

# Submission to the Office of the High Commissioner for Human Rights on climate financing and human rights

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## About this submission

This paper represents a response to the call for inputs on climate financing and human rights issued by the United Nations Office of the High Commissioner for Human Rights (OHCHR). It was submitted to the OHCHR on 16 January 2026. The submission highlights research from the [Just Transition Finance Lab](#) and Law & Governance research units at the [Grantham Research Institute on Climate Change and the Environment](#) and from the [TPI Global Climate Transition Centre](#), all based at LSE. The submission covers a range of issues and policy areas that span the breadth of expertise at the respective research centres.

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The OHCHR's Call for Inputs can be viewed here: [www.ohchr.org/en/calls-for-input/2026/call-inputs-climate-financing-and-human-rights](http://www.ohchr.org/en/calls-for-input/2026/call-inputs-climate-financing-and-human-rights)

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The views expressed in this submission represent those of the authors and do not necessarily represent those of the host institutions or funders. The authors declare no conflict of interest in the preparation of this submission.

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## Summary messages

- **The climate finance gap is a human rights gap.** Persistent shortfalls and delays in delivering against international climate finance goals to fund necessary climate change mitigation initiatives, adaptation infrastructure and complementary social programmes for just transitions directly undermine states' capacity to protect economic and social rights, particularly in countries especially vulnerable to climate change.
- **Debt-heavy climate finance instruments can undermine human rights and the justice dimensions of energy transitions.** Over-reliance on public spending constrains fiscal space and forces trade-offs between debt and social protection, making grant-based and highly concessional financing essential to ensure rights-compatible transitions to net zero greenhouse gas emissions.
- **Transparency and accountability around climate finance remain inconsistent and limited, but there are increasing examples of good practice that can be replicated.** Transparency and robust protection of access to information on climate finance are essential for improving accountability for human rights in climate action and reporting initiatives. Numerous tools developed by researchers can improve access and help users make sense of this information. Some governments show strong practices in reporting on climate finance and in regulating corporate disclosures.
- **Public participation in climate finance initiatives is important for ensuring alignment of climate finance and the realisation of human rights for all.** Although participation remains inconsistent, we identify examples of social dialogue being promoted in climate finance initiatives. Examples of enhancing inclusivity through climate framework legislation are also increasing.
- **International cooperation and orchestration initiatives hold promise but need to be better designed and linked to accountability mechanisms.** There are international organisations working to promote international climate cooperation in ways that could mobilise public and private financial flows but key initiatives are under-publicised and have not been designed to sufficiently promote synergies between social, economic and environmental goals. Moreover, international cooperation is limited by a focus on financial *goals* without setting clear *rules and standards* for achieving them, thereby limiting accountability and enabling blame-shifting in ways that may undermine human rights.
- **Country platforms could help to integrate grant spending to support measures such as reskilling and inclusive participation.** This includes country platforms that are part of Just Energy Transition Partnerships. Such arrangements can help to build legitimacy and absorptive capacity before large-scale investments proceed. Similarly, there is potential for market instruments such as transition credits to incorporate social safeguards and community engagement when designed with appropriate metrics and blended finance elements.
- **Incorporating clear use-of-proceed and social performance indicators in issuances of thematic sovereign bonds can provide a replicable structure for governments seeking to attract private capital while maintaining transparency and accountability.** Lessons from multilateral development banks' use of green, social and sustainability bonds could help shape policies that reflect just transition priorities.
- **The *quality* of finance, including its concessionality, predictability and accessibility, is as important as the *quantity* for ensuring the realisation of human rights.** There is scope to consider approaches that prioritise grant-based and concessional resources for social programmes that support human rights, embed rightsholder-aligned metrics in disclosure regimes, and strengthen the monitoring of distributional outcomes.
- **Ultimately, early planning, transparent reporting and participatory governance should help to align financial flows with human rights standards.** Policymakers will need to recognise that climate change mitigation, adaptation and finance are interdependent, and they need to be made inseparable from respect for human rights. It follows that inclusive institutional design can support both climate and social objectives.

# Responses

1. Please share concrete examples and stories of actionable pathways in mobilizing sufficient climate financing and associated challenges and opportunities in the pursuit of the full realization of human rights for all people. Please describe relevant opportunities and promising practices, such as in relation to international cooperation, non-debt creating climate financing, social protection aspects, participation, direct access, taxonomies, role of the private sector, taxation, or climate-related insurance and financial facilities.

Sufficient climate financing for the full realisation of human rights for all people is not being mobilised. Significant gaps remain in the provision of climate finance globally, but there are realistic pathways to closing those gaps, as identified by the Independent High-Level Expert Group on Climate Finance (Bhattacharya et al., 2025). The lack of proven, real-world pathways to mobilising sufficient climate financing in the pursuit of the full realisation of human rights for all limits the identification of concrete examples of delivering on such an ambitious objective; however, we identify various examples of promising practices in different areas.

Recent research from the Just Transition Finance Lab on Just Energy Transition Partnerships (JETPs) shows that **country platforms** are emerging as practical convening mechanisms to channel non-debt finance into supporting social objectives in tandem with energy transitions, with grants specifically allocated for social protection and reskilling funded upfront to reduce the risk of non-execution and build legitimacy before large capital programmes are scaled up (Wang, 2025). Recent findings on JETP grants and country platforms in Indonesia and South Africa also point to grant and concessional elements in platform design that strengthen participation (Selvaraju et al., 2025). In order to align private finance with such people-centred platform features, sectoral guidance for banks and insurers should set out governance commitments so that financial institutions help deliver just transition outcomes (International Labour Organization and United Nations Environment Programme Finance Initiative, 2023).

The Just Transition Finance Lab has also conducted research on **transition credits** showing how **market instruments** can be structured to incorporate labour rights and community participation rather than treating social outcomes as an afterthought (Robins and Nicholls, 2025). In the case of the early retirement of a coal plant in the Philippines, for example, ACEN Renewables showed how the process can be paired with well-defined just transition plans, stakeholder dialogue and asset repurposing for storage or grid services to support workers and local communities (Just Transition Finance Lab, 2024). Principles for developing appropriate just transition plans can be drawn from this case study. Just transition plans necessarily address human rights issues and root causes of human rights abuses in climate-driven energy transitions, and they could be expanded to explicitly include human rights-specific criteria. In moving from pilots to scale, a structured blend of guarantees, concessional layers and grant elements can anchor measurable social outcomes while protecting fiscal space, as laid out, for example, in a new framework from Habib and Kumar (2025). Such an approach complements institutional roadmaps for integrating just transition criteria into banking and insurance products (International Labour Organization and United Nations Environment Programme Finance Initiative, 2023).

On the public finance side, the Just Transition Finance Lab's methodology on **thematic sovereign bonds** provides a potentially replicable route for governments to mobilise private capital while embedding social safeguards. Just transition activities can be included among eligible expenditures in the case of use-of-proceeds bonds and social key performance indicators (KPIs) can be used in sustainability-linked bonds. In addition, post-issuance reporting commitments should demonstrate measurable just transition impacts such as the number of people benefiting from renewable energy training programmes funded by the bond (Scheer, Burge et al., 2025). To qualify just transition activity inside public financial management, the World Bank's Just Transition Taxonomy offers a narrative classification that governments and development finance institutions can adapt to national contexts, ensuring bond frameworks and budget lines capture people-centred transition activities. Incorporating a social dimension into taxonomies can enable

the consideration of human rights in supply chains (World Bank Treasury Sustainable Finance et al., 2024).

Taken together, the various frameworks referenced above could converge with the Just Transition Finance Lab's instrument design to form actionable pathways **that align public and private capital**: platforms with ring-fenced grant windows for participation, reskilling and affordability; transition credits linked to rights-holder metrics and supported by risk-sharing; and sovereign just transition bonds whose KPIs and reporting make social impacts visible. Each pathway can centre human rights by financing social initiatives early on, qualifying just transition initiatives more clearly, and aligning private finance with public frameworks to enhance accountability.

To determine whether sufficient climate finance has been mobilised, the TPI Global Climate Transition Centre (TPI Centre) provides a free, publicly available, independent tool, the Assessing Sovereign Climate-related Opportunities and Risks (ASCOR) framework, that assesses countries on climate change, including international climate finance. The framework is composed of indicators for the transparent assessment of the progress made by countries in managing the low-carbon transition and the impacts of climate change (Scheer, Honneth et al., 2025). The indicators are divided into three pillars: Emissions Pathways, Climate Policies and Climate Finance. Pillar 2 incorporates broad just transition criteria, including whether the state has ratified international human rights conventions. Under pillar 3, TPI Centre researchers assess whether UNFCCC Annex II (i.e. developed) countries have met their proportional share of the US\$100 billion goal on international climate finance. As significant historical emitters, these countries are responsible for providing international climate finance to developing countries according to Article 9 of the Paris Agreement.

The proportional share of the US\$100 billion goal is set at 0.18% of each country's GDP.<sup>1</sup> This percentage was calculated by taking the ratio of US\$100 billion and the sum of the GDP of all Annex II countries averaged over three years. Based on the latest disclosure of financial flows over the period from 2021 to 2023, 7 of 22 assessed developed countries contributed their proportional share of this international climate finance goal. France, Germany and Denmark contributed the highest amounts as a share of their GDP (0.35%, 0.28% and 0.27%, respectively). This methodology provides a way to compare contributions across countries to evaluate whether developed countries are delivering a sufficient and fair amount of international climate finance, covering all forms of finance. Annex II countries are generally those with the greatest historical emissions, meaning that evaluating their climate finance contributions implicitly considers the fairness principle of responsibility for climate impacts. Further analysis of data reported by developed countries in the Biennial Transparency Reports (BTRs) could identify which countries receive finance from specific donors, allowing the identification of patterns linked to historical emissions or colonial ties.

Finally, there is a need for stronger global leadership to promote international cooperation and orchestrate human-rights-compatible climate financing. It is crucial that international organisations promote climate finance in ways that exploit synergies and mitigate trade-offs across the social, environmental and economic dimensions of sustainable development, which necessarily involves consideration of the full spectrum of internationally recognised human rights. Initiatives such as the **SDG Stimulus** could contribute to achieving these objectives. The SDG Stimulus was selected as a High Impact Initiative by the UN Secretary-General in 2023, granting the initiative greater international visibility as an orchestration initiative. However, while such initiatives hold considerable promise for advancing action towards international climate finance and other sustainability goals, research shows that they appear to be unsuited to delivering global sustainability transformations as they are not adequately designed to pursue synergies across different goals (Higham and Bäckstrand, forthcoming).

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<sup>1</sup> This analysis can be applied to other global commitments such as the New Collective Quantified Goal (NCQG) agreed at COP29.

2. Please provide relevant quantitative or qualitative data or information on climate financing received and its relationship to human rights, including on how the quality and quantity of climate finance can impact climate and human rights outcomes. Please provide information on financing needs including regarding human rights realization and alignment, provision and disbursement, accessibility, predictability, effectiveness, and any tools used for assessment or monitoring of human rights impacts.

### Funding gaps

While global flows of climate finance have been increasing, systemic gaps persist that undermine predictability, equity and rights-based outcomes. Governments' persistent failure to achieve the international goal of delivering US\$100 billion in climate finance annually has created a significant trust deficit that risks undermining progress. Furthermore, although the amount of climate finance is increasing globally, the distribution remains highly unequal, which can exacerbate risks to human rights and increase the likelihood of adverse human rights impacts resulting from climate change and from energy transition initiatives.

Although OECD reporting indicates that developed countries collectively provided and mobilised over US\$100 billion in climate finance in 2022, this achievement came two years after the deadline of meeting the annual goal by 2020 (OECD, 2024). The **figure also remains contentious** because of disputes over the methodology used to calculate the sum and what qualifies as 'climate finance'. The contestation over the methodology risks adversely affecting human rights if it means that urgently-needed funding for rights-compatible outcomes is not forthcoming where it is deemed not to 'count' as climate finance. Moreover, governments' failure to deliver fully on the international climate finance goal has surely had profound negative implications for human rights. Delays and volatility in climate finance provision can push essential social welfare spending and investments in urgent climate adaptation infrastructure into austerity cycles, increasing multidimensional vulnerability for climate-exposed states and communities (Wang, 2025). Furthermore, headline figures obscure how much funding is given through repayable loans rather than grants. Civil society assessments of climate finance flows find effective value far lower because much of the finance was delivered as loans, often non-concessional, or double-counted. Such practices constrain fiscal space and sovereign policy autonomy, directly affecting governments' ability to uphold economic and social rights (Scheer, Burge et al., 2025).

First, there is a **persistent adaptation finance gap**. The United Nations Environment Programme (UNEP) estimates adaptation needs at US\$310–365 billion annually by 2035; yet only US\$26 billion was delivered in 2023 (UNEP, 2025). This is a chronic, more than twelvefold shortfall. Underfunding adaptation on this scale translates into avoidable mortality, displacement of people, loss of livelihoods, erosion of cultural heritage and food insecurity, with disproportionate harm to vulnerable groups, including women, informal workers, Indigenous peoples, persons with disabilities, and children (Intergovernmental Panel on Climate Change, 2022).

There is also **geographical disparity** in mobilising finance for climate adaptation finance, which is shaped by primary financial flows. Commercial incentives drive finance towards high-return investments, systematically under-serving communities in places such as informal settlements, and fragile or conflict-affected areas, where human rights needs, including for basic services, are often the greatest (Wang, 2025). All actors should therefore take steps to ensure that allocation frameworks better address risks to vulnerable groups and respect for human rights instead of focusing solely on profitability.

The integrity of climate finance in official development assistance is also important in assessing the relationship between potential gaps in climate finance and human rights outcomes. There is significant scope to address the persistent problem of **double-counting or re-labelling existing aid** as climate finance. Such practices risk eroding additionality and reducing resources for sectors critical for delivering human rights (OECD, 2024). Relatedly, **high borrowing costs** for climate-

vulnerable states create a binary between debt distress and rights-compatible investment. Many of these states need affordable climate finance that does not trap them in a cycle of unsustainable debt or condemn them to sovereign default. Fiscal stress forces trade-offs between servicing debt and funding social protection, undermining the protection and realisation of human rights. Lenders should explore non-conditionality, guarantees and risk-sharing mechanisms to reduce the cost of capital and protect fiscal space for human-rights-compatible investments in developing countries.

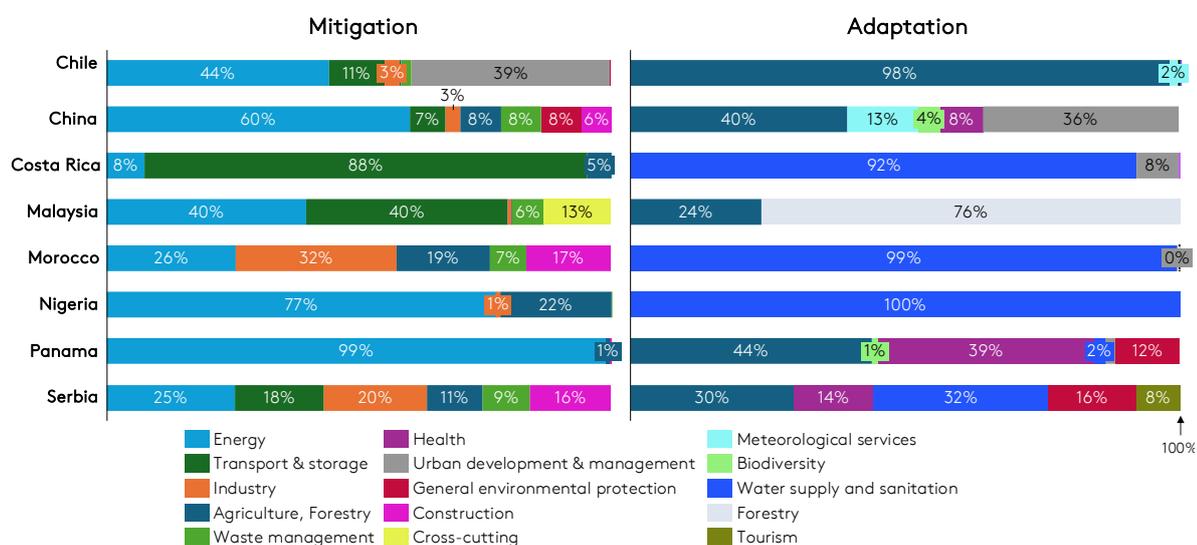
### Transparency issues

Positively, transparency in international climate finance is increasing, which is essential for improving accountability for human rights in climate action and reporting initiatives. That is why international financial institutions and other providers of climate finance should revise existing information access and reporting policies to limit exemptions and comprehensively publish information on projects they are considering and funding, paying particular attention to the needs of communities that climate finance is intended to help (Higham et al., 2024).

The Enhanced Transparency Framework under the Paris Agreement, which requires states to submit standardised **Biennial Transparency Reports (BTRs)**, has been fully operationalised. The first submission deadline was in December 2024. At COP29, countries also agreed on the New Collective Quantified Goal (NCQG). Developed countries’ BTR submissions enable the tracking of international climate finance trends across both public and private finance. Data show which sectors and projects are being funded, on what terms, and in which recipient countries. India, the Philippines and Brazil are the top three recipients of private finance mobilised from donor states assessed in the ASCOR tool. The energy sector remains the dominant target for private finance, with transport and agriculture also commonly represented.

Fifty-one per cent of developing states assessed using ASCOR publish some form of cost breakdown for mitigation and adaptation investment needs. More states disclose costed measures to meet mitigation goals than adaptation goals (Hizliok et al., 2025). Disclosures on financing needs identified in BTRs have made new data available in a broadly consistent format. However, differences remain: some disclose only mitigation costs; the sectors used to classify required investments are not always consistent; and some states present finance received with no mention of future investment needs. Most costed mitigation measures in this group of countries – those within ASCOR’s universe and with published BTRs before September 2025 – are in energy and transport. For adaptation, costed measures are concentrated in agriculture, water and sanitation (see Figure 1).

Figure 1. Sectoral cost breakdown in 2024 in selected countries



Source: Authors’ analysis based on ASCOR results and BTR submissions

**Agriculture** is one of the sectors cutting across mitigation and adaptation, owing to its high greenhouse gas emissions and vulnerability to climate change. Investing in reducing agricultural emissions is particularly relevant to human rights, given the significance of smallholder farmers in many countries. Financing related measures is therefore not only a climate-related priority but a broader human rights priority to support rights to food, water, health and an adequate standard of living in communities most exposed to climate impacts.

**3. Please describe specific measures, legislation, policies, strategies, programmes, or practices that your Government has undertaken or advanced to mobilize, support, provide access to, or effectively utilize climate financing, in compliance with international human rights law, including financing in relation to mitigation, adaptation, loss and damage, just transition, and technology.**

As academic researchers, our answer to this question concerns governments broadly and not exclusively initiatives of the United Kingdom (where we are based). We identify numerous examples of specific measures that governments have undertaken or advanced in this area in compliance with international human rights law or in ways that may advance human rights protection.

The ASCOR framework includes **just transition criteria** to assess whether governments have undertaken legal or regulatory actions to integrate just transition principles into their climate, employment and carbon pricing policies. Although the examples of policies and programmes discussed below are not specifically aimed at mobilising, supporting or using climate finance, they provide relevant policy models for promoting just transitions in countries receiving climate finance.

Around half of the sovereigns assessed using the ASCOR framework have strategies to promote green jobs and decent work. Argentina, for example, established a comprehensive green jobs framework, which includes Resolution 82/2023 mandating a [Green Jobs Programme](#) and contributing to the development of a [Green Employment Indicator System](#). This programme identifies employment-related risks and opportunities in the energy transition and outlines targeted actions to address them. The goals of this programme include vocational training and skills improvement, as well as support for workers through fair change processes. The UK launched a [Green Jobs Taskforce](#), an independent, multi-stakeholder body that is tasked with submitting recommendations to the government on employment-related impacts of the transition. The Taskforce also informed the country's green jobs approach, set out in the [Net Zero Strategy: Build Back Greener](#).

Without coordinated action, **carbon taxes** can often have regressive effects on low-income households, that potentially undermine their economic and social rights, as these households tend to spend a relatively larger share of their income on energy bills compared with better-off households. Most high-income countries assessed using the ASCOR tool that have a carbon price have recognised or addressed potential disproportionate impacts of carbon pricing on lower-income households. For example, [EU Member States](#) distribute a portion of auction revenues from the EU Emissions Trading System 2 (ETS2) towards vulnerable citizens. [Singapore](#) states that revenue from its carbon tax will be used to "cushion the impact on businesses and households". All the proceeds generated by [Germany's](#) domestic carbon pricing system for transport and heating are reinvested in climate protection measures and financial relief for citizens (e.g. by reducing the renewable energy levy).

Regarding our point above on **transparency**, the UK offers an example of potentially good practice. It established a Transition Plan Taskforce that has issued guidance on disclosure by companies and financial institutions on anticipating, assessing and addressing the social risks of transitioning to a low-emissions and climate-resilient society, which may facilitate increased transparency from non-state actors in ways that enhance human rights. The UN High-Level Expert Group on Net Zero Emissions Commitments of Non-State Entities has also issued recommendations on transparency and disclosure that governments should adopt (Higham et al., 2024; see also Higham et al., 2022).

In addition to the above examples of existing practices, research conducted at the Just Transition Finance Lab indicates further actions that governments could take. For example, in scaling up just transition finance, embedding **grant-funded social measures** within country platforms can strengthen rights outcomes (Robins and Nicholls, 2025). Such measures include reskilling programmes, encouraging inclusive practices and community benefit agreements. Funding these components upfront helps to avoid tokenistic engagement and ensures meaningful participation. There is scope to develop these platforms further by integrating grievance mechanisms and transparent reporting on social KPIs. In another example, the Just Transition Finance Lab's assessment methodology for **thematic sovereign bonds** provides governments with a practical framework for issuing thematic bonds that mobilise private capital while embedding human rights safeguards. The methodology includes use-of-proceed criteria and KPIs covering decent work, community benefits and affordability (Scheer, Burge et al., 2025). It may also be important to pair financial instruments – such as contracts for difference, guarantees and concessional loans – with social dialogue and skills training programmes to ensure that sectoral decarbonisation initiatives do not undermine labour rights or regional economic development (Selvaraju, 2025). Policymakers should consider how such instruments can complement national climate strategies and align with targets under the NCQG, and how they can replicate successful efforts in hard-to-abate sectors to ensure that industrial policy and climate finance work in tandem to advance human rights.

**4. Please identify challenges and barriers that limit mobilization of, access to, or effectiveness of climate financing for advancing human rights-based climate action, including systemic issues such as increased debt burdens, debt servicing, and potentially debt creating loans.**

Please see our responses to several of the questions above that address numerous challenges and barriers in this regard, including inconsistencies in national information disclosures on climate finance and contestation over the definition, calculation and double-counting of climate finance, including as part of official development assistance.

We identify additional challenges and barriers below.

Certain types of climate finance can act as a major obstacle for sufficiently deep social transformations to facilitate a just transition. Over-reliance on **debt instruments** for social support programmes related to energy transitions creates systemic risks for fiscal space and sovereign policy autonomy. Loan-heavy structures, often at near-market terms, are ill-suited for financing measures such as reskilling, income support and affordability buffers, which are essential for mitigating adverse impacts on human rights during economic transitions. Sovereign debt instruments can exacerbate debt distress and force trade-offs between debt servicing and social investment, undermining human rights (Wang, 2025). Grant-based and highly concessional finance is more appropriate for these social initiatives yet remains scarce.

In addition to the points noted above, other research provides further relevant insights on how variations in **transparency** on climate finance pose challenges to long-term mobilisation. Fragmented reporting and insufficient rightsholder-relevant disclosures hinder accountability. Current frameworks often prioritise lender and investor needs, leaving information gaps on how funds deliver decent work, community benefits and affordability. Investors, however, require accurate information about projects that generally can only be acquired through reporting in situ. Such reporting is often scarce, and the lack of quality information-sharing between project developers, lenders, and local communities undermines long-term investment.

Researchers at the Just Transition Finance Lab have identified **practical indicators** that governments and issuers can adopt to improve transparency, including special measurements for marginalised workers (Macquarie and Tyson, 2025). Multilateral development banks' use of green, social and sustainability bonds (GSS) bonds also offers an example of good practice in impact reporting, which sovereign and sub-sovereign issuers could replicate (Tyson et al., 2025). Impact measurements should also be aligned with environmental, social and governance (ESG) reporting, as exemplified by Article 9 of the EU Sustainable Finance Disclosures Regulation. ESG reporting,

especially on the governance side, can boost investor confidence where impact measurement does not necessarily provide the desired insight into how a project is managed, including how human rights impact assessments have been integrated.

**Accessibility** of climate finance has major implications for how local actors are able to progress with promoting human rights. Local governments, cooperatives and community enterprises often face high transaction costs and lack direct access to concessional windows. In the absence of dedicated funds earmarked for social projects and technical assistance programmes, vulnerable communities are likely to remain excluded from climate finance flows (Mitchell, 2025). Platforms that integrate grant-funded participation and planning can improve accessibility and legitimacy. Considering a wider national government framework on grant funding that avoids the additional ties imposed by excessive conditionality is also important.

Even when finance is accessible, **absorptive capacity** is frequently constrained by weak institutional frameworks and limited early-stage investment in planning and skills. Front-loading resources whereby sufficient capital is allocated from the outset for participation, social dialogue and capacity-building is critical to avoid underperforming projects (Wang, 2025). Furthermore, use-of-proceed frameworks often lack distributional KPIs, such as re-employment rates, wage progression and tariff affordability. The Just Transition Finance Lab has published indicators and verification guidance that can be embedded into sovereign issuance and transition plans to ensure that climate finance delivers positive human rights outcomes (Macquarie and Tyson, 2025).

As we have found in preliminary findings from work in progress at the Just Transition Finance Lab, conditionality on climate finance sometimes constrains state capacity. Conditionalities tied to climate finance, in addition to ill-defined taxonomies, can unintentionally restrict policy space for context-specific decisions. Participation criteria adapted to local circumstances and stronger national ownership within funding platforms and financial instruments can help to safeguard state autonomy while meeting climate and human rights objectives. Such an approach could have a wide range of applications, including in country platforms within JETPs.

Finally, the structure and politics of **international goal-setting** on climate change remain understudied but are nonetheless known to pose significant challenges for mobilising climate finance. It is important to set climate goals – not only for emissions reductions and limiting temperature rise, but also for climate finance, including the US\$100 billion goal and the NCQG – to achieve consensus and promote international cooperation. One reason for a persistent lack of fulfilment of international climate goals is that their design makes it difficult to establish robust mechanisms for holding actors to account for meeting them (Finnemore and Jurkovich 2020). Existing international political structures lead to international climate finance goals being set in ways that enable blame-shifting and responsibility-shirking by governments without necessarily promoting the codification of more stringent rules, norms or accountability mechanisms that could actually ensure the goals are achieved (Higham, forthcoming).

**5. Please describe how your Government ensures accountability, transparency, and meaningful participation of rights-holders, particularly those most affected by climate change, regarding climate finance. Please provide information regarding human rights standards, safeguards, and grievance mechanisms, access to information including scientific information, and ensuring business enterprises' human rights responsibilities.**

As above, our response to this question is written as academic researchers and not from the perspective of the UK as a UN Member State. In addition to the response below, we have made numerous comments on transparency, accountability and participation in our responses above; see also Higham et al. (2022) and Higham et al. (2024).

Involving workers, communities and other affected stakeholders in efforts to establish a national institutional framework to proactively plan a just transition is key to promoting more equitable living and working conditions. **Social dialogue** with workers and employers (i.e. tripartite agreements as recommended by the International Labour Organization) and engagement with

other specific stakeholders (e.g. Indigenous peoples, rural communities, civil society and women) can be institutionalised in a just transition 'commission' aimed at coordinating national policy. Spain is a leading example of a country that has done this: with coordinated oversight by the Just Transition Institute (ITJ), its just transition strategy includes tripartite agreements supporting fossil fuel mine and plant closures, and inclusive stakeholder engagement throughout the process (Ministry for Ecological Transition and Demographic Challenge, 2023).

**Climate framework laws** can also institutionalise meaningful participation of rights-holders through, for example, provisions that establish consultation mechanisms or provisions on access to information. Among other governance functions they establish at the national level, framework laws define a country's strategic direction on climate change and establish institutional arrangements for climate governance. Researchers at the Grantham Research Institute have identified and collected these climate framework laws for the Climate Change Laws of the World database ([www.climate-laws.org](http://www.climate-laws.org)). Explicit consideration of human rights in climate framework laws has been somewhat rare, but numerous framework laws include participation mechanisms of different kinds (Higham et al., 2021). Analysis from the Grantham Research Institute highlights different approaches to enhancing inclusivity through climate framework laws (Bradeen and Higham, 2024). This analysis is based on insights gleaned from updating UNEP's *Law and Climate Change Toolkit*, which provides a further platform for assessing the content of climate framework laws.

Although climate framework laws cover more than finance issues, they provide an opportunity for countries to establish climate finance mechanisms (such as Climate Change Funds) and streamline climate change considerations into the mandates for Finance Ministries, among other priorities. In principle, these can be linked to provisions on participation. Kenya's *Climate Change Act*, for example, mandates public participation and access to information on all climate-related policies and strategies and establishes a Climate Change Fund to finance priority actions, with its operations likewise subject to public participation (see also Higham et al., 2023).

**6. Please share specific recommendations for mobilizing climate financing, including through international cooperation, to support the realization of human rights of all people, such as relating to relevant legal principles, the new collective quantified goal on climate finance, taxation, grant-based support, debt relief and cancellation, debt for nature swaps, non-debt-creating innovative mechanisms, and the respective roles of public and private finance.**

Many of our responses above provide insights that also address this question; please see those responses for a complete answer. For example, we have noted that enhanced UN orchestration on climate and sustainable development finance could in principle support international cooperation towards the realisation of human rights, provided greater consideration is given to policy integration and pursuing synergies and minimising trade-offs across goals (Higham and Bäckstrand, forthcoming).

Below we provide additional recommendations based on our ongoing research.

The *Baku to Belém Roadmap to 1.3T* includes specific recommendations on mobilising climate finance to support the realisation of human rights of all people. We have distilled six core recommendations from the Roadmap and suggest ways in which they could be put into effect, drawing on our own research findings.

### **1) Prioritise grants and high-concessional finance for social and rights components.**

Lenders and planners should consider front-loading grants and concessional resources for skills, income support, affordability measures and community benefits within country platforms, particularly where debt stress is acute.

### **2) Use just transition-linked sovereign bonds to embed safeguards.**

It may be helpful to adopt sovereign bond frameworks with social KPIs and grievance routes, drawing, for example, on the Just Transition Finance Lab's sovereign bond methodology and adapting multilateral development banks' GSS bond reporting practices to domestic contexts.

### **3) Integrate rightsholder-aligned metrics into transition plans and taxonomies.**

Governments and businesses should aim to ensure that their reporting captures the distributional effects of and access to funding allocation for affected groups.

### **4) Reduce the cost of capital through risk-sharing rather than pure lending.**

Lenders and institutional investors should examine guarantees, first-loss tranches and foreign-exchange risk-sharing, paired with debt relief or restructuring where appropriate, to protect fiscal space for rights-aligned investment.

### **5) Develop industrial decarbonisation compacts.**

Combining financial instruments such as contracts for difference and targeted subsidies with social dialogue, skills funds and regional development initiatives could help to ensure that sector-specific net zero emissions pathways are human-rights-compatible. This could be supported by drawing on the Just Transition Finance Lab's steel sector policy work (Selvaraju, 2025).

### **6) Strengthen predictability for adaptation and social protection.**

Lenders should consider multi-year envelopes and non-debt mechanisms to close adaptation gaps and support social protection measures, recognising external mobilisation benchmarks alongside national needs. There is scope to finance participation, planning and capacity at the project inception stage to build absorptive capacity and pipelines that crowd-in private capital while minimising the risk of adverse impacts on human rights.

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