



## BRIEFING NOTE: SB64

### Integrating Human Rights into Climate Action

#### Introduction

The fossil fuel-driven climate crisis continues to intensify, devastating ecosystems, displacing communities, deepening social and economic inequalities, and directly impacting the enjoyment of human rights across the globe. At the same time, the world is facing escalating militarization, authoritarianism, attacks on civic space, and the erosion of international law and multilateralism. The ongoing genocide against Palestinians, the expansion of regional violence across the SWANA, and the continued protection of impunity by powerful States have exposed profound failures within the international system and weakened trust in global governance institutions. These crises are deeply interconnected. Fossil fuels continue to fuel conflict, violence, environmental destruction, and human rights violations, while the same political and economic interests obstruct the urgent climate action required to protect people and the planet.

Yet the past year has also demonstrated that multilateralism can still deliver meaningful collective action when States choose cooperation, solidarity, and international law over obstruction and delay. The Advisory Opinions issued by the International Court of Justice (ICJ), the Inter-American Court of Human Rights (IACtHR), and the International Tribunal for the Law of the Sea (ITLOS) established unprecedented legal clarity on States' obligations in the context of the climate crisis. Together, these rulings affirm that climate inaction, fossil fuel expansion, environmental destruction, and failures to regulate corporate actors can constitute breaches of international law, including international human rights law. The recent United Nations General Assembly (UNGA) resolution welcoming the ICJ's ruling further reinforced this legal clarity and recognition of the urgency of this moment, and is a crucial step in the implementation of the Court's findings.

Similarly, the Santa Marta Conference on Transitioning Away from Fossil Fuels marked a historic political shift by moving international discussions beyond whether fossil fuels must be phased out, to *how* to collectively achieve a managed, equitable, and just transition. The commitments emerging from Santa Marta and subsequent processes reaffirm an unavoidable reality: transitioning away from fossil fuels is not only a scientific necessity, but also a human rights imperative and a legal obligation - as clarified by the ICJ climate ruling.

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Despite this scientific, legal, and political clarity, the UNFCCC negotiations continue to fall short of delivering the transformative action required to equitably phase out fossil fuels, ensure accountability, provide remedy and reparations, protect environmental human rights defenders, and uphold the rights of Indigenous Peoples and affected communities. Growing calls to reinforce the imperative of effective multilateralism and reform the UNFCCC form part of a broader demand to transform systems of global governance that have too often enabled impunity, corporate capture, exclusion, and delay.

This briefing note outlines **the priorities of the Human Rights and Climate Change Working Group for SB64.**

## Joint statement against war

We gather for the SB64 in Bonn at a time of widening wars plunging humanity and the planet into intensifying cycles of suffering and crises. We cannot discuss climate action in a vacuum while the world is burning. Wars, often fought over fossil fuel control, generate massive greenhouse gas emissions while destroying the ecosystems that sustain life. Fossil fuels have been driving warfare for over a century. From colonial resource extraction to today's military-industrial complex, the same interests that hinder climate action are those that finance and fuel armed conflicts.

Fossil fuels are treated as ordinary commodities when they actually are fueling wars, without proper accountability. There is a structural regulatory gap regarding the materials that fuel these conflicts. Fossil fuels like gas, coal, crude oil, and military aviation fuels are essential inputs for modern warfare and illegal occupations, yet they are not subject to the same export controls or due diligence as weapons. The "military-fossil fuel-extractivism nexus" ensures that while climate finance remains critically underfunded, global military spendings reach new records (\$2.7 trillion in 2024). Prioritizing the machinery of war over the survival of the planet is a deliberate choice that speaks volume.

Furthermore, one obstacle to accountability is the "invisibility" of military climate impacts. Military activity accounts for an estimated 5.5% of the global total of emissions, more than any individual country other than China, the United States and India. However, this figure does not include emissions arising from armed conflict or post-conflict reconstruction, suggesting that the true climate impact is likely substantially higher. Yet, despite the military sectors' significance to global emissions, separate reporting of military emissions is voluntary resulting in incomplete and inconsistent data. Governments reporting to the UNFCCC often omit key emission sources, and often hide behind national security exemptions to justify incomplete reporting. Without a

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mandatory accounting of this carbon footprint, which is likely substantially higher than what is currently reported, the UNFCCC and its Parties cannot implement a just transition.

Finally, while climate finance remains underfunded, the diversion of public resources toward militarization and weapons production undermines states' obligations to use the maximum available resources for climate and human rights. Shifting these funds is not just a moral imperative but a necessity for funding meaningful and effective climate action.

We cannot achieve climate justice while ignoring the actors and states responsible for genocide, ecocide, militarized dispossession, and the violation of human rights. We condemn Israel's ongoing genocide in Palestine and its aggression in Lebanon. We condemn Russia's systematic aggression in Ukraine. We condemn the United States for its interventionism, including the illegal fuel blockade and "energy starvation" against Cuba, the military attacks and repeated threats of force against Venezuela and Iran, the deadly military campaigns in the Caribbean, and the non-consensual re-militarization of Puerto Rico. We further condemn the United Arab Emirates for fueling the genocide in Sudan through illegal arms transfers, and the complicity of Global North states (including EU States and the U.S.) whose mineral demand drives the militarized plunder of the Democratic Republic of the Congo, displacing over 8 million people. Those are only a few examples among many others where communities are paying the price of a global system that prioritizes militarization over human dignity and ecological survival.

States are bound by international human rights obligations arising from treaties they have ratified and from norms of customary international law. States that commit internationally wrongful acts in breach of their human rights obligations incur state responsibility, giving rise to obligations of cessation and reparation. This accountability necessarily includes the binding duty of States to regulate and sanction the private sector under their jurisdiction including the corporations, financial institutions, and the full range of economic actors linked to the military-industrial complex that profit from or contribute to armed conflict and illegal occupation. There must be accountability. We must put an end to the systemic impunity normalizing people's suffering and trampling on human dignity.

**[We stand in solidarity with all peoples facing war, occupation and extractivist dispossession.](#)**

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## LIST OF ACRONYMS

ACE	Action for Climate Empowerment
AIM	Arrangements for Intergovernmental Meetings
AO	Advisory Opinion
BAR	Baku Adaptation Roadmap

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BECCS	Bioenergy with carbon capture and storage
CCS	Carbon capture and storage
CDR	Carbon dioxide removal
DAC	Direct air capture
EHRDs	Environmental Human Rights Defenders
FPIC	Free, Prior and Informed Consent
FRLD	Fund for responding to Loss and Damage
GAP	Gender Action Plan
GGA	Global Goal on Adaptation
GST	Global Stocktake
GHG	Greenhouse gas
HCA	Host Country Agreement
HRDs	Human Rights Defenders
ICJ	International Court of Justice
IPCC	Intergovernmental Panel on Climate Change
JTWP	Just Transition Work Programme
LCIPP	Local Communities and Indigenous Peoples Platform
NAPs	National Adaptation Plans
NCQG	New collective quantified goal on climate finance
NDCs	Nationally Determined Contributions

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NGCCP	National Gender and Climate Change Points
SLAPP	Strategic Lawsuits Against Public Participation
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
UNDROP	United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas
WEHRDs	Women Environmental Human Rights Defenders

## DEEPENING RIGHT-BASED CLIMATE ACTION: OUR PRIORITIES

The Human Rights and Climate Change Working Group has identified key priorities for 2026: a just transition rooted in human rights; remedy and reparations for climate harm; the effective protection of Environmental Human Rights Defenders (EHRDs); and defending rights-based multilateralism to counter the rise of militarism and authoritarianism.

### > A Just Transition rooted in human rights

A just transition, rooted in human rights, must be at the center of climate action. The fulfillment of human rights is not optional in the move beyond fossil fuel-based societies – it is essential for legitimate, effective, and sustainable climate policy that simultaneously advances the protection of everyone’s rights – including labour rights. Just transition must dismantle systemic inequalities and centre the needs, voices and knowledge of those most impacted.

While COP30’s outcome failed to tackle the dominance of fossil fuels and provide adequate climate finance, States agreed to develop a Just Transition Mechanism with the goal to accelerate and coordinate climate cooperation that truly protects and advances human rights and equality. The decision further called for a whole-of-society, whole-of-economy and inclusive approach to transition pathways.

In the strongest operational human rights language in a COP decision to date, the JTWP’s COP30 text crucially affirmed the rights of Indigenous Peoples, including the rights to self-determination and Free, Prior and Informed Consent (FPIC), which are so often violated by

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both transition mining activities and the expansion of fossil projects. Additionally, the decision explicitly recognised the centrality of labour rights within a just transition. Further, the decision finally recognised the care economy – an essential element for gender transformation since women perform 75% of unpaid care work globally. It also stressed the need to account for the rights of groups facing different levels of marginalisation and specific systemic inequalities.

In the lead up to and at COP31, Parties must take concrete steps to structure the Mechanism and its work so that it can hit the ground running and deliver on justice- and rights-based pathways as soon as possible. SB64 is an important midway mark to realize human rights in the operationalisation of the Mechanism, from its areas of work to the ways observer voices can meaningfully influence negotiations and enact a truly just transition.

## > Remedy and reparations for climate harm

The accelerating impacts of the climate crisis are leading to widespread human rights violations, which disproportionately affect individuals, Peoples, and communities who are in vulnerable situations due to historical and present marginalization and intersecting forms of discrimination, oppression, exploitation, inequality, and violence. States have legal obligations to prevent, minimize, and remedy foreseeable human rights violations, including those due to the climate crisis.

At the UNFCCC, this right has long been denied. Decades of denial of the need for action to address loss and damage, reliance on voluntary approaches, and persistent attempts to circumvent and avoid liability for climate harm have prevented progress on redressing climate harm.

But the tables are turning. The ICJ, in last year's climate ruling, strongly affirmed the right to remedy and reparation in the context of climate harm, strengthening long-standing demands for accountability from climate-vulnerable countries and affected communities. International law is clear: when States fail to prevent or respond to foreseeable climate harm, they have an obligation to make full reparation, including restitution, compensation, rehabilitation, satisfaction, and guarantees of non-repetition. Now, UNGA has welcomed and endorsed this climate ruling, including a strong recognition of the legal obligations in relation to remedy and reparations for climate harm.

Parties must use SB64 as a platform to work further in the demands for reparations. They must learn from the Santa Marta process and recognize that climate and racial reparations are legal obligations, and an indispensable element for a transition to be just. Any further decision-making

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and implementation regarding loss and damage in the UNFCCC must recognize this, and the UNFCCC must evolve towards a regime rooted in responsibility, reparative justice, and reparations.

## > Advancing the protection of environmental human rights defenders, climate activists and people in vulnerable situations

Advancing the protection of Environmental Human Rights Defenders (EHRDs), including those at the frontline of climate action and [just transition](#), and people in situations of vulnerability and marginalisation is essential to ensuring effective and equitable climate action. Across regions, individuals and communities advocating for environmental protection and climate justice face increasing risks, including intimidation, criminalisation and life-threatening violence. These threats are often heightened where governance is weak, civic space is restricted, or economic interests in extractive and high-emission activities prevail. The continued detention and criminalization of Indigenous leaders and Human Rights Defenders, [including Daria Egereva and Natalya Leongardt still arbitrarily detained in Russia](#), further illustrate the growing repression faced by those defending land, human rights, and the environment. At SB64, the HR&CC WG will continue to [call for their immediate release](#), and amplify the voices and demands of all defenders and frontline communities who are unable to safely access or participate in the negotiations.

States have clear obligations to respect, protect, and fulfil the rights of these actors. This includes guaranteeing freedoms of expression, association, and peaceful assembly; ensuring access to information; and providing effective remedies when violations occur. Legal and policy frameworks should explicitly recognise the role of EHRDs and establish preventive protection mechanisms, including early warning systems and rapid response measures. Particular attention must be paid to the specific risks faced by Indigenous Peoples, women, youth, children, persons with disabilities, [workers](#), and other groups in vulnerable situations, who often experience intersecting forms of discrimination.

A rights-based approach to climate policy also requires meaningful, inclusive, and safe participation in decision-making processes. This includes ensuring FPIC where applicable, and removing barriers to participation such as lack of accessibility, resources, or legal recognition.

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## > Defending rights-based climate multilateralism and resisting authoritarianism, resource extractivism & exploitation and militarization

Climate multilateralism must be **people-centered** and **human rights-based**, and built on the total dismantling of the machinery of war and the restoration of people's right to a peaceful, healthy, and just future.

As such, Parties must first and foremost require the **mandatory accounting of all military emissions** in National Determined Contributions (NDCs) and the Global Stocktake (GST) as well as reported to the Intergovernmental Panel on Climate Change (IPCC) greenhouse gas (GHG) inventories, through transparent and standardized reporting that assesses, monitors, and reports both direct military emissions and the environmental and climate impacts of wars, military occupations, and attacks on civilian and energy infrastructure. This transparency is critical for a just transition, as each dollar funneled into the military **generates more than twice the greenhouse gas emissions** of a dollar invested in civilian sectors.

States must also shift public spending away from weapons production and toward climate finance. We highlight that **reinvesting just 15% of global military spending** (\$387 billion) would more than cover the annual costs of climate adaptation for developing countries

Finally, States must establish **mandatory end-use certification and due diligence for fossil fuel exports to conflict parties**, classifying military fossil fuels as dual-use materials subject to the same export controls as arms. Energy is a right, not a weapon. It cannot fuel wars and genocides, nor be weaponised as collective punishment.

## **REAL SOLUTIONS TO EQUITABLY LIMIT WARMING TO 1.5°C**

Staying below 1.5°C of warming is imperative to limit the damage caused by the climate crisis and related human rights harms. To achieve this objective, the focus needs to be on real solutions: a full and equitable phaseout of fossil fuels, including by removing barriers to phaseout, and sustainable and just food systems without relying on dangerous distractions.

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## > Fully and Equitably Phasing Out Fossil Fuels

The evidence is undeniable and consolidated: the whole cycle of fossil fuel reliance – particularly by high-income States and corporate actors – is the main historical and current driver of GHG emissions, pushing us towards tipping points. Fossil fuels’ role in climate breakdown, alongside their impact on ecosystems, gravely affects the fulfilment of human rights and leaves entire sacrifice zones without reparations for affected communities. Scientific evidence makes it clear that there is no pathway to limiting warming below 1.5°C without the rapid, full, and equitable phaseout of coal, oil, and gas.

Strong action for a phaseout is not just a scientific necessity, but also needed to comply with international human rights law obligations. In its climate advisory opinion, the ICJ affirmed that keeping global temperature rise below 1.5°C is legally binding under the Paris Agreement, that States have duties under customary and conventional law to prevent harm, and that fossil fuel production and consumption, the granting of exploration licenses, and the provision of fossil fuel subsidies can all constitute breaches of such obligations. Developed countries must lead this transition by ending fossil fuel expansion, eliminating subsidies, phasing out existing fossil fuels, and providing scaled-up public climate finance, technology transfer, and capacity-building support to developing countries.

COP30 failed to deliver on a fossil fuel phaseout, showing the reticence of some Parties to address the cornerstone of an economic system that extracts high-carbon, non-renewable resources as much as human dignity. UNFCCC Parties must finally effect the implementation of a fast, full, funded and just fossil fuel phaseout. Science-based, enforceable, and time-bound objectives for both State and corporate actors, alongside adequate climate finance to support low-income countries, are crucial for this. [Defossilisation must have human rights fulfilment at its core](#), supporting regenerative and rights-based economies over reproductions of extractivism. Phaseout strategies and action plans, whether at the UN or national level, must secure the full and meaningful participation of and reparation for rightsholders in all their diversity, workers, communities, and Indigenous Peoples. SB64 provides a step towards COP31 and an opportunity to build on the Santa Marta Conference outcomes and ambitious action by some countries.

## > No Dangerous Distractions

A full fossil fuel phaseout is one without activities and technologies that some claim are necessary for climate action, but in reality are dangerous distractions that serve to prolong reliance on fossil fuels. Dangerous distractions such as carbon offsets produced through carbon

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markets, highly speculative and risky technological fixes – carbon dioxide removal (e.g. direct air capture with carbon capture and storage (DACCS), bioenergy with carbon capture and storage (BECCS), among others), other forms of geoengineering (e.g. solar radiation management, among others), and carbon capture and storage (CCS) –, and REDD+ are increasingly prevalent as fossil fuel producers grasp for “fixes.” Far from being solutions, these activities primarily serve to distract from the root causes of climate change, allow polluters to keep on polluting, perpetuate the same extractivist practices that have contributed to the climate crisis, delay the phase-out and prolong the fossil economy, and pose significant risks to Indigenous Peoples, and vulnerable communities. Additionally, they can take valuable support away from legitimate climate action, and no matter what proponents claim, [carbon markets are not climate finance](#).

These activities also pose a threat to human rights both directly and by delaying the needed phaseout. Carbon markets, which generate pollution credits to enable largely Global North countries and companies to continue business as usual activities on the promise that emissions will be “offset” by mitigation elsewhere (largely locations in the Global South), have a [history of human rights abuses, localized harms, and overcounting of the reductions or removals being claimed](#). Therefore, it is critical that the Article 6.4 Paris Agreement Crediting Mechanism works to strengthen policies and tools, such as the sustainable development tool, and resist any attempts at weakening standards. Similarly, evidence shows that CCS and so-called novel CDR technologies are unnecessary, costly, risky, and unjust, especially for communities, including Indigenous Peoples, directly impacted by their environmental effects or human rights impacts.

These dangerous distractions should not find their way into any workstream or negotiations in Bonn and, if they do, Parties should reject them. Carbon offsetting and techno-fixes are dangerous distractions and not a solution nor a substitute for prioritizing rapid, real mitigation measures.

## **> An investment and trade framework that advances a Just Transition**

Investor-State Dispute Settlement (ISDS) mechanisms pose significant challenges to ambitious climate action and a just transition away from fossil fuels. By enabling foreign investors to challenge government conduct through arbitration and seek compensation for alleged losses, ISDS can constrain the policy space needed for States to advance climate action and phase out fossil fuels. Navigating or defending against these claims can lead to significant legal costs for States, and when investors are successful in obtaining damage awards, they result in the transfer of public funds to private entities. The mere threat of ISDS disputes - mostly frequently used by

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fossil fuel investors - can have a chilling effect on policy-making, deterring governments from taking essential steps to safeguard communities, and protect human rights and the environment.

The Santa Marta Conference situated the need to address ISDS to enable the transition away from fossil fuels. It opened a window for more sustained engagement on ISDS across the climate agenda with distinct opportunities to contribute in the run-up to the Second Conference, co-hosted by Tuvalu and Ireland in 2027, at Pacific Pre-COP and COP31 this year.

ISDS has been increasingly recognised within the UNFCCC space, such as the Baku to Belem roadmap to \$1.3T and Sharm el-Sheikh dialogue on Article 2.1(c) of the Paris Agreement. The Baku to Belem roadmap report in 2025 explicitly identified ISDS as a systemic barrier to equitable climate finance, which can impact the sovereign policy-making space of developing countries. ISDS has been frequently brought up in workshops under the Sharm el-Sheikh dialogue, as a barrier to making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development. These references can provide opportunities to further embed ISDS reform into concrete financing pathways in the UNFCCC processes. During SB64, Parties have the opportunity to bring up the issue of ISDS mechanisms as a structural barrier to a just transition in the context of the Veredas Dialogues on Article 2.1(c) as well as the Trade and Climate Dialogue.

## > [Land & Food Systems](#)

Corporate-driven natural resource grabbing and increasing land inequality are exacerbating climate change and ecosystem destruction, while undermining the sustainable management of territories by small-scale food providers, Indigenous Peoples, and rural communities. Recognizing and securing the control, governance, and rights of Indigenous Peoples, small-scale food providers, and rural communities over land and ecosystems is key to achieving climate justice and transforming food systems to ensure that they are just, sustainable and healthy. These groups serve as essential custodians of the natural world, contributing significantly to reducing GHG emissions, climate change mitigation and adaptation, and biodiversity conservation. The contribution of small-scale food providers to ecological stewardship is crucial, this is why climate negotiations must align with existing human rights frameworks such as [UNDROP](#), [UNDRIP](#), and the [Guidelines of the Committee on Food Security](#). Unlike industrial agriculture, which often relies on large-scale monocultures and intensive chemical inputs, smallholder farming tends to promote crop and non-crop biodiversity at both field and landscape levels.

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Agroecology and techniques such as intercropping, agroforestry, and the use of peasant/native seed systems are rooted in generations of ecological knowledge and constant innovation, and are central to these practices. The result is not only more sustainable land use but also food systems that are more resilient to climate and market shocks, and aligned with just transition principles. Ultimately, climate and environmental justice cannot be realized without addressing resource grabbing and land inequality.

The workshop on means of implementation (MoI) for agriculture and food security taking place in the first days of SB64 must include conversations on safeguards for land and small-scale food producers impacted by harmful financing, with clear signals to shift harmful finance to grants-based funding supporting agroecology. This discussion on MoI should start with the recognition of the dire need to significantly increase the scale of provision of public finance for agroecology and small-scale food producers, with direct access windows for small-scale food producers, and Indigenous Peoples. Issues of access, technology transfer and capacity building should include concerns on the risks associated with debt-generating finance in agriculture, or the risks associated with technological approaches such as digital agriculture, AI, GMOs, for human rights and food sovereignty.

## **RESPECTING & PROMOTING HUMAN RIGHTS THROUGH KEY UNFCCC WORK STREAMS AND THEIR IMPLEMENTATION**

### **> Just Transition Work Programme**

The COP30 decision to develop a Just Transition Mechanism and operationalise it by COP31 is a welcome effort to institutionalise years of dialogue and co-create clear and actionable pathways with the significant input of affected rightsholders. It must enhance international cooperation to accelerate and coordinate efforts to achieve a truly just transition with the urgency and safeguards required, including in responding to the potential human rights impacts of transition decisions elaborated without preventive measures.

The Mechanism must embody human rights principles and standards in practice. Meaningful, effective, and inclusive participation must be a key priority, including through specific participatory frameworks for rightsholders, such as social dialogue and collective bargaining for workers and their organizations, and FPIC for Indigenous Peoples, among others. Permanent, institutionalised representation of the UNFCCC constituencies in the Mechanism's coordination

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structure must be secured to reflect representativeness and translate the whole-of-society commitment into the steering body's composition.

Moreover, to effectively fulfil its mandate, a Just Transition Mechanism needs to guarantee coherent coordination, multi-level and multi-sectoral knowledge development and exchange, and technical and financial support. Each of these functions needs to be linked to specific bodies to ensure timely, high-quality responses that have human rights considerations at their core.

## Recommendations for SB64 negotiations:

- Decide on a Mechanism that meaningfully operationalise human rights obligations, principles, and standards in practice, aligning guidance with recent climate advisory opinions.
- Secure permanent, institutionalised representation of the UNFCCC constituencies and stakeholders on the Mechanism's operationalisation bodies to reflect representativeness and translate the whole-of-society commitment into the steering body's composition.
- Establish the structure of the Mechanism that creates a "Permanent Committee" (coordination body with a formal mandate to inform the CMA/COP and related bodies), and a "Technical Body", both with meaningful and effective participation of Parties and Non-Parties beyond the current constituency participation modalities.
- Be responsible, through the Permanent Committee and Technical Body, for the informed and effective deliberation of its members, considering regular meetings and at least one in-person meeting per year.
- Enhance the current JTWP, ensuring an inclusive approach and the active participation of experts and rightsholders, to deliver specific inputs and recommendations.
- Address the creation and circulation of guidelines in particularly needed transition dimensions that remain underserved by existing frameworks (such as critical minerals), be a space of knowledge-sharing, and map best practices of transitioning with meaningful respect to human rights.
- Actively create spaces for dialogue on a rights-based just transition, generating new opportunities for exchange, learning, and mutual accountability by sector and issue.
- Deliver an action plan with concrete transition pathways that are in line with just transition principles.

## > Gender Action Plan (GAP)

The adoption of the [Belém Gender Action Plan](#) (GAP) at COP30 marked a pivotal moment for gender equality in the UNFCCC. The GAP is the implementable framework of the [Enhanced](#)

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[Lima work programme on gender](#), driving forward gender-responsive climate action across the UNFCCC. Particular elements of this GAP stand out. It acknowledges that differentiated impacts of climate change and opportunities for communities, especially all women and girls, are shaped by multidimensional factors. It also explicitly recognises several excluded groups, including women from local communities, migrant women, women with disabilities, women smallholder farmers, women from rural and remote communities, Afro-descendant women, and women environmental defenders. It creates specific avenues for coherence across the UNFCCC and for national level action, enables the expansion across emerging areas at the nexus of gender and climate, and significantly integrates gender- and age-disaggregated data.

SB64 represents a critical moment to define the direction of the Belém GAP: will it remain a facilitative framework focused on knowledge exchange, or evolve into a resourced, accountable, and transformative mechanism capable of advancing gender justice within global climate governance?

## **Recommendations for SB64 negotiations:**

- **Implement the GAP across the UNFCCC:** The transition into the implementation of the Belém GAP presents an opportunity to strengthen the operational impact of gender-responsive climate action across the UNFCCC including by enhancing coherence between the GAP and other key processes, including the Global Goal on Adaptation, the JTWP, and the Global Stocktake. This also includes efforts to better integrate gender considerations into national-level planning instruments such as Nationally Determined Contributions (NDCs) and National Adaptation Plans (NAPs), as well as improving data collection and reporting on gender-differentiated climate impacts.
- **Strengthen and Enhance the Role and Capacity of National Climate Gender Focal Points (NGCCFPs):** Through active participation in the SB64 in-session workshop (Deliverable A.2.1) for National Gender and Climate Change Points (NGCCFP), ensure NGCCFPs are equipped with formal mandates, decision-making authority, and sustained financial and technical resources, enabling them to effectively integrate gender across NDCs, NAPs, and all national climate policies.
- **Establish gender-responsive, participatory, robust, and rights-based data systems:** Parties must encourage the collection and use of gender-disaggregated and intersectional climate data, grounded in participatory and community-led methodologies, to move beyond extractive data practices and ensure policies reflect lived realities. The expert data dialogue at SB64 (Deliverable D.5.2) is a critical moment to create the data foundation for the rest of the GAP's implementation.

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- **Ensure dedicated financing and capacity-building for implementation:** Provide predictable, accessible funding and technical support for GAP implementation, prioritising direct access for grassroots feminist organisations and frontline communities, including through engaging fully in the gender-responsive climate finance workshop at SB64.
- **Protect and resource women environmental human rights defenders (WEHRDs):** Recognise WEHRDs as central actors in climate action, and ensure their protection through enabling legal frameworks, safe participation in decision-making spaces, and direct, flexible funding for their work, particularly in contexts of shrinking civic space.

## > Global Goal on Adaptation (GGA)

At COP30, Parties adopted the Global Goal on Adaptation (GGA) text, including the first-ever reference to people of African descent. Despite controversy over whether indicators could be agreed without sufficient means of implementation, 59 indicators were adopted. Parties were encouraged to test them and provide feedback on their operability under the Belém-Addis vision, a two-year policy-alignment process aimed at developing guidelines for implementing the Belém Adaptation Indicators by COP32 in Ethiopia.

The Baku Adaptation Roadmap (BAR), as laid out in the GGA text, is intended to bring coherence to the UNFCCC adaptation architecture and avoid duplication by leveraging the mandates and outputs of constituted bodies and work programmes. Guided by the need to align adaptation action with adequate responses under the Paris Agreement temperature goal, the Belém Adaptation Indicators are meant to inform national tracking of adaptation action and progress, without creating new obligations for developing country Parties, benchmarks, evaluation criteria, standardized methodologies, data-collection processes, or compliance frameworks. They also recognize cross-cutting considerations, including children, youth, persons with disabilities, Indigenous Peoples, local communities, people of African descent, migrants, human rights, gender, intergenerational equity, social justice, knowledge-sharing, and access to financial, technology transfer, and capacity-building support.

Despite the progress made at COP30, adaptation is not expected to feature prominently at COP31; rather, efforts are likely to focus on defining the scope of the BAR and encouraging Parties to continue testing the Belém Adaptation Indicators and providing constructive feedback within the framework of the Belém-Addis vision, in the lead-up to COP32.

### **Recommendations for SB64 negotiations:**

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- Despite the provisions in the GGA text, the role of the BAR remains a matter of debate. The BAR must not stray from its objective of defining the means of implementation for adaptation.
- Ensure that the BAR adopts a cross-cutting approach to human rights and provides developing countries with access to quality adaptation financing.
- Parties should be encouraged to continue testing the Belém Adaptation Indicators and provide constructive feedback on how to move forward with the Belém-Addis vision.
- The Belém-Addis vision, despite para 9 of the GGA, must strive to create benchmarks, evaluation criteria, global standardized methodologies and data-collection processes, and compliance frameworks.

## > Loss and Damage

Climate-related loss and damage is widely recognized as a human rights crisis, including by the ICJ in its climate advisory opinion, and should be addressed as such. Nevertheless, an adequate response to this reality under the UNFCCC is still largely absent, with loss and damage mechanisms and institutions being hampered by a lack of adequate and predictable resources to effectively address already unavoidable climate impacts. While loss and damage is not explicitly on the agenda in Bonn, key agenda items can help advance finance and rights-based loss and damage action. Additionally, as key policies are still being developed for the Fund for responding to Loss and Damage (FRLD) and it begins funding its first projects under a limited start-up phase reflecting the lack of sufficient resources, Bonn comes at a critical time to elevate the need to ensure long-term operational policies and frameworks for a fully funded FRLD that upholds and promotes human rights.

### **Recommendations for SB64 negotiations:**

- Push for **establishing a permanent agenda item on Loss and Damage** to maintain political focus and support. While parallel work happens in the constituted bodies (the Executive Committee of the Warsaw International Mechanism for Loss and Damage (WIM ExCom), the Santiago Network (SNLD), and the FRLD), this remains largely technical and involves only a sub-set of Parties. The absence of loss and damage from the official agenda undercuts addressing loss and damage as the third pillar of climate action, and hampers the ability to ensure coordination and support, enhance action, and elevate the topic to the level of attention required commensurate with growing needs. Such an agenda item could help to transform the UNFCCC institutional framework on loss and damage to a system that would ensure compliance with legal obligations on loss and damage, and on climate reparations, as clarified by the ICJ, which it currently is not.

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- Ensure that **human rights considerations are strongly integrated in the terms of reference for the “Regular Report on Loss and Damage”** that the Santiago Network Advisory Board (SNAB) and the WIM ExCom are jointly discussing in a structured dialogue during SB64, and the SNAB will conclude by its 7th meeting.
- **Center addressing loss and damage in key SB64 agenda items** such as those related to climate finance and in particular in the Article 9.1 climate finance work programme, the Global Stocktake, and the JTWP, and particularly ensure that they advance the urgent provision of scaled up adequate and predictable public, grants-based finance for loss and damage.
- Build on the clarity provided by the ICJ and other international courts about **the legal obligations of States in relation to climate-related loss and damage**, including [the provision of international finance](#), upholding the human rights of communities’ affected by the climate crisis, including their right to remedy, and ensuring that climate action is aligned with human rights, to [enhance the effectiveness of loss and damage responses](#) in the UNFCCC.
- Urge the Board of the FRLD, which at its B.9 Board meeting shortly after Bonn must deliver several core decisions, to ensure that **the operationalization of the Fund leads to rights-based, community-led loss and damage responses**, specifically with related decisions at B.9, including:
  - Adopting an Active Observer policy that ensures the meaningful participation of rightsholders, by establishing Active Observer seats for Indigenous Peoples, women and gender representative organizations, young people and children, and environmental organisations, and making arrangements for the active participation of affected communities, while excluding the private sector. In addition, the Board must establish a comprehensive participation framework.
  - Adopting the FRLD’s first funded projects under its start-up financing phase that centers access for communities to the FRLD resources while starting work in parallel as a priority on the long-term operationalization of a dedicated community access modality that delivers small-grants to community-led organizations, women’s rights’ organizations, Indigenous Peoples, local civil society organizations, and people experiencing marginalisation, as indicated in the FRLD’s governing instrument.
  - Adopting an ambitious resource mobilization strategy for a FRLD that centers on public provision and is resourced at the scale of needs of developing countries, including by integrating equity-based innovative sources of finance that generate public resources based on the polluter pays principle.

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## > International Climate Finance

The provision of climate finance is not only a central pillar of the climate treaties, but it is an international law obligation as clarified by the ICJ. Despite these obligations, the worsening global climate crisis, and needs in the trillions for mitigation, adaptation, loss and damage, and just transition, instead of the required scale up of climate finance flows, the past two years have seen a retraction of Global North countries' finance commitments as they shrink their official development assistance while boosting military expenditures. The New Collective Quantified Goal on Climate Finance (NCQG) agreed at COP29 solidified this inadequacy and injustice for the next decade. COP30 did little to reverse course, as it did not provide further clarity on how much public finance developed countries would actually provide under the \$300 billion by 2035 commitment, how much would be grants rather than loans, and how Article 9.1 of the Paris Agreement, which obliges developed countries to provide financial resources to developing countries, would be honoured in practice.

A demand for a public provision decision at COP31 never materialized, instead the Belém package launched only a two-year work programme on climate finance under Article 9 of the Paris Agreement more broadly, with no formal link to the NCQG. In contrast, the Baku-to-Belém Roadmap to \$1.3 trillion under the NCQG focused overwhelmingly on private sector flows, although not formally endorsed by Parties, is now said by the COP30 Brazilian Presidency to be “under implementation.” Accountability and transparency for what is delivered and by whom, its quality and additionality is further undermined by the continued absence of a uniformly accepted definition of climate finance and clear accounting, tracking, and reporting standards.

At COP30, Parties approved further work through a new Veredas Dialogue on Article 2.1.c on making all financial flows consistent with the Paris Agreement. With the first meeting at SB64, it will be important for the Veredas Dialogue to become more than a talk shop and to instead expose and address systemic failures and structural inequalities in the global tax, trade, and debt regimes that continue to perpetuate economic dependency, deny countries and communities of the Global South access to climate finance, and hinder a just and equitable transition that upholds and protects human rights.

### **Recommendations for SB64 negotiations:**

- Ensure the Article 9 climate finance work programme centers how to scale up the Article 9.1 public provision as the core of the NCQG commitment, with a particular focus on paragraph 16 of the NCQG on tripling UNFCCC funds' outflows by 2030, with a clear methodology for tracking what is genuinely new, additional, and grant-based climate finance for mitigation, adaptation and for addressing loss and damage. Discussions must focus on adequate and ambitious resource mobilization strategies and developed

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countries replenishment commitments for UNFCCC funds. This includes the first replenishment under the Fund for responding to Loss and Damage (FRLD) and the third replenishment for the Green Climate Fund (GCF) both to be kicked off in 2026.

- Establish a dedicated work stream under the Article 9 climate finance work programme on practicable pathways for mobilising high quality public finance under the NCQG \$300 billion commitment with a focus on affordability, maximum concessionality, accessibility, including direct access for affected people and communities, and the needs and priorities of developing countries, in alignment with human rights, including gender-responsiveness and respecting FPIC for Indigenous Peoples.
- Embed human rights standards—transparency, accountability, and participation in decision-making processes—into public climate finance frameworks and strengthen their implementation, especially in UNFCCC funds at the center of public finance provision. Establish a work stream on strengthening accountability, transparency, and predictability of public climate finance to be provided by developed countries under Articles 9.1 and 9.5 as part of the climate finance work programme.
- Start the Veredas Dialogue at SB64 in Bonn with a focus on international structural disenablers limiting developing countries' access to adequate and affordable climate finance, including unsustainable debt burden, unjust tax and trade regimes, including ISDS, as well as continued and expanded spending by developed countries for fossil fuel subsidies and military expansion.
- Center a discourse on financial needs of developing countries and affected people and communities as a cross-cutting priority across different SB64 workstreams (such as on tripling adaptation finance, supporting the tripling of renewable energy, financing NDC implementation, strengthening accountability in the global stocktake).

## > Global Stocktake

The first Global Stocktake (GST) confirmed what frontline communities have long known: 1.5°C is slipping out of reach. Closing this gap is a precondition for the enjoyment of fundamental human rights - to life, health, food, water, housing, bodily autonomy, self-determination, and a clean, healthy and sustainable environment - by present and future generations, and a precondition for gender justice. And all the more important as the international community advances toward the Second Global Stocktake (GST2)

Yet participation in GST mechanisms has so far been uneven. Frontline communities, women and girls in all their diversity, gender-diverse people, Indigenous Peoples, feminists, youth, persons with disabilities, workers, and other rights-holders remain largely excluded from shaping both the process and its outcomes. The importance of the UAE Dialogue at SB64 can therefore not be underestimated : its mandate is implementation - and implementation cannot wait.

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The following recommendations set out how the UAE Dialogue and GST2 can be a vehicle for accelerated, rights-based, gender-just implementation, built - not retrofitted - to include those most affected.

## Recommendations for SB64 negotiations:

- **Fully implement GST1 outcomes, with accountability as the top priority.** The UAE Dialogue's mandate is implementation, not procedure. Accountability should be assessed by whether implementation reaches all rights-holders in vulnerable situations, including people with disabilities and Indigenous Peoples.
  - **Align all policies, finance flows, and investment plans with 1.5°C pathways.** Closing the gap is a precondition for the rights to life, health, food, water, housing, bodily autonomy, self-determination, and to a clean, healthy and sustainable environment. Means of implementation must reach all vulnerable groups, with dedicated resourcing for women-led, feminist, and gender-diverse organisations.
  - **Adopt gender-transformative** adaptation centring care, bodily autonomy, sexual and reproductive health and rights, and the local leadership of women, girls, and gender-diverse people.
  - **Formally recognise and concretely protect EHRDs and, building on the Belém GAP, WEHRDs,** who face compounded, gendered risks including sexual violence, criminalisation and reprisals.
- **Confront governance gaps, fragmented implementation, and uneven human rights integration in climate action.** The UAE Dialogue must identify the real drivers of impact, engage with the political and policy dilemmas that block implementation, including patriarchal and intersecting structures of exclusion, and treat disagreement as a signal of needed transformation, not a threat to be managed
- **Establish a participatory architecture for GST2, anchored in a Global GST People's Assembly.** A grassroots-driven, co-designed deliberative space founded on civic participation, linguistic justice, gender equity, and ethical responsibility, with full interpretation, sign language, plain-language materials, and meaningful hybrid participation. Rights-holders must be engaged from scene-setting onward.
- **Ground GST2 in the best available science,** including the lived knowledge of women, girls, gender-diverse people, Indigenous Peoples, and frontline communities - as evidence, not anecdote.

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## > Glasgow Work Programme on Action for Climate Empowerment

Action for Climate Empowerment (ACE) is where the right to participation, to information, and to education becomes real in climate governance: a society that is trained, informed, and able to hold power accountable is a precondition for ambitious climate action, and the empowerment of people to shape and scrutinize the decisions that affect their lives is not an instrument of implementation, but a right in itself. ACE is not a secondary agenda item; it is the connective tissue of the entire climate regime. Yet ACE remains siloed within the UNFCCC and chronically underfunded, and its affirmation of children, youth, Indigenous Peoples, and frontline communities as agents of change remains meaningful in text but unrealized in practice. This is compounded by an epistemic crisis in which authoritarian and extractive forces are dismantling the infrastructure of truth and criminalizing researchers and defenders, while climate disinformation delays urgent action and weakens democratic debate, participation, and public trust. The Glasgow Work Programme midterm review provides an opportunity to strengthen fully inclusive participation across all levels of climate governance by embedding ACE as cross-cutting infrastructure of the UNFCCC, naming information integrity as a first-order concern, and countering climate disinformation.

### **Recommendations for SB64 negotiations:**

- Mandate structured interfaces between ACE national focal points and the focal points for gender, Local Communities and Indigenous Peoples Platform (LCIPP), Just Transition, the Escazú Agreement, and the Open Government Partnership, both within and beyond the UNFCCC.
- Ensure ACE national strategies are co-designed across ministries of culture, health, education, planning, and social protection, not housed in a single department.
- Embed civil society organizations within ACE focal point teams rather than consulting them at arm's length.
- Embed civic media literacy across all ACE education programmes.
- Develop accountability mechanisms for greenwashing and disinformation by the private sector, and ensure outlets spreading climate misinformation cannot access UNFCCC processes.
- Protect EHRDs, journalists, and scientists, recognizing their protection as a structural ACE concern.
- Establish a People's Global Climate Assembly as a structured, inclusive mechanism for whole-of-society participation in UNFCCC processes, with a formal channel for its outputs to inform Party positions.

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- Integrate gender-responsive, child-sensitive, disability-disaggregated, race-disaggregated, and age-disaggregated indicators into the monitoring and evaluation framework of the Glasgow Work Programme.
- Include civic space and EHRDs protection indicators in the annual ACE summary report.

## > Right to a clean, healthy, and sustainable environment

The right to a clean, healthy and sustainable environment has been recognised across the world at the national, regional, and international level. UNGA resolution 76/300 clearly states that the right to a clean, healthy and sustainable environment is a human right, which the ICJ confirmed in 2025 and added that this right is essential for the enjoyment of all other human rights. Since 2022, the COP and CMA decisions have consistently referenced the right to a clean, healthy and sustainable environment, and for the first time included it in the operational decision—the JTWP outcome at COP30. We urge States to continue on this path and go beyond the status quo by ensuring the effective protection of the right to a healthy environment by adopting meaningful, effective, and human rights-based decisions.

### **Recommendations for SB64 negotiations:**

- **Refer explicitly to the right to a clean, healthy, and sustainable environment** across relevant COP and CMA decisions, building upon the commonly agreed language adopted at previous COPs:
  - Acknowledging that climate change is a common concern of humankind and that Parties should, when taking action to address climate change, respect, promote and consider their respective obligations on human rights, *the right to a clean, healthy and sustainable environment*, the right to health, the rights of Indigenous Peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity
- Refer explicitly to paragraph 393 of the **ICJ AO** on the Obligations of States in respect of Climate Change:
  - “... a clean, healthy and sustainable environment is a precondition for the enjoyment of many human rights, such as the right to life, the right to health and the right to an adequate standard of living, including access to water, food and housing.”

## GUARANTEEING CIVIC SPACE IN CLIMATE ACTION

### > Civic space in climate negotiations

Civil and political rights, particularly freedom of expression, peaceful assembly, and the right to public participation, are essential for the meaningful and inclusive participation of a broad range of civil society actors and Indigenous Peoples at UN climate conferences to ensure oversight of governmental action, to provide diverse inputs that can shape States' decisions, and to assist knowledge sharing between global policy-making processes and the public. Yet civic space continues to be eroded globally, [including in COP host countries and Germany](#), the host of SB64. There remain concerns about the policing of peaceful protests in Germany and other States, including [Australia](#), the COP31 co-host, and Fiji, the Pre-COP host, [the human rights situation in Türkiye](#), and shrinking space for [advocacy actions in the UNFCCC Blue Zone](#) in recent years.

Despite vociferous protests and advocacy by observers in recent years, inclusive participation for SB64 remains elusive. Germany's visa process remains inadequate to ensure all registered delegates can attend the conference and calls for a dedicated UNFCCC visa process have gone unheeded.

### **Recommendations for SB64 negotiations:**

- Germany and the UNFCCC Secretariat must ensure that all observers wishing to participate in SB64 can do so meaningfully and safely, including by:
  - Timely and equitable visa issuance for all registered SB64 participants
  - Guaranteeing the rights to freedom of expression and peaceful assembly—including for those wishing to peacefully demonstrate against global conflicts as well as occupation, genocide, apartheid, and ecocide in Palestine—before, during, and after the negotiations within the World Conference Center and outside the UNFCCC venue.
- Parties must ensure that the Arrangements for Intergovernmental Meetings (AIM) conclusions of SB64 protect civic space and meaningful participation in climate negotiations, uphold human rights protections across all future UNFCCC sessions, and mandate the UNFCCC Secretariat to strengthen transparency and accountability, including by:
  - Guaranteeing access to negotiation rooms and adequate space for observers, ensuring meaningful civil society presence and input in decision-making spaces in all UNFCCC meetings.

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- Removing administrative, financial, and logistical barriers to the meaningful participation of Indigenous Peoples, as well as other individuals most affected by climate change and frontline defenders, especially those from least-responsible countries with limited resources, including by allocating dedicated resources to enhance the capacity of EHRDs—particularly women, young people, and marginalized groups—to meaningfully engage in UNFCCC processes, and realizing language justice throughout the negotiations.
- Encouraging all COP30 hosts to replicate the COP30 Special Envoy system to strengthen representation from underrepresented groups, including a Special Envoy for Human Rights.
- Reiterating the importance of ensuring that Host Country Agreements (HCAs) are publicly available and accessible, including by ensuring that they are published promptly after signature and made easily accessible on the UNFCCC website and by the host country, and aligning HCAs with human rights safeguards, conflict of interest provisions, and mandatory commitments to protect freedom of peaceful assembly.
- Meaningfully addressing the undue influence of corporate actors, in particular big polluting industries, in the UNFCCC process including by putting in place stringent conflict of interest policies.
- Adopting a zero-tolerance approach to intimidation, harassment, violence, and reprisals against observers participating in UNFCCC processes, and appointing a dedicated UNFCCC focal point to monitor incidents, collect relevant data, and support accountability and redress.
- The UNFCCC Secretariat and Türkiye should conclude a robust and human rights compliant HCA for COP31, as swiftly as possible, in line with previous AIM conclusions. The HCA must also be made public and easily accessible immediately after signing, including through widely disseminated publication on the UNFCCC website.
- Parties must fulfill and increase funding commitments to the UNFCCC, ensuring that budgetary constraints do not undermine the right to participation of observers, particularly from underrepresented and frontline communities, at both SBs and COPs.

## > Protection of Environmental Human Rights Defenders

Thousands of people who fight for communities' right to a clean, healthy and sustainable environment face serious dangers. Between 2012 and 2024, at least [2,253](#) EHRDs were killed or went missing, and the true number is likely much higher, since many attacks go unreported due to conflict, press freedom restrictions, and limited monitoring.

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Beyond physical violence, EHRDs repeatedly encounter barriers to participating in the climate negotiations meant to address the crises they face on the ground. These include visa restrictions, surveillance, exclusion from key negotiating spaces, and other indirect but oppressive tactics used against them.

Women EHRDs face particular risks, especially those who are Indigenous, poor, disabled, racialised, or living in rural areas. They face gender-based violence, displacement, criminalisation, and a wide range of other attacks. All defenders increasingly face digital surveillance and online harassment, but women and LGBTQI+ defenders are disproportionately targeted with doxxing, smear campaigns, and gendered online violence. Reporting mechanisms are often weak or inaccessible, and many women end up self-censoring. In this context, the first explicit recognition of WEHRDs under the Belém Gender Action Plan represents an important step towards acknowledging the specific risks and barriers faced by women EHRDs.

## **Recommendations for SB64 negotiations:**

- Create a dedicated negotiation track on EHRDs protection. A focused stream under the SBs should be established to formally address the recognition, protection, and participation of EHRDs, leading to concrete outcomes such as a work programme or formal decision.
- Embed EHRDs protection in climate mechanisms. All climate decisions and mechanisms, including the implementation mechanism that will stem from the JTWP, must explicitly protect civic space and guarantee meaningful participation of affected communities, with Indigenous Peoples' FPIC guaranteed.
- Formally recognise women EHRDs' leadership throughout the implementation of the GAP. This means ensuring their full and equal participation in climate decision-making, providing legal protections against all forms of gender-based violence and harassment (including SLAPPs), releasing those in arbitrary detention, and repealing laws used to criminalise them, and allocate unrestricted funding that lets EHRDs, in particular women EHRDs, make decisions based on their own realities on the ground.

## **> UNFCCC reform**

The UNFCCC has reached a critical breaking point. Climate negotiations have systematically failed to deliver climate justice and undermined international law by allowing blocking States to hold the negotiations hostage, marginalizing vulnerable States, Indigenous Peoples, and civil society, allowing the richest countries and the largest historical emitters to avoid legal obligations and accountability, enabling the fossil fuel industry and other big polluters to continue to pollute with impunity and propose false solutions to greenwash their image, and hosting talks in

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countries with problematic human rights records and significant fossil fuel interests. Frustrations with the process have mounted in recent years, from a near walk-out due to a weak finance deal at COP29 to plenary objections related to the failure to address fossil fuel phaseout at COP30, diminishing trust overall.

Countries are increasingly seeking recourse elsewhere, as demonstrated by the plethora of international court proceedings on climate change, and most recently the First Conference on Transitioning Away from Fossil Fuels in Santa Marta outside of UNFCCC auspices. While these approaches to increase ambition and accountability are critical, they are a complement, and not an alternative, to reforming the UNFCCC, currently the main multilateral space for climate decision-making and cooperation. Improving the effectiveness, inclusiveness, and accountability of the UNFCCC remains critical to deliver climate action in line with legal obligations such as a fossil fuel phaseout and international climate finance.

## **Recommendations for SB64 negotiations:**

- Use the **AIM negotiations** to call for a comprehensive reform of the UNFCCC, and establish a dedicated space to enable meaningful discussions and concrete decisions on the various pathways for making the process more effective, inclusive, and accountable.
- Build political recognition of **the urgent need to end the undue influence of fossil fuel and other polluting industry representatives** from official spaces, including observer organizations, party delegations, and Presidency teams, and establish concrete pathways to do so. This includes mandating through AIM the adoption of **a rigorous UNFCCC Accountability Framework** to guide engagement with representatives from non-governmental organizations and address conflicts of interest, and ending commercial partnerships, in particular with polluting industries and actors enabling and working with them.
- Follow the lead of other UN spaces and move the UNFCCC beyond the current model of consensus decision-making, which enables obstruction and a race to the bottom, and **move to a majority-based decision-making process that empowers genuine multilateralism**, reflects the urgency of the climate crisis, and upholds the principles of equity and intergenerational justice. Make use of the standing Presidency consultations on the topic to raise the need to urgently adopt the Rules of Procedure.