

Paris Agreement Implementation and Compliance Committee

Document PAICC/2025/M15/3

Report of the 15th meeting of the Paris Agreement Implementation and Compliance Committee

Dates: 29 September–2 October 2025

Venue: Bonn, Germany (hybrid)

I. Agenda item 1: Opening of the meeting

1. The Co-Chairs, Eyad AlJubran and Jacob Werksman, opened the 15th meeting of the Paris Agreement Implementation and Compliance Committee by welcoming the members and alternate members of the Committee.
2. As agreed by the Committee,¹ the 15th meeting was held from 29 September to 2 October 2025, in Bonn, Germany, as a four day-meeting in hybrid format.
3. The secretariat confirmed that, in accordance with paragraph 15 of the modalities and procedures of the Committee,² a sufficient number of Committee members were present at the meeting to constitute a quorum.
4. The table below presents the members and alternate members of the Committee. The names of those present at the meeting are in bold.

Group/constituency	Members	Alternate members
African States	Selam Kidane-Abebe	Mominata Compaore
	Natasha Banda Museba	Haidy Ahmed Mahmoud
Asia-Pacific States	Jing Zhong	Muneki Adachi
	Eyad AlJubran	Haseeb Gohar
Eastern European States	Eva Šalplachtová	Grzegorz Grobicki
	Grigory Yulkin	Ivan Narkevitch
Latin American and Caribbean States	José Félix Pinto-Bazurco Barandiarán	Michai Robertson
	Jimena Nieto	Edgar Fernández Fernández
Western European and other States	Jacob Werksman	Johan Pettersson
	Christina Voigt	
Small island developing States	Diane Tan	Rueanna Haynes
Least developed countries	Eunice Asinguza	

II. Agenda item 2: Adoption of the agenda and organization of work

5. The Co-Chairs presented the provisional agenda for the 15th meeting contained in document [PAICC/2025/M15/1](#),³ noting that the structure of the agenda and the items included therein reflected the evolving nature of the Committee's work and the

¹ See report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 36.

² Modalities and procedures for the effective operation of the Committee, contained in the annex to decision [20/CMA.1](#) (hereinafter referred to as modalities and procedures).

³ Provisional agenda and annotations for the fifteenth meeting of the Paris Agreement Implementation and Compliance Committee ([PAICC/2025/M15/1](#)).

suggestions made at the 14th meeting.⁴ The Committee considered and adopted the agenda as presented.

6. In accordance with rule 12 of the rules of procedure of the Committee,⁵ the meeting was open to Parties and admitted non-Party observers, except for agenda items 4–6, 8, 10, and parts of agenda item 3.⁶
7. With regard to the organization of its work, the Committee agreed to address the items of the agenda in the order as they appear in the indicative schedule.⁷

III. Agenda item 3: Information from the secretariat in relation to the submission of reports and communications from Parties to guide the Committee in its functions in accordance with its rules of procedure:

(a) Information made available pursuant to rule 18 of the rules of procedure

8. The secretariat presented the most up-to-date information to the Committee related to:
 - i. the communication and maintenance of nationally determined contributions (NDCs) by Parties in the NDC public registry;⁸
 - ii. the submission of mandatory reports and communication of information under Article 13, paragraphs 7 and 9, and Article 9, paragraph 7, of the Paris Agreement, including through the first biennial transparency reports (BTRs) of Parties;
 - iii. the submissions of mandatory biennial communications of information under Article 9, paragraph 5, of the Paris Agreement; and
 - iv. the participation by Parties in the facilitative, multilateral consideration of progress under Article 13, paragraph 11, of the Paris Agreement.
9. The Committee considered the information provided by the secretariat, pursuant to rule 18 of its rules of procedure in the context of its function under paragraph 22(a) of its modalities and procedures.
10. Regarding the communication and maintenance of NDCs, the Committee expressed its appreciation that additional 33 Parties had communicated an NDC between the conclusion of its 14th meeting (18 July 2025) and the conclusion of its 15th meeting (2 October 2025).⁹ The Committee decided that the issues under consideration with regard to these Parties have been resolved and requested the secretariat to notify them

⁴ See report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 9.

⁵ Rules of procedure of the Committee as contained in the annex to decision [24/CMA.4](#) (hereinafter referred to as rules of procedure).

⁶ As per rule 12, paragraph 1, of the rules of procedure and paragraph 13 of the modalities and procedures.

⁷ <https://unfccc.int/documents/649974>.

⁸ Public registry referred to in Article 4, paragraph 12, of the [Paris Agreement](#), <https://unfccc.int/NDCREG>.

⁹ The total number of Parties that have communicated an NDC as of the conclusion of the 15th meeting of the Committee is 65. As a result, the total number of Parties that have not communicated an NDC has decreased to 130 Parties. (In this regard, see report on the 13th meeting ([PAICC/2025/M13/3](#)), paragraph 16, and report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 18 with footnote 13.)

of this decision. The Committee noted that the secretariat had received from some Parties documents for inclusion in the NDC public registry that are related to but that those Parties had not described as their NDCs (or as the update of their NDCs). The Committee recommended that the secretariat, in line with decision [5/CMA.1](#) on the modalities and procedures for the operation and use of a public registry referred to in Article 4, paragraph 12, of the Paris Agreement, consult with the Party to clarify whether the communication from the Party is its updated or its subsequent NDC, and, with the consent of the Party, make any other additional documents available, as appropriate, in the 'Additional documents' column of the registry.

11. The Committee considered the information provided in the responses on behalf of 63 Parties concerned to the Committee's notifications with regard to their NDCs under item 4(a) of its agenda (see paragraphs 22–27 below).
12. The Committee recalled that for a Party to have 'maintained' an NDC under Article 4 of the Paris Agreement for the purpose of its mandate under sub-paragraph 22(a)(i) of the modalities and procedures, it is necessary that the Party has an NDC in the registry that is applicable to the time period at which the Committee is meeting.¹⁰ In this regard, the Committee found that all 195 Parties to the Paris Agreement had 'maintained' an NDC in the public registry.¹¹
13. With respect to the submission of mandatory reports or communication of information under Article 13, paragraphs 7 and 9, and Article 9, paragraph 7, of the Paris Agreement, the Committee expressed its appreciation for the submission by five Parties of mandatory reports or communication of information under Article 13.7(a) and (b) as well as under Articles 13.9 and 9.7 of the Paris Agreement between the conclusion of its 14th meeting (18 July 2025) and the conclusion of its 15th meeting (2 October 2025).¹² The Committee decided that the issues under consideration in this regard have been resolved for these Parties and requested the secretariat to notify them of this decision.
14. Furthermore, the Committee welcomed the submission by one Party from the least developed countries (LDCs) and small island developing States (SIDS) of its BTR between the conclusion of its 14th meeting (18 July 2025) and the conclusion of its 15th meeting (2 October 2025).^{13, 14}

¹⁰ Report on the 13th meeting ([PAICC/2025/M13/3](#)), paragraph 20, and report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 20.

¹¹ Footnote 8 above.

¹² The total number of Parties that have submitted their mandatory reports and information under the Enhanced Transparency Framework (ETF) as of the conclusion of the 15th meeting of the Committee is 92. As a result, the total number of Parties that have not submitted one or more of the mandatory reports and information listed in rule 18, paragraphs 2(b)(i–iii), of the rules of procedure has decreased to 28 Parties. (In this regard, see report on the 13th meeting ([PAICC/2025/M13/3](#)), footnote 16, and report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 22, footnote 19.)

¹³ As a result, the total number of Parties from LDCs and SIDS that have submitted a BTR has increased to 17 Parties. (In this regard, see report on the 13th meeting ([PAICC/2025/M13/3](#)), paragraph 23, and report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 23, footnote 20.)

¹⁴ Noting that, in accordance with decisions [1/CP.21](#), paragraph 90, and [18/CMA.1](#), paragraph 4, LDCs and SIDS may submit the information under Article 13, paragraphs 7 and 9, of the Paris Agreement at their discretion, the Committee considered the submission of reports and information by the deadline of 31 December 2024 not to be mandatory for LDCs and SIDS.

15. The Committee considered the information provided in the responses by seven Parties concerned with regard to their BTRs under item 4(a) of its agenda (see paragraphs 22–27 below).
16. With regard to mandatory biennial communications of information under Article 9, paragraph 5, of the Paris Agreement, the Committee noted that no other Party¹⁵ had submitted a biennial communication via the online portal referred to in decision [12/CMA.1](#), paragraph 6,¹⁶ between the conclusion of its 14th meeting (18 July 2025) and the conclusion of its 15th meeting (2 October 2025). The Committee recalled its previous discussions relating to mandatory biennial communications of information under Article 9, paragraph 5, of the Paris Agreement.¹⁷
17. With regard to the participation by Parties in the facilitative, multilateral consideration of progress (FMCP) under Article 13, paragraph 11, of the Paris Agreement, the Committee took note of the procedural summary report on the FMCP convened at the 62nd session of the Subsidiary Body for Implementation (SBI 62), which includes a summary of the first in-person working group session (FMCP1).¹⁸ The Committee noted that nine Parties are scheduled to undergo the second working group session (FMCP2) at SBI 63 and considered the information provided by the secretariat in this regard.^{19, 20}
18. The Committee noted that some of the Parties that had been invited to FMCP2 were rescheduled to the subsequent session (FMCP3) due to logistical reasons relating to SBI 63.

(b) Information made available pursuant to rule 19 of the rules of procedure

19. The Committee started consideration of the eleven final technical expert review reports (TERRs), prepared under Article 13, paragraphs 11–12, of the Paris Agreement and made available to it pursuant to rules 7 and 19, paragraph 1, of its rules of procedure.²¹
20. The Committee engaged in an initial discussion on the identification of significant and persistent inconsistencies of the information submitted by a Party pursuant to Article

¹⁵ In addition to the eleven Parties that have submitted biennial communications since 2020, and the Party that submitted its first biennial communication on 13 June 2025, see report on the 14th meeting ([PAICC/2024/M14/3](#)), paragraph 17.

¹⁶ <https://unfccc.int/Art.9.5-biennial-communications>.

¹⁷ Report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 17; report on the 13th meeting ([PAICC/2025/M13/3](#)), paragraphs 13–14: The Committee noted that the group of Parties that has submitted biennial communications under Article 9, paragraph 5, of the Paris Agreement is not limited to Parties that are obliged to provide financial resources in continuation of their existing obligations under the Convention. Some members expressed the view that the indication of whether a Party is a developed country Party should be drawn from the self-categorization as a developed country in that Party's BTR, while other members expressed the view that this should be based on Annex II of the Convention.

¹⁸ [FCCC/SBI/2025/11/Add.2](#).

¹⁹ https://unfccc.int/Second_session_FMCP2.

²⁰ As referred to in paragraph 191 of the modalities, procedures and guidelines for the enhanced transparency framework (MPGs), contained in the annex to decision [18/CMA.1](#), a FMCP shall include a written question and answer phase as well as a working group session phase.

²¹ Available at <https://unfccc.int/first-biennial-transparency-reports> (column 6). Further information on the technical expert review is available at <https://unfccc.int/technical-expert-review>.

13, paragraphs 7 and 9, of the Paris Agreement with the modalities, procedures and guidelines for the enhanced transparency framework (MPGs),²² for the purposes of paragraph 22(b) of its modalities and procedures²³ and rule 19, paragraph 2, of the rules of procedure. In this context, the Committee decided to undertake inter-sessional work on individual TERRs to explore possible approaches on how to identify significant and persistent inconsistencies.

21. The Committee noted with appreciation the interaction of the Co-Chairs with the lead reviewers at the second meeting of lead reviewers of BTRs under the ETF, on 23 September 2025, and the conclusions adopted by the lead reviewers in this regard.²⁴ The Committee reiterated that an open line of communication with lead reviewers of BTRs and Article 6 lead reviewers is desirable, noting decision [5/CMA.3](#), paragraph 40, and decision [6/CMA.4](#), paragraph 14 and annex II, paragraph 49, respectively.²⁵

IV. Agenda item 4: Consideration of issues and engagement with Parties concerned:

(a) Consideration of information provided by Parties concerned

22. The Committee considered the information provided in the responses on behalf of 63 Parties concerned to the Committee's notifications with regard to their NDCs and the responses by seven Parties concerned with regard to their BTRs received between the conclusion of its last meeting (18 July 2025) and the conclusion of its 15th meeting (2 October 2025).²⁶ In continuation of its approach at the 14th meeting,²⁷ the Committee examined challenges and constraints identified by these Parties in their responses, their plans for communicating their NDCs and/or for submitting mandatory reports and information under the ETF, and any requests addressed to the Committee.
23. The Committee reflected and agreed on how to respond to each of these Parties. The Committee also reaffirmed its preparedness to engage with Parties concerned.

²² Modalities, procedures and guidelines for the enhanced transparency framework (MPGs), contained in the annex to decision [18/CMA.1](#).

²³ According to paragraph 22(b) of the modalities and procedures, the Committee may, with the consent of the Party concerned, engage in a facilitative consideration of issues in cases of significant and persistent inconsistencies of the information submitted by a Party pursuant to Article 13, paragraphs 7 and 9, of the Paris Agreement with the MPGs (footnote 22 above).

²⁴ [Conclusions from the 2nd meeting of Lead Reviewers of Biennial Transparency Reports](#), paragraph 12, in which the lead reviewers: "noted the presentation made at the meeting by the Co-Chairs of the PAICC on the interlinkages between the work of the PAICC and the enhanced transparency framework under the Paris Agreement and emphasized that the information provided allowed for a better understanding of the mandates and role of the PAICC in facilitating implementation of the Paris Agreement"; and "requested the secretariat to continue fostering their interaction with the PAICC, including in relation to the definition of 'persistent and significant issues' on the basis of the final technical expert review reports."

²⁵ Report on the 12th meeting ([PAICC/2024/M12/3](#)), paragraph 25.

²⁶ In accordance with rule 20 of the rules of procedure, the Committee had notified the Parties concerned referred to in paragraphs 16 and 24–25 of the report on the 13th meeting ([PAICC/2025/M13/3](#)), see paragraph 27 of the report.

²⁷ Report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 19.

24. In responding to the Parties concerned, the Committee recalled the respective deadlines of 10 February 2025 for the communication of NDCs, and of 31 December 2024 for the submission of mandatory reports and information under the ETF, and reminded Parties that the Committee has no ability to change these deadlines. It further urged Parties to communicate their NDCs and/or submit their mandatory reports and information under the ETF by the date specified in their responses or as soon as possible.

25. The Committee noted the range of challenges raised by some of the Parties concerned, including:

Finance challenges

- constraints related to financial support, including insufficient, delayed or uncertain financial resources;
- delayed engagement or non-responsiveness of institutions that support the preparation of Parties' NDCs and/or BTRs, and revisions in their regulations/rules;

Technical challenges

- technical limitations such as the absence of a fully functional greenhouse gas inventory system, gaps in sectoral emissions data and modelling expertise, and limitations in monitoring, reporting, and verification frameworks;
- limited data availability, collection and sharing;

Institutional challenges

- cross-sectoral co-ordination challenges;
- changes in government, national regulations, staffing, institutional structures, and the arrangement of ministries;
- challenges with regard to stakeholder engagement;
- lengthy national reviews and internal approval processes;
- time required for participatory processes;
- contracting/procurement difficulties and recruitment delays.

Other

- major socio-political constraints, including political instability;
- armed conflict, illegal occupation, genocide; and possible instances of force majeure.

The Committee decided to include a reference to these challenges in its annual report to the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA).

26. The Committee affirmed its intention to prepare a guide or tool aimed at providing orientation on resources available to Parties to support the preparation of NDCs and BTRs, taking into account the resources identified in the initial mapping by the secretariat and relevant existing tools and resources.

27. The Committee noted with concern that over 45 Parties had not provided the Committee with any information relating to the consideration of issues and decided to

follow up with these Parties. The Committee also noted a request by a Party to be consulted, and agreed to make the necessary arrangements, as appropriate.

(b) Consultations with Parties concerned

28. The Committee engaged in consultations with four Parties concerned who had requested to have a consultation during the 15th meeting of the Committee. The consultations were conducted in the form of virtual exchanges²⁸ with the participation of representatives of appropriate finance, technology and capacity-building bodies or arrangements under or serving the Paris Agreement, where so requested and decided in consultation with the Party concerned.²⁹
29. After listening to the presentations and interventions made by these Parties the Committee engaged with them and considered the challenges and constraints as well as the intentions they outlined with regard to the communication of their NDCs and/or their BTRs.
30. The Committee took note of the challenges faced and the progress made by these Parties and included them in its summary included in paragraph 25 above and agreed to continue engaging with them until the NDC and/or BTR are communicated in accordance with the Committee's modalities and procedures.³⁰
31. The Committee also noted that despite these challenges and constraints the Parties confirmed their intentions and timeframes to complete their work on their NDCs and BTRs; some Parties indicated that they have received support to do so, and others indicated that this support was not sufficient.
32. The Committee appreciated the presence of representatives of appropriate finance, technology and capacity-building bodies or arrangements under or serving the Paris Agreement during the consultations and offered to assist the Parties concerned in the engagement with the relevant bodies and arrangements, including to address challenges, and ensure the timely reply of the relevant bodies and arrangements. The Committee also agreed to follow up inter-sessionally, and at its next meeting, to explore specific opportunities to assist these Parties.

V. Agenda item 5: Consideration of systemic issues

33. The Committee continued its consideration and identification of possible issues of a systemic nature with respect to the implementation of and compliance with the provisions of the Paris Agreement faced by a number of Parties pursuant to its function in paragraph 32 of the modalities and procedures and building on its discussions at its 13th and 14th meetings.³¹

²⁸ Noting the non-availability of financial resources, the Committee decided to conduct its consultations virtually, without prejudice to holding in-person consultations pursuant to paragraphs 25 and 27 of its modalities and procedures and rule 21.1, paragraph 4, of the rules of procedure, should resources become available.

²⁹ Pursuant to paragraph 25(c) of the modalities and procedures, and rule 21.1, paragraph 4(b), of the rules of procedure.

³⁰ Footnote 2 above.

³¹ Report on the 13th meeting ([PAICC/2025/M13/3](#)), paragraph 17; report on the 14th meeting ([PAICC/2025/M14/3](#)), paragraph 31.

34. The Committee noted with concern the large number of Parties that had, by the end of its 15th meeting (2 October 2025), still not communicated an NDC,³² and the significant number of Parties that had not submitted mandatory reports and information under the ETF.³³ The Committee also noted the constraints and challenges raised by Parties included in paragraph 25 above.
35. Some Committee members noted that the setting by the CMA of a clear and explicit deadline for the next round of NDCs, as well as the effective communication of that deadline to Parties and the public, is of critical importance. Some Committee members recalled decision [4/CMA.1](#), paragraphs 1–3, and noted the importance of support to developing country Parties in preparing, communicating and accounting for their NDCs.
36. The Committee agreed to continue to discuss whether the matters referred to in paragraphs 34–35 above relate to issues of a systemic nature.

VI. Agenda item 6: Budgetary and financial matters

37. The Committee took note of the information presented by the secretariat on budgetary and financial matters related to the biennium 2026–2027.
38. The Committee reiterated the need to ensure the Legal Affairs division to be fully resourced in the current and future biennia through the core budget to support its mandatory work and encourages, if necessary, Parties to make contributions to the supplementary trust fund in order to support the Committee.

VII. Agenda item 7: Calendar of meetings in 2026

39. In accordance with rule 5 of its rules of procedure, the Committee considered the options presented by the secretariat relating to the possible number, duration, tentative dates and venue of its meetings in 2026.
40. On the basis of a proposal from the Co-Chairs, the Committee decided to hold three meetings in 2026, with its 16th meeting to be held as a four-day meeting in the week of 23–27 March 2026 in hybrid format, subject to the availability of financial resources. The Committee also expressed its preference to hold its 17th meeting no less than two weeks before or two weeks after the SB 64 sessions in 2026.
41. The Committee requested the secretariat to arrange a virtual one-day onboarding meeting as early as feasible in 2026 for the benefit of new members and alternate members and for early planning of the 16th meeting of the Committee. It also requested the secretariat to schedule an inter-sessional online meeting to hear from the Kyoto Protocol Compliance Committee facilitative branch on their experience in their analysis of transparency reports.
42. The Committee requested the secretariat to communicate all dates to members and alternate members well in advance, recognizing that members and alternate members shall confirm their availability for the respective meetings as soon as possible.

³² See paragraph 10 and footnote 9 above.

³³ See paragraph 13 and footnote 12 above.

VIII. Agenda item 8: Annual report of the Committee to the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement

43. The Committee considered the draft for the sixth annual report of the Committee to the CMA and decided to request the secretariat, under the guidance of the Co-Chairs, to complete the report, by reflecting the Committee's report of its 15th meeting and any recommendations, and to circulate it to the Committee for adoption using electronic means, in accordance with rule 9, paragraph 7, of its rules of procedure.

IX. Agenda item 9: Other matters

44. In order to assist the Committee with its work, the Committee requested the secretariat to develop an internal tool to facilitate the timely managing and tracking of its interaction with Parties and their progress on issues under the Committee's consideration.
45. No further matters were raised under this agenda item.

X. Agenda item 10: Adoption of the report on the fifteenth meeting of the Committee

46. The Committee considered and adopted the report of its fifteenth meeting contained in the present document on 15 October 2025.³⁴

XI. Agenda item 11: Closure of the meeting

47. The Committee expressed its deep gratitude to the Co-Chairs for their excellent leadership in advancing the work of the Committee throughout this critical year and also thanked the secretariat for its dedicated support.
48. After thanking the members and alternate members of the Committee for their constructive engagement and hard work, the Co-Chairs closed the meeting.
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³⁴ Using electronic means, in accordance with rule 9, paragraph 7, of its rules of procedure.