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Measuring Access Under the New Collective Quantified Goal: An Implementation Roadmap

Concept Paper Key Findings

About the Concept Paper

This document highlights key findings from the Concept Paper which has been commissioned by the Center for Access to Climate Finance, an initiative of the Taskforce on Access to Climate Finance (Taskforce) hosted by the NDC Partnership Support Unit. The document has been prepared by the Climate Policy Initiative.

The Taskforce is a joint initiative of climate-vulnerable developing countries, bilateral and multilateral climate finance providers, and other relevant organizations. It was convened by the United Kingdom's COP26 Presidency in 2021 in response to concerns that existing mechanisms for accessing climate finance are often slow, complex, resource intensive, uncertain, and project based. In the same year, the Taskforce published the Principles and Recommendations on Access to Climate Finance, which set out a new approach to guide climate finance providers and recipients in how climate finance could be accessed, programmed, and used. These are being tested by seven "pioneer" countries. There is strong synergy between the access components of the New Collective Quantified Goal (NCQG) on climate finance and the Principles and Recommendations. To enhance the impact of its work, the Taskforce is committed to supporting the NCQG reporting process by contributing to the development of its approach and indicators related to access, an area where the Taskforce has accumulated substantial knowledge and experience.

This Concept Paper benefited from consultations and expert input throughout its development, including from climate-vulnerable countries, climate finance providers, members of the Standing Committee on Finance (SCF), the secretariat of the United Nations Framework Convention on Climate Change (UNFCCC), technical experts, and members of the Taskforce's Technical Working Group. These contributions helped inform the analysis and proposed methodology but do not imply endorsement of the Paper's findings or recommendations.

The Concept Paper provides a technical contribution to inform the reporting mandate of the SCF, which will begin in 2028. The Paper proposes an Implementation Roadmap to guide Parties and finance providers in selecting indicators and designing a future reporting framework to measure progress on access. The Paper makes a first application of the Implementation Roadmap, identifying key access components, proposing candidate indicators, and conducting a preliminary review of existing reporting and disclosure practices for access-related data. The analysis is limited to the NCQG access dimensions and is informed by stakeholder engagement and consultation. This work presents key findings and considerations as an independent analytical technical contribution, along with options for consideration by relevant Parties and institutions, without prejudice to any approach to be decided by the SCF, future decisions by the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), or reforms of multilateral and bilateral providers. It does not imply any legal obligations or interpretations of the NCQG decision. The Paper does not represent an institutional view of the NDC Partnership, the Taskforce on Access to Climate Finance, or their members.

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Acronyms

CMA	Conference of the Parties serving as the meeting of the Parties to the Paris Agreement
CPI	Climate Policy Initiative
IFIs	international financial institutions
LDCs	Least Developed Countries
MCFs	multilateral climate funds
MDBs	multilateral development banks
NCQG	New Collective Quantified Goal on climate finance
OECD-DAC	Development Assistance Committee of the Organisation for Economic Co-operation and Development
SCF	Standing Committee on Finance
SIDS	Small Island Developing States
UNCTAD	United Nations Conference on Trade and Development
UNFCCC	United Nations Framework Convention on Climate Change



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Executive Summary

Introduction and Context

Despite increasing total climate finance, persistent structural and systemic barriers constrain access for vulnerable countries. This is particularly challenging for Least Developed Countries (LDCs) and Small Island Developing States (SIDS), where access to finance is critical to driving low-carbon development, strengthening climate resilience, and addressing climate-related losses and damages. These countries face access barriers across the financing chain, from planning and project preparation to approval, disbursement, and reporting. Their challenges include, but are not limited to, capacity gaps; financial, debt, and fiscal constraints; fragmentation of the financial architecture; lack of transparency and predictability; perception and fiduciary concerns; and procedural and administrative barriers. Improving access is, in this way, multidimensional: It concerns not only the amount and terms of finance, but also whether processes are navigable and transparent, and whether countries and local institutions have the capacity and authority to shape, access, and use finance.

The New Collective Quantified Goal (NCQG) on climate finance responds to these challenges by establishing priority interventions for enhanced access. Agreed at COP29, the NCQG, *Decision 1/CMA.6*[1], places access at the core of delivery expectations. Paragraphs 21–26 set out expectations for bilateral providers, multilateral climate funds (MCFs), and international financial institutions (IFIs), including multilateral development banks (MDBs), to provide finance—particularly concessional finance—in a timely, predictable, and equitable manner, and to break down barriers that prevent access.

The NCQG establishes a need for systematic reporting on access, but no standardized framework or set of indicators yet exists to measure it, limiting comparability and meaningful reporting. The United Nations Framework Convention on Climate Change (UNFCCC) Standing Committee on Finance (SCF) is mandated to report on collective progress toward all elements of the NCQG biennially from 2028 (UNFCCC, 2024a, para. 30), and Parties have recognized the importance of transparency when measuring progress in enhancing access to climate finance (UNFCCC, 2024a, para. 33). In addition, Parties also agreed that the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA) will undertake a special assessment of access to climate finance in 2030 with a view to assessing progress on the access-related provisions of the decision and identifying further opportunities to enhance access to climate finance (UNFCCC, 2024a, para. 34).

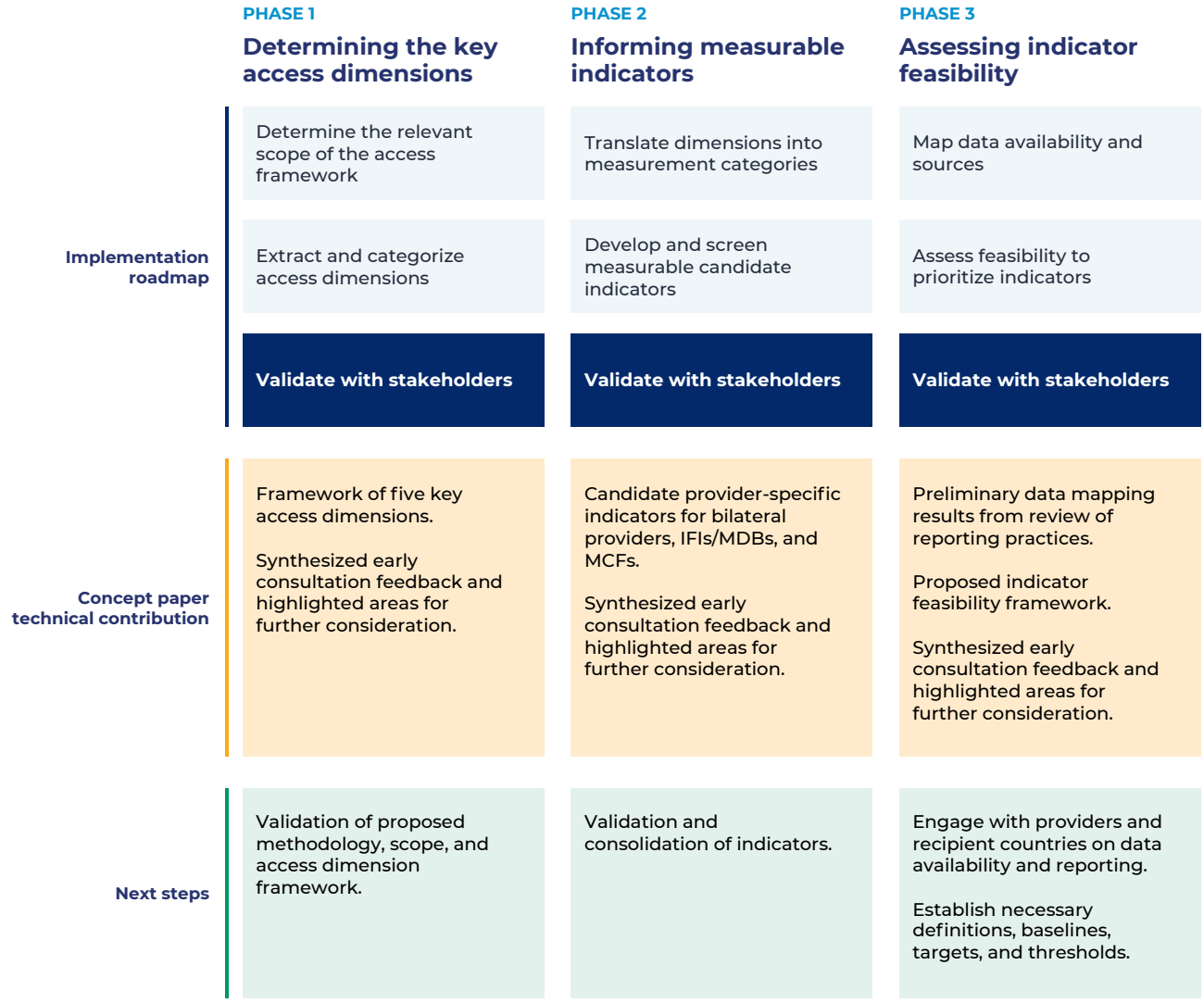
The Concept Paper, commissioned by the Center for Access to Climate Finance, hosted by the NDC Partnership Support Unit, and prepared by the Climate Policy Initiative (CPI), provides an independent technical contribution to inform this future work. It proposes an Implementation Roadmap to define and measure access enhancements under the NCQG. It is intended as a starting point that the SCF, Parties, finance providers, and recipient countries can consider, refine, and operationalize in tracking access.

The Implementation Roadmap is the three-phase process through which access indicators can be defined, refined, and tested (see Figure 1). Each phase is consultative and iterative, and feedback at any stage may surface a need to revise earlier definitions, dimensions, or indicators before proceeding. The Concept Paper makes a first application of the Implementation Roadmap, producing provisional access dimensions, actor-specific candidate indicators with indicator passports, and a preliminary feasibility mapping.

The results have been informed by consultations with more than 30 institutions, among them bilateral providers, IFIs including MDBs, MCFs, recipient-country representatives, and technical experts, through bilateral and group interviews, technical workshops, a presentation at the 39th meeting of the SCF, and rounds of written feedback.

1. Paragraph 21 sets out the overarching, systemic framing on access, addressing structural barriers within the financial system as a whole. Paragraphs 22–24 assign access-related responsibilities to specific actor groups: Paragraph 22 to bilateral providers, paragraph 23 to IFIs including MDBs, and paragraph 24 to MCFs, each calling on these actors to provide finance—particularly concessional finance—in a timely, predictable, and equitable manner, and to address barriers that prevent access. Paragraphs 25 and 26 are included in this analysis as they extend the access agenda beyond individual provider actions. Paragraph 25 emphasizes the need to strengthen enabling environments on both the supply and demand side of climate finance, while paragraph 26 emphasizes the importance of ensuring that finance reaches implementers on the ground, particularly vulnerable communities.

Figure 1
Implementation Roadmap



The Implementation Roadmap is offered as a starting point, or proof of concept, that Parties can refine, iterate, and carry forward, rather than a fixed or final indicator set or measurement framework for NCQG access reporting. Outcomes from how the Concept Paper applies the Implementation Roadmap include:

› **Phase 1: Determining the key access dimensions.** The analysis identified six specific barriers to access acknowledged in the NCQG, and five underlying access dimensions the decision establishes to address them (see Figure 2). Together, these translate the NCQG provisions into areas that can be assessed through measurable indicators, linking the institutional conditions, processes, and modalities addressed in the decision text to potential measures of enhanced access. The dimensions are interlinked rather than mutually exclusive: Several principles in the decision—such as country ownership, direct access, and programmatic approaches—cut across more than one dimension and are captured through relevant indicators under each.

› **Phase 2: Informing measurable indicators.** Actor-specific candidate indicators were developed for bilateral providers, IFIs including MDBs, and MCFs, recognizing that each group operates under materially different mandates, governance arrangements, and reporting systems. Each relevant provision was first broken down into discrete measurement categories anchored in the Phase 1 access dimensions, and one or more candidate indicators were proposed for each. Each candidate indicator was assessed for specificity, relevance, comparability, and the risk of unintended effects. This screening drew on established indicator-quality criteria such as the Clear, Relevant, Economic, Adequate, Monitorable (CREAM) framework. Indicators were then refined, combined, or removed considering stakeholder feedback. Each candidate indicator is documented in an indicator passport (available in the annex of the forthcoming full Concept Paper) that sets out its definition, unit, calculation method, disaggregation, data source, and interpretation notes to support consistent interpretation across providers. In total, the Concept Paper proposes 32 candidate indicators (13 for bilateral providers, 9 for IFIs including MDBs, and 10 for MCFs) as a starting point for further review and refinement.

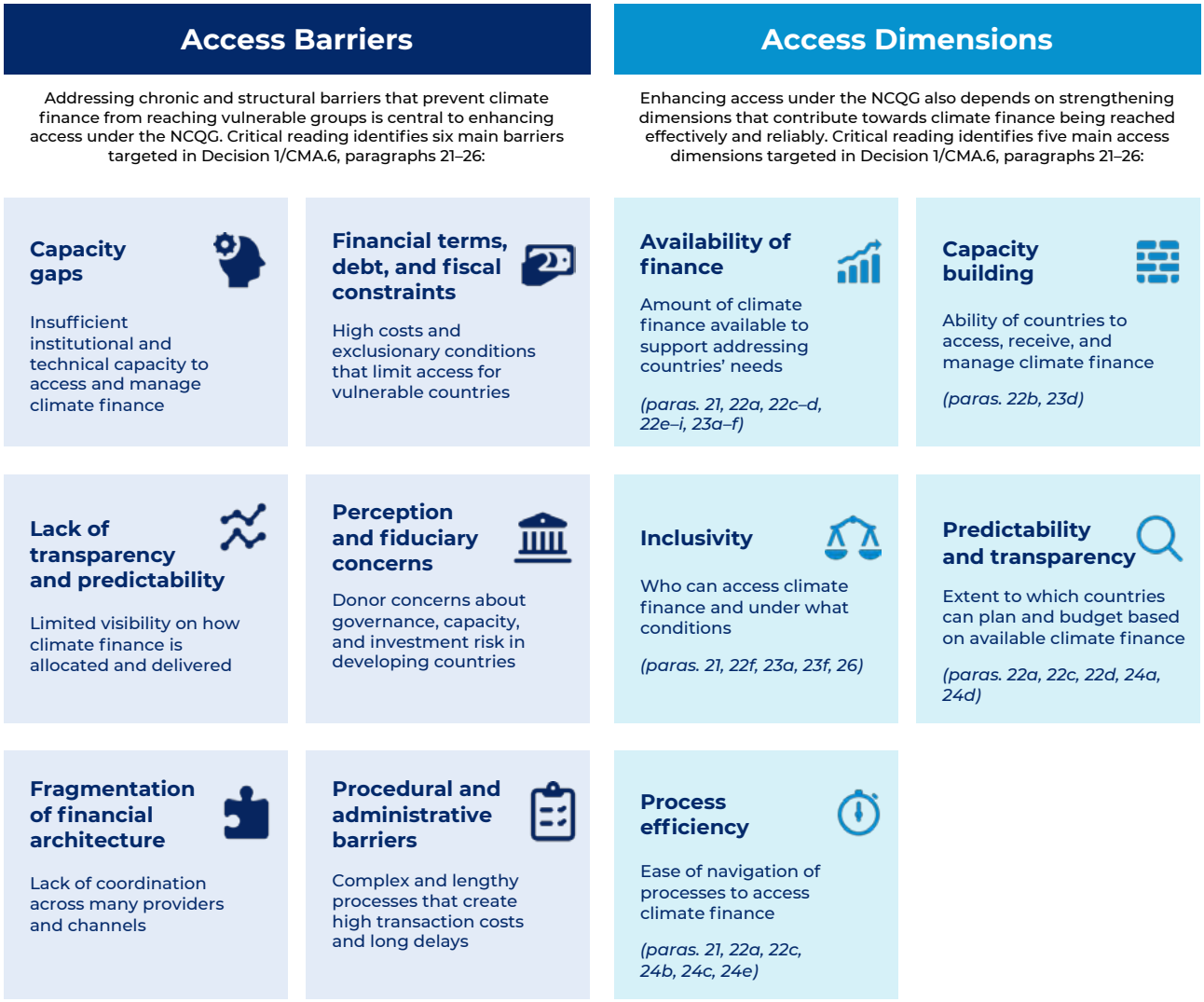
› **Phase 3: Assessing indicator feasibility.** To ground the proposed indicator set in reporting reality, the Concept Paper conducts a preliminary data mapping exercise across a sample of providers—drawing on annual, sustainability, impact, and evaluation reports, project-level databases, and aggregated sources—to assess, indicator by indicator, whether the necessary data are currently reported, partly reported, or not reported, and, where gaps exist, whether that data could realistically be derived.

While the results are preliminary and require further validation with individual institutions, the mapping reveals some broad patterns on data availability. In particular, finance volume data are most readily available, though often not disaggregated at the level indicators require. Additionally, data on providers' own processes are rarely published but likely held internally. Recipient-side measures, such as application burden and capacity outcomes, would largely require new data collection. The mapping also helps distinguish gaps that could close with improved disclosure versus those that first require common definitions or methodologies, a distinction that can inform a phased approach to reporting.

This analysis focuses on access-related provisions in NCQG paragraphs 21–26, particularly the actor-specific paragraphs 22–24 addressed to bilateral providers, IFIs including MDBs, and MCFs. The candidate indicators are therefore provider focused: They capture institutional and procedural dimensions of access. System-level determinants, including the cost of capital referred to in paragraph 21, debt sustainability, and recipient-country macroeconomic conditions, also shape access but cannot be attributed to individual providers and require complementary analysis. Findings should therefore be read as an assessment of how providers can deliver on and measure their NCQG access commitments, not a complete assessment of any country's ability to access and use climate finance.

Figure 2

Barriers to Access and Access Dimensions Highlighted in the NCQG



Source: CPI analysis of Decision 1/CMA.6.



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Key Insights

Table 1 summarizes key takeaways and outcomes of the analysis by access dimensions and crosscutting considerations, and the sections below elaborate on them.

1. Availability of Finance

This dimension covers whether climate finance is available in sufficient volume and appropriately distributed to meet the needs and priorities of those most impacted by climate change. Significant gaps persist between pledged climate finance and actual investment requirements (CPI, 2025), and developing countries receive a disproportionately small share of available finance (UNFCCC, 2024b; Wubet et al., 2025).

The candidate indicators for this dimension focus on volume and share of finance, with disaggregation by recipient type, climate objective, concessionality, and delivery channel. Given that most providers already report aggregate climate finance volumes, this dimension is likely to be relatively readily measurable compared to other dimensions. However, some areas require further development to enable measurement:

- **Data are not granular enough.** Most providers already disclose climate finance volumes, but required disaggregation—for example, *by concessionality, recipient-country,* or *delivery channel*—is often reported only at the portfolio level rather

Table 1

Summary of Key Insights by Access Dimension

Access Dimension	Key Insights
Availability of finance	Climate finance volumes are widely reported, though greater climate-specific disaggregation, and common definitions of terms like *highly concessional finance, direct access,* and *local entity* are needed.
Capacity building	Climate-specific tracking is difficult: This is often embedded in wider projects and portfolios. Common definitions and reporting across distinct categories—for example, *institutional strengthening, project preparation,* and *finance mobilization*—are needed.
Inclusivity	Data are available, but volume and shares of finance to LDCs, SIDS, and vulnerable groups should be read alongside financing terms, concessionality, and institutional mandates. Common definitions for climate vulnerability, what counts as meaningful consideration of vulnerable groups, and country-level reporting are needed.
Predictability and transparency	Approval alone does not show predictability: Indicators should distinguish between finance committed, approved, and disbursed. A common definition of what qualifies as a *programmatic* approach is needed. Climate-specific disbursement data are limited, and multiyear programs require cohort-based reporting.
Process efficiency	Process data are rarely publicly disclosed, and the recipient-side burden is largely unmeasured. Standardized process-stage definitions and low-burden data collection would help track change within institutions rather than direct cross-provider comparison.
Crosscutting Considerations	
Differences in mandates and governance across bilateral providers, IFIs including MDBs, and MCFs mean indicators cannot always be applied uniformly. A limited set of common indicators should be complemented by actor-specific ones.	
Capturing recipient experience is necessary but must be designed to not increase reporting burden.	
Data ownership, attribution, and interoperability require clear arrangements on who reports and how results are attributed to avoid double counting, given that finance often flows through multiple actors, including bilateral contributions channeled through MCFs and MDBs.	
Access tracking should build on existing reporting systems, not duplicate them. Any reporting framework should be interoperable with existing COP, UNFCCC, and provider reporting systems.	
Thresholds, baselines, and targets need to be established to measure qualitative NCQG provisions and ensure progress can be interpreted consistently over time.	
Accountability versus the relevance of NCQG paragraphs requires further consultation. While the decision text assigns specific enhancements to specific actors, any final framework should distinguish what each actor is explicitly accountable for from the broader actions relevant to enhancing access.	

than specifically for climate finance. Whether disaggregated climate-tagged data exist internally or require additional reporting efforts would need to be verified with each provider to determine reporting feasibility.

- **No definition of *highly concessional finance* is shared across providers.** A technical definition, such as a grant element threshold, below-market-rate criteria, or similar agreed criteria, should be developed and consistently applied across institutions. Efforts to define *highly concessional finance* do not need to start from scratch. The SCF and Parties could build on ongoing work by the Development Assistance Committee of the Organisation for Economic Co-operation and Development (OECD-DAC), and MDBs that are already addressing this gap, including work by the OECD-DAC Working Party on Climate and Development Finance on grant equivalent calculation and concessionality grading, the ongoing Rio Markers review, and the reporting framework of the MDB Joint Report.
- **Direct access and local entity are not consistently defined.** Agreement is needed on which channels—direct-access entities, national implementing entities, subnational institutions, enhanced direct access, or other locally led windows—should count toward a direct access indicator. This is most relevant to direct access-related indicators proposed for MCFs. For this, MCFs' own ongoing efforts to harmonize results and indicators across their mandates could similarly be leveraged rather than duplicated.
- **Finance volume should be interpreted against complementary indicators.** These should reflect recipient experience, local decision-making authority, and better financing terms. Higher volumes or shares of concessional or direct access finance do not, by themselves, demonstrate that recipients have meaningful authority or face fewer barriers to access.

2. Capacity Building

This dimension covers recipient country institutions' growing ability to identify, design, apply for, and manage climate finance. Recipient countries frequently lack the dedicated personnel, expertise, and accredited intermediaries to navigate the fiduciary and reporting requirements of international funds (Robertson, 2024; Wubet et al., 2025). This can reinforce inequities: Countries with the greatest climate finance needs may be least able to access available funding. Existing readiness programs are often short term, fragmented, and insufficiently aligned with long-term institutional development (UNFCCC, 2022; Wubet et al., 2025).

Candidate indicators for this dimension focus on the volume and share of finance directed to capacity building, technical assistance, and readiness support, and on the follow-on investment this support enables rather than meeting one-off project needs. Several factors affect how reliably these indicators can be measured:

- **Climate-specific disaggregation is limited.** Capacity building support is often embedded within broader climate projects and subsequently reported as part of wider development portfolios. A common method is needed to consistently identify and value climate-related capacity building components.

- **There is no common definition or classification of *capacity building, technical assistance, and readiness*.** These terms vary across providers, limiting comparability of any volume-based indicator built on them.
- **Institutional versus project-specific capacity building should be distinguished.** Project-specific technical assistance—for example, *external consultants engaged for the life of a single project*—and support for sustainable, in-country institutional structures—for example, *support for setting up and building the capacities of a permanent national climate finance unit*—have very different implications for long-term country ownership and capacity retention.
- **Capacity building should be reported across distinct categories.** Capacity building and readiness support spans several functions, including institutional strengthening, project preparation, finance mobilization, and reporting. Tracking support by category would help reveal where gaps lie. For instance, readiness support may identify investment opportunities without covering the separate work of turning them into finance-ready proposals. For project preparation, reporting should ideally capture whether readiness support is linked to dedicated project preparation windows, and the time from prioritization to approval or deployment of that support.
- **Volume of support alone does not show whether capacity was built.** The volume of capacity building support measures inputs, not whether institutional capacity has increased or is retained once support ends. Where feasible, it should be read alongside the follow-on investment that support enables and complemented by evidence of whether supported institutions go on to prepare, access, or manage climate finance directly, drawing on existing provider reporting and recipient-side evidence.

3. Inclusivity

This dimension covers whether climate finance is accessible across countries, regions, and actors, ensuring that those who need it most are not excluded. Eligibility criteria based on income classification can render climate-vulnerable SIDS ineligible for concessional windows even where climate exposure is high, underscoring the need for eligibility frameworks that incorporate multidimensional vulnerability metrics (Robertson 2024; Wubet et al., 2025). Systemic financial constraints compound these challenges: In 2024, approximately 50% of public climate finance was delivered through project or balance sheet debt (CPI, 2026), exacerbating debt vulnerabilities in countries already facing fiscal stress.

Candidate indicators proposed in this Paper to measure inclusivity focus on the volume and share of finance directed to LDCs, SIDS, and vulnerable groups; the number of beneficiaries reached; and the extent to which vulnerable groups are explicitly considered in project design. Several areas require further development to enable consistent measurement of inclusivity:

- **Instrument and concessionality data require careful interpretation.** Available data can distinguish non-concessional and concessional finance, including grants, loans, equity, guarantees, and other instruments, though detailed information on concessional terms is not always publicly disclosed. Grant shares should also be interpreted in the context



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of institutional mandates and resource windows, since institutions without concessional windows cannot provide grants at scale. Debt-to-non-debt ratios may provide another measure, but should be interpreted alongside the level of concessionality, as highly concessional loans may be more access-enhancing than non-debt instruments with commercial return expectations. Instrument shares should therefore be reported alongside a measure of concessionality—such as *grant-equivalent value*—which depends on the common definition of highly concessional finance noted above, rather than used as stand-alone indicators.

- **Indicators on vulnerable groups require common criteria and careful interpretation.** Beneficiary data may be difficult to identify, count, and disaggregate consistently, particularly for indirect beneficiaries of larger interventions. A high beneficiary count captures reach, but does not indicate whether support was adequate, transformative, or durable. Similarly, *explicit consideration and prioritization* of vulnerable groups can range from a limited reference in project documentation to substantive measures such as targeted outreach, dedicated budget lines, or tailored safeguards. Common criteria would improve consistency, and data collection should protect the privacy of some groups, including refugees and Indigenous Peoples.
- **Indicators should be disaggregated to the country level, wherever possible, with a consistent understanding of climate vulnerability.** Though LDCs and SIDS are discussed together throughout the NCQG text, their access to climate finance should be tracked and reported separately since combining them into a single vulnerable countries category risks masking meaningful differences in progress between them. Climate vulnerability also extends beyond LDCs and SIDS to other developing countries not captured by either classification. Agreement is needed on a common, multidimensional definition or index of climate vulnerability. Recognizing that existing vulnerability and risk indices assess climate impacts differently, this Concept Paper does not adopt or endorse any single definition. Country-level reporting, wherever possible, would allow progress to be interpreted for individual countries rather than only through group-level figures, which can obscure uneven progress across the different groups.

4. Predictability and Transparency

This dimension covers whether climate finance flows are reliable, consistent, and clearly communicated, enabling recipient countries to plan. When disbursement timelines, eligibility criteria, and funding availability are unclear or inconsistent, countries cannot make informed decisions about how to align national planning with available finance, undermining long-term planning (Clynes et al., 2024; United Nations Conference on Trade and Development [UNCTAD], 2024).

Candidate indicators for this dimension focus on the volume and share of finance delivered through multiyear, programmatic arrangements, and on the consistency and reliability of disbursement relative to what was approved. The following factors affect how these indicators should be interpreted and measured:

- **A large approved volume does not necessarily show whether finance is predictable from the recipient's perspective.** Indicators should distinguish between finance committed, approved, and disbursed, and consider whether funding is provided through a multiyear arrangement with an approved work plan, budget, and implementation schedule.
- ***Programmatic approaches* require common definitions.** *Programmatic* can refer to several models, including predictable multiyear country allocations, multicountry programs, or country-led investment plans. Common criteria are needed to distinguish these from stand-alone delivery and to assess whether finance is aligned with nationally identified priorities. Where providers already report programmatic finance, data are often available, but because each applies its own definition, the lack of common criteria remains a barrier to comparable reporting.
- **Delivery should be reported over the program life cycle.** Multiyear programs may disburse over several years, meaning that simple period-based ratios can understate performance. Cumulative disbursement should therefore be reported by approval cohort and compared among cohorts of the same age, to distinguish expected implementation sequencing from genuine delay.
- **Climate-specific disbursement tracking is methodologically, not just definitionally, constrained.** MDBs report climate finance as the climate share of an operation at commitment and activity level, with no separate climate-specific disbursement stream, making it difficult to link disbursements to climate components where tranches are tied to non-climate milestones. For MCFs, many of the data between approval and disbursement sit with implementing entities rather than the funds themselves, limiting comparability across funds with differing approval processes. In the near term, some providers may only have illustrative or partial disbursement data, rather than comprehensive coverage. This is an area for further methodological development, and climate-specific disbursement reporting could be phased in as data systems and common methods mature.

5. Process Efficiency

This dimension covers the speed, simplicity, and cost effectiveness of the procedures for accessing climate finance. This includes, but is not limited to, accreditation, application, approval, and disbursement. Procedural and administrative complexity—including lengthy accreditation timelines, burdensome documentation, and fragmented procedures across funds—creates high transaction costs that fall disproportionately on lower capacity recipients (Robertson, 2024; UNCTAD, 2024; Wubet et al., 2025). With over 100 bilateral and multilateral providers operating under different mandates and accreditation requirements, recipient countries must navigate a complex, inconsistent system that delays disbursements (Clynes et al., 2024; Concern Worldwide et al., 2024).

Candidate indicators for this dimension focus on application steps, approval and disbursement timelines, and the existence of streamlined or harmonized arrangements across providers. Several considerations affect how meaningfully these can be measured:

- **Standardized milestones and process-stage definitions are needed.** Cross-institutional comparability may be affected by differences in approval procedures, funding modalities, project size and complexity, and definitions of project milestones. Timelines should be reported using common stage definitions and, where possible, disaggregated by project size, access modality, or recipient type. Disaggregation by stage is needed to identify where delays arise, given that different stages are controlled by different actors, including applicants, accredited entities, implementing agencies, legal teams, and country-level processes.

  Multyear programmatic approvals also need a distinct denominator so that a single approval disbursed over several years is not penalized by period-based ratios designed for one-off projects.

- **Indicators should capture recipient-side burden, not only provider-side procedures.** The number of reports, application steps, or elapsed days may reflect formal requirements in a provider's process, but does not capture the staff time, technical capacity, or coordination required of recipient institutions. Reducing report numbers may not reduce the burden if remaining requirements are complex, duplicative, or poorly aligned with other providers. Similarly, the existence of a streamlining mechanism does not confirm that recipients use or benefit from it. Provider-side measures should be complemented, where feasible, by recipient-informed evidence on the time and effort required to apply for, manage, and report on finance.

- **Simplification should mean practical harmonization, not merely coordination.** Co-financing, joint platforms, and common frameworks do not necessarily reduce the requirements recipients face. Simplification and harmonization indicators should distinguish arrangements that result in a single or mutually recognized set of requirements from those that retain multiple parallel processes. This is particularly important where finance is delivered through several institutions or intermediaries.

- **Efficiency indicators should avoid unintended effects.** Indicators focused on speed or administrative simplicity could unintentionally favor easier, lower risk operations or better resourced recipients. Results should therefore be interpreted alongside recipient capacity, project



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complexity, financing modality, and the needs of LDCs, SIDS, and other vulnerable countries, since some higher risk applicants may require stronger oversight rather than simplification.

- **Process efficiency metrics are rarely publicly disclosed.** Though they likely exist internally, data on a provider's own procedures, such as application steps, streamlined arrangements, or standardized templates, are generally not published. Indicators requiring direct recipient-side evidence, such as staff time to complete an application or reporting requirement, would require new data collection, such as through recipient surveys.
- **Aggregation across institutions may be undesirable.** Given differences in mandates, project-cycle structures, financing modalities, and disbursement governance, these indicators may be more appropriate for tracking change within institutions over time than for direct cross-provider comparison.

Crosscutting Implementation Considerations

In addition to the dimension-specific findings above, consultations with institutions and preliminary data mapping surfaced several considerations that cut across multiple, or all five, access dimensions. They are summarized below to inform further consultation as this work progresses.

- **Application is actor specific, and aggregate progress tracking must consider diverse mandates.** Bilateral providers, IFIs including MDBs, and MCFs have differing mandates, governance arrangements, instruments, and access modalities with distinct rules and reporting obligations. Consultees highlighted that access provisions and indicators cannot be applied uniformly across institutions, and that aggregating results across entity types risks obscuring meaningful differences or creating unintended *de facto* rankings. Any future reporting framework should identify a limited set of common indicators where actors perform similar functions, such as allocating finance, supporting access channels, or translating approvals into delivery, while retaining actor-specific indicators and qualitative contextual

information where mandates or operating models materially affect interpretation.

- **Reporting burdens and recipient experiences should be incorporated.** Provider-side reporting cannot fully capture recipient experiences of application complexity, reporting burden, process efficiency, country ownership, and capacity support. However, new recipient surveys or feedback mechanisms could themselves increase burdens on resource-constrained countries. The preliminary data mapping suggests provider-side data—*finance volumes, processes, project-level details*—are largely reported or internally derivable, while recipient-side burden and capacity outcomes are more methodologically constrained. Any recipient-side data collection should build on existing mechanisms, including information on support received reported by developing countries in their biennial transparency reports, rather than create new burden. For example, the World Bank's Country Opinion Survey offers one possible model, and the upcoming review of the Enhanced Transparency Framework's Modalities, Procedures and Guidelines (expected to conclude by 2028) offers a natural entry point to consider incorporating recipient-side evidence into the wider transparency architecture.
- **Finance stages should be distinguished systematically.** Finance committed, approved, mobilized, and disbursed represent different stages and have different implications for assessing access. Commitment or approval may indicate availability and predictability, while disbursement is most relevant to whether finance is translated into delivery. Each indicator should specify its relevant stage and reporting boundary, particularly for indicators that currently combine approval and delivery measures. Where climate-specific disbursement data are not yet available or comparable, a future reporting framework should distinguish this methodological limitation from lack of disclosure and phase in such reporting as data systems and common methods develop.
- **Data ownership, attribution, and interoperability require clear reporting arrangements.** Access pathways often involve multiple actors, including applicants, intermediaries, accredited entities, implementing entities, MCFs, MDBs, and bilateral providers. Because the NCQG's provisions speak directly to bilateral providers, IFIs including MDBs, and MCFs, these three groups are the natural reporters to the SCF, but progress also depends on factors outside their control, such as recipient-country domestic processes. This raises questions about who collects, validates, and reports data, and how results should be attributed. For instance, a financial flow delivered through a national implementing entity or accredited intermediary raises the question of whether progress should be attributed to that local entity, to the MCF or provider that approved the finance, or reported and disaggregated for both. It also raises the risk of double counting where an MDB acts as an accredited or implementing entity for an MCF-approved project, since the same finance could appear in both institutions' figures. The same applies to bilateral contributions channeled through MCFs and MDBs, which could be counted both by the contributor and by the delivering institution.



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- **Thresholds, baselines, and targets need to be established.** Many NCQG access provisions are expressed qualitatively, without specified thresholds, baselines, or targets, leaving both the desired direction of change and a fixed reference point for "enough" progress undefined for several indicators—for example, what share of finance for LDCs and SIDS would represent sufficient progress. Volume-share indicators also need agreement on a consistent measurement basis—*nominal value, grant-equivalent value, project count,* or *disbursement*—since different bases will produce non-comparable results. Establishing baselines, targets, and a common measurement basis, while outside the scope of this Concept Paper, will be a necessary step to enable any future reporting framework.
- **Access tracking should build on existing reporting systems, not duplicate them.** NCQG-related access tracking should be interoperable with existing COP, UNFCCC, and provider reporting systems to reduce duplication and burden. Paragraph 32 of the NCQG decision asks the SCF to consider "all relevant and available data sources, such as information provided in biennial transparency reports and reporting based on project-level data," from MDBs, MCFs, and IFIs (UNFCCC, 2024a, para. 32). For bilateral providers, relevant channels include biennial transparency reports and Paris Agreement Article 9.5 communications (recently updated under Decision 10/CMA.7[2] to include access reporting). For MCFs, annual reports to the COP and CMA provide an existing channel. For MDBs, which have no formal reporting line to the CMA, the SCF could build on the data sources foreseen in paragraph 32, including the MDB Joint Report.
- **Accountability versus the relevance of NCQG paragraphs requires further consultation.** The NCQG text names specific actors for specific enhancements. Capacity building, for example, is explicitly called for from bilateral providers (UNFCCC, 2024a, para. 22b) but not emphasized for others. A dimension's absence from an actor-group paragraph does not mean it is unimportant to those actors' contribution: IFIs and MCFs can also shape capacity building in practice. Any final framework should distinguish what the text explicitly holds each actor accountable for from the broader set of actions relevant to enhancing access overall.

2. Paragraph (c)(ii) of the decision: Information on how support intended to be provided and mobilized contributes to the implementation of Decision 1/CMA.6, including information on intended efforts related to, inter alia, paragraphs 13, 15, 16, 17, 21, 22, 24, and 26 thereof, as applicable.



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Recommendations

This Concept Paper provides a technical and analytical basis for future discussions on reporting climate finance access under the NCQG. The five provisional access dimensions, the 32 candidate indicators with their indicator passports, and the preliminary data mapping developed in this Paper offer a foundation for future work. Subject to further consultation and validation, they can help the development of common definitions; identify which indicators could be reported early, and which require further methodological work; and inform the design of a future approach to access reporting under the NCQG.

The considerations outlined below are intended to serve as potential entry points for further work.

- **Undertake broader consultation and validation, including recipient-country perspectives.** Consultations to date have covered a subset of relevant stakeholders across provider types. Further exchanges could broaden this group and strengthen recipient-country representation, including LDCs and SIDS. Recipient-side evidence should build on existing mechanisms, such as developing countries' biennial transparency reports, which contain information on support received.

- **Further validate and refine the candidate indicators.** The candidate indicators provide a concrete basis for further consultation, which could examine whether these indicators adequately capture each access dimension; where they should be refined, combined, or removed; which could apply across provider types and which should remain actor-specific; and where safeguards against unintended effects are needed.
- **Verify data availability and indicator feasibility with providers.** The data mapping is preliminary and draws mainly on published sources and assumptions. Testing these results, or a subset of candidate indicators, with a small group of volunteer providers across bilateral providers, IFIs including MDBs, and MCFs could help confirm what data are held internally, clarify the reporting effort involved, and show where indicators or definitions need to be revised. The results would feed into further consultation on which indicators to take forward.
- **Develop common working definitions for key terms that are necessary to enable access measurement.** Alignment on key terms and concepts, such as what constitutes direct access and local entities, thresholds for *highly concessional finance*, and what qualifies as a *programmatic approach*, is necessary to enable consistent access reporting. This work could build on ongoing OECD-DAC, MDB, and MCF processes, including the OECD-DAC Working Party on Climate and Development Finance's work on grant-equivalent calculation and concessionality grading, its review of the Rio Markers, the reporting framework of the MDB Joint Report, and MCFs' own efforts to harmonize results and indicators across their mandates.
- **Establish common baselines, targets, and benchmarks.** Agreed baselines and a consistent measurement basis—for example, *nominal value, grant-equivalent value,* or *disbursement*—would allow progress on access to be interpreted consistently over time.

Beyond the areas identified above, the following considerations could support the development of an approach to reporting on access under the NCQG.

- **Use a phased implementation approach for the first reporting cycle in 2028.** This would distinguish between indicators ready for early reporting, those requiring improved disclosure or common methodologies, and those requiring new data-collection systems or longer term institutional changes.
- **Ensure interoperability with existing reporting systems.** As it develops its approach to access reporting, the SCF could build on existing channels outlined in the crosscutting considerations above, including the data sources foreseen in paragraph 32 of the NCQG decision, to reduce duplication and reporting burden, particularly for recipient countries.
- **Continuously improve across reporting cycles.** Access reporting will need to evolve as definitions, data systems, and methods mature. The special assessment of access to climate finance in 2030—*paragraph 34 of the NCQG decision*—offers a natural checkpoint to review the approach and indicators and adjust them for subsequent cycles.



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Measuring access is central to understanding whether the NCQG delivers finance that countries can actually obtain, manage, and use. This Concept Paper demonstrates that the NCQG's access provisions can be translated into measurable terms, and that reporting can build on the information providers already track. However, further work is needed to build consensus on indicators, develop common definitions and baselines, and move toward an agreed approach to access reporting. Taken forward collectively, this work can help ensure that NCQG reporting captures not only how much finance is provided, but who can access it and under what conditions.

The Concept Paper, which provides the full analytical framework, indicator passports, and Implementation Roadmap underlying this assessment, is available on request. Interested stakeholders may obtain a copy by contacting supportunit@ndcpartnership.org.

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