SUBMISSION

Suggested Topics for Workshops Under the Sharm el-Sheikh Dialogue in 2025

March 2025

This response addresses the guiding question on which topics need to be discussed in the workshops, focusing on the following specific policy areas:

1. addressing and shifting finance flows not consistent with the goals of the Paris Agreement
    a. shifting public financial flows from fossil fuels to clean energy
    b. overcoming investment treaties as a barrier to mobilizing climate finance
2. transition plans as a tool to mobilize private finance
3. country platforms as a tool to align national plans with the goals of the Paris Agreement
4. the role of central banks and prudential regulations in aligning finance flows

In all cases, we can provide further recommendations on format and speakers.

1. Addressing and Shifting Finance Flows Not Consistent With the Goals of the Paris Agreement

A. Shifting Public Financial Flows from Fossil Fuels to Clean Energy

Article 2.1(c) relates to all financial flows—public and private. Public flows are particularly influential because they 1) are directly controlled by governments, 2) can support technologies and geographies that attract insufficient private finance, and 3) can crowd in private finance where it is most needed. Public financial flows encompass all government spending and revenues, including taxation and carbon pricing. In contrast, public financial *support* includes flows that benefit the energy industry: subsidies (direct, indirect, and those granted through the tax system), public lending, and state-owned enterprise (SOE) investments. In 2023, support for fossil fuels totalled at least USD 1.5 trillion (Gerasimchuk et al., 2024).

The majority of support was for **subsidies**, at around USD 1.1 trillion in 2023 (Fossil Fuel Subsidy Tracker, n.d.). In G20 countries, subsidies for fossil fuels were more than triple the USD 168 billion provided for renewable power in 2023 (global data on renewable support was unavailable) (Laan et al., 2024). Clearly, countries have not implemented their commitments to phase out "inefficient fossil fuel subsidies," which were first made by the G20 in 2009 and have been repeated in various forums since then. The historic UAE Consensus included "transitioning away from fossil fuels in energy systems, in a just, orderly, and equitable manner" (CMA, 2023). It also reiterated the 26th UN Climate Change Conference's (COP 26) commitment to the "phase-out of inefficient fossil fuel subsidies while providing targeted support to the poorest and most vulnerable in line with national circumstances and recognizing the need for support towards a just transition" (CMA, 2023).

However, there have been pockets of progress. Countries such as India and Zambia have made successful fossil fuel subsidy reforms (Gerasimchuk et al., 2025). COP 28 saw the launch of the Coalition on Phasing Out Fossil Fuel Incentives Including Subsidies, a group of 16 countries working to remove fossil fuel subsidies both collectively and through domestic action (International Institute for Sustainable Development [IISD], n.d.). Members are publishing national fossil fuel subsidy inventories and working toward presenting national phase-out plans.

In terms of **public financing**, flows have started to shift, with an estimated USD 29 billion provided to fossil fuel projects in 2023 compared to USD 34 billion for clean energy.[1] This shift is partly thanks to the Clean Energy Transition Partnership (CETP), whose 41 governments and public finance institutions committed to end international public support for fossil fuels and instead scale up support for clean energy. The CETP's leadership is welcome, but more needs to be done to eliminate fossil financing, increase ambition on the scale-up side, and expand membership (Jones et al., 2024).

Tripling renewable capacity by 2030—necessary to be consistent with 1.5°C scenarios—requires global annual investment in renewables, grids, and storage to double to around USD 1 trillion a year on average between 2023 and 2030 (International Energy Agency [IEA], 2024). International public finance will be needed in emerging markets and developing economies (EMDEs), where investment is lagging. Africa, for example, currently attracts only 3% of global energy investment (IEA, 2023a, 2023b). In EMDEs other than China, concessional financing needs to reach between USD 80 billion and USD 100 billion annually by the early 2030s to bring in the levels of private investment needed to be consistent with 1.5°C scenarios (IEA, 2023a), with around USD 28 billion for Africa annually (IEA, 2023b), in addition to direct public investment. Highly concessional public finance and grants are particularly important to avoid worsening debt levels (Martin, 2024).

[1] 2023 estimate based on the 2020–2022 average from https://energyfinance.org.

Capital expenditure (CapEx) by SOEs was vastly in favour of fossil fuels, with USD 368 billion for fossil projects compared to USD 7.8 billion for clean energy (Gerasimchuk et al., 2024). SOEs are a powerful tool in the energy transition because they are under direct control of government, shape the energy landscape in many EMDEs, and have important roles in energy access and employment (Viswanathan et al., 2022). SOE CapEx also makes up most of the public USD 447 billion in 2023 in financial flows that lock in fossil fuel production, along with production subsidies and international public finance. Scenarios by all credible expert institutions, including the Intergovernmental Panel on Climate Change and the IEA, show that there is no room for new coal, oil, and gas projects, including new liquefied natural gas infrastructure, in a 1.5°C world (Green et al., 2024). Expanding such infrastructure is also unnecessary to meet declining fossil fuel demand in 1.5°C scenarios.

We recommend that one workshop of the Sharm el-Sheikh dialogue discusses best practices and lessons learned from countries' experiences in shifting public financial flows from fossil fuels to clean energy, as well as potential outcomes of the Sharm el-Sheikh dialogue that can help support this shift. The organizations that prepared this submission have the expertise, government networks, and capacity to support such a workshop.

B. Overcoming Investment Treaties as a Barrier to Mobilising Climate Finance

Investment treaties are international agreements that govern cross-border investment flows. As of 2022, there are more than 2,500 bilateral investment treaties or investment chapters in free trade agreements ("investment treaties") in force globally, most of which have investor–state dispute settlement (ISDS) provisions. ISDS allows foreign investors to challenge host governments' measures before international arbitration tribunals, even if they pursue legitimate public policy objectives, such as climate mitigation and adaptation. The fear of high-value compensation claims can delay ambitious climate action, such as setting oil and gas phase-out dates, and lock states into high-carbon pathways.

ISDS is also a barrier to mobilizing climate finance, which makes it highly relevant to the discussions on Article 2.1(c) (Organisation for Economic Co-operation and Development [OECD], 2022a). Indeed, the majority of existing ISDS claims have arisen in relation to fossil fuel investments (Di Salvatore, 2021). Maintaining investment treaties with ISDS contradicts other efforts to mobilize capital toward climate action. First, ISDS insulates fossil fuel investors from transition risks by functioning similarly to free state-backed insurance, encouraging further fossil fuel investments (OECD, 2022a; Schaugg et al., 2024). Second, compensation awards as a result of ISDS claims can significantly constrain countries' fiscal space to respond to climate change. Such ISDS awards can have a particularly crippling effect on developing economies. In the past decade, the average compensation awarded by tribunals exceeded USD 250 million (UN Trade and Development, 2024a). In 2019, Pakistan was ordered to pay more than USD 5.8 billion in compensation for not approving a gold and copper mine development, which was tantamount to the bailout Pakistan secured from the International Monetary Fund in the same year (Bonnitcha & Brewin, 2020).

During the workshops in 2024, the investment treaty reform agenda was raised, which was picked up by the report prepared by the co-chairs of the Sharm el-Sheikh dialogue and presented to the parties in November 2024. The co-chairs included “implementing global reforms to investment protection regimes that do not support climate action” as one of the issues that need to be further addressed under the dialogue in 2025 (United Nations Framework Convention on Climate Change [UNFCCC], 2024).

Countries are increasingly moving away from broad investment protection by withdrawing from or terminating investment treaties and by engaging in ISDS reform at the United Nations (IISD, 2024; IISD et al., 2024; UN Trade and Development, 2024b). It is important for the Sharm el-Sheikh dialogue to discuss topics such as investment treaties that have been overlooked in climate finance discussions but have an impact on achieving Article 2.1(c). **Therefore, we recommend that one of the workshops this year discusses the need to reform investment treaties with ISDS as a part of the implementation of Article 2.1(c). The organizations that prepared this submission have the expertise, government networks, and capacity to support such a workshop.**

2. Transition Plans as a Tool to Mobilise Private Finance

Transition plans—and the underlying transition planning process—are a key part of the enabling environment to deliver Article 2.1(c)’s goal of making all financial flows consistent with a pathway toward low greenhouse gas emissions and climate-resilient development. Transition plans can unlock finance and investment flows by helping the private sector align business strategies with mitigation and adaptation goals. To unlock these benefits, it will be critical for transition plans to reflect different contexts and national circumstances.

Transition plans were discussed under the Sharm el-Sheikh dialogue in 2024 as part of a workshop discussion on “avoiding greenwashing and maladaptation through transparency and tracking to ensure credibility in efforts towards achieving Article 2.1(c)” (UNFCCC, 2024). Looking ahead to 2025, some participants suggested that transition plans be discussed again, focusing on increasing the use of transparent and credible transition plans in the private sector (UNFCCC, 2024). We recommend further discussion in one of this year’s workshops to explore transition plans as a tool to mobilize private finance for mitigation and adaptation, particularly for emerging markets and developing countries. This focus would move the discussion forward from transparency, tracking, and credibility to the role that transition plans can play in aligning financial flows and implementing Article 2.1(c).

Transition plans help mobilize private finance in several ways. First, they help companies align their financial planning with climate targets and allocate capital to mitigation and adaptation projects (Accounting for Sustainability, 2025). A 2022 OECD survey found that 79% of financial institutions indicated that a lack of transition plan information was an obstacle to identifying companies to finance in line with net-zero goals (OECD, 2022b). Transition plans also enable effective stewardship by investors and the allocation of “transition finance,” which is already a USD 50 billion market, going to companies that are transitioning (Mahmood et al., 2024). The Network for Greening the Financial System (2024) has also recognized that transition plans support adaptation and climate resilience. Private sector transition plans can also support the alignment of domestic and international financial flows with national climate and adaptation goals if they account for national pathways and circumstances.

Recent developments on the role of transition plans in enabling businesses to articulate climate-related strategies and their management of climate-related risks have also occurred in the broader international finance system. Including transition plans during one of the 2025 workshops would enable a discussion of developments that occur outside of the UNFCCC process but are relevant to Article 2.1(c). For example, transition plan disclosures are included in global sustainability reporting frameworks, such as the International Sustainability Standard Board's International Financial Reporting Standards (IFRS) S1 and S2 disclosure standards, which some jurisdictions are beginning to implement (IFRS Foundation, 2024). In addition, under the 2024 Brazilian Presidency, the G20's Sustainable Finance Working Group (SFWG) developed high-level principles for "credible, robust, and just" transition plans for financial institutions and corporations and additional recommendations for supporting just transitions (G20 SFWG, 2024). Going forward, the 2025 South African Presidency will work further on incorporating adaptation and resilience into transition planning (G20 SFWG, 2025).

For these reasons, we recommend that one of the workshops of this year's Sharm el-Sheikh dialogue focuses on the role of private sector transition plans in mobilizing private finance for mitigation and adaptation, particularly for emerging markets and developing countries. The organizations that prepared this submission have the expertise, government networks, and capacity to support such a workshop.

3. Country Platforms as a Mechanism for Catalysing Finance and Technical Support towards National Climate and Development Priorities

Country platforms are emerging as key mechanisms to coordinate and align financial flows with national climate and development objectives, thereby supporting the implementation of Article 2.1(c). These platforms are government-led, multistakeholder partnerships that bring together national governments, development finance institutions, private investors, bilateral and multilateral donors, national development banks, and civil society. They aim to provide an integrated approach to planning, prioritizing, and mobilizing both public and private finance to achieve shared national goals. By improving coordination, reducing fragmentation, and aligning investment flows with ambitious, 1.5°C-aligned nationally determined contributions, country platforms can accelerate the delivery of public goods, enhance development effectiveness, and speed up the transition to low-carbon, climate-resilient economies. To be effective, these platforms must be tailored to national contexts, anchored in robust development and transition plans, and guided by core principles that foster social inclusivity, transparency, and national ownership.

The Brazilian G20 Presidency's Taskforce on Climate Finance Mobilization (TF-CLIMA) in 2024 prioritized the development of national transition plans and country platforms to address sustainable development challenges within the broader context of financial system reform. In October 2024, TF-CLIMA published detailed principles emphasizing the need for alignment with national priorities and fostering collaboration among climate and development actors.

Country platforms, such as the Brazil Climate and Ecological Transformation Investment Platform, the recently announced Country Platform in Colombia, and Just Energy Transition Partnerships in South Africa, Indonesia, and Vietnam, illustrate how these mechanisms can mobilize finance, bridging national priorities with the global system. National development banks must play a pivotal role in these platforms by facilitating the origination of projects due to their in-depth knowledge of the local socio-economic context and their mandate to deliver on national priorities. Despite the potential benefits, challenges remain in operationalizing country platforms, including mobilising private investment at scale in a manner that prioritises social justice, ensuring meaningful civil society participation and addressing capacity constraints in emerging and developing economies. Addressing these issues is crucial to ensuring that country platforms effectively catalyse finance and technical support for national priorities in a manner consistent with implementation of Article 2.1(c).

Given the potential of country platforms in advancing climate and development objectives, we recommend that one of this year's Sharm el-Sheikh dialogue workshops focuses on best practices and lessons learned from their design and implementation. The organizations that prepared this submission have the expertise, government networks, and capacity to support such a workshop.

4. The Role of Central Banks and Prudential Regulations in Aligning Financial Flows

Central banks and financial supervisors play a critical role in aligning financial systems with the goals of the Paris Agreement. They are uniquely positioned to address systemic risks arising from both physical and transition climate risks. They can support the transition to low-carbon, climate-resilient economies through monetary policies and prudential regulations. Left unaddressed, these climate risks could threaten financial stability and undermine economic resilience.

Central banks influence financial systems through four key monetary tools: lending, asset purchases, collateral acceptance, and exchange rate management—all of which can be adjusted to incorporate climate considerations. Monetary policies, such as green quantitative easing or adjusting collateral frameworks to favour climate-aligned assets, have the potential to influence the cost of capital for both green and fossil investments. Beyond monetary policies, central banks have a powerful tool at their disposal: prudential policies. Prudential regulations, including differentiated capital requirements for climate-aligned investments, can further support the reallocation of financial flows toward low-carbon activities. On the one hand, climate risks, like all systemic risks, are generally underestimated and require the application of aggregate correction factors linked to indirect indicators of potential exposure. Consequently, macroprudential regulation can no longer ignore the role of the financial system in combating climate change. To safeguard system stability threatened by climate risks, it must instead become a policy tool at all levels. On the other hand, regulations like Basel III can impose financing constraints and hinder financial flows to EMDEs, where perceived risks are higher. This often leads to higher borrowing costs and reduced capital availability for clean energy projects in these regions.

There is growing momentum in integrating climate considerations into the mandates of central banks and financial supervisors: at the last G20 Finance Ministers and Central Bank Governors meeting, leaders reaffirmed their commitment to promptly implementing international financial reforms and upholding robust prudential standards. Initiatives such as the Network for Greening the Financial System, with over 140 members, have provided critical guidance on incorporating climate-related risks into supervisory frameworks and monetary policy operations. Tools like climate stress testing, enhanced disclosure requirements, and the integration of climate risks into capital adequacy frameworks are being explored and implemented in various jurisdictions. The European Central Bank and the Bank of England have conducted climate stress tests to assess the resilience of financial institutions to transition and physical risks. Despite progress in high-income and many Asian countries, significant disparities remain, particularly in EMDEs. Research from the WWF's Sustainable Financial Regulations and Central Bank Activities assessment highlights the urgency of bridging these gaps.

We recommend that one of the workshops of the Sharm el-Sheikh dialogue focuses on the role of central banks and regulators in implementing Article 2.1(c). The organizations that have prepared this submission have the expertise, government networks, and capacity to support such a workshop.

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E3G is an independent climate change think tank with a global outlook. We work on the frontier of the climate landscape, tackling the barriers and advancing the solutions to a safe climate. Our goal is to translate climate politics, economics and policies into action.

E3G builds broad-based coalitions to deliver a safe climate, working closely with like-minded partners in government, politics, civil society, science, the media, public interest foundations and elsewhere to leverage change.

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About Oil Change International

Oil Change International is a research, communications, and advocacy organization focused on exposing the true costs of fossil fuels and facilitating the coming transition towards clean energy.

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