10 October 2025

English only

Human Rights Council

Expert Mechanism on the Right to Development
Twelfth session
27–29 October 2025
Item 5 of the provisional agenda
Implementation of the mandate and programme of work

Climate Finance: Vulnerability and Responsibility

Draft Study by the Expert Mechanism on the Right to Development

Summary

The study analyses processes and innovative practices that contribute to financing climate transition and development at different levels, identifying the conditions under which they are compatible with the right to development. It examines the implementation of mechanisms established under the Kyoto Protocol and pays special attention to Article 6 of the Paris Agreement pertaining to carbon markets. This, to assesses the conditions that can mobilize additional resources and revenues to support a just transition and the necessary adaptation to climate change, in accordance with the principles of the right to development, and a focus on participation, human-centred development, transparency, equality, and sustainability.

The study also refers to clean cooking initiatives, which contribute to CO^2 mitigation, forest preservation and the improvement of millions of women's life. It further explores the extraction, refining and supply chains of critical minerals, essential tools for climate transition and possible sources of revenues for producers developing countries. A final focus is placed on the actions and enabling conditions for the repatriation of illicit financial flows to developing countries, as a means to support climate adaptation and transition efforts.

The study draws upon a diverse range of sources, including observations; expert panels; UN reports, data and materials, as well as bilateral and multilateral dialogues. It further incorporates the contributions received from the wide-range of stakeholders who responded to the relevant call for input.

Please recycle

I. Introduction

1. The Expert Mechanism study "Climate Justice, Sustainability and the Right to Development" (A/HRC/60/95) considers climate change an existential planetary threat and a shared concern of humanity that poses profound challenges to human rights, particularly to the right to development.

2. Integrating climate justice principles into just transition processes enables societies to establish more inclusive and equitable pathways toward sustainable development. However, a just transition must move beyond theory and be supported by robust, targeted climate finance mechanisms. These mechanisms are essential to uphold the right to development, a fundamental right of both communities and individuals who are increasingly and disproportionately affected by climate change. The negative impacts of climate change are further exacerbated by the reductions in pledged Official Development Assistance (ODA) by several developed countries. This poses additional challenges to achieving climate and development goals.

3. The present study complements studies on Climate Justice by the Expert Mechanism (A/HRC/60/95) and the Special Rapporteur on the right to development,[1] respectively. The latter explores the issue of loss and damages and the measures that States, international financial institutions, multilateral development banks and businesses should take to address them.

4. This study analyses certain processes and innovative practices that could contribute to financing climate transition and development at different levels and examines the conditions under which they are compatible with the right-to-development principles.

5. The present study undertakes a detailed examination of the implementation of mechanisms established under the Kyoto Protocol, guided by the principle of "common but differentiated responsibilities." Special attention is given to Article 6 of the Paris Agreement which pertains to carbon markets. The aim is to assess how and under which conditions these initiatives can mobilize additional resources and revenues to support a just transition and the necessary adaptation to climate change. This is done in accordance with the principles of the right to development, and a focus on participation, human-centred development, transparency, equality, and sustainability.

6. This study draws upon a diverse range of sources, including observations; expert panels; United Nations reports, data and materials, as well as bilateral and multilateral dialogues. It also incorporates contributions from a wide-range of stakeholders including States, civil society organizations, and think-tanks who responded to the relevant call for input. Participation in several international climate-development related conferences has additionally informed the study's findings and perspectives.

7. A right-to-development perspective requires taking into consideration the deep connections between climate change and broader social, economic and development challenges. Therefore, the study also explores several potential sources and challenges related to climate and development finance. These include the conditions surrounding the extraction, refining and supply chains of critical minerals, which are essential tools for climate transition and possible sources of revenues for producers developing countries. The study also highlights clean cooking initiatives, which contribute simultaneously to CO^2 mitigation, forest preservation and the improvement of millions of women's lives. A final focus is placed on the actions and enabling conditions for the repatriation of illicit financial flows to developing countries, as a means to support climate adaptation and transition efforts.

II. Relationships between climate finance and the right to development

8. Countries with the highest, current and cumulative, greenhouse gas (GHG) emissions bear the greatest historical responsibility. Specific and dedicated climate finance is

1. A/79/168

particularly necessary to address the asymmetry between these countries and those that emit the least and are most affected by the consequences of GHG emissions.

9. Without additional investment in the transition to low-carbon technologies, renewable energies, biodiversity protection and the phase-out of fossil fuels, both in producing and consuming countries, the current development financing tools will be largely insufficient to meet the social and economic development needs outlined in the 2030 Agenda.

10. Countries around the world are facing increasingly severe social, environmental and economic impacts from extreme weather events, such as droughts, floods, forest fires, rising sea levels, population displacement, and infrastructure damage. However, low-lying countries and small islands States are particularly vulnerable to these events, among others due to their populations' dependency on fishing and agriculture, activities that are particularly sensitive to climate change. These challenges should be addressed but there is a financial gap as recently recognize in the Seville compromise which explicitly mentions the "Baku to Belem Roadmap" (adopted at COP29 in Baku). This estimates climate financing needs at $1.3 billion. Accordingly, climate finance is expected to be a central issue at COP 30 in November 2025.

11. Tailored and effective climate financing is all the more necessary for countries and communities that are particularly vulnerable to climate-change impacts, at a time when recent shifts and reductions in ODA (due to changing political priorities) have put development cooperation under severe strain. It is important to note that ODA commitments were already falling short of targets, and while there is an increase in South-South cooperation, this does not replace North-South cooperation.

12. The rather drastic reduction in the volume of ODA comes at a time when multilateralism is being undermined and the implementation of international law is being called into question, against a backdrop of debate on decolonisation. In terms of both climate and development, this context implies profound changes in the relations among partners and highlights the imperative need to generate new resources.

13. Climate finance is thus the new flux of money, but predominantly delivered as loans with a large share of which has been non-concessional. In other words, much of the financing for adaptation and transition rests on the shoulders of the countries that are most affected and least responsible.

14. A fair and equitable approach to climate finance should be aligned with the right-to-development principles including States' duty to cooperate. In terms of climate finance, this is also enshrined in Article 4 of the UN Framework Convention on Climate Change (UNFCC) which establishes that developed countries shall provide adequate, new and additional climate finance to developing countries, coupled with technology transfer and capacity building. This responsibility is crucial for addressing the disproportionate impacts of climate change on developing countries and ensuring their right to development. Effective climate action necessitates public finance, international oversight and equitable resource distribution.[2]

15. Main concepts involve in above mentioned responsibility are climate- finance, mitigation, adaptation, and resilience. **Climate finance** refers to all private and public financial resources and instruments for climate change mitigation, adaptation and resilience. In principle, this financing cannot replace development financing, but rather complement it. Despite an increase in announced commitments and current disbursements, the delivery of public climate funds remains inadequate and insufficient, particularly in vulnerable regions.[3]

16. **Climate mitigation** refers to efforts that are taken mainly by developed, industrialised countries, through more or less ambitious climate policies, targeting the demand and behaviour of businesses and households and the proper use of technology. The current global allocation of climate-related funds addresses particularly climate transition and climate mitigation. The present study agrees that "*channelling the majority of funds towards*

2. Submission from International-Lawyers, UN ECOSOC accredited organization
3. A/HRC/EMRTD/11/CRP.1

mitigation rather than adaptation initiatives poses an obstacle to the realization of the right to development".[4]

17. The impacts of some of these mitigation policies should not be overlooked. Digital technology and its various applications in technological innovations are tools for enabling the transition to low-carbon economies. However, they are also huge emitters of GHGs, because of both the resources and minerals involved in the development of these technologies, as well as the widespread use, scale and speed at which these digital tools are developing.[5]

18. **Climate adaptation** refers to the process of adjusting to current or anticipated climate conditions and their associated consequences, in order to mitigate adverse effects and leveraging beneficial opportunities. It aims to reduce the vulnerability of various sectors and infrastructure to the impacts of climate change.

19. While unevenly financed, mitigation and adaptation efforts are integral part of national development processes and plans, insofar as they directly influence the main drivers of development, namely access to water and energy, agriculture, fisheries, economic diversification and job creation, as well as the preservation of natural resources, the environment and biodiversity. However, regardless of its form, climate finance cannot replace development finance and ODA. This financing must be consistent with the principles of climate justice and a just transition, particularly with regard to the groups, communities and regions in most vulnerable situations which are disproportionately affected by climate change.

20. **Climate resilience** refers to the ability of an ecosystem, society or even an organisation to anticipate and prepare for climate change. This can range from the implementation of early warning systems or social safety nets (particularly for groups in most vulnerable situations) to nature-based solutions.

21. Adaptation, mitigation and resilience are complementary and sometimes involve similar policies. But each requires specific funding. Adaptation financing is often the priority of the main development partners. Correctly funded, it can produce faster results. In contrast, mitigation efforts do not offer an immediate impact and quick return on investment.

22. Despite their generally low GHG emission levels, and albeit their deep dependence and investment in fossil fuels, all developing countries, including Least Developed Countries (LDC), are actively engaged and involved in climate mitigation, at national, regional and international levels. Their commitment is reflected in the targets set under the Paris Agreement through their National Determined Contributions (NDCs). The range of contributions, actions and initiatives undertaken by developing countries across all levels is remarkable.

Participation of local communities

23. Climate finance should incorporate the principles of the right to development and include mechanisms for meaningful consultation and participation of local communities, including and especially those in the most vulnerable situations, who are consistently the most exposed to climate risks. These participatory processes make it possible to better define the concrete objectives to be achieved. They help take into account local practices and accumulated traditional and ecological knowledge, while reducing the risk of maladaptation, exacerbation of inequalities and the emergence of social conflicts.[6]

24. Regulatory, institutional, fiscal and economic conditions should be aligned with mitigation, adaptation and resilience objectives. They should be monitored and accompanied by indicators to understand how the measures implemented strengthen climate resilience and whether they do so effectively.

4 A/HRC/60/95

5 UNCTAD/DER/2024, Digital Economy Report 2024

6 Submission from Indigenous Environmental Network (IEN), May 2025

III. Main regulatory or programmatic frameworks since Kyoto Protocol and their link to the right to development

A. Common but Differentiated Responsibilites and Respective Capabilities

25. The principle of Common but Differentiated Responsibilities and Respective Capabilities (known by the acronym CBDR-RC) adopted at the United Nations Conference on Environment and Development - Earth Summit - held in Rio de Janeiro in 1992) is a principle of international environmental law that strikes a balance between the need for all States to take responsibility for global environmental problems and the need to recognise the significant differences in the levels of economic development among States.

26. Article 7 of the Rio Declaration (1992) indicates that: "*In view of the different contributions to global environmental degradation, States have common but differentiated responsibilities. The developed countries acknowledge the responsibility that they bear in the international pursuit of sustainable development in view of the pressure their societies place on the global environment and of the technologies and financial resources they command"*

27. These differences are linked to the varying contributions of States to these climate-related challenges, as well as their respective capacities to address them. CBDR-RC has been formalised in international law and in various conventions and protocols adopted subsequently, including Article 2.2 of the Paris Agreement, the Kyoto Protocol and the Montreal Protocol on Substances that Deplete the Ozone Layer. However, in practice, a lack of consensus has emerged over time regarding the layers of responsibility and accountability shaped by historical disparities in economic growth, resource exploitation, carbon emissions and development. The principle of CBDR-RC aims to address the dual challenges of development and climate action, striving to achieve sustainable development.

28. On one hand, the principle of CBDR-RC supports the eradication of poverty, the elimination of hunger, the improvement of quality of life, and the creation of economic opportunities notably in developing countries. On the other hand, it also emphasizes the urgent need for climate action, environmental protection, and the fight against biodiversity loss notably in developed countries. This creates tension between developed and developing States, as they navigate differing priorities and capacities. The complexity of climate responsibility deepens when regional, demographic, and emission dynamics are taken into consideration.

29. These challenges are further exacerbated by hyper-consumerism, mass production, narrow corporate and political interests, greenwashing, oppressive policies, and a lack of meaningful and active participation in climate action. Meanwhile, LDCs continue to bear the brunt of climate disasters, constrained by limited financial resources and compounded socio-economic vulnerabilities. In 2024, at COP29, LDCs voiced deep disappointment and a sense of betrayal over the inaction of Annex I countries.[7] Recent geopolitical tensions, record-breaking heat, intensified climate disasters, and political complexities added further strain to the already strained global climate agenda.[8]

30. Despite these obstacles in implementing the principle of CBDR-RC within the broader frameworks of both the right to development and climate justice, CBDR-RC remains a foundational pillar of international climate policy. It could contribute to fill the "climate debt" gap, support innovation, and promote the active participation of communities. By doing so, it can pave the way for equitable and sustainable solutions to the global climate crisis.

[7] Annex I countries refers to a list of countries that includes members of the Organisation for Economic Co-operation and Development (OECD) as well as economies in transition. Annex I countries are subject to additional obligations under the UNFCCC, obliging them to take the lead in combating climate change.

[8] A Massive Earth Foundation, Abhishek Gupta; CBDR - Equity, Inclusion, & Environmental Law, 23/12/2024.

B. Carbon pricing and carbon markets

31. Carbon markets operate as a market mechanism, where the forces of supply and demand determine the price of emission-related goods and services. By assigning a financial cost to GHG emissions and incorporating these costs into economic decision-making, the system incentivizes business and individuals to adopt cleaner alternatives. Importantly, this economic rationale is compatible with the principles of the right to development.

32. Moreover, the market-based approach does not exclude the use of other decarbonization tools, such as legislative, regulatory, incentive-based, or private or public initiatives. Instead, it can complement broader policy mix aimed at achieving goals in an equitable and effective manner.

How does it work?

33. Multinationals and large corporations use carbon credits to avoid CO^2 emissions into the atmosphere as part of their carbon balance sheet. A carbon credit is therefore a certificate representing 1 tonne of CO^2 whose emission has been prevented (avoided deforestation, clean cooking, renewable energy) or removed from the atmosphere (afforestation, CO^2 capture). This means measuring the carbon stock, but also asking the question of what would have happened in other scenarios. And in this area of predictability, there is evidently a risk of fraud with excessive and overestimated figures.

34. Therefore, such a market, voluntary or regulated, has to **be transparent and monitored by independent bodies to avoid any conflict of interest**.

Which types of market?

35. Various market tools have been put in place alongside the CBDR-RC principle. Carbon markets consist of **compliance markets** and **Voluntary Carbon Markets** (VCM).

36. On **compliance markets**, companies and Governments must report their GHG emissions in accordance with the relevant legislation. This may take the form of a **cap-and-trade system**, whereby regulators set an upper limit for total emissions (the "cap") and then distribute or auction emission allowances. In general, one allowance entitles the holder to emit one tonne CO^2. This is the case with the EU Emissions Trading System (EU ETS), which is the largest compliance market scheme in the world. Two other systems are possible. Under the "**baseline and credit" system**, each individual entity is required to reduce its emissions at a certain rate, based on a reference rate (the "baseline"). Companies that reduce their emissions more quickly earn credits that they can then sell to entities that are not meeting their obligations. Regulators can also set a tax, i.e. a fixed price per tonne of CO2 emitted.[9] Compliance markets are growing rapidly with more and more jurisdictions putting them in place. Finally, voluntary carbon markets (VCM) can be added to the mandatory system.

37. Under **voluntary carbon markets (VCM)**, a project owner implements a climate action that avoids or removes CO^2. The project is validated by an independent body to address a certain number of requirements established by a **standardisation body** and the carbon credits are allocated to the project in proportion to the amount of CO^2 avoided. These credits can then be traded on secondary markets. A credit exists until it is withdrawn, which is when an organization uses the credit to meet its climate objectives, thereby attributing the project's climate impact to itself, adding it to its own Balanced-Unbalanced (balun) sheets.[10]

38. VCM is therefore a **step-by-step process**: i) Project design (i.e. domestic photovoltaic panels with batteries to power household lighting); ii) Validation and certification; iii) Development and verification (the panels are installed and actually in use); iv) Sale of credits and withdrawal (sale through a broker or exchange, either directly to the end buyer: a company or an individual).

[9] Carbon Market Initiative (feuille de route), November 2022

[10] Idem

What is the point of such market for developing countries with very low emissions?

39. These markets can generate **resources**, depending on the **price per tonne of carbon** which in turn depends on the supply and demand and on the validity and solidity of the market. The sectors and local players involved in VCM include land use and carbon sequestration projects which comprise potential direct payments to small-scale farmers and pastoralists, renewables energies, blue carbon (marshes, mangroves, algae), domestic equipment (clean stoves), waste management, etc.

40. These markets are also **incentives** to develop the renewable energy sector. This can generate carbon credits by reducing emissions. The sale of these credits constitute additional funding to reduce costs of renewables projects.

41. Credits could become **an export product** and establish a new relationship with the highest emitting countries. After Kyoto Protocol, the Paris Agreement provides for the possibility of using emissions reduction in a third country to meet its own climate commitments (NDC)

C. Article 6 of Paris Agreement

42. Facing the need in climate finance to support green transition and the gap in ODA, the role of carbon markets in financing climate actions has gained significant momentum. When designed to be fair, well-regulated, and ensuring a fair revenue distribution and benefit sharing, carbon pricing mechanisms could hold substantial potential to drive global socio-economic impact.

43. Article 6 of the Paris Agreement was operationalized at COP29. It addresses the adverse impacts of the previous mechanism under the Kyoto Protocol, namely the Clean Development Mechanism (CDM). In theory, the various projects initiated under the CDM since 2006[11] were supposed to enable more ambitious climate targets to be adopted. The major part of credits (Certified Emissions Reduction Units - CERs) comes from renewable energy investments, reduction of non-CO^2 greenhouse emissions and energy efficiency projects, but the uneven geographical distribution of projects and, in practice, the lack of consistent control of projects' contribution to sustainable development have been arguments to contend that the CDM did not fulfil its initial objectives.[12] In addition, the large part of the emission reductions under the CDM would have taken place anyway, which ultimately lead to increased emissions.[13] The restriction by the EU in 2013 to use CERs in the EU-ETS brought down prices and the market for CERs has not recovered since.

44. The new and operationalized rules of Article 6.4 of the Paris Agreement tend to address the problem. Article 6 establishes **guidelines** to implement bilateral agreements (Article 6.2). It also defines a range of robust social and environmental safeguards (Article 6.4) for activities that validate bilateral carbon credit transfers between countries (Internationally Transferred Emission Reductions, or ITMOs) for these countries to achieve their Nationally Determined Contributions (NDCs) through both carbon markets (article 6.2 and 6.4). and non-market strategies (article 6.8).

45. To this end, Article 6 establishes a centralized mechanism governed by strict rules that includes: **prior authorization** of trades; the operation of registries that monitor them to **ensure environmental integrity** upstream and under the control of a **panel of experts;** a **supervisory body;** a method for **measuring and quantifying credits**, particularly for forestry projects; a mandatory project verification based on robust **environmental and human rights safeguards** that ensure a project cannot proceed without the explicit and informed consent of Indigenous Peoples; an **appeal mechanism for any affected person** or community, and more decentralised cooperation with more flexible rules. It has been agreed at COP29 that these new rules will be reviewed and evaluated in 2028.

---

11 Clean Development Mechanism (article 12 of Kyoto Protocol)

12 Katrin Millock, Hélène Ollivier; The clean development mechanism; Paris School of Economics, 2025

13 Carbon market watch https://carbonmarketwatch.org

D. Experiences, challenges, success and failures regarding right-to-development principles

Efficiency, Integrity and transparency

46. The **EU ETS** (Emission trade system) launched in 2005, established a cap on emissions from power stations and industrial plants, and has recently expanded to include maritime transport and intra-EU aviation. While pioneering in its approach, the system initially faced significant challenges, including an oversupply of allowances that led to prices crashes, substantial windfall profits, and large market surplus. These issues ultimately weakened decarbonization incentives and undermined the environmental integrity of the credits. Addressing these persistent challenges has been critical to strengthening the EU ETS' role in effective climate mitigation.[14]

47. In addition, the credibility of emission reductions claimed by projects implemented under the CDM has come under scrutiny, particularly regarding whether these reductions are real and additional. In particular, projects focused on avoiding deforestation, such as those under the REDD+ framework, have raised specific concerns. This is crucial, as REDD+ represents the largest single category of climate projects globally, comprising 28% of all credits issued in Africa since 2016.

48. However, subsequent reforms improved EU ETS system's effectiveness, making it a model for other caps-and-trade programs worldwide with a price per tonne around $100 which is a real incentive. Emissions in the targeted sectors have halved since the introduction of ETS phase 1. In addition, European countries added certain emitters sectors: the German national emissions trading system has included fossil fuels, especially in the transport and building sector, since 2021. EU-ETS phase 2 which takes effect in 2027. Accordingly, up to 85% of total CO^2 emissions will fall under carbon pricing.[15]

49. In other parts of the world, South Korea implemented a national emissions trading system in 2015, becoming the first Asian country to do so. However, it faced similar challenges as the EU during its first phase of implementation and its effectiveness is still being discussed. The country is exploring ways to enhance its carbon pricing mechanisms and secure international carbon credits to meet its ambitious emissions reduction targets for 2030 and 2050.

50. Japan has started the phased implementation of its compliance carbon market, which continues to cover approximately 1,200 facilities. In March 2024, the Tokyo Metropolitan Government published results showing that total emissions from covered facilities amounted to 11.2 million tonnes of CO^2 ($MtCO^2$). This represents a 32% reduction compared to base-year emissions.[16]

51. In Latin America, Chile became the first country to introduce a nationwide carbon tax in 2017, targeting large-scale stationary sources such as power plants and industrial facilities. Similarly, Mexico implemented a carbon tax in 2014, applied to fossil fuels based on their carbon content. In 2020, Mexico introduced a pilot emissions trading system for the energy and industrial sectors. China launched its national carbon market in 2021, initially focusing on the energy sector, with plans to expand to other industries over time.[17]

52. The results of these regulated markets in industrialized countries with high emissions therefore vary in terms of their impact on reducing emissions. It would be risky to draw identical conclusions from experiences that were established at different times and in different institutional contexts. However, it is clear that the transparency and quality of credits affect the price per tonne, which must be high enough to serve as a real incentive to reduce emissions.

---

14 Submission from Germany

15 Idem

16 The Cap-and-Trade Program of the Tokyo Metropolitan Government's (TMG) third compliance period, spanning from FY2020 to FY2024, ends in March 2025 and the fourth starting from April 2025 https://icapcarbonaction.com/system/files/ets_pdfs/icap-etsmap-factsheet-

17 https://earth.org/the-history-and-legacy-of-carbon-pricing-around-the-world/

53. Despite the high-income potential of **voluntary carbon markets** (VCM), particularly in Africa as explained below, carbon markets are well below this potential for many reasons including: fragmentation, shortage of large-scale project developers, an uncertain and complex regulatory landscape, a low price per tonne of around 5 USD, and the absence of local demand.

54. According to Africa Carbon Markets Initiative (ACMI),[18] Africa currently uses 2% of its annual carbon credit potential and should aim to generate over $100 billion in credit sales annually by 2050. One of the primary barriers to achieving this goal is the lack of integrity in the carbon market. Additionally, the VCM faces challenges stemming from the lack of consistency and clarity. By definition, the VCM is driven by voluntary, private initiatives and is not regulated by Governments or financial authorities. However unregulated should not mean fragmented or opaque, and it certainly should not limit the potential of the market to contribute as fully as possible to securing a liveable future for the planet and all its inhabitants.

55. The quality of emission credits depends on the credibility of the underlying projects and the rigor of certification standards. Voluntary carbon markets have grown rapidly since the 2000s with increasing participation from developing countries and plans for further engagement. From 2021 onwards, carbon credits peaked at 362 megatonnes.[19] However a subsequent decline in demand and falling prices, partly due to allegations of greenwashing, have raised questions about the integrity of these markets.

56. As recently highlighted by the President of Kenya, Mr. William Ruto,[20] there is scepticism about the effectiveness of carbon markets to actually address climate change or bring about societal benefits. Specially in Africa "*Some people ask whether carbon credits, particularly large land-use projects, are causing Africans to lose their land to facilitate continued pollution by rich countries – driving concerns about a form of recolonisation in Africa."* Notwithstanding these concerns, President Ruto underscores that *"high-integrity, transparent, and equitable African carbon credits have continued to deliver benefits for broad sections of society (…) They support African income and jobs, food security, people's health, climate resilience, and biodiversity."* In his view, credibility issues cannot prevail: "*A lot is at stake, and failing to address these issues could prevent the market from unlocking substantial benefits for African people, economies, and livelihoods (*and) *markets will move forward without Africa. The immense opportunity for Africa could be missed entirely."*

Equity and non-discrimination

57. In industrialized regions and in high-emitting countries, carbon pricing policies and carbon taxes often face resistance, due to concerns about their economic impact, especially on lower-income groups and industries dependent on fossil fuels.

58. For developing countries, facing a carbon tax to have access to external markets, for instance the Carbon Border Adjustment Mechanism (**CBAM),**[21] constitutes a barrier and is considered as EU green protectionism. According to the EU, its carbon border adjustment mechanism aims to prevent the relocation of production to third countries with less ambitious climate rules (carbon leakage). The goods covered are those whose production is highly carbon-intensive (iron and steel, cement, fertilizers, aluminium, electricity, hydrogen). After the information and reporting phase for emissions generated (2026), importers will have to surrender the equivalent of the emissions generated in CBAM certificates, which must be purchased at the price of allowances on the ETS market.

18 African Carbon Market Iniitiative https://africacarbonmarkets.org/wp-content/uploads/2024/07/ACMI_Status-and-Outlook-Report-2024-_v2.pdf

19 Mettre les marchés du carbone au service du développement, Rapport 2024 sur les PMA, UNCTAD, Octobre 2024

20 Africa-Europe Foundation/ Climate Action Platform : Realizing the full potential of carbon pricing and markets, Report for COP28

21 Carbon Board Adjustment Mechanism

59. A recent report,[22] underlined that CBAM creates appealing incentives for low-emitting producers including African producers and providers. The report further highlights that stakeholders in the region are not consulted *"in the further detailing of eligibility criteria, metrics, measurement systems and payments timelines, responsibilities and procedures"* Therefore*, "it is highly likely that the resulting set-up results in barriers to market entry for African producers, defeating the purpose of accelerating the greening of global industrial capacity and missing out on the solution that Africa can provide in this regard*.

Meaningful and informed participation

60. The critiques of carbon offsets or carbon markets define them as a way to pay for others to reduce emissions or absorb CO^2, to compensate for one's own emissions. These critiques should not be dismissed and must be taken seriously,[23] particularly from a right-to-development perspective.

61. Investigations and peer-review studies have found that many offset projects have been ineffective in reducing emissions. Indigenous representatives have denounced intimidation, violence, land evictions, and increased pollution. They are concerned that this mechanism could reinforce an exploitative colonial relationships, to the exclusive benefit of financial institutions, banks, and the private sector primarily based in the Global North.[24] Others have concluded that these market-based mechanisms are not fit for purpose, and even worse, they may exacerbate their negative impacts on biodiversity, gender equality and human rights.[25]

62. Participation is deeply shaped by cultural and social contexts. Different cultures and communities hold different values, beliefs, and practices that influence their relationships with the environment. Many Indigenous communities maintain a deep spiritual connection to the land and may oppose development projects that threaten their traditional ways of life. Ensuring access to information for all stakeholders, both ex-ante (i.e. project documents) and ex-post (i.e. monitoring and verification reports) is crucial throughout the project lifecycle. This could require capacity-building support to help stakeholders understand, engage with, and influence projects' outcomes. Mechanisms for feedback and inclusive decision-making can enable communities to propose solutions or adjustments, ensuring that projects are both effective and equitable.

63. An accessible and effective complaint mechanisms for affected persons should be established on a fair and transparent basis, including possible compensation.

Governance

64. Establishing a carbon market, whether regulated at the national or regional level or even voluntary between two entities, requires real commitment from public authorities. Its governance model is key to its success and to the confidence of buyers in industrialized countries. If confirmed in the future, an appropriate governance model will be required for entities that wish to have access to the European market for international credits.

65. Establishing a governance model first requires **political will**, grounded in a thorough **understanding** of how carbon pricing and carbon markets work, including their volatility, the risks posed by speculative actors, and the diversity of financing mechanisms involved. This is a long-term commitment that demands sustained effort and rigorous development, not only during the initial stages but throughout the entire process.

66. National and local governments play a key role in ensuring the integrity of carbon production in their region. To ensure Article 6 readiness, the Government needs to put in place the **data infrastructure** for a **national carbon registry**, and policies around

22 Africa Europe Foundation/Climate Action Platform Africa : Realizing the full potential of carbon pricing and markets, Report for COP28

23 Submission from ArcDH Association

24 Submission from Indigenous Environment Network, May 2025

25 Friends of the Earth international; the biodiversity market mirage, 2024

corresponding adjustments.[26] These bodies must be as independent as possible in order to avoid any abuse or conflict of interest.

67. **Non-State actors** in this area also play an important role: creating methodologies for measurement, reporting, and validating carbon credits. They perform a third-party audit function, ensuring projects meet the requirements set by the registries.

68. Often, methodologies proposed by verification and validation bodies are poorly suited to the local context, both in terms of what they measure and how they do it. For example, most agricultural methodologies are developed for industrial-scale agriculture. As a result, the protocols are expensive and impractical for small-holder farmers.[27] The emergence of third-party rating agencies[28] with local expertise is a step in the good direction.

69. Globally, such initiatives require policy and regulatory frameworks that are conducive and based on fit-for-context methodologies with rigorous measurements. Information and tools have to be compiled and built to assess projects' quality and integrity. In addition, fair and equitable access to markets must be guaranteed. A compliance carbon market can also be implemented in phases with limited objectives and targeted sectors and then expanded to other products or sectors to create incentives for new green alternatives. The regulatory framework can be reinforced or adjusted according to the permanent monitoring of its results.

Benefit-sharing and the social component of carbon markets

70. The distribution of results-based finance is a critical component of all GHG emission-reduction initiatives. Equitable and transparent benefit-sharing arrangements are essential to ensure that all stakeholders, including Indigenous Peoples and local communities, are recognized and fairly rewarded for their role and contributions, such as forest conservation and management activities.

71. Even if project developers wish to comply with above mentioned elements many challenges remain. Engagement with the community is often a complex task that implies identifying who represents whom, and understanding community needs to avoid elite capture or conflict among communities. However, many of the relevant case studies show the existence of strong, community-based governance. Many communities already have well-established community governance mechanisms in place, that can be leveraged by carbon projects. In addition, current low-carbon prices do not support the cost of the structures required for in-depth engagement with communities and related risk mitigation.[29]

72. There is no uniform definition of "benefit sharing arrangements" in the VCM. Benefit sharing arrangements identify how **monetary and non-monetary benefits** will be allocated to a given stakeholder and how the distribution will take place.[30]

73. The "benefits" are commonly regarded as the revenues from the sale of carbon credits. These revenues may then partially be redistributed to local stakeholders or project implementers. The form of such redistribution may include monetary and non-monetary benefits. Monetary benefits can be, for example, direct payments or a community investment fund shared among local stakeholders. Non-monetary benefits may include, for example, capacity development programs, provision of infrastructure or social services, technical assistance, agricultural inputs, technology, introduction of alternative livelihoods or income-generating activities, or other in-kind goods.[31]

74. The main question behind the debate on benefit-sharing is how, and to what extent, the benefits from carbon credit sales are shared with those implementing the projects and/or

26 Corresponding Adjustments are ccounting mechanism designed to prevent double counting of emission reductions when countries trade carbon credits

27 Realizing the full potential of carbon pricing and markets, Africa-Europe Foundation, Report for COP28

28 https://bezerocarbon.com/ or https://www.sylvera.com/

29 CAP-A-Benefit-Sharing-Report-23.08.24_FINAL.pdf

30 https://carbonmarketwatch.org/wp-content/uploads/2023/11/Assessing-transparency-and-integrity-of-benefit-sharing-arrangements-related-to-voluntary-carbon-market-projects.pdf

31 FCPF and BioCarbon Fund Initiative 2020, p. 2, Streck et al. 2021, p. 3).

the local communities where the projects are located. The shift from "beneficiary" to "partner" to "stakeholder" is more than semantic; it implies a fundamentally different understanding of the relationship between the project developer and the local stakeholders who are, or should be, seen as agents of change, as opposed to passive recipients.

75. It is important to distinguish the benefits specified in formal "benefit-sharing arrangements" from other benefits that may arise from the implementation of carbon crediting projects. These additional benefits, commonly referred to as "co-benefits" or, more broadly, positive sustainable development impacts, can include improvements in livelihoods, ecosystem services, and other social or environmental outcomes.

76. Benefit-sharing can occur at different stages of a carbon crediting project. Ex-ante benefit-sharing typically includes assisting the community in the start of the project and ex-post benefit-sharing occurs when the project delivers results. For small-scale communities, the support in the early stages of a project can be crucial for the project's success.

77. A further distinction in benefit-sharing arises from the Share of Proceeds (SOP) mechanism that has been implemented under the CDM and the Article 6.4 mechanism of the Paris Agreement. The SOP is a share of carbon credits and/or **a fee that is deducted at the issuance and forwarded to the Adaptation Fund**. In this way, carbon crediting projects contribute indirectly to climate adaption efforts, even though the support is not provided directly in the context of individual projects. The application of SOP has also been proposed for VCM, as noted by the Integrity Council for the Voluntary Carbon Market (ICVCM 2022a).

IV. Clean cooking

78. There is a broad acknowledgement of the significant role that carbon credits and climate finance have already played in scaling clean cooking efforts, recognising the potential for further expansion of this support, within the context of Article 6 and voluntary markets, provided these are met with high-integrity credits that are used responsibly.

79. The cookstove sector, with its unique ability to deliver both global climate benefits and immediate local impacts, offers a powerful opportunity for buyers to contribute to a more equitable and sustainable future.[32]

80. Whether from a climate, environment, health, or empowerment perspective, clean cooking is increasingly recognized as a **critical component of a just energy transition**. The impacts that this has on health and in addressing inequalities and poverty are widely documented. People cooking in often poorly ventilated dwellings, experience indoor smoke up to 100 times higher than the acceptable levels for fine particles. This has disproportionate effects on the health of women traditionally involved in cooking and young children who stay with them.

81. The lack of clean cooking access, whatever the contribution of carbon credits to its funding, exacerbate inequalities because women and children dedicate many hours daily to collecting wood fuel and polluting cooking. Furthermore, more than 30% of global wood fuel harvested is unsustainable and contributes to forest degradation, while 51% of global black carbon emission, the second largest contributor to climate change after carbon dioxide, come from household energy need, including cooking.[33]

82. A key factor in financing the rollout of clean stoves is the VCM. Cookstove projects can issue carbon credits, based on the volume of emission that are avoided. They account for around 15% of all carbon credits issued from May to November 2023. But according to Nature Sustainability published research,[34] clean cookstove projects are overestimating their carbon removal benefit by almost 1,000%. This could mean that cookstove projects are issuing far more carbon credits - each of which is meant to represent a tonne of carbon - than

32 https://cleancooking.org/wp-content/uploads/2025/02/Buyers-Guide-to-Cookstove-Credits.pdf

33 https://ec.europa.eu/newsroom/intpa/items/767859/en

34 https://www.nature.com/articles/s41893-023-01259-6

what is justified by their real-world performance. This shows, one more time, the need for integrity and transparency.

83. Despite these challenges, there are several reasons to remain cautiously optimistic about the expansion of clean cookstoves. While not all cookstoves providers are dependent of the carbon market, efforts to improve the integrity of the carbon credits issued by cookstoves are important to restore confidence and become an accelerator of a clean cooking strategy. The International Energy Agency estimates that most African countries are not expected to reach full clean cooking access even in the 2050s.

84. In addition to the funding of clean cookstove, one key learning from EnDev's experience in Bangladesh,[35] which helped to build trust, is to hold learning events, meetings, and cooking demonstrations in homes and spaces within communities, rather than in external venues. These settings allowed people to comfortably learn about improved cookstoves, express their doubts, and share their experiences in their familiar environments. The early adopters and trained technicians provided credible testimonials and personal insights on the everyday experience of cooking with an improved cookstove.

85. In the words of the First Lady of the Republic of Ghana, Ms. Rebecca Akufo-Addo: *"It will be impossible to meet global climate goals, achieve a just clean energy transition, protect our environment, achieve gender equality and provide a future for the next generation without changing the way people cook."*.

V. Critical minerals: from extraction to added-value

86. Critical minerals are unique in that they are **both a resource** for many developing countries with rich mineral deposits and **a necessity for achieving (at least in part) the green transition** that most industrialised countries are due and historically responsible to implement. They are a kind of "resources for resources".

87. According to the UN panel on critical minerals,[36] critical energy transition minerals such as copper, lithium, nickel, cobalt and rare earth elements are essential components in many of today's rapidly growing clean energy technologies, from wind turbines and solar panels to electric vehicles and battery storage. Demand for critical minerals is set to almost triple by 2030 as the world transitions from fossil fuels to renewable energy in order to reduce global carbon dioxide emissions to net zero by 2050.[37] The International Energy Agency (IEA) estimates that demand will quadruple by 2040. A transition of this magnitude brings with it tremendous opportunities, but also substantial challenges directly related to the right to development. Mining, at all scales, large and small, has too often been linked with human rights abuses, environmental degradation and conflict. Indigenous Peoples' lands and resources have been dispossessed and the lives of local peoples upended.

88. Human rights and the right to development must be at the core of all mineral value chains. This is not only a moral imperative, but essential to meeting legal obligations, and ensuring justice, equity and sustainability. Human rights must be protected, respected and fulfilled, including those of workers, children, youth, women, local communities, and environmental and human rights defenders. Indigenous Peoples, who are custodians and owners of mineral resource-rich lands, have often been dispossessed of lands and resources, excluded, and marginalized from decision-making. They have infrequently shared equitable benefits. Their individual and collective rights must be upheld and their knowledge and contributions recognized.

89. There is an urgent need for **resource-rich regions to move beyond the export of raw minerals by building** local refining and processing capacities, thereby **increasing the economic value of their mineral resources** and moving up the mineral value chain.

35 https://endev.info/best-practice/bangladesh/

36 https://www.un.org/en/climatechange/critical-minerals

37 https://www.un.org/sites/un2.un.org/files/high-level_expert_group_n7b.pdf

90. The Africa Green Minerals Strategy[38] highlights that the continent holds a substantial share of global reserves of minerals essential for the energy transition, including over 50% of global cobalt, 40% of manganese and significant deposits of lithium. The Democratic Republic of Congo illustrates this potential: by processing its cobalt locally, the country nearly tripled its export value, with $6 billion cobalt exports in 2022, compared to $167 million from previously unprocessed cobalt.

91. In Latin America and the Caribbean, a major supplier of lithium and copper, the challenge is to shift away from enclave-style extraction that is economically isolated toward integrating extraction into national, higher value-added industrial activities. Otherwise, the critical minerals boom risks deepening commodity dependencies, exacerbating economic vulnerabilities and worsening inequalities.

92. Nearly half of UN member States are commodity dependent,[39] relying on raw materials for over 60% of their export revenue. This dependence affects 66% of small island developing States, 83% of least developed countries and 85% of landlocked developing countries. Africa, for example, holds over a fifth of the world's reserves of metals critical for the energy transition, but much of the added value manufacturing in green technology happens elsewhere. The continent captures only 40% of its potential revenue from critical minerals and holds just 1% of global photovoltaic capacity.

93. To fully leverage the potential of critical minerals and avoid the pitfalls of dependence, developing countries must urgently move up the global value chains.

VI. Illicit Financial Flows

94. Illicit financial flows (IFFs) are illegal movements of money or capital from one country to another. These movements are considered as IFF when funds are **illegally earned, transferred, and/or utilized across an international border**.[40]

95. The Thabo Mbeki[41] report released in 2015 shows that, in addition to a deprivation or resources, IFF weaken State institutions by encouraging corruption and undermine the rule of law and the functioning of criminal justice systems. It was estimated that Africa was losing $50 billion annually, on the back of the over one trillion dollars that the continent had lost in the three decades prior.

96. It further indicates that commercial activities account for 65% of the losses, criminal activities account for 30%, and corruption accounts for 5% of the losses.

97. Indeed, IFFs can result from various **illicit tax and commercial practices, illegal markets, corruption and exploitation**, draining State revenues and fuelling illegal activities. They can take many forms and use different channels and are therefore very difficult to track and estimate because of their:

- Origin, such as corruption or drug dealing,
- Channel, for instance sale of used cars (to mix legal money with money laundering from drug cartel)
- Use, for example terrorist financing
- Transfers, particularly money laundering and their destination.

98. They are also reported to be directly associated with human rights abuses, including trafficking in persons and smuggling of migrants.

38 https://au.int/sites/default/files/documents/44539-doc-AGMS_Final_doc.pdf

39 https://unctad.org/news/critical-minerals-leaders-cop29-call-ensuring-developing-countries-reap-fair-share

40 https://gfintegrity.org/issue/illicit-financial-flows/#:~:text=Illicit financial flows (IFFs) are,trade-related illicit financial flows.

41 https://www.un.org/esa/ffd/ffd3/wp-content/uploads/sites/2/2015/11/IFF_Main-Report_FRE.pdf

99. All of the above shows how complex it is to measure these flows. It requires data and information that is far from be readily available and, when it is, it is scattered across national institutions. Within the UN, a methodological work is underway (UNCTAD and UNODC together, within the framework of the SDGs)[42] When available, these methodological tools will be able to compile, cross-reference and track data from different sources including national accounts, the balance of payments for trade and police and intelligence and customs, to make initial estimates. Preliminary results show the scale and origin of the lost amounts[43] spent in development and/or climate transition.

100. In recent years, the Pandora Papers and other scandals have demonstrated how easy it is to launder "dirty" money including into the EU's legal financial system, which is only as resilient as its weakest link.[44]

101. The enormous sums involved in illicit practices and the large number of global players exposed by the Panama scandal suggest that Governments around the world cannot avoid taking firm action against "tax havens" and territorial jurisdictions with financial clout. IFFs resulting from tax fraud deserve a full attention at the continental and global levels.[45] This requires to systematically build capacity in Governments and administrations, a permanent **exchange of information** at the national, regional and international levels, and the use of appropriate digital tools (blockchain, open source) to analyse, accelerate and facilitate the cross-checking of information.

102. IFFs represent enormous sums that could be otherwise used to boost development; they weaken public institutions, widening inequalities; they are illegal and linked to human rights abuses. The fight against IFFs should be therefore considered not only a priority but a prerequisite in the realisation of the right to development.

VII. Conclusion and Recommendations

A. Carbon pricing is both a tool and a process

103. **Carbon and biodiversity credits could allow many developing countries to monetise their carbon repositories. In particular, the carbon market could mobilize critical finance for conservation, energy transition and climate resilience.**

104. **As an example, forests in Africa absorb 600 million tonnes of carbon dioxide each year, greater than any other forest ecosystem in the world.[46] Africa represents 20% of the world total land sinks, around 0,8% billion tonnes of CO^2.[47]**

105. **Carbon pricing is one of the tools in the climate finance toolbox and an integral component of broader climate-resilient development strategies.**

106. **There is no one-size fits all solution or procedure: a carbon strategy has to be aligned with the national context and priorities, in accordance with the national climate agenda. Whether voluntary carbon markets, biodiversity credits, or regulated emissions trading systems, none of these initiatives are an static institution. A carbon**

42 In July 2017, the United Nations General Assembly adopted the indicator framework for the monitoring of progress towards SDGs, with indicator 16.4.1 on the "total value of inward and outward illicit financial flows" selected as one of two indicators to measure progress towards target 16.4 to "significantly reduce illicit financial (and arms) flows by 2030, strengthen the recovery and return of stolen assets and combat all forms of organized crime". As co-custodians of SDG Indicator 16.4.1, UNCTAD and UNODC are mandated to collect data and provide methodological guidance on how to measure such Indicator.

43 https://unctad.org/system/files/non-official-document/IFFsAfrica_RapportFinal_20221121.pdf

44 https://transparency.eu/priority/financial-flow-crime/

45 https://ituc-africa.org/Declaration-de-Thabo-Mbeki-sur-les-Panama-Papers-Les-avertissements-du-Panel-de.html?lang=en

46 EMURGO (2024) Global Carbon Markets and Africa https://www.emurgo.africa/blog/posts/global-carbon-markets-and-africa

47 Financing Africa we want ; Mo Ibrahim Foundation; Facts and figures; May 2025

strategy should be designed to anticipate and respond to the changing circumstances always considering quality, credibility and integrity as preconditions for a transparent, standardised and scalable market that can efficiently channel capital to where it is most urgently needed. Markets and integrity have to go hand in hand.

107. **This implies:**

- **Establishing a legal basis and a regulatory framework: the framework should include key guiding principes, institutional arrangements and the description of implementation. A manual of procedures allowing greater flexibility could be used and regularly updated while the legal text has to remain stable on longer term.**
- **Developing an integrated approach to guarantee a full alignment with the national climate agenda: including Ministries of Foreign Affairs supported by Ministries of Environment and those responsible for National Determined Contributions (NDCs).**
- **Building a phased approach: counties should consider a limited number of sectoral emissions in accordance with their NDC. Initially, they may focus on a limited number of sectors and expand them in a next phase. In addition, it is important to recognize that short-, medium- and long-term needs are different. Early phases may prioritize capacity building and institutional readiness, while later stages can focus on scaling impact and integrating more complex sectors.**
- **Strengthening domestic capacities and monitoring systems.**
- **Co-creation throughout the whole process: from inception to monitoring and evaluation, through sufficient and efficient stakeholders consultations, trainings, workshops within the Government (different ministries) as well as with local civil society organizations, communities and projects' developers.**
- **Expanding international cooperation and partnerships: to lower transaction costs and improve the positioning of Least Developed Countries (LDCs) in carbon markets. South-South cooperation and the involvement of regional institutions can help harmonize standards and regulations, thereby reducing the burden on LDCs and facilitating more effective participation and negotiations.**[48]
- **Prioritizing social and economic integrity: environment integrity is the condition for accurate reported emissions reduction and proper accounting. Equitable and transparent benefit-sharing arrangements ensure that all stakeholder, including Indigenous Peoples and local communities are fairly recognized and rewarded for their contributions. This includes roles such as forest conservation and sustainable management.**

Each actor in the market has a role

108. **Governments must establish a clear and stable regulatory landscape conducive to scaling carbon markets.**

109. **Suppliers should substantially scale the production of high-integrity credits and equitably share revenue with local communities.**

110. **Buyers should establish and act on credible net-zero commitments. That means using credits alongside more ambitious efforts to decarbonise their operations, while supporting a high-integrity supply pipeline by committing to long-term offtake.**[49]

48 https://unctad.org/news/carbon-markets-powerful-tool-least-developed-countries-cop29-hears

49 Africa Carbon Markets: Status and Outlook Report 2024

B. Clean cooking

111. **Clean cooking is a typical example of an initiative that address climate mitigation through reduction of GHG emissions while fighting against deforestation and forest degradation. It implies the development of a new economic sector, improves health within the local communities, and provides for a gender-oriented action.**

112. **So far, affordability of clean cooking depends of various factors. On one hand, it is indispensable to ensure a viable market and a sustainable entrepreneurial ecosystem supporting local clean cooking companies to attract tailor-made business development and investment and finance services. This could contribute to decrease the cost of cookstoves and appliances and improve access to modern fuels for low-income families. This economic approach, anchored in the local context, complements broader development strategies and constitutes an additional tool to finance a climate and energy just transition.**

113. **On the other hand, from a right to development perspective, it is crucial to focus on the active, free and meaningful participation of the communities, particularly women groups to discuss and address when needed the traditional ways of cooking, which are deeply rooted in cultural norms.**

114. **According to the *Cooking behaviour study*[50] conducted by Clean Cooking Alliance in sub-Saharan Africa[51] behavioural changes when addressing local cooking in need of changes should highlight the easy-of-use of the proposed solid value cleaner solution. Relevant messages in this connection should:**

- **Include a prior assessment of the local cooking behaviour determinants;**
- **Highlight health benefits, particularly the reduction of smoke exposure, with clear and accessible information specially in context where basic education levels are low and consumer self-perception may be limited;**
- **Incorporate a focus on fuel and money savings: with preferred incentives such as discounts and instalments-based payment options to improve affordability.**

115. **The most effective communication channels appears to be :**

- **Trusted social networks (i.e. neighbours, peers, family, and friends);**
- **Community meetings;**
- **Mass media platforms such as TV and Radio.**

C. Transform critical minerals

116. **The rapidly increasing demand for critical minerals, driven by the global push toward net-zero emissions; the geopolitical context, and the lack of investment in productive-, refining- and knowledge-sharing constitute both opportunities and risks from a right to development perspective.**

117. **The UN SG Panel on Critical Energy Transition Minerals provide the main principles of equity and justice worldwide in these sectors including supply and demand.**

118. **For mineral-rich Global South countries, including Brazil, India and many countries in Africa, applying a right to development approach when dealing with critical mineral-related policies would be beneficial. Africa alone holds over 30% of the world's critical mineral reserves, including 70% of global cobalt and 85% of manganese. The region, however, holds just a fraction of processing capacities.**

50 https://cleancooking.org/wp-content/uploads/2025

51 AVSI study was conducted in 8 countries : Cote d'Ivoire, Burundi, South Sudan, Kenya, Somalia, Congo Republic, DRC, Mozambique

119. **It is crucial for these countries to avoid being overshadowed by dominant global powers. The cycle of bans between global economic powers at the end of 2024 and early 2025, have wider implications on pricing and access to raw material that have gone beyond the primary concerned countries. Global South countries could address the impact that these recent cycle of bans are having on their economies and establish tangible collaborations among them through forums such as the G20.**[52]

[52] transitionmineralscouncil.org