

# **Considerations for Selecting Indicators for the UAE Framework for Global Climate Resilience**

# **Discussion paper**

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Center for Climate and Energy Solutions

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# A. Summary

- Parties agreed to a framework for the Global Goal on Adaptation (*GGA*)—known as the UAE Framework for Global Climate Resilience (*UAE Framework*)—at the 5<sup>th</sup> Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (*CMA5*) in Dubai (December 2023). The purpose of the UAE Framework is to guide the achievement of the GGA and review its overall progress. Seven thematic and four iterative adaptation cycle targets were agreed to as part of the UAE Framework (See Annex 1).
- Under the two-year UAE-Belém work programme to collect and map indicators for monitoring progress under targets for the UAE Framework—which concludes at CMA7 (November 2025)—the Subsidiary Bodies (*SB*) Chairs mandated 78 experts to refine or develop relevant indicators. As of September 2024, 5304 indicators were compiled, many overlapping. The current goal is to reduce this to 100 indicators, and the selection process is ongoing.
- 3. At the 62<sup>nd</sup> Subsidiary Bodies (*SB62*) in June 2025, Parties will continue deliberations on the outcomes from the UAE–Belém work programme in preparations for CMA7, where the indicators will be considered and adopted.
- 4. This paper examines considerations for selecting the 100 indicators under the UAE Framework and explores a number of emerging issues that are complicating efforts to do so. These emerging issues include: data gaps; the context-specific nature of certain indicators; questions around whether expert work should continue beyond SB62; the level of ambition intended for the indicators; and concerns regarding metadata.

#### **Questions for Consideration**

- What emerging issues within the UAE Framework indicators discussions are important to address?
- Given the criteria agreed at COP28 and COP29, what else needs to be considered to get to 100 indicators, if anything?
- Should additional work continue post-SB62 and post-COP30? If yes, what would that entail?

#### Considerations to reduce the number of indicators

In addition to the agreed criteria from CMA5 and CMA6 (see Annex II), other considerations for selecting the 100 indicators could include:<sup>1</sup>

- promoting equity for a fair and inclusive selection process
- prioritizing indicators that have the highest potential in the short- and long-term
- identifying cost effectiveness and time efficiency
- identifying shortcomings and gaps, and avoiding maladaptation
- ensuring indicators are globally applicable yet flexible for national circumstances
- enhancing engagement and ensuring action and support
- ensuring high usability
- supporting and catalyzing further development and refinement of indicators.

# **B.** Context

- 5. Article 7.1 of the Paris Agreement established the GGA to enhance adaptive capacity, strengthen resilience, and reduce vulnerability. At CMA3 (November 2022), Parties decided to establish and launch the two-year Glasgow–Sharm el-Sheikh work programme on the GGA, with several key objectives that focused on furthering the understanding of the GGA and its application.<sup>2</sup> Further, at CMA4 (November 2023), Parties decided to initiate the development of a framework for the GGA as part of the Glasgow–Sharm el-Sheikh work programme, containing a set of elements.<sup>3</sup>
- 6. Parties adopted the UAE Framework at CMA5. Its purpose is to guide the achievement of the GGA; reduce the increasing adverse impacts, risks, and vulnerabilities associated with climate change; and to enhance adaptation action and support.<sup>4</sup> The decision sets out seven thematic and four iterative adaptation cycle targets that sit under the GGA (see Annex I). The targets are meant to accelerate swift action at all levels, from local to global.
- 7. Further, Parties and observers were encouraged to submit views on which indicators could be used for assessing the targets under the UAE Framework and requested the UN Framework Convention on Climate Change (UNFCCC) Secretariat to synthesize these submissions by the 60<sup>th</sup> Subsidiary Bodies (SB60). At CMA5, Parties also decided to launch a two-year UAE–Belém work programme on developing indicators for measuring progress achieved toward the targets.<sup>5</sup> In the decision, Parties also requested that the SB chairs organize workshops to assist with the development of the indicators under the work programme.
- 8. At SB60 in June 2024, Parties: (i) further elaborated the modalities and requested an expert group to give input to the development of the indicators in three additional workshops;<sup>6</sup> and (ii) agreed a set of criteria for the compilation and mapping of existing indicators relevant to measure the targets



under the UAE Framework, including information on areas not covered by existing indicators (see Annex II).<sup>7</sup>

- 9. Additionally, the UAE–Belém work programme found that the agreed criteria was insufficient in collecting and mapping the indicators.<sup>8</sup> The program also noted that it would be useful to have additional criteria, such as global relevance and measurability, and questioned whether some criteria should take precedence over others.
- 10. At CMA6, the Parties: (i) identified additional criteria for consideration by the experts in refining existing and developing new indicators for the GGA Framework (see Annex II); and (ii) discussed the contentious issue of whether indicators on means of implementation (*MOI*)—capacity building, finance, and technology transfer—could be agreed under the UAE Framework. Parties found a compromise that a broader set of indicators for 'enabling factors for the implementation of adaptation action, including MOI should be included in the final outcome under the UAE–Belém work programme, if applicable.'<sup>9</sup> The Parties also agreed to limit the number of indicators under the UAE Framework to 100.
- 11. The SB Chairs tasked a group of mandated experts with developing a consolidated list of indicator options for Parties to consider at SB62 in June 2025, to be published four weeks prior to the meeting. The technical expert group is meant to reduce the political challenges with the GGA, such as Parties' different opinions on what the GGA is meant to achieve, and whether it should be geared toward tracking global finance for adaptation.
- 12. The Parties have agreed to a set of criteria for the compilation and mapping of existing indicators relevant to measure the targets under the UAE Framework.<sup>10</sup> This exercise is technical in nature and is undertaken by the expert group.<sup>11</sup>
- 13. Three workshops under the UAE–Belém work programme have taken place. The fourth workshop is scheduled to take place before SB62 to take stock of the progress of the experts; a final workshop is scheduled to take place between SB62 and SB63. At CMA7 (November 2025) at the latest, Parties are expected to consider and adopt the indicators under the UAE Framework.

# C. Emerging Issues

- 14. A number of emerging issues complicate efforts to streamline the indicators under the UAE Framework ahead of CMA7. These include:
  - data gaps
  - the context-specific nature of certain indicators
  - questions around whether expert work should continue beyond SB62
  - the level of ambition intended for the indicators
  - concerns regarding metadata.

#### Data Gaps and Metadata

15. The current compilation of indicators reveals that there are limitations in data and methodologies. As the UNFCCC Secretariat highlighted in its report, 83 percent of the indicators do not have available information on their associated methodologies.<sup>12</sup> Further, information is low on data readiness levels: only 14 percent of the indicators have this type of information. Of these, only 2 percent were moderately ready for use. Additionally, 6 percent of the submitted indicators were 'new' (i.e., not found in existing frameworks, reports or national adaptation plans (*NAPs*)).



- 16. Indicators might, for example, lack sufficient data to respect human rights and reflect the perspectives of Indigenous Peoples, as significant data gaps remain for Indigenous Peoples.
- 17. However, data collection for these indicators will be crucial. Parties must consider whether they are willing to adopt indicators at COP30 that lack data readiness. This may present a challenge in light of the COP29 decision, which emphasizes the importance of data readiness.<sup>13</sup>
- 18. There are also issues with metadata, particularly regarding attribution of certain collected data. The experts groups could require additional guidance on how to address the ongoing issues with metadata.

#### **Context Specific: Global Versus National**

- 19. Several Parties have raised concerns regarding the global applicability of the indicators, noting that they should reflect national circumstances. One proposed approach is to allow Parties to select from a menu of indicators tailored to their specific contexts. However, this raises an important question: Should Parties be permitted to choose indicators based on their national circumstances, or would such flexibility undermine the global comparability and consistency of the indicators?
- 20. Another key question is how to ensure that the data from the indicators have global applicability, while also allowing for disaggregation that provides granularity, reflects national circumstances, and remains relevant for national and local actors. This ties into the broader issue of whether there are indicators that could drive increased action and support at various levels—national, sub-national, regional, and global—including fostering private sector investment.
- 21. Indicators related to MOI continue to be contentious. However, the COP29 decision suggests that Parties and experts should, if necessary, develop or identify indicators that address enabling factors for the implementation of adaptation action, including MOI.

#### **Reporting Burdens for Vulnerable Developing Countries**

- 22. There is concern that the implementation of these indicators may create reporting burdens for vulnerable developing countries, including for Least Developed Countries (*LDCs*) and Small Island Developing States (*SIDS*).
- 23. The COP29 outcome called for Parties to update their adaptation communications and submit biennial transparency reports (*BTRs*) in line with the UAE Framework.<sup>14</sup> A key question is whether reporting on the indicators should be made mandatory, and if so, whether it should be done through a single reporting mechanism. As a result, will the BTRs become the primary vehicle for reporting on these indicators?<sup>15</sup>
- 24. Further, the Paris Agreement cemented a flexible approach to adaptation communications, ensuring that each Party's national circumstances and choices determine the vehicle for reporting on adaptation. The need for flexibility will need to be weighed against the benefits of having one vehicle of reporting on the adaptation indicators, for ease of collecting the data.<sup>16</sup>

#### **Role of the Experts**

25. Progress reports on the indicators from the expert groups will be published six weeks prior to SB62.<sup>17</sup> There is a question about whether the experts' work should be extended beyond SB62 and even if it should carry on beyond COP30. This ambiguity needs to be addressed by the Parties under the guidance of the SB Chairs to ensure clear expectations and alignment with the overall work programme.



26. Following SB62, there may be a need to reflect on whether Parties are on track to reach an agreement at CMA7. This will help identify gaps or areas of concern that need to be addressed to ensure the successful adoption and implementation of the indicators by the time of CMA7.

#### Level of Ambition: Short Term Versus Long Term

- 27. Questions remain regarding the appropriate level of ambition and the timeline associated with each indicator. With 2030 fast approaching, there is an urgent need to clarify whether these indicators are intended to drive short-term progress, align with medium-term milestones, or support long-term transformative change. Establishing a clear timeframe is essential for ensuring accountability and guiding Parties in setting realistic yet ambitious targets. There are also questions whether these indicators can be readjusted over time.
- 28. Indicators should reflect the highest possible level of ambition in line with the objectives of the UAE Framework. Indicators that can catalyze immediate action while contributing to sustained, long-term outcomes will be most effective in advancing the UAE Framework. Striking this balance is crucial to support Parties in aligning national activities with the global applicability of the UAE Framework.

### D. Considerations for Selecting the 100 Indicators

- 29. The work under the UAE–Belém work programme in developing the compilation of the indicators for the UAE Framework resulted in 5304 indicators as of September 2024, of which around 40 percent were overlapping between the different targets.<sup>18</sup>
- 30. A consolidated list of indicator options will be presented at SB62. As the Parties have agreed to limit the number of indicators to 100, prioritization of the indicators is therefore pending.
- 31. As a response to the lack of data availability and methodologies, Parties could decide that the UAE Framework should be an iterative process that ensures continuous enhancement of the indicators and related methodologies. This is particularly pertinent given that the IPCC is currently revising its 1994 IPCC Technical Guidelines on impacts and adaptation as well as adaptation indicators, metrics, and guidelines.<sup>19</sup>
- 32. Regarding the issue that there are few indicators reflecting Indigenous Peoples' knowledge and participation, Parties could decide that the importance of having these indicators should be prioritized over the need for 'already available' indicators.
- 33. Concerning the creation and development of new GGA-specific indicators, there are several new areas that could benefit from development, including (but not limited to): regions (mountains and desert areas); climate education and public awareness; transboundary cooperation; tracking MOI; human mobility and displacement; child nutrition/poverty; and oceans.<sup>20</sup>
- 34. The selection of indicators could also be guided by the long-held notion of giving special consideration to the most vulnerable developing countries, including SIDS and LDCs, and taking into account vulnerable groups, communities, and ecosystems.<sup>21,22</sup> In this regard, Parties may wish to consider agreeing, at COP30, on a dedicated support mechanism for SIDS and LDCs to ease reporting requirements related to the indicators under the UAE Framework.
- 35. Parties will need to consider if they should ensure that the indicators do not duplicate existing reporting frameworks, such as the Sustainable Development Goals (*SDGs*), the Sendai Framework, and the Convention on Biodiversity (*CBD*) nor increase the reporting burden on developing countries.



- 36. Consideration should be given to reduce the number of indicators by focusing on those that best meet the agreed criteria from CMA5 and CMA6 (See Annex II). Additional considerations for selecting the 100 indicators could also include:
  - promoting equity for a fair and inclusive selection process
  - prioritizing indicators that have the highest potential in the short-term and long-term
  - identifying cost effectiveness and time efficiency
  - identifying shortcomings and gaps, and avoiding maladaptation
  - ensuring indicators are globally applicable yet flexible for national circumstances
  - enhancing engagement and ensuring action and support
  - ensuring high usability
  - supporting and catalyzing further development and refinement of indicators.
- 37. Looking ahead, work following SB62 will be vital in shaping the final structure and utility of the UAE Framework. However, it remains uncertain whether this process will continue beyond COP30, making the outcomes of this next phase even more critical.

# E. C2ES Resources

- Issues and Options to Develop Modalities for the Baku Adaptation Roadmap <u>https://www.c2es.org/wp-content/uploads/2025/04/C2ES-Baku-Adaptation-Roadmap-Submission.pdf</u>
- Transformational Adaptation at COP29: Issues and Options <u>https://www.c2es.org/document/transformational-adaptation-for-cop29-issues-and-options/</u>
- Enhancing Action & Cooperation for Early Warning Systems
  <u>https://www.c2es.org/document/enhancing-action-international-cooperation-for-early-warning-systems/</u>
- Enhancing Action & Cooperation for Halting and Reversing Deforestation and Forest Degradation

https://www.c2es.org/document/enhancing-action-international-cooperation-for-halting-andreversing-deforestation-and-forest-degradation/

- Enhancing Action & Cooperation for Sustainable Agriculture and Resilient Food Systems <u>https://www.c2es.org/document/enhancing-action-cooperation-for-sustainable-agriculture-resilient-food-systems/</u>
- Options for a Politically Salient Headline for the GGA
  <a href="https://www.c2es.org/document/options-for-a-politically-salient-headline-for-the-global-goal-on-adaptation/">https://www.c2es.org/document/options-for-a-politically-salient-headline-for-the-global-goal-on-adaptation/</a>
- The Global Goal on Adaptation at COP28 <u>https://www.c2es.org/wp-content/uploads/2023/11/GGA-Outcomes-Technical-Paper.pdf</u>



# F. Annex I: List of Targets Agreed Under the UAE Framework for Global Climate Resilience

Parties have agreed to several thematic and dimensional targets under the UAE Framework for the GGA. **Thematic Targets** 

- 1. Significantly reducing climate-induced **water** scarcity and enhancing climate resilience to waterrelated hazards toward a climate-resilient water supply, climate-resilient sanitation and toward access to safe and affordable potable water for all.
- 2. Attaining climate-resilient **food and agricultural** production and supply and distribution of food, as well as increasing sustainable and regenerative production and equitable access to adequate food and nutrition for all.
- 3. Attaining resilience against climate change related **health** impacts, promoting climate-resilient health services, and significantly reducing climate-related morbidity and mortality, particularly in the most vulnerable communities.
- 4. Reducing climate impacts on **ecosystems and biodiversity**, and accelerating the use of ecosystembased adaptation and nature-based solutions, including through their management, enhancement, restoration and conservation and the protection of terrestrial, inland water, mountain, marine, and coastal ecosystems.
- 5. Increasing the resilience of **infrastructure and human settlements** to climate change impacts to ensure basic and continuous essential services for all, and minimizing climate-related impacts on infrastructure and human settlements.
- 6. Substantially reducing the adverse effects of climate change on **poverty eradication and livelihoods**, in particular by promoting the use of adaptive social protection measures for all.
- 7. Protecting **cultural heritage** from the impacts of climate-related risks by developing adaptive strategies for preserving cultural practices and heritage sites and by designing climate-resilient infrastructure, guided by traditional knowledge, Indigenous Peoples' knowledge, and local knowledge systems.<sup>23</sup>

#### Dimensional Targets Relevant to the Iterative Adaptation Cycle

- 8. Impact, vulnerability, and risk assessment: by 2030 all Parties have conducted up-to-date assessments of climate hazards, climate change impacts and exposure to risks and vulnerabilities and have used the outcomes of these assessments to inform their formulation of national adaptation plans, policy instruments, and planning processes and/or strategies; and by 2027 all Parties have established multi-hazard early warning systems, climate information services for risk reduction, and systematic observation to support improved climate-related data, information, and services.
- 9. **Planning:** by 2030 all Parties have in place country-driven, gender-responsive, participatory, and fully transparent national adaptation plans, policy instruments, and planning processes and/or strategies, covering, as appropriate, ecosystems, sectors, people, and vulnerable communities, and have mainstreamed adaptation in all relevant strategies and plans.
- 10. **Implementation:** by 2030 all Parties have progressed in implementing their national adaptation plans, policies and strategies and, as a result, have reduced the social and economic impacts of the key



climate hazards identified in the assessments referred to [in para 8 on impact, vulnerability, and risk assessment] above.

11. **Monitoring, evaluation, and learning:** by 2030 all Parties have designed, established, and operationalized a system for monitoring, evaluation, and learning for their national adaptation efforts and have built the required institutional capacity to fully implement the system.<sup>24</sup>



# G. Annex II: Agreed Criteria for Compilation and Mapping of Indicators

- 1. The Parties have agreed a set of criteria for the compilation and mapping of existing indicators relevant to measure the targets under the UAE Framework, including information on areas not covered by existing indicators, and these are as follows:<sup>25</sup>
  - the relevance of the indicators to measuring progress toward one or more of the targets
  - the specific relevance of the indicators to adaptation, including enhancing adaptive capacity, • strengthening resilience, and reducing vulnerability to climate change
  - whether quantitative and/or qualitative information applies to the indicators •
  - data availability for the indicators •
  - the ability of the indicators to reflect regional, national, and local circumstance •
  - the applicability of the indicators across different contexts •
  - the ease of interpretation of the indicators •
  - the clarity of methodologies associated with the indicators •
  - the ability of the indicators to be aggregated across levels and disaggregated by demographic and • socioeconomic characteristics, such as vulnerability, gender, age, disability, race, socioeconomic status, and status as Indigenous Peoples, as appropriate and depending on national circumstances
  - the indicators' basis on the best available science
  - the indicators' basis on traditional knowledge, Indigenous Peoples' knowledge, and local • knowledge systems
  - that the indicators should not be used as a basis for comparison between Parties.
- 2. Further, at the 6<sup>th</sup> Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA6), the Parties identified additional criteria for consideration by the experts in refining existing and developing new indicators for the UAE Framework:<sup>26</sup>
  - the measurability and availability of data enabling the transparent monitoring of progress
  - the ability to use data that are already available or can be easily collected by countries, including • data from international databases and standardized reporting practices
  - the use of metrics where baselines exist
  - the relevance to multiple thematic targets
  - outcome and output orientation.



## **H.** References

<sup>4</sup> UNFCCC, Global goal on adaptation, Decision 2/CMA.5, ¶ 7 (March 15, 2024),

https://unfccc.int/documents/637073.

<sup>6</sup> UNFCCC, Report of the Subsidiary Body for Scientific and Technological Advice on its sixtieth session, held in Bonn from 3 to 13 June 2024, FCCC/SBSTA/2024/7, ¶¶ 30–63 (July 30, 2024), <u>https://unfccc.int/documents/640211</u>

<sup>7</sup> UNFCCC, Report of the Subsidiary Body for Scientific and Technological Advice on its sixtieth session, held in Bonn from 3 to 13 June 2024, FCCC/SBSTA/2024/7,  $\P$  41.

<sup>8</sup> UNFCCC, Workshop under the UAE–Belém work programme on indicators and refined mapping of indicators, ¶ 5 (November 9, 2024), <u>https://unfccc.int/sites/default/files/resource/sb2024\_06\_adv.pdf</u>.

<sup>9</sup> UNFCCC, Global goal on adaptation, Decision -/CMA.6, ¶ 21 (g) (November 24, 2024),

https://unfccc.int/documents/644457 (Advanced Unedited Version).

<sup>10</sup> UNFCCC, Report of the Subsidiary Body for Scientific and Technological Advice on its sixtieth session, held in Bonn from 3 to 13 June 2024, FCCC/SBSTA/2024/7, ¶ 41.

<sup>11</sup> UNFCCC, Refined Indicator Mapping (v2)- UAE- Belém Work Programme (November 9, 2024),

<u>https://unfccc.int/documents/642669</u>. For example, expert presentations at the third workshop under UAE-Belem work programme on indicators: "Third Workshop under the UAE–Belém work programme on indicators", UNFCCC, accessed on March 24, 2025, <u>https://unfccc.int/event/workshop-uae-belem-wp-indicators</u>.

<sup>12</sup> UNFCCC, Workshop under the UAE–Belém work programme on indicators and refined mapping of indicators, ¶ 4. <sup>13</sup> UNFCCC, Global goal on adaptation, Decision-/CMA.6, ¶17(a).

<sup>14</sup> UNFCCC, *Global goal on adaptation*, Decision-/CMA.6, ¶34.

<sup>15</sup> This is in opposition of the nationally driven nature of adaptation reporting and could lead to an increased reporting burden.

<sup>16</sup> For example, it should be noted that reporting under the National Adaptation Plan process includes many of the elements under the UAE Framework for Global Climate Resilience, potentially leading to a heavier reporting burden if Parties agree to create mandatory reporting through one specific vehicle, such as the Biannual Transparency Reports.

<sup>17</sup> UNFCCC, *Global goal on adaptation*, Decision-/CMA.6, ¶14.

<sup>18</sup> UNFCCC, *Refined Indicator Mapping (v2)- UAE- Belém Work Programme* (November 9, 2024), <u>https://unfccc.int/documents/642669</u>.

<sup>19</sup> "Intergovernmental Panel on Climate Change [hereinafter IPCC] agrees on outlines of three key contributions to the Seventh Assessment Report", IPCC, March 1, 2025, <u>https://www.ipcc.ch/2025/03/01/ipcc-agrees-outlines-of-three-key-contributions-to-ar7/</u>.

<sup>20</sup> UNFCCC, Workshop under the UAE–Belém work programme on indicators and refined mapping of indicators, ¶ 4.



<sup>&</sup>lt;sup>1</sup> "Key Takeaways from the CCXG Global Forum on the Environment and Climate Change 18-19 March 2025", Organization for Economic Cooperation and Development [hereinafter OECD] Climate Change Expert Group, accessed April 18, 2025, <u>https://www.oecd.org/content/dam/oecd/en/events/2025/03/global-forum-on-the-environment-and-climate-change-march-2025/Key-takeaways-GFE-March-2025.pdf.</u>

<sup>&</sup>lt;sup>2</sup> UN Framework Convention on Climate Change [hereinafter UNFCCC], *Glasgow–Sharm el-Sheikh work programme* on the global goal on adaptation referred to in decision 7/CMA.3, Decision 7/CMA.5 (December 2023), <a href="https://unfccc.int/sites/default/files/resource/cma5">https://unfccc.int/sites/default/files/resource/cma5</a> auv 8a gga.pdf.

<sup>&</sup>lt;sup>3</sup> These elements reflected (i) the dimensions of the iterative adaptation cycle; (ii) thematic areas, hereunder water, food and agriculture; cities, settlements and key infrastructure; health; poverty and livelihoods; terrestrial and freshwater ecosystems; and oceans and coastal ecosystems; tangible cultural heritage; mountain regions; and biodiversity; and (iii) sources of information such as Party submissions and reports of the Intergovernmental Panel on Climate Change.

<sup>&</sup>lt;sup>5</sup> UNFCCC, *Global goal on adaptation*, Decision 2/CMA.5, ¶ 9-10.

<sup>21</sup> UNFCCC, UNFCCC, FCC/INFORMAL/84/Rev.1, Article 3 ¶2 (May 9, 1992),

https://unfccc.int/sites/default/files/convention text with annexes english for posting.pdf.

<sup>22</sup> For example, indicators that reflect vulnerability could be favored over others, if it proves difficult to choose the right indicators. Parties could also ensure that the most vulnerable countries, groups, and communities are given special consideration for the activities connected with implementing the UAE-Belem work programme, such as data collection and reporting activities.

<sup>23</sup> UNFCCC, Global goal on adaptation, Decision 2/CMA5, ¶ 9.

<sup>24</sup> UNFCCC, Global goal on adaptation, Decision 2/CMA5, ¶ 10.

 $^{25}$  UNFCCC, Report of the Subsidiary Body for Scientific and Technological Advice on its sixtieth session, held in Bonn from 3 to 13 June 2024, FCCC/SBSTA/2024/7, ¶ 41.

<sup>26</sup> UNFCCC, *Global goal on adaptation*, Decision -/CMA.6, ¶ 17(a)-(e).

