



Climate Action Network

## Preliminary assessment of the final list of potential Global Goal on Adaptation indicators

October 2025

*Climate Action Network (CAN) is a global network of more than 2000 civil society organisations in over 130 countries driving collective and sustainable action to fight the climate crisis and to achieve social and racial justice.*

*Climate Action Network (CAN) welcomes the final list of potential indicators, the UAE–Belém work programme on indicators for assessing overall progress towards achievement of the targets referred to in paragraphs 9–10 of decision 2/CMA.5. We appreciate the efforts and collective work of all the experts in refining the list of indicators to 100. For CAN, agreeing on a final list of robust and fit-for-purpose indicators is an essential outcome from COP30 for full operationalisation of the **Global Goal on Adaptation (GGA)**. In particular, the inclusion of Means of Implementation (Mol) Indicators is essential and central for measuring progress achieved towards the targets referred to in paragraphs 9–10 of decision 2/CMA.5.*

Drawing on [CAN's submissions](#)<sup>1</sup> and their demands, the following key criteria and principles guided this initial analysis of the final list to assess its adequacy, identify gaps, and ensure it can track progress towards the GGA.

### Criteria and Principles:

1. **Means of Implementation:** Do the indicators reflect the means of implementation necessary for effective and equitable adaptation? Particularly on the provision of finance, including quality, quantity and access, and in line with paragraphs 15 (h)-(i) of the SB62 draft conclusions (FCCC/SBSTA/2025/4)<sup>2</sup>.
2. **Measure clear, constructive and relevant progress:** Do the indicators measure clear progress on adaptation, including clear definitions, are easy to use and be interpreted and used for policymakers and non-experts. Do the indicators avoid incentivising maladaptive outcomes, undermining progress on other targets?
3. **Justice and Equity:** Do the indicators collectively make progress towards adaptation in line with the principles of Just Transition, assessing justice and equity, especially regarding impacts on vulnerable populations and the social inequalities? Does the

<sup>1</sup> [https://climatenetwork.org/wp-content/uploads/2024/04/CAN-Submission\\_UAE-Belem-Work-Programme-on-Indicators\\_April-2024.pdf](https://climatenetwork.org/wp-content/uploads/2024/04/CAN-Submission_UAE-Belem-Work-Programme-on-Indicators_April-2024.pdf)

<sup>2</sup> 15(h) - Indicators for means of implementation and other factors that enable the implementation of adaptation action are to be included, and those that are not relevant to the Paris Agreement are to be removed

15 (i) Indicators for means of implementation to measure (1) access, (2) quality and (3) adaptation finance, including provision, in line with the Paris Agreement, to help Parties address needs and gaps in implementing the global goal on adaptation

indicator allow for specific attention to the risks faced, and action to address these risks, for vulnerable populations, including women, children and youth, people with disabilities, Indigenous Peoples, and displaced people? And does the indicator contribute to measuring progress on the elimination of barriers and discrimination that exclude these people in vulnerable situations from effective adaptation?

## **Initial assessment of the indicators List**

The current indicators show a marked improvement and a welcome orientation towards adaptation outcomes. Provided means of implementation indicators can be strengthened (according to criteria (1), we support the adoption of the indicator list in Belem. In the spirit of balance and transparency, we also provide comments below relating to criteria 2 and 3 on ways in which the existing list could be further strengthened in the years to come.

### **1. Means of Implementation (Mol) indicators, especially on finance:**

As per the Paris Agreement, Means of Implementation includes provision of financial resources from developed to developing countries (Art. 9.1), support, including financial support, for technology development and transfer (Art. 10.6), as well as Capacity-building (Art. 11).

- a. The Means of Implementation, especially finance, are the backbone of achieving the GGA, particularly for developing countries. However, **in the current indicators list, there is an insufficient number of Mol indicators, and those included do not all track support from developed to developing countries.** Before diving into the options for Mol indicators, it is clear that any effort to measure progress under the GGA is fundamentally limited if the framework does not clearly account for the resources that make implementation possible. Absence of Mol targets leaves the framework incomplete, since without Mols, progress on other indicators will be infeasible, making any indicator abrupt and arbitrary, as there is no concrete baseline against which it can measure progress.
- b. The proposed **finance indicators measure finance flows in general, but they do not all specifically capture climate finance.** They conflate public, private, and national budget contributions, which is not in line with the Paris Agreement. This creates incoherence and risks blurring lines of accountability and responsibility.
- c. Lastly, Parties need to use this opportunity to address critical gaps in Mol indicators and ensure that the framework as a whole becomes implementable by revisiting their decision against including Mol targets.

### ***On the Mol options presented:***

- d. We acknowledge that owing to the limit of 100 indicators in total, including Mol sub-indicators under each thematic target, it might not be feasible. Hence, ensuring the disaggregation of the 10c indicators is absolutely crucial and needs to be **strongly emphasised** for tracking public finance provided and mobilised. The usage of the 10c MOI indicators as **cross-target indicators** (as proposed by the experts in their report) needs to be clearly stated in the CMA.7 decision text and highlighted in the adopted list of indicators to avoid misunderstanding or

disregard.

- e. Among the four options, *Option 3 10c06* – “Amount of international public finance for climate adaptation provided or mobilised by developed countries and received by developing countries for the implementation of national adaptation plans, policy instruments and planning processes and/or strategies per [time frame]” – and *Option 4 10c06*- “Amount of international public finance for climate adaptation provided by developed countries and received by developing countries for the implementation of national adaptation plans, policy instruments and planning processes and/or strategies per [time frame]” is the closest to CAN’s position. For *Option 3 10c06* to be credible, the baseline and common denominators must be firmly understood, including what counts as “provided” versus “mobilised,” how time frames are set, and how disbursements are distinguished from pledges. Noting that these are long-standing debates in the finance negotiations, it is important not to reopen them in the GGA context in a way that risks creating further fractures or reopening the Paris Agreement. The principles of Equity and CBDR-RC are a prerequisite, and the Global Goal on Adaptation framework should be grounded on those principles, hence.

- i. It is critical to include indicators measuring the quality of finance (e.g., access, whether they add to debt burdens, and whether they are predictable and long-term); however, the current list does not include any indicators that monitor the quality of finance for adaptation.
- ii. The inclusion of *10c08 Option 1* and *10c08 Option 2*, which incorporate private finance, is misaligned with the GGA mandate. Private finance flows are not governed by the UNFCCC’s accountability architecture, nor do they carry obligations under CBDR-RC.
- iii. The inclusion of indicators that include monitoring national spending is problematic from a sovereignty perspective and should be excluded.
- iv. Lastly, certain thematic targets do have an indicator assessing MoI, for example, *9b05 “Amount of climate adaptation finance disbursed to food and agriculture per year”*. In such cases, it is important to clarify the added value of including the MoI indicators under the thematic target. They would need to track flow to high-quality finance, for example, for food systems based on agroecological practices or shifting finance from harmful practices, such as the shift in subsidies from industrial agriculture to agroecology.

- 2. **Measure clear, constructive, and relevant progress:** The indicator list needs to be further strengthened with regard to clarity and implementation.

- a. Many indicators track the mere existence of strategies, policies or reporting mechanisms, rather than whether these instruments are producing tangible adaptation outcomes. While we acknowledge the limited science on climate attribution and other challenges, we must strive for clear definitions of concepts, baselines, and adaptation relevance and agree on indicators that measure real progress.

***Taking 9(b) indicators as an example:***

- i. Most indicators lack clear definitions of key terms (e.g., what counts as a “climate-resilient practice” in 9b01, who is an “actor” in 9b02, what constitutes an “institutional framework” in 9b03, or what qualifies as “direct agricultural loss” in 9b10). Improving clarity here will facilitate data aggregation between countries.
- ii. Existence, Not Quality: Indicators often measure whether something exists, not how effective or sustainable it is (e.g., 9b03 counts frameworks regardless of functionality; 9b04 records policies without assessing readiness or financing; 9b05 tracks money without differentiating by instrument or terms).
- iii. Undefined Denominators: Indicators that use percentages often lack a stable denominator (e.g., total number of actors in 9b02, total agricultural land in 9b01/9b06, total Parties in 9b04). Small shifts in definitions can distort trends.

***On NAPs specifically:***

- iv. Given that a NAP tracking system is already in place, purely tracking the existence of NAPs reduces the process to box-ticking exercises, providing a false sense of progress without capturing real-world adaptation impacts on communities, ecosystems, or resilience-building efforts. However, we also recognise the value of tracking these elements and therefore propose consolidating such indicators and merging them.
  - b. At present, beyond the challenges with Mol indicators outlined above, there are no indicators which seem to undermine progress in other areas. That said, this should remain an area to which Parties and experts are sensitised as operationalisation begins.
3. **Justice and Equity:** Many indicators do include a social dimension, but the link still needs to be strengthened in terms of adaptation relevance.
- a. The indicators under **9(f) include social and social protection measures, but** further clarification may be needed when measured at the national level. In general, balance does exist in terms of inclusion of and shift in vulnerability of communities at risk.
  - b. Disaggregation is crucial to measure progress towards a more climate-resilient and just world. Parties should be encouraged to disaggregate as many indicators as possible. Only by measuring how different social groups are affected and protected will the Paris Agreement principles of Justice and Equity be achieved. We wish to highlight indicators 10b04 and 10b05 as important examples, as people of all genders, as well as Indigenous Peoples, need to be properly represented in Adaptation Planning and implementation.

## **Conclusion:**

From the Preliminary Assessment, Climate Action Network recommends the following

1. The indicators are about measuring progress, including Mol, and how, through enhanced adaptation action, we are addressing the needs of the vulnerable communities and delivering justice and equity. Specifically, CAN calls for sharper, stronger and balanced Mol indicators and strongly advises against reopening the full list of indicators, instead focusing solely on addressing concerns relating to Means of Implementation (Mol) indicators.
2. On the Means of Implementation (Mol) indicators, CAN urges parties to work on clear definitions of Mol in line with the Paris Agreement and the principle of CBDR-RC - making a case that Mol in this regard is an international provision, especially from developed to developing countries, and
  - a. Strengthen existing Mol indicators to ensure they effectively measure the provision and receipt of support (finance, technology, capacity-building) and are actionable.