

**Submission by the United Republic of Tanzania on behalf of the Africa Group of Negotiators
(AGN)**

On

**Issues to be addressed during the 2025 Sharm el-Sheikh Dialogues on Article 2.1 c and its
complementarity with Article 9**

The Africa Group, in response to the invitation by the Co-chairs, makes this submission. It provides key elements of important consideration in the 2025 Sharm el-Sheikh Dialogues including key topics and questions.

1.0 Preamble

We appreciate progress made in 2023 and 2024 under the leadership of the Co-chairs.

The Africa Group recalls decision 1/CMA. 4 and emphasize the need for the SeS dialogue process to pay equal attention to all issues relating to Article 2.1 C and its complementarity with Article 9 to enhance understanding on its scope.

We note that the dialogues have, over the two years, provided important avenues for Parties and Non-party stakeholder consultations with notable progress on mitigation and decarbonization pathways and investments in the sector, regulatory options including the role of various policies and tools in supporting low carbon climate resilient pathways and linkages with the financial architecture, and the role of different actors under and outside the Paris Agreement

However, the group underscores that further discussions are needed in the areas of adaptation, climate resilient pathways, just transition, the role of the UNFCCC including in linking with external institutions and processes, unlocking additional climate finance flows, avoiding and addressing negative consequences of regulatory and unilateral measures, **complementarity with Article 9** and application of the Principles of the Convention and its Paris Agreement.

The group emphasizes that continuation of SeS dialogues must prioritize the elaboration of the differences between Article 2.1.c and Article 9 of the Paris Agreement with regards to: (i) scope, (ii) legal mandate, (iii) consistency, and (iv) implementability in the context of provision and mobilization of financial resources from developed countries to developing countries. The first dialogue should consider this aspect as a foundational basis for convergence building on the process of exploring more efficiently linkages between Article 2.1.c and Article 9 of the PA.

2.0 Issues for consideration in 2025: Substantive topics and questions

2.1 Financing Adaptation and Climate Resilient pathways

The Africa Group affirms that Article 2.1c and its complementarity with article 9, must, in addition to building understanding on mitigation and decarbonization pathways, facilitate deepened discussions on adaptation and resilient pathways of national and global level in nature. Previous discussions have clearly shown that there is a gap both in understanding and in implementing adaptation and resilience through Article 2.1c.

2025 SeS dialogues should focus on: exploring possible national sector-level adaptation and resilience pathways and how they can be financed acknowledging the crucial importance of tackling finance barriers and gaps.

Identifying and defining climate finance flows for resilience building and adaptation is still unclear. Ways to track, label and identify such flows are very much needed as avenues to assist finance providers to channel and mobilize resources in support of adaptation and resilience.

Financing adaptation and resilient pathways must consider the role of international public finance in catalyzing additional finance at global and national levels, addressing barriers to unlocking additional and scaled up finance for these pathways, establishing responsible arrangements between public and private actors to support adaptation pathways, the interaction between sectoral level adaptation and economy wide resilience planning with the financial sector and architecture and how fiscal policies support consistency of financial flows with adaptation and resilient pathways across investment portfolios.

Key questions to address:

1. How would article 2.1 C and its complementarity with article 9 support the designing of adaptation pathways and unlock possibilities for enhanced public support for adaptation including by strengthening the role of international public finance in catalyzing additional finance to support at scale adaptation and resilient pathways?
2. How can we create the complementarity and coherence between Article 9 and Article 2.1c in adaptation and resilience building?
3. What are the key barriers to supporting adaptation pathways and how do we address them?
4. How could fiscal policies at country level best interact with sectoral and economy wide adaptation and resilient planning processes, policies and pathways, to promote the alignment of financial flows with adaptation and resilient pathways?

2.2 Defining the scope for financing just transitions

Just transitions should embody efforts to transition from a carbon intensive, vulnerable development pathway to one that is low carbon and climate resilient. Such efforts have an additional cost – social and economic - that requires factoring in the designing of mitigation and adaptation transition pathways. Article

2.1 C SeS dialogues should consider required reforms in the global financial system to unlock new finance streams to cover the full and incremental costs of the transition to make it fair and equitable. The chapeau of Article 2 provides such guidance on linkage between Article 2.1.c and sustainable development in its three dimensions, with social and economic development as core elements to be achieved through climate finance and flows.

The Africa Group notes that these reforms must aim at supporting vulnerable regions, and economies by ramping up new markets for low carbon and adaptation innovations, significantly lowering the cost of capital, consider how to maneuver transitional risks and shocks in an equitable manner by advancing financial safety nets and avoiding unintended consequences such as debt distress in the process of transitioning.

Key questions are:

1. What just transitions considerations should be made in the context of unlocking new streams of finance under Article 2.1 c?
2. What solutions and partnerships could be pursued between public and private actors particularly financial institutions to present practical ways of addressing transitional risks and shocks?
3. In which ways can reforms of the financial architecture for enhanced delivery of climate goals integrate just transitions financing considerations?
4. What is the role of the UNFCCC in coordinating and following through just transitions considerations with actors outside the Convention, in particular international financial institutions?

2.3 Promoting fairness and addressing unintended consequences

The UNFCCC has an intrinsic mandate to support and promote equity and fairness in pursuing international climate cooperation to protect the climate system. The Africa Group recalls Article 2.2 of the Paris Agreement and Article 3 of the Convention and emphasizes that actions to operationalize Article 2.1 C must avoid driving unintended consequences in developing countries, must be country specific and respect national circumstances. Further, these actions should contribute to real emission reductions, adaptation and resilience building, and fair and equitable economic development and transformation avoiding green washing, maladaptation, and fiscal instability. Therefore, the 2025 Sharm el-Sheikh Dialogues should bring together the principles of the Convention and its Paris Agreement and efforts to operationalize Article 2.1 C while addressing unintended consequences.

The questions for consideration are:

1. How can the principles of the Convention and its Paris Agreement be operationalized in the context of Article 2.1 C and its complementarity with Article 9?

2. a. How could the UNFCCC cooperation on Article 2.1c eliminate and avoid unintended consequences? b. What is the role of accountability frameworks in managing unintended consequences in the implementation of Article 2.1.c?
3. Which financial instruments can be considered to prevent debt and act as guardrails to prevent adverse consequences on developing countries?
4. What guardrails are needed to ensure that all countries take equitable action towards Article 2.1c and adverse consequences, strain on administrative capacities and undue conditionalities are not imposed on developing countries?
5. What is the role of the UNFCCC in promoting fairness and equity for actors outside the Convention and how can this be done?

3.0 Process

The Africa Group appreciates the consultative approach used by the Chairs in 2025 that included conducting group level consultations to gather input on priority issues for inclusion in the agenda. A similar approach should be applied in 2025. Additionally, we urge the Co-chairs to ensure a balanced representation of speakers and presentation of case studies from both developed and developing countries. Acknowledging the importance of the dialogues this year and envisaged conclusion in COP 30, the last dialogue should include mapping areas of convergence, divergence, and provide areas for further work.