

AFRICAN NON-STATE ACTORS POSITION FOR UNFCCC COP31

From Belém to Antalya:
Delivering Climate Justice,
Protecting Africa's Development
Space and Financing
Africa's Transformation

1. FRAMING

“
Africa has paid enough for a crisis it did not create.”

COP31 must turn **Belém’s** promises into delivery: **finance into action**, adaptation into resilience, a just transition into **development**, and Africa’s resources into value created and retained in Africa.



1. FRAMING

- a. Africa cannot continue to pay three times for a crisis it did not create: first, through climate impacts that destroy lives, livelihoods, jobs, incomes, ecosystems and hard-won development gains; second, through inadequate and inaccessible finance that diverts scarce public resources from development priorities; and third, through a global transition that risks reducing Africa once again to a source of cheap raw materials, carbon assets, land and energy while value is created elsewhere. Children across the continent already face hunger, disrupted schooling, disease and lost opportunity as droughts, floods, storms and heatwaves intensify. COP31 must break this cycle.
- b. Africa approaches COP31 in Antalya at a decisive moment for the international climate regime. The central question is no longer whether commitments can be negotiated, but whether existing commitments will be financed, implemented, measured and enforced.
- c. The COP30 Belém outcomes established important foundations: a pathway towards at least USD 1.3 trillion annually in climate finance by 2035; the USD 300 billion annual goal for developing countries by 2035; stronger emphasis on public, grant-based and highly concessional finance; and a call to scale adaptation finance. They also advanced adaptation indicators, just-transition arrangements, Article 6 implementation and delivery of the Global Stocktake.
- d. For Africa, however, a decision is not delivery. The African Non-State Actors Roadmap to COP32 positions COP31 as the test of implementation and accountability. CCDA-XIV reinforces this imperative: move from participation to agency, pledges to implementation, fragmented projects to transformative finance, and isolated climate actions to integrated development pathways.
- e. This demand builds on Africa's trajectory across recent COPs. At COP28, PACJA rallied around "Keep Your Promise" and accountability for existing commitments. At COP29, the focus shifted to an ambitious, needs-based climate-finance goal and the means for communities to implement adaptation, mitigation and a just transition. At COP30, the agenda broadened into a development-centred African position spanning finance, adaptation, loss and damage, energy access, critical minerals, debt and global financial reform.
- f. Africa is not seeking another cycle of declarations without implementation. It demands a climate regime that recognises its special needs and circumstances, right to development, development constraints and strategic assets—and requires those with the greatest historical responsibility and financial capacity to lead.
- g. Africa is not asking to be exempted from climate action. It is demanding the finance, technology, policy space and fair international conditions needed to act without sacrificing development. For African workers, this means a transition that creates and protects decent jobs, secures livelihoods, extends social protection and is negotiated through social dialogue—not one that shifts adjustment costs onto working people.
- h. COP31 must therefore serve as the bridge from Belém's commitments to African transformation and the road to COP32 in Addis Ababa. In Antalya, Africa must defend and consolidate existing gains, force implementation, secure immediate progress on finance and adaptation, and protect its development space.



2. Political Imperatives for Africa's Non-State Actors

African Non-State Actors call for COP31 to deliver on seven political imperatives:

a.) Turn pledges into accountable delivery.

COP31 must be the first major accountability test of the Belém outcomes. Africa demands transparent reporting on finance promised and disbursed; grants and highly concessional finance versus debt-creating instruments; NDC and NAP implementation; adaptation finance reaching Africa; delivery of just-transition commitments; resources reaching local and frontline communities; jobs created and protected, disaggregated by sex, age and sector, including the informal economy; and social-protection coverage for affected workers.

b.) Make climate finance serve Africa's transformation.

COP31 must be the first major accountability test of the Belém outcomes. Africa demands transparent reporting on finance promised and disbursed; grants and highly concessional finance versus debt-creating instruments; NDC and N

Climate finance must be adequate, predictable, accessible, grant-based or highly concessional, country-owned, locally accessible and aligned with development. Its success must be measured not only by volume, but by the value created and retained in Africa: industrialisation, decent jobs, technology transfer, resilience and domestic fiscal gains.

c.) Put adaptation finance and implementation at the centre.

For Africa, adaptation is not secondary climate action; it is a development and survival imperative. COP31 must guarantee needs-based, predictable and accessible finance for adaptation implementation, aligned with Africa's assessed needs and delivered primarily through grants and highly concessional resources.

With SB64 failing to agree on the Global Goal on Adaptation agenda item, COP31 must move beyond measuring adaptation to financing and implementing it. The Belém Adaptation Indicators cannot become another reporting framework without resources. Africa must insist: No indicators without implementation. No plans without finance. No resilience commitments without resources reaching local communities. Adaptation must also protect workers exposed to heatwaves, floods and other climate hazards through occupational safety and health standards and adaptive social protection.

d.) Make Africa's energy transition a development transition.

It must close the energy-access gap while advancing affordability, reliability, industrialisation, productive capacity and decent jobs.

Africa must advance an African-led just energy transition centred on universal access to affordable and reliable energy; rapid renewable-energy deployment; decentralised, people-centred systems; productive uses of energy; industrial electrification; skills; decent green jobs; social protection; and African manufacturing and value addition. Transition plans must be negotiated with trade unions through social dialogue and provide income support, retraining and redeployment for workers in affected sectors, including the informal economy.

e.) End the extractive model of the green transition.

Africa's critical minerals must drive African industrialisation, regional value chains, decent jobs, technology transfer and fiscal revenues—not another cycle of raw-material exports.

Africa's demand is clear: no green transition that reproduces the extractive model of the past. COP31 must support local processing and beneficiation, regional value chains, and safeguards that prevent environmental and social costs from remaining in Africa while value is captured elsewhere. Mining and processing must guarantee freedom of association and collective bargaining, living wages, occupational safety and health, an end to child and forced labour, and pathways to formalise artisanal and small-scale miners.

f.) Make climate justice inseparable from trade justice.

Climate measures must not penalise African industrialisation, exports or movement up global value chains. Unilateral measures such as CBAM risk imposing new costs on countries that contributed least to the climate crisis.

COP31 must advance cooperative alternatives to unilateral measures and invest in African industrial decarbonisation and value addition. Any carbon-border measure must include employment-impact assessments, social dialogue and transition support for workers in affected export sectors.

g. Democratise climate governance and enforce accountability.

People experiencing climate impacts must have meaningful power in decisions that shape their lives, livelihoods and futures.

Women, children, youth, Indigenous Peoples, smallholder farmers, pastoralists, fisherfolk, workers and trade unions, persons with disabilities, local communities and frontline populations must participate in UNFCCC and climate-action decisions as rights-holders, knowledge holders and decision-makers—not merely as consultees.



3. Africa's COP31 Negotiating Position by Track

A. Adaptation

African NSA headline position.

COP31 must move adaptation from indicators and plans to financed implementation and measurable resilience. A robust accountability framework must connect global commitments to locally led delivery, urban planning, climate mobility and tangible outcomes.

Context

COP30 established the Belém Adaptation Indicators and called for adaptation finance to triple by 2035. Yet SB64 failed to agree on the Global Goal on Adaptation, particularly its means of implementation, while African societies and economies continue to absorb escalating climate shocks. These impacts also disrupt children's education, food security, health and safety. COP31 must therefore finance and operationalise the indicators, strengthen synergies across climate, biodiversity and land action, and enable locally led solutions that reflect how communities manage interconnected systems of water, food, health, ecosystems and livelihoods.

African NSAs demand:

1. Operationalise the Belém Adaptation Indicators with adequate finance, technology and capacity support.
2. Integrate adaptation and biodiversity action, recognising that ecosystem loss weakens resilience, adaptation effectiveness and economic development.
3. Establish a clear pathway to triple adaptation finance, prioritising public, grant-based and highly concessional resources.
4. Simplify and expand direct access to adaptation finance for African national and sub-national institutions and locally led actors.
5. Scale support for implementing NAPs and adaptation communications.
6. Invest in climate information, early-warning systems and anticipatory action as core adaptation infrastructure responsive to children and youth.
7. Direct adaptation finance to agriculture and food systems, water, cities, health, livelihoods, ecosystems, pastoralism and climate mobility—and ensure it reaches local governments and communities.
8. Secure an implementation mandate for agriculture beyond 2026, with a clear successor to the Sharm el-Sheikh joint work on implementation of climate action on agriculture and food security (SSJWA).
9. Protect workers exposed to climate hazards through heat-stress standards, occupational safety and health, income support and adaptive social protection, including for informal-economy workers.

B. Mitigation

African NSA headline position.

Africa supports mitigation ambition aligned with science and the Paris Agreement—but ambition must be equitable, financed, technology-enabled and compatible with development. Africa cannot be required to decarbonise without the means to do so.

Context

The 2025 NDC synthesis showed that current commitments are bending the emissions curve but remain insufficient to meet the Paris temperature goals. COP30 proposed mechanisms to accelerate implementation, while SB64 failed to agree on the future of the Sharm el-Sheikh Mitigation Work Programme. COP31 must close this implementation gap by advancing the first Global Stocktake outcomes and an equitable transition away from fossil fuels—without shifting disproportionate obligations onto African countries.

African NSAs demand:

1. Require developed countries to lead with rapid, deep and sustained emissions reductions.
2. Accelerate global implementation of the first Global Stocktake outcomes.
3. Rapidly expand renewable energy and energy efficiency worldwide.
4. Accelerate a just, orderly and equitable transition away from fossil fuels.
5. Finance and support African NDC implementation through sectoral investment plans, technology transfer and adequate implementation resources.
6. Protect Africa's right to development and policy space from disproportionate mitigation obligations.
7. Require employment and social-impact assessments and worker-agreed just-transition plans before restructuring or phasing out carbon-intensive sectors.
8. Integrate mitigation with adaptation, food security, energy access and industrialisation.

C. Energy Access and Just Transition

African NSA headline position.

Africa's just transition must begin with its development reality: hundreds of millions still lack reliable energy, while industries, infrastructure and jobs remain underbuilt. The transition is therefore not a burden-sharing exercise; it is a global investment opportunity in universal energy access, African industrialisation, decent jobs and sustainable development.

Context

African countries must decarbonise while simultaneously building energy systems, industries, infrastructure and jobs at scale. SB64 advanced work on the Just Transition Mechanism and launched the review of the UAE Just Transition Work Programme. COP31 must use this opening to embed energy access, decent work, social protection and social dialogue in the mechanism's design and delivery.

1. Deliver universal access to affordable, reliable and clean energy.
2. Recognise energy access as a climate goal and a core pillar of climate action.
3. Operationalise an accessible Just Transition Mechanism that recognises national circumstances and nationally determined pathways, gives non-state actors formal governance roles, and includes a dedicated window for workers' transition support.
4. Provide additional, predictable and accessible just-transition finance.
5. Build African manufacturing of renewable-energy technologies through technology transfer, investment and skills development.
6. Create decent green jobs, especially for women and youth, that guarantee freedom of association, collective bargaining, living wages, safe working conditions and social protection.
7. Link energy access to industrialisation and productive use.
8. Develop just-transition plans through tripartite social dialogue among governments, employers and trade unions, anchored in the ILO Guidelines for a Just Transition.
9. Formalise and protect informal-economy workers in energy, waste, recycling and green-enterprise strategies, and extend social protection.
10. Prioritise public investment in capable public energy utilities and services as anchors of universal access, affordability and quality jobs.

D. Climate Finance: The Central Political Battle

African NSA headline position.

Climate finance is the credibility test of the Paris regime. Africa does not need more announcements; it needs finance that arrives at scale, is affordable and accessible, and drives structural transformation rather than fragmented projects.

Context

COP29 established the USD 300 billion annual goal for developing countries by 2035 and a broader pathway towards USD 1.3 trillion annually. COP30 reinforced the need for public, grant-based and highly concessional finance, especially for adaptation. At COP31, unresolved questions on the Adaptation Fund, Article 9.1, the climate-finance work programme and the Veredas Dialogue must be resolved around one test: whether finance is additional, accessible, non-debt-creating and delivered to African priorities.

1. Accelerate delivery of the USD 300 billion annual goal and establish a credible pathway to at least USD 1.3 trillion annually by 2035.
2. Prioritise grants and highly concessional finance for adaptation and loss and damage, and reduce reliance on debt-creating instruments.
3. Simplify access, expand direct access for African institutions, local governments and locally led actors, and create dedicated windows for child- and youth-led climate action, innovation and community resilience.
4. Require country-level delivery plans, transparent reporting of commitments and disbursements, tracking of grants versus loans, and disclosure of finance reaching communities and workers' organisations.
5. Lower the cost of capital, cancel unsustainable debt, reform international financial institutions, curb illicit financial flows and excessive profit repatriation, and strengthen African regional financial institutions.
6. Condition public, multilateral and private climate finance on decent work, workers' rights and social-protection floors, and use it to strengthen public services and public-sector capacity.

E. Loss and Damage

African NSA headline position.

Loss and damage is not humanitarian charity; it is a matter of climate justice and differentiated responsibility. COP31 must substantially capitalise the Fund for Responding to Loss and Damage and make it rapidly and directly accessible to vulnerable countries and frontline communities.

Context

Establishing and operationalising the Fund was an important institutional step, but it remains critically undercapitalised as climate disasters intensify. COP31 must shift the debate from institutional architecture to adequate, predictable and accessible delivery

1. Provide predictable, substantially scaled-up loss-and-damage finance, predominantly as grants rather than loans.
2. Address the full spectrum of loss and damage across African sectors, including agriculture, and ensure finance reaches frontline communities and vulnerable livelihood systems.
3. Enable simplified, rapid and direct access for vulnerable countries.
4. Finance responses to economic and non-economic losses, including climate-induced displacement and mobility.
5. Fund local and community-level recovery and transparently track resources reaching affected communities.
6. Strengthen coordination among the Fund for Responding to Loss and Damage, the Santiago Network and other relevant institutions.
7. Ensure loss-and-damage finance complements rather than competes with adaptation finance.
8. Recognise lost jobs, incomes and workplaces as economic losses, and deliver income support, social protection and rights-based protection for displaced, migrant and informal workers.

F. Capacity Development, Technology and Implementation

African NSA headline position.

Africa needs durable institutions, technology and implementation capacity— not recurring dependence on external consultants and short-term workshops.

Context

Africa's capacity gap is not simply a shortage of training; it is a shortage of sustained institutional finance, technology, data infrastructure and skilled personnel. COP31 must strengthen African-led institutions and data governance, expand participation in global scientific and technology processes, and connect capacity support directly to NDC, NAP and Article 13 implementation.

Africa NSAs demand:

1. Build long-term institutional capacity tied directly to NDC and NAP implementation, rather than relying on short-term workshops. Transfer technology on equitable and concessional terms.
2. Strengthen African scientific and research institutions and secure African ownership of climate data and knowledge systems.
3. Expand African institutions' participation in global technology and scientific governance.
4. Deliver affordable, locally appropriate technology, knowledge and capacity for agricultural extension, climate information, early warning, sustainable water management and soil health, combining scientific research with local and Indigenous knowledge.
5. Integrate climate education, child rights and practical climate-action skills into formal and non-formal education.
6. Resource trade unions and workers' organisations to participate effectively in NDC, NAP and just-transition planning and UNFCCC processes.

G. Carbon Markets and Carbon Border Adjustment Measures

a. Article 6 and Carbon Markets

African NSA headline position.

Africa must not become a warehouse for cheap offsets. Carbon markets must deliver real mitigation and retain climate, economic and community value in Africa, under strong rules for integrity, sovereignty, transparency, rights and benefit sharing.

Context

Article 6 implementation is accelerating through reporting rules, registries, national authorities, methodologies and the Paris Agreement Crediting Mechanism. By June 2026, 129 Parties had designated national authorities and 418 CDM-transition requests had received host-country approval. COP31 must ensure this expansion builds functional, high-integrity African markets with strong public regulation, African ownership of infrastructure and data, and fair returns for communities and national development.

Africa NSAs demand:

1. Enforce high-integrity carbon markets consistent with the Paris Agreement.
2. Apply robust environmental and social safeguards.
3. Disclose carbon-project ownership and benefit distribution fully.
4. Align carbon-market finance with a fair transition to sustainable agriculture, and support farmers to develop bankable, high-integrity soil-carbon projects.
5. Guarantee meaningful community participation and free, prior and informed consent where applicable.
6. Strengthen national and regional carbon-market regulators.
7. Guarantee fair benefit sharing and direct carbon-market revenues towards adaptation, resilience and development.
8. Secure African ownership of carbon-market infrastructure and data.
9. Maximise African value capture and prevent the export of cheap carbon assets.
10. Enforce labour and decent-work safeguards in every carbon-market project, including freedom of association, fair wages, occupational safety and health, prohibition of forced and child labour, and accessible worker grievance mechanisms.

G. Carbon Markets and Carbon Border Adjustment Measures

b. Carbon Border Adjustment Mechanisms (CBAM)

African NSA headline position.

Africa opposes unilateral carbon-border measures that shift transition costs onto developing countries, constrain industrialisation and weaken export competitiveness. Climate-trade policy must support—not penalise—Africa's value addition and industrial decarbonisation.

Context

The EU's definitive CBAM regime became operational in January 2026 for specified carbon-intensive products. For Africa, CBAM is not only a climate instrument; it is a trade, industrialisation and development measure that risks imposing a double burden on producers already constrained by limited access to affordable clean energy. COP31 must advance cooperative approaches that recognise differentiated circumstances, finance African industrial decarbonisation and protect affected workers.

Africa NSAs demand:

1. Greater transparency regarding the climate and trade impacts of unilateral carbon-border measures on developing countries.
2. Recognition of differentiated national circumstances and differing historical contributions and stronger international cooperation on common approaches to industrial decarbonisation.
3. Avoidance of double burdens on African producers and promote technology transfer to decarbonise African industries.
4. Technical and financial support for African countries to develop credible emissions accounting and MRV systems.
5. Support for African value addition rather than exporting raw materials.
6. Reinvestment of climate-related revenues into global decarbonisation and developing-country transition where relevant, rather than simply fiscal protectionism.
7. Employment-impact assessments of CBAM and similar measures, social dialogue with affected workers and unions, and dedicated transition support (income support, reskilling, social protection) for workers in exposed sectors such as steel, aluminium, fertilisers and cement.

4. Other Catalytic Demands of African Non-State Actors

a. Operationalise Africa's Special Needs and Circumstances

COP31 must make Africa's special needs and circumstances operational—not rhetorical. They must shape finance allocation, adaptation delivery, capacity support, technology transfer, transition pathways, implementation expectations and international cooperation, all anchored in Africa's development aspirations. In agriculture, this requires explicit recognition of the vulnerability of smallholder farmers; priority for adaptation, food and nutrition security, and rural livelihoods; and policies tailored to diverse farming systems, local conditions and farmers with limited capacity to absorb climate risk.

b. Accelerate Global Financial Reform

COP31 must accelerate reforms that connect climate justice with debt justice, tax justice and transformation of the global financial architecture. African Non-State Actors demand an end to counting debt as climate finance; climate finance that does not deepen Africa's debt burden; direct, affordable access for African institutions, national entities and local governments; faster reform of international financial institutions and multilateral development banks; stronger action on tax justice; and expanded domestic fiscal space for social protection, public services and just-transition programmes. Climate finance must be aligned with debt sustainability, development finance and African priorities.

c. Defend Rights and Civic Participation

COP31 must protect the participation rights of Indigenous Peoples, women, youth, workers, farmers, pastoralists, fisherfolk, persons with disabilities, local communities and frontline populations. This requires reversing the decline in access to UNFCCC processes, guaranteeing meaningful representation in decision-making, and establishing accountable pathways for frontline actors to access climate finance. Host countries must guarantee the rights to peaceful assembly, association and expression.

d. Establish a People-Centred Accountability Framework

COP31 must establish an African accountability baseline and a people-centred framework for tracking implementation. The framework must connect global commitments to measurable national and local delivery, disclose resources reaching communities and workers' organisations, and enable rights-holders to assess progress and demand corrective action.

5. Closing Call

Africa is highly climate-vulnerable, strategically indispensable and determined to shape its own future. African Non-State Actors demand a fair and accountable global architecture for finance, technology, trade, energy, natural resources and development.

At COP31 in Antalya, Parties must prove that the climate regime can deliver justice in practice—not merely declarations on paper. African Non-State Actors therefore demand that Parties:

- a. Require developed-country Parties to lead through substantially greater provision of climate finance, technology transfer and capacity support.
- b. Reform international financial institutions and align their operations with climate justice, development, debt sustainability and Africa's priorities.
- c. Build an African green transition that creates and retains value, jobs, technology and revenues in Africa rather than reproducing extraction under a green label.
- d. Ensure climate-trade policies enable—not penalise—African industrialisation, value addition and competitiveness.
- e. Anchor the Just Transition Mechanism and national transition plans in decent work, social protection and social dialogue, so no worker or community bears the transition alone.
- f. Place affected people at the centre of climate governance as rights-holders, knowledge holders and decision-makers.

