequent documents including the Work Plan clarify that the time between CMA 6 and CMA 7 is being used to formulate the Roadmap. The finalised Roadmap itself is intended to be published prior to CMA 7.
- 1.6. Under paragraph 27, the Presidencies are “requested” to “produce a report summarizing the work as they conclude the work [done by them at the latest] by [COP30/CMA 7] (November 2025)”. In the context of the COP/CMA as governing bodies of the UNFCCC and the Paris Agreement respectively, it is common practice to

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<sup>1</sup> See: Decision 1/CMA.6, [https://unfccc.int/sites/default/files/resource/cma2024\\_17a01\\_adv.pdf](https://unfccc.int/sites/default/files/resource/cma2024_17a01_adv.pdf).

<sup>2</sup> See: <https://unfccc.int/topics/climate-finance/workstreams/baku-to-belem-roadmap-to-13t#Submissions>.

<sup>3</sup> See: [https://unfccc.int/sites/default/files/resource/Presidencies\\_BTBRoadmap\\_Workplan\\_final\\_0.pdf](https://unfccc.int/sites/default/files/resource/Presidencies_BTBRoadmap_Workplan_final_0.pdf).

‘request’ actions from the Secretariat, the Presidencies, constituted bodies and subsidiary bodies. These requests are interpreted, in practice, as providing a mandate in the sense of giving legitimacy to the relevant addressees to conduct the work requested of them. As their role is to assist the COP and CMA in the implementation of the treaties, it would be unusual for these bodies not to complete the work requested of them.<sup>4</sup> However, these requests do not create specific obligations in international law, enforceable by other signatories to the relevant treaties, for the relevant bodies to do anything beyond that for which they are already responsible. In the present context, the Presidencies and the Secretariat have been given a mandate to utilise their platforms and the resources of the UN to complete the Roadmap and produce a summary report on their work by COP30/CMA 7. It appears that the Presidencies indeed intend to publish the Road Map at least two weeks prior to COP 30 / CMA 7, which could guide any discussions relating to NCQG, however no specific action or outcome has been ‘mandated’ for COP 30 / CMA 7.

## 2. Mandate in relation to the Roadmap

- 2.1. Paragraph 7 of the NCQG decision “Calls on all actors to work together to enable the scaling up of financing to developing country Parties for climate action from all public and private sources to at least USD 1.3 trillion per year by 2035”. Although this is within the operative part of the NCQG decision (i.e. the core part that sets out actions), the use of the verb “calls on” does not create any binding obligation or mandate on Parties. This is in contrast with verbs such as “decides” or “resolves” which can arguably create binding commitments provided that the surrounding words do not dilute or qualify them (though in this context they are typically not accompanied by any right of action for Parties or private individuals to seek to enforce those commitments). A more comprehensive analysis of this can be found in LRI advice on the ‘Legal status of paragraph 7, NCQG decision’.
- 2.2. Paragraph 27 of the NCQG decision “Decides to launch” the Roadmap and “requests the Presidencies to produce a report summarizing the work” by CMA 7 / COP 30 in November 2025.

Full text (emphasis added): 27. ***Decides to launch, under the guidance of the Presidencies of the sixth and seventh sessions of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement, in consultation with Parties, the “Baku to Belém Roadmap to 1.3T”, aiming at scaling up climate finance to developing country Parties to support low greenhouse gas emissions and climate-resilient development pathways and implement the nationally determined contributions and national adaptation plans including through grants, concessional and non-debt-creating instruments, and measures to create fiscal space, taking into account relevant multilateral initiatives as appropriate; and***

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<sup>4</sup> See Articles 7, 8 and 9 of the UNFCCC setting out functions of the COP, the COP President and the Subsidiary Bodies and articles 16 -19 of the Paris Agreement on the CMA, the Secretariat, the SBs and other constituted bodies.

***requests the Presidencies to produce a report summarizing the work as they conclude the work by the seventh session of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (November 2025);***

- 2.3. By ‘deciding’ to launch the Roadmap, the above Paragraph 27 confirms that the Parties to the Paris Agreement have collectively committed to launching the Roadmap and conferred a ‘mandate’ on the Presidencies of the sixth and seventh COP sessions to lead the work, but the Parties have not created a legally binding commitment requiring the Secretariat, the Presidencies or any other Party to enforce or execute that commitment. Paragraph 27 gives an instruction to CMA 6 and CMA 7 Presidencies to guide the process of launching the Roadmap, subject to consultation with Parties. Consistent with the level of obligations conferred on them, the Presidencies are requested to produce a report summarising their work, which is to be concluded by the time of CMA 7 (commencing 10 November 2025).
  - 2.4. However, paragraph 27 does not commit to any particular outcome arising from the Roadmap.
  - 2.5. Whether paragraph 7 and paragraph 27 are viewed in combination or independently of each other (and despite expressly mentioning a quantum of USD 1.3 trillion per year), they do not commit Parties to any particular outcome and do not give any Party (or any private individual) an actionable right in respect of the objectives set out in those paragraphs. Parties may still consider using paragraph 7, in conjunction with paragraph 27 and the Roadmap itself, in future negotiations and/or decisions to build a case for decision paragraphs that establish more concrete actions (though such actions may not be legally binding and enforceable).
  - 2.6. As set out in section 1 above, consultations have taken place and work on the Roadmap is well underway, with publication and launch dates now scheduled.
3. Potential outcomes at COP 30 / CMA 7
- 3.1. Following the reasoning above, paragraph 27 does not mandate a particular outcome at COP 30 / CMA 7. Nevertheless, the Presidencies’ Work Plan (described above) provides some clarification: the Presidencies aim to publish the finalised Roadmap and their report by **27 October 2025** (i.e. two weeks prior to the commencement of CMA7 / COP 30 in Belém, Brazil) and aim to hold a high-level launch event for the Roadmap in the week commencing **10 November 2025** at CMA 7/COP 30.
  - 3.2. The Work Plan states that “the objective of the work in 2025 is to facilitate the inclusive development of a Roadmap that **guides** all actors to work together to enable the scaling up of financing to developing country Parties for climate action from all public and private sources to at least USD 1.3 trillion per year by 2035” (paragraph 6, emphasis added).
  - 3.3. As announced in the Work Plan, the Presidencies have been conducting outreach and engagement, including engaging in climate-finance related events and Roadmap-

specific consultation events. There will also be preparation of technical inputs and expert work to support the Roadmap's development, and technical information received is intended to become a repository of information.

- 3.4. Although paragraph 27 does not require the Parties to consider the Roadmap or the report at CMA 7, it does request that this report be prepared by the time of CMA 7 in November 2025, which logically suggests an *intention* for the report to be considered by the Parties at the session.
- 3.5. Whilst the Work Plan only envisages a high-level launch event, the very nature of the Roadmap as a process established by the CMA to identify a broad set of actions and measures needed to scale up finance for climate action and respond to the needs to implement NDCs and NAPs implies continued work under the CMA. This work could take various forms, e.g. Parties could decide to establish a work programme, workshops, dialogues or combination of those.
- 3.6. There is also scope to seek to include the Roadmap as an agenda item for CMA 7. However, the provisional agenda items for CMA 7 / COP 30 published on the UNFCCC website on the 5 September 2025<sup>5</sup> do not include NCQG or the Roadmap. The agenda item would therefore need to be proposed as a supplementary agenda item as per the rules of procedure. This could arguably be done on the basis of:
  - A. Rule 10 of the draft Rules of Procedure: "(b) Items the inclusion of which has been decided at a previous session." It could be argued that the decision at CMA 6 to launch the Roadmap combined with the request made to the Presidencies to produce a report by CMA 7 constitutes a decision to include the Roadmap as an agenda item at CMA 7. However, as explained above, the NCQG decision does not actually *mandate* that the Roadmap be considered at CMA 7 and the Roadmap is not included in the provisional agenda, but the supplementary provisional agenda could include it if the Presidencies decide to do so; or
  - B. A proposal by a Party or Parties (though this would need to be agreed by consensus)<sup>6</sup> could be included in the supplementary agenda ahead of the COP as per rule 12 of procedure or even brought up and added during the COP when adopting the agenda as per rule 13 of Procedure. In this regard, we note that the Ministry of Finance of Brazil has launched a COP 30 Circle of Finance Ministers initiative as part of the Brazilian presidency of COP 30 to support the development of the Roadmap.<sup>7</sup> Given that the COP 30 Brazil Presidency has only established "support circles" for what it considers to be key issues for COP 30, it is possible

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<sup>5</sup> [https://unfccc.int/sites/default/files/resource/cma2025\\_01\\_adv.pdf](https://unfccc.int/sites/default/files/resource/cma2025_01_adv.pdf)

<sup>6</sup> See FCCC/CP/1996/2. The draft rules of procedure were never adopted formally due to dispute over Article 42 on voting. It is recognized that the draft rules of procedure are adopted at the start of every COP except for Article 42, and there is no general decision-making rule - decisions are to be made by consensus.

<sup>7</sup> See: '[Brasil launches COP30 Circle of Finance Ministers to support the Baku to Belém Roadmap to USD 1.3 trillion](#)'. See also: '[COP30 Presidency launches support circles on key issues for the conference](#)'.

that Brazil will propose the Roadmap as an agenda item for COP 30.

- 3.7. If the Roadmap is adopted as an agenda item, this could create a platform to discuss a negotiating text on next steps for the Roadmap. Indeed the NCQG decision originated from a report presented as a pre-session document by the co-chairs of agenda item 11(a) (being the NCQG) at CMA 6 / COP29 and a “framework for a draft negotiating text, crystallising core options and areas of disagreement.”<sup>8</sup>

#### 4. The Roadmap at SB 62

- 4.1. As announced on the Web Page, at SB 62, two events relating to the Roadmap took place:

- A Presidency-led open consultation event with Parties on Monday, 16 June 2025: <https://unfccc.int/event/presidency-led-consultation-event-with-parties-on-the-baku-to-belem-roadmap-to-13>; and
- A Presidency-led open consultation event with non-Party stakeholders on Thursday, 19 June 2025: <https://unfccc.int/event/presidency-led-consultation-event-with-stakeholders-on-the-baku-to-belem-roadmap-to-13-t>.

- 4.2. These events sought to gather views and opinions on the development of the Roadmap in an informal setting. Prior to the consultations, over [100 written submissions](#) on the Roadmap were made by a range of stakeholders including Parties, civil society organisations, research institutions and financial actors.<sup>9</sup>

#### 5. Next steps

- 5.1. As mentioned above, even though paragraph 27 does not mention explicitly that the report by the CMA 6 and CMA 7 Presidencies will be considered by CMA 7, since the decision to create a Roadmap was established by the CMA in the same paragraph, it is likely that it will be considered by CMA 7 and there is a good basis to argue that it should be included as an agenda item.
- 5.2. In the meantime, following the consultations and written submissions, the Presidencies are now preparing the Roadmap and their summary report ahead of the publication date and high-level launch event outlined in section 1 above.

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<sup>8</sup> See: [‘Interactive: Tracking negotiating texts at the COP29 climate summit - Carbon Brief’](#).

<sup>9</sup> See: [‘Baku to Belém Roadmap to 1.3T | UNFCCC’](#)