
**Submission by the International Centre for Climate Change and Development (ICCCAD) at
Independent University, Bangladesh (IUB)**

15 March 2022

Preamble

1. The International Centre for Climate Change and Development (ICCCAD) based at Independent University, Bangladesh (IUB) welcomes the call for submissions on the Santiago Network on Loss and Damage (SNLD) (i) Operational modalities; (ii) Structure; (iii) The role of the Executive Committee and its expert groups, task force and technical expert group; (iv) The role of loss and damage contact points and other relevant stakeholders at the subnational, national and regional level; (v) Possible elements for the terms of reference of a potential convening or coordinating body that may provide secretarial services to facilitate work under the Santiago network (Paragraph 10(a), of Decision 19/CMA.3).
2. ICCCAD at IUB is a registered Observer Organisation under the UNFCCC for a number of years and has been actively collaborating with the Paris Committee on Capacity Building (PCCB) in organising the Capacity Building Hub at COP24, COP25 and COP26. We are also actively engaged in research and capacity building on Adaptation as well as Loss and Damage at the country level in some Least Developed Countries (LDCs) along with our partner universities which are part of the LDC Universities Consortium on Climate Change (LUCCC) which we coordinate.
3. ICCCAD strongly supports the process to develop the institutional arrangements of SNLD outlined in Decision 19/CMA.3 and stands ready to engage with it to avert, minimize and particularly address loss and damage. ICCCAD views that the five aspects noted in paragraph 10(a), Decision 19/CMA.3 are vitally important for operationalising the Santiago Network on Loss and Damage.
4. In view of ICCCAD, the roles of relevant stakeholders at the subnational, national and regional levels are extremely important for several reasons: LDCs are the countries impacted first and most by climate change, bearing the brunt of both economic and non-economic losses and damages. At the same time, they lack proper documentation and data on loss and damage which is crucial to facilitate informed policymaking and action. Thus, LDCs need to build the technical capacity and knowledge to deal with L&D.
5. Therefore, ICCCAD would like to put emphasis on the following specific needs to be reflected in the work of Santiago Network regarding the role of relevant stakeholders at the subnational, national and regional levels. This submission reflects that the Paris

Agreement Article 7 para 5¹ that describes attributes of adaptation action, and all of these are highly relevant to attributes of actions to address L&D.

a. Capacity building

6. ICCCAD considers that the promotion of country ownership is a central element of capacity building. So, we are of the view that capacity building cannot be done top-down, but has to grow from within. Any external support must be respectful of this.
7. We firmly believe that capacity building strongly contributes to global public goods, which benefit each and every citizen and country of the world. The elements of education, training, public awareness, public participation, and public access to information have both intrinsic and instrumental values—they, being inherently good in their own merit, contribute to inclusive citizenship including the marginalised in any society and also those elements properly applied contribute to the sustainability and effectiveness of adaptation, mitigation and addressing loss and damage. These values combined help develop an effective approach to empowerment, helping citizens to realize their potential. This lens is needed in this moment when we are witnessing a growing disconnect between climate science, as evidenced by the latest IPCC AR6 findings, and the international and national climate policies, particularly of major emitters—companies and countries. Therefore, a comprehensive approach for implementation of the capacity building agenda is likely to contribute to behavioural changes among citizens of each country, which is expected to bridge this disconnect in the future.
8. We believe that channelling proper technical support and guidance on approaches to address loss and damage through the Santiago Network will help facilitate responses to the impacts of loss and damage (for both slow onset and rapid onset events) and ensure a uniform methodology of measure of both impacts of loss and damage and ways of tackling it.
9. Another important tool of capacity building is how to access finance for loss and damage where it can support the development of new project proposals focused on loss and damage, as well as ensure concrete implementation projects to address loss and damage on the ground. This is of paramount importance since unlocking climate finance is considered as one of the biggest challenges in dealing with climate change-induced impacts. Other factors important for capacity building include the building of strong institutions nationally and within the UNFCCC, networks and partnerships and long term financial and technical support using programmatic approaches.

¹ PA Article 7 para 5: Parties acknowledge that adaptation action should follow a country-driven, gender-responsive, participatory and fully transparent approach, taking into consideration vulnerable groups, communities and ecosystems, and should be based on and guided by the best available science and, as appropriate, traditional knowledge, knowledge of indigenous peoples and local knowledge systems, with a view to integrating adaptation into relevant socioeconomic and environmental policies and actions, where appropriate.

b. Building evidence base

10. For addressing loss and damage, we see that under the agenda of Loss and Damage there is a need to create a comprehensive evidence base that grows both from the bottom-up from the scientific and technical origins. We welcome strong support to gather evidence of loss and damage happening on the ground. As set out in AR6 WG2 losses and damages are both current and past adverse impacts and adverse project risks, so we need to gather evidence from various sources, accepting and learning from different perspectives, and we need to understand how the gender and inter-sectional differentiation of losses and damages provide the dimensions of the evidence base.
11. As a “Knowledge-Hub” on Loss and Damage, the Santiago Network could create access to knowledge and information and undertakes in-country evidence-based Research on Loss and Damage (L&D), in order to develop a better understanding of L&D needs of developing countries to feed into UNFCCC processes. This will help gather experience and information on concrete approaches to address L&D and provide aggregate information on country needs regarding L&D by conducting/facilitating an annual L&D gap report as a reliable assessment of both, finance needs for L&D measures and the funding available on an annual basis is needed.

c. Support to develop policies at the national and subnational levels

12. In our view, the Santiago Network needs to provide support in developing policies, plans, strategies and programmes at the national and subnational levels in LDCs to address loss and damage. The GCF experience of the need for investment in national level preparedness demonstrates clearly that the policy and institutional base for addressing loss and damage requires considerable investments.
13. We consider that SNLD will have a different paradigm of technical assistance because conventional technical assistance for climate action has not worked well in the past. Technical assistance efforts to date have been short-term, project-based, consultancy-led, and donor-driven. Interventions are often regarded as time-bound projects rather than as continuing programmes, raising issues of sustainability and ownership of the outcome of development efforts. Developed countries typically support technical assistance by funding disconnected initiatives through development assistance agencies on an ad-hoc basis. They often hire consultants to conduct training sessions or give other short-term assistance but provide little to no continuing support. These characteristics continue to stand in the way of ownership by the recipient countries.
14. To foster coordination and collaboration among stakeholders from the field of L&D, Climate Risk Management, Humanitarian Aid, the SNLD could facilitate information exchange and awareness raising. This could include for (i) Providing a coordination mechanism to share

knowledge among relevant organizations, e.g. Information and experience sharing of countries, communities and other actors that work on addressing L&D with national L&D approaches; (ii) Facilitating South-South learning, where ICCCAD can mobilise the LUCCC Network to effectively channel information from the WIM to the local level where it can be used by households and decision-makers via local, grassroots and subnational level initiatives

15. In conclusion, ICCCAD at IUB is pleased to offer its support to the SNLD in providing research and evidence gathering, particularly in the LDCs as well as capacity building on L&D going forward. We believe that our proposals will be considered at the fifty-sixth sessions of the Subsidiary Body for Scientific and Technological Advice and the Subsidiary Body for Implementation.