



Proposed approaches for the BTR review issues

**Background paper for the third meeting of lead
reviewers of biennial transparency reports**

8 May 2026

Acronyms and abbreviations

BTR	Biennial Transparency Report
FTC	Financial, technology development and transfer, capacity-building
LRs	Lead Reviewers
MPGs	Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement
NDC	Nationally Determined Contribution
NIR	National Inventory Report
PaMs	Policies and measures
TERT	Technical Expert Review Team

I. Background and scope

1. In their conclusions from the 2nd meeting of lead reviewers of biennial transparency reports (para. 9), the LRs requested the secretariat to continue collecting and analyzing information on substantive review-related issues raised by TERTs and Parties or identified by the secretariat's knowledge hubs during the additional reviews of BTRs in 2025 and 2026 with a view to presenting an analysis for discussion at the next meeting of BTR LRs and informing review practices and review guidance, as appropriate.¹

2. To support resolving those new substantive review-related issues, the secretariat has continued with consultations with advisory groups of review experts. The main purpose of these advisory groups is to provide feedback and advice on solutions for complex BTR review issues raised by the TERTs in general and cross-cutting, NDC tracking progress (including PaMs and projections), and FTC areas. Once agreed upon at the advisory groups' meetings, these review approaches will be presented at the BTR LRs meetings and with LRs agreement will be considered by the secretariat when updating the Review Guidance to support BTR technical reviews.

3. To facilitate the work of the BTR LRs, the secretariat has prepared this technical background paper including review issues and proposed solutions based on the discussion and agreement by the advisory groups of review experts and taking into consideration approaches applied by TERTs in the finished or ongoing BTR1 reviews.

4. The BTR review issues described in this background paper include:

(a) Applicability of para. 6 of the MPGs to the flexibilities provided in the MPGs paras 159, 162(c) and 162(f);

(b) How to review missing tabular information;

(c) Consideration of progress in case of conditional NDC targets;

(d) Consideration of progress with relevant indicators selected to track progress towards the implementation and achievement of NDC;

(e) Consideration of progress in case of NDC 2.0 and NDC 3.0 targets reported in the same BTR submission;

(f) For EU member States, how to report national institutional arrangements and projections of key indicators.

(g) Clarifying that projections of key indicators is not to be used for tracking progress of NDCs (MPGs para. 97 in conjunction with para. 93);

(h) Guidance for interpreting references to inventory data in the projections provision;

(i) Review of grant-equivalent values for bilateral and multilateral financial support provided.

5. In addition, in their conclusions from the 2nd meeting of lead reviewers of biennial transparency reports (para. 15), the LRs noted that they could not complete consideration of or agree on conclusions for one issue at the meeting, namely "Revision of baseline scenario in case of recalculation of GHG inventory". The LRs requested the secretariat to include consideration of this issue at the next meeting of BTR LRs, taking into account the discussions at their 2nd meeting by working groups of LRs and review experts, and the background paper prepared by the secretariat for that meeting on substantive issues identified during the 2024–2025 reviews. Proposal for this issue is presented in paragraph 40 below.

¹ Available at [Conclusions from the first meeting of lead reviewers of Biennial Transparency Reports](#)

II. Proposed approaches for the BTR review issues

A. General and cross-cutting issues

1. Applicability of para. 6 of the MPGs to the flexibilities provided in the MPGs paras 159, 162(c) and 162(f)

6. **Issue description:** MPGs provide certain flexibilities in the TER to those developing country Parties that need them in light of their capacities. These flexibilities mainly relate to *how* the review is conducted, rather than *what* is reviewed. These include the following:

(a) Developing country Parties that need flexibility may instead choose to undergo a centralized instead of an in-country review, but are encouraged to undergo an in-country review (para. 159);

(b) Developing country Parties that need flexibility instead encouraged to provide additional information requested by the TERT within three weeks of the request (instead of two weeks) (para. 162(c));

(c) Developing country Parties that need flexibility can instead provide comments on the draft TERR within three months of its receipt (instead of one month) (para. 162(f)).

7. The solution proposed below aims to clarify whether a Party applying any of the above-mentioned flexibilities needs to fulfil the requirements under para. 6 of the MPGs to clearly indicate the provision to which flexibility is applied, concisely clarify capacity constraints, and provide self-determined estimated time frames for improvements in relation to those capacity constraints and whether the TERT can provide recommendations for not fulfilling these requirements?

8. **Proposed solution:** The BTR TER is governed by the review scope as defined in para. 146 of the MPGs and as such, the review of consistency with the MPGs is limited to the information reported on NIR, information necessary to track progress in implementing and achieving NDC, financial support provided and climate change impacts and adaptation information, if a Party elects a voluntary review of this information.

9. Consequently, para. 6 provisions are invoked only when flexibilities are applied in relation to any reporting provision in within the review scope. All other flexibility provisions (e.g. ones listed above) do not relate to the review scope and as such, do not attract para. 6 requirements.

10. However, if a Party applies the flexibilities provided in paras. 159, 162(c) and 162(f) of the MPGs, it will be noted in the introduction section of the TERR.

2. How to review missing tabular information

11. **Issue description:** The MPGs have specific provisions for the submission of different components of tabular information in the BTR (e.g. CRTs, NDC-CTF and FTC-CTF).

12. The solution proposed below aims to clarify how to review missing tabular information, specifically whether missing tabular format should be considered an issue and thus lead to a recommendation in the TERR.

13. **Proposed solution:** The MPGs have specific provisions for the submission of different components of tabular information in the BTR. All requirements to report information in tabular format on specific elements should be reviewed on the basis of the underlying provisions in the MPGs.

14. All references to “tabular format” or “common tabular format” in the MPGs are interpreted to mean the common tabular format tables contained in annexes II and III of decision 5/CMA.3.

15. Missing tabular information in this guidance also covers the scenarios where a Party:

(a) Makes a delayed submission of CRTs/CTF containing the relevant tabular information (as per relevant internal rules agreed to govern such cases), which thus cannot be considered in the review;

(b) Reports the required tabular information in a format that is not consistent with the CRTs/CTF as provided in annexes to decision 5/CMA.3.

16. **GHG inventory:** As per the MPGs (para. 38), it is mandatory for all Parties to report CRTs as part of their NIR and if not submitted, the TERT should provide a recommendation for the Party to do so.

17. **Tracking progress:** In the tracking progress section, there are differences in requirements to report information in tabular format for different elements and the TERT should provide recommendations to report tabular information on specific elements considering the relevant provisions, if relevant tabular information is considered missing:

(a) As per MPGs (para. 79), each Party shall report the information referred to in paragraphs 65–78 of the MPGs in a narrative and common tabular format, as applicable. Thus, Parties can choose to report the information on tracking progress required by paras. 65–78 in a narrative or common tabular format, as applicable. If the relevant information is provided in narrative format because the tabular information is not applicable, the TERT should not provide a recommendation for a Party to do so. If the relevant information is quantifiable and subject to numerical calculations, corresponding adjustments and emissions balance, such as information provided in the structured summary referred in para. 77(a)-(d), and is not provided in a tabular format, the TERT should provide a recommendation for a Party to do so;

(b) As per para. 80 of the MPGs, information on actions, PaMs that support the implementation and achievement of its NDC under Article 4 of the Paris Agreement shall be presented in a narrative and tabular format. As such, if not done, the TERT should provide a recommendation to provide such information in tabular format;

(c) As per para. 82 of MPGs, information on actions, PaMs specified in 82(a-i) shall be provided to the extent possible, in tabular format. As such, if not done, the TERT should provide a recommendation for the Party to provide such information in tabular format, to the extent possible. The TERT should note any explanation provided by the Party and include in the recommendation, as relevant, any specific reasons provided by the Party regarding the non-submission of the tabular information;

(d) As per para. 85 of the MPGs, each Party shall provide, to the extent possible, estimates of expected and achieved GHG emission reductions for its actions, policies and measures in the tabular format referred to in paragraph 82. As such, if not done, the TERT should provide a recommendation for the Party to provide such information in the tabular format referred to in paragraph 82, to the extent possible. The TERT should note any explanation provided by the Party and include in the recommendation, as relevant, any specific reasons provided by the Party regarding the non-submission of the tabular information; in the case of Parties applying flexibility in the light of their national capacities, the TERT should provide an encouragement to do so;

(e) As per para. 91 of MPGs, each Party that submits a stand-alone national inventory report shall provide a summary of its GHG emissions and removals for the reporting years corresponding to the Party's most recent national inventory report in tabular format. As such, if not done, the TERT should provide a recommendation for the Party to provide such information in tabular format;

(f) As per para. 101 of the MPGs, projections shall be presented in graphical and tabular formats. As such, if not done, the TERT should provide a recommendation to the Party to report projections in tabular format, considering any flexibilities applied by the Party as per para. 102 regarding less detailed methodology or coverage.

18. **FTC support provided:** As per paras. 123, 124, 127 and 129 of the MPGs respectively, developed country Parties are required to report information in (common) tabular format on bilateral/regional and multilateral financial support; and technology

development and transfer and capacity-building support provided. As such, if not done, the TERT shall provide recommendations to the Party to report such information in tabular format.

19. It is not mandatory for Parties to report the required tabular information in CRTs/CTF tables prepared using the reporting software or in the form of excel sheets. As such, they can prepare the CRTs/CTF using other means and in other types of files (e.g. PDF). They can also just include these tables only in the BTR/NID. In all such cases, the TERT should not provide a recommendation for the Party to report the information in CRTs/CTF tables prepared using the reporting software or in the form of excel spreadsheets. The TERT could, however, consider noting the helpfulness of submitting tabular information using the reporting software in relevant areas of improvement.

B. NDC implementation tracking issues

1. Consideration of progress in case of conditional NDC targets

20. **Issue description:** Some Parties reported conditional target(s) in their NDCs and BTRs, which are dependent on the provision of financial resources, technology development and transfer, and/or capacity-building support. These conditional target(s) are often framed as enhancements of unconditional target(s) (for example, by additionally decreasing the level of emissions or increasing the share of renewable energy compared to unconditional target). In many cases, Parties did not specifically describe in their BTRs the conditions that would need to be met during the implementation period to enable the achievement of their conditional target(s). How should TERTs take such conditional NDC target(s) into consideration?

21. **Proposed solution:** MPGs reporting requirements do not specifically distinguish between unconditional and conditional targets, however each Party needs to provide information on any conditions and assumptions relevant to the achievement of its NDC (para. 75(i)).

22. In assessing the implementation and achievement of conditional NDC target(s), the TERT needs to understand which underlying conditions and assumptions are required, such as the provision of financial resources, technology development and transfer, capacity-building support, and/or any other condition and assumption relevant to the achievement of its NDC as specified by the Party, and whether these conditions and assumptions are fully, partially, or not met during the reported implementation period. It is important to emphasize that the TERT should not assess whether the underlying conditions and assumptions were fully, partially or not met, instead it is up to the Party to provide such information. If this information was not provided in the BTR or it is not clear, the TERT should request clarification from the Party during the review, based on the reporting requirements as per para. 75(i) of the MPGs and make a recommendation to provide such information in the next BTR submission.

23. If a Party confirms that the required conditions were met, the TERT should assess progress using the same approach as for unconditional targets, while noting that the conditions have been fulfilled. Where conditions and assumptions for implementing and achieving conditional NDC target(s) were only partially met or not met, the TERT should not assess progress towards the conditional targets and should instead indicate that progress toward conditional targets remain contingent on the receipt of the necessary support. The exception from this approach is the case where the Party has communicated to the TERT that it would prefer a consideration of progress in implementation and achievement of its conditional target by the TERT, even if the conditions have not been met; in such case, the TERT should consider the progress in implementing or achieving conditional NDC target(s) along with any unconditional target(s).

2. Consideration of progress with relevant indicators selected to track progress towards the implementation and achievement of NDC

24. **Issue description:** Each Party may select any number of indicators to track progress in the implementation and achievement of its NDC. In some cases, a Party identified one or more indicators that are directly linked to its NDC target(s), alongside indicators that, for example, relate to the implementation of mitigation actions contributing indirectly to the implementation and achievement of the NDC target(s).² In other cases, a Party does not distinguish between these categories, even it is evident that some indicators are not directly linked to the NDC target(s). How should TERTs assess progress in such situations?

25. **Proposed solution:** The TERT should first check the descriptions and definitions of NDC targets and indicators selected to track progress and understand the linkages of indicators with NDC targets. In case it is evident to the TERT that some indicators are not directly linked to the NDC targets, the TERT should in consultation with the Party, including through preliminary questions prior to the review week, clarify such cases and ask Party to confirm which indicators are directly relevant for tracking progress in implementing and achieving NDC targets.

26. The TERT should base its consideration of progress in the implementation and achievement of the NDC only on indicators that are directly linked to the NDC target(s) and note that the Party also provided information on indicators indirectly linked with the NDC targets without undertaking their consideration in terms of progress made.

3. Consideration of progress in case of NDC 2.0 and NDC 3.0 targets reported in the same BTR submission

27. **Issue description:** Parties may report, within the same BTR submission, information necessary to track progress in implementing and achieving NDC target(s) that relate to both NDC 2.0 and NDC 3.0. This situation may arise, for example, due to overlapping implementation periods (e.g. 2021–2030 and 2025–2035), or when implementation periods do not overlap but for instance the target year of NDC 2.0 has been reached (2030) and its achievement needs to be considered by the TERT while the implementation period of NDC 3.0 (2031–2035) has started and the progress made needs to be assessed. In such cases, how should the TERT assess the progress made in implementing and achieving a Party's NDCs?

28. **Proposed solution:** If a Party, in its BTR, provides information necessary to track progress in implementing and achieving NDC target(s) that relate to both NDC 2.0 and NDC 3.0, the TERT should, in its review report, assess progress and/or achievement separately for targets under each NDC. Clear and separate information on both NDCs provided by Parties in their BTR is necessary to allow such assessment. In doing so, the TERT should take into account differences in reference points, baselines, base years, starting points, and target (end) years, while comparing it with the most recent information for the indicator(s) selected to track progress provided for each reporting year in the implementation periods, as well as the status of mitigation policies and measures, actions and plans linked with implementation of NDC 2.0 and 3.0, if reported in the BTR.

29. This approach will enable the TERT to assess whether targets under each NDC have been achieved once the Party provides information on the target (end) year of the implementation periods.

4. For EU member States, how to report national institutional arrangements (MPGs para. 61) and projections of key indicators (MPGs para. 97)?

30. **Issue description:** The EU and its member states have a joint NDC target. How should the requirements for national institutional arrangements and projections of key indicators be reviewed for EU member States?

² In their BTRs, some Parties named indicators that are directly linked to the NDC targets as “key” or “headline” indicators and those that are indirectly linked to the NDC targets as “supporting” or “supplementary”.

31. **Proposed solution:** To fully understand an EU member State's institutional arrangements with respect to the joint EU target, information about that member State's national arrangements for domestic implementation are needed, as well as information on or references to the EU's institutional arrangements. If the domestic institutional arrangements are not provided in the BTR, the TERT should raise a recommendation on paragraph 61.

32. For the EU joint target, there is a single indicator based on the EUs economy-wide emissions. Therefore, projections of the key indicator reported by an EU member state should be for the indicator of the EU (economy-wide emissions of the EU) and not the member State's emissions. The relevant section of the BTR and CTF table 10 should contain information on the indicator of the EU or provide references to it. If CTF table 10 contains projections of the member State's emissions, the TERT should raise a recommendation on paragraph 97.

5. **Clarifying that projections of key indicators is not to be used for tracking progress of NDCs (MPGs para. 97 in conjunction with para. 93)**

33. **Issue description:** Paragraph 93 of the MPGs states that "Projections...shall not be used to assess progress towards the implementation and achievement of a Party's NDC under Article 4 of the Paris Agreement unless the Party has identified a reported projection as its baseline". Paragraph 97 states that "Each Party shall also provide projections of key indicators to determine progress towards its NDC under Article 4 of the Paris Agreement." Are these two requirements in conflict with respect to whether projections should be used in assessing progress in achievement of the target?

34. **Proposed solution:** Paragraph 97 is describing for which key indicators (those used to determine progress towards the NDC target) projections should be provided, not what the projections should be used for. Therefore, projections should not be used to assess progress towards the NDC target. For Parties with BAU or baseline targets, the projected BAU or baseline may be used as the basis to which the key indicator data would be compared, as per paragraph 93, but this comparison is to actual, not projected, indicator data.

6. **Guidance for interpreting references to inventory data in the projections provision**

35. **Issue description:** The MPGs refer to inventory years with respect to projections in both paragraph 95, "Projections shall begin from the most recent year in the Party's national inventory report..." and paragraph 99 "Projections shall be presented relative to actual inventory data for the preceding years." How should TERTs assess these two provisions?

36. **Proposed solution:** The reference to most recent inventory year in paragraph 95 should be assessed only in the context of calculating the minimum year for which to extend projections. It should not be interpreted as a restriction on the inventory data used to produce the projections. Paragraph 99 should be interpreted only as requiring inventory data and projections results to be presented together in graphical and tabular formats, as appropriate.

C. **FTC support issues**

1. **Review of grant-equivalent values for bilateral and multilateral financial support provided**

37. **Issue description:** According to paragraph 118 of the MPGs, the reporting of FTC support provided is a "shall" requirement for developed country Parties.³ All reporting provisions that follow in that chapter (paragraphs 119-125) are therefore of a mandatory nature – with the exception of the reporting of grant-equivalent values for bilateral and multilateral support, which are to be reported *on a voluntary basis*. In general, reporting provisions of non-mandatory nature ("should" requirements) invite an encouragement to the

³ For other Parties that provide support the reporting of FTC support provided and mobilized is a "should" requirement.

Party to report such information. How should the TERT assess the lack of reporting of grant-equivalent values?

38. **Proposed solution:** In cases where a Party has not reported the grant-equivalents of the amounts of bilateral and/or multilateral financial support provided, the TERT should assess the information based on the following guidance:

(a) Case A: If no grant-equivalent values have been reported and the Party has clearly documented in the BTR that such information was not available, the TERT should not raise an encouragement.

(b) Case B: If no grant-equivalent values have been reported but during the review the Party provides clear documentation that such information was not available, the TERT should encourage the Party to include an explanation in the BTR as to why the information on grant-equivalent values was not available.

(c) Case C: If no grant-equivalent values have been reported and no additional information is provided during the review indicating such information is not available, the TERT should encourage the Party to report grant-equivalent values or include an explanation in the BTR why the information on grant-equivalent values was not available.

D. Pending issue(s) from the previous LRs meeting

1. Revision of baseline scenario in case of recalculation of GHG inventory

39. **Issue description:** Many Parties have NDC targets that are expressed as a ‘below baseline scenario’, i.e. a commitment to reduce GHG emissions by a specified quantity/percentage relative to a projected emissions baseline or business-as-usual scenario. A baseline scenario is a reference case that represents future events and conditions most likely to occur in the absence of activities taken to meet the mitigation target. In such cases, the indicator selected to track progress is emissions-based, for instance total GHG emissions, that is subject to recalculations of GHG inventory. These recalculations will affect the historical emissions level(s) in the starting point or period used for developing the baseline scenario and create inconsistency with fixed projected baseline emissions, including emissions level in the target year. In some cases, this situation could lead to an early (over)achievement of the NDC if emissions were overestimated in the starting point/period. How should such cases be addressed by the TERT?

40. **Proposed solution:** As no agreement was reached at the advisory group on using paragraph 67 of the MPGs as a basis for revising the baseline scenario — which stipulates that each Party shall provide information for each selected indicator, including for the reference point(s), level(s), baseline(s), base year(s), or starting point(s), and update such information in accordance with any recalculation of the GHG inventory, as appropriate⁴ — the proposal is to revisit this issue once sufficient information has been obtained through the technical expert reviews of BTRs from Parties with NDCs that consist of baseline scenario targets regarding the construction of baselines and their subsequent updates or revisions, as appropriate. This information could also serve as technical input to discussions under the forthcoming revision of the MPGs, with a view to enhancing the clarity and consistency of the relevant provisions.

⁴ Divergent views were expressed on understanding what *updating the indicator for baseline(s)* means.