

The Enhanced Transparency Framework

Discussion Paper

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Center for Climate and Energy Solutions

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A. Summary

1. The Enhanced Transparency Framework (**ETF**) is a critical lever to building mutual confidence among Parties to the UN Framework Convention on Climate Change (**UNFCCC**) and enhance international cooperation to reach the goals of the Paris Agreement (**PA**).
2. December 2025 will mark the ten-year anniversary of adopting the PA. Most of the implementing guidance that operationalizes the PA was agreed at the UNFCCC’s 24th Conference of the Parties (COP24). Additional technical details and tables were finalized at COP26 and remaining reporting provisions for Article 6 were agreed at COP29. With this, the ETF entered a largely post-negotiations era. Parties must now shift to earnest implementation of the reporting modalities, procedures and guidelines, and comprehensively use and test the adequacy of the transparency system.
3. This paper provides an overview of the state of the ETF under the PA and how its reporting and review processes function. It also considers how these modalities can be used to highlight climate action, foster confidence that Parties are contributing to collective climate efforts, and enhance international cooperation.

Questions for consideration

- How can Parties best use the ETF to build mutual trust and confidence?
- In what ways can the transparency process drive greater momentum on climate action, and how can Parties capitalize on these opportunities to enhance international cooperation?
- How can the technical expert review and facilitative, multilateral consideration of progress (**FMCP**) be best used to help Parties highlight their actions or identify areas of capacity-building or best practice?

B. A Fully Operational Enhanced Transparency Framework

The Importance of Transparency

4. Parties' third update of their nationally determined contributions (**NDCs**), due in 2025, not only require high ambition but implementation and follow-through. By requiring Parties to clearly and consistently report on their progress, the ETF carries the vital role of "building mutual trust and confidence."¹ Reporting and review are binding legal obligations under Paris, though flexibility may be applied for developing country Parties, in particular small island developing states (**SIDS**) and least developed countries (**LDCs**).² Parties are required to provide regular updates on their progress toward fulfilling commitments of both climate action and support. The ETF's built-in flexibility provisions allow for Parties—regardless of capacity—to participate in an iterative learning and improvement process. Shared participation and transparent reporting are intended to enhance mutual trust and enhance cooperation among Parties to achieve the objectives of the PA.
5. Transparency and country-level reporting further help to inform national planning and design of new NDCs, as well as the assessment of collective action through the global stocktake (**GST**). By highlighting Parties' individual efforts to advance climate action, the ETF can improve assessment of the level of collective effort by Parties, providing a more comprehensive understanding to inform the second GST, scheduled between 2026 and 2028. As such, transparency makes up one of three main elements of the PA ambition cycle: NDCs, transparency, and the GST.

The ETF Enters a Post-Negotiations Phase

6. The majority of the ETF's modalities, procedures, and guidelines (**MPGs**) were agreed as part of the Katowice Climate Package in 2018.³ The detailed set of MPGs outline the guiding principles of the ETF, namely that transparency is meant to be conducted in a facilitative, non-intrusive, and non-punitive manner that is respectful of national sovereignty and will avoid placing undue burden on Parties. The MPGs also establish the methodologies to be used by Parties in national inventory reports (**NIRs**), information to be reported to establish progress toward meeting NDCs, and the provisions of the ETF's review mechanisms.
7. At COP26, Parties finalized most of the PA's implementing guidance. For the ETF, they agreed on: specific structures and information to be reported by Parties in tabular formats; greenhouse gas data for national inventories; NDC progress tracking information; financial, technology development, and transfer and capacity-building (**FTC**) support provided and received; outlines for biennial transparency reports (**BTRs**) and review reports, and a training program for technical review experts.⁴
8. The modalities for the PA's carbon market and non-market approaches were finally agreed in 2024 at COP29. Parties finalized inputs for the agreed electronic format (**AEF**) that will inform a centralized accounting reporting platform that will automatically generate information for use in a Party's BTR, should they participate in Article 6 transactions.⁵
9. Capacity-building measures have also matured for developing country Parties to meet the new transparency requirements under the PA. The Paris Agreement established the Capacity-Building Initiative for Transparency (**CBIT**)⁶ and the Paris Committee on Capacity Building (**PCCB**).⁷ As of September 2024, CBIT support has amounted to USD \$168 million covering 100 projects in 90 countries, primarily used to facilitate preparation and production of country BTRs.⁸

C. Transparency System under the Paris Agreement

Biennial Transparency Reports

10. The ETF now supersedes former guidance under the Cancún transparency arrangements, which prescribed different requirements for developed and developing countries.⁹ With bifurcated reporting requirements now retired, all Parties face the same reporting guidelines regardless of development status. That said, developing country Parties, including LDCs and SIDS, have the option to apply flexibility to some reporting provisions in light of their capacity. Parties must still submit national communication (**NC**) reports as agreed at COP16.¹⁰ In an effort to streamline, however, Parties have the option to submit NCs and BTRs as a combined report,¹¹ which can be accomplished by adding NC-specific information to their BTRs.¹²
11. The first BTRs were to be submitted by December 31, 2024, by all Parties, with the exception of SIDS and LDCs, which can submit reports at their discretion. By the end of 2024, 88 Parties had submitted their transparency reports to the UNFCCC, including dozens of SIDS and LDCs. As of April 2, 2025, 100 Parties had submitted BTRs.¹³
12. The BTRs represent an important milestone in tracking progress toward achieving the goals of the PA. Guidance requires Parties to include “information necessary to track progress made in implementing and achieving” their NDCs, particularly information to facilitate clarity, transparency, and understanding of the NDC. To facilitate the understanding and tracking of information across NDCs, Parties are required to provide a structured summary of the information in their BTR. The NDC structured summary must include targets, identify quantitative and/or qualitative indicators to track progress towards those targets, and provide updates on each indicator.¹⁴
13. The ETF requires all Parties to prepare a NIR of greenhouse gases using good practice methodology. Accounting must be conducted in a manner that: promotes environmental integrity; promotes transparency, accuracy, completeness, comparability, and consistency; and ensures the avoidance of double counting, should a Party transfer mitigation outcomes. All Parties must utilize the 2006 Intergovernmental Panel on Climate Change (**IPCC**) Guidelines for National Greenhouse Gas Inventories, or its subsequent refinements. Parties may use nationally appropriate methodologies if they better reflect national circumstances or relate to a lack of resources or data availability. However, they must explain how their methods are consistent with those of the IPCC and prioritize capacity-building toward the IPCC guidelines.¹⁵
14. While not required, each Party should provide adaptation-related information in its BTR. This can include information on current and projected climate change trends and impacts; domestic adaptation priorities; progress toward implementation of adaptation actions; and adaptation gaps and challenges. Parties should also provide updates on the implementation of adaptation actions in accordance with the global goal on adaptation (**GGA**) and the UAE Framework for Global Climate Resilience.¹⁶ Additionally, Parties may communicate any adaptation-related financial, technology development and transfer, and capacity-building needs.¹⁷ To help reduce reporting burdens, Parties can also streamline adaptation-related reporting and submit an adaptation communication (**AdCom**) and satisfy the adaptation requirements in the NC through the BTR.¹⁸
15. Financial support for climate action remains a critical piece of reporting. In their BTRs, developed country Parties are required to report on any financial, technology transfer, and capacity-building support provided to developing country Parties, while any other Parties that provide such support are encouraged to report this information. Similarly, developing country Parties should provide information on support that is needed and received.¹⁹ All parties must also explain the methodologies

used in calculating the value of either support provided or received, though stakeholders have long commented on the lack of common methodologies to do so.

16. The Secretariat has announced that a BTR Synthesis Report will be published in October 2025 ahead of COP30, which will help provide an assessment of progress of NDC implementation.²⁰ Such information will help to inform the GST2 process that is set to begin in 2026.

Technical Expert Reviews

17. BTRs will undergo two review processes. The two-part review allows for an independent assessment of a Party's progress in implementing its NDC and peer review. Both are meant to facilitate the improvement of Party reporting and capacity over time.
18. The first step, known as the technical expert review (**TER**), is intended to review: the information provided in the Party's greenhouse gas inventory; progress against the Party's NDC; and, for developed country Parties, the information on support provided or, for developing country Parties, to information of support needed and received. Reviewers assess whether the BTR was prepared in a way that is consistent with the MPGs and identify areas of improvement and, in the case of developing country Parties, any possible capacity-building needs.
19. The TER process is meant to be facilitative, non-intrusive, and non-punitive. Expert reviewers are intended only to review the consistency of BTR with the guidelines, and are forbidden from making political judgments, reviewing the adequacy or appropriateness of a Party's NDC and domestic action, reviewing the adequacy of support provided, or commenting on the decision by developing country Parties to apply flexibility.²¹
20. Parties may choose to conduct the TER of their BTR in one of three different formats: an in-country review that is scheduled, planned, and conducted in close coordination with the Party; a centralized review that is conducted in a single location, allowing one TER team to review several Parties concurrently; or a desk review that is conducted remotely.²² To optimize the benefits of the TER, Parties agreed in the MPGs that in-country reviews should be utilized consistently, including for the first BTR review and at least two BTRs in a ten-year period.²³
21. The UNFCCC Secretariat has stressed the need for more technical experts given the impending increase in transparency reports and reviews of first BTRs to be completed. Parties responded to the call and registered many new experts to the Roster of Experts.²⁴ In 2023 and 2024, some 5,000 technical experts passed examinations and qualified for participation in TER.²⁵
22. Parties scheduled for TER in 2025 have already been assigned, with the schedule for review posted on the UNFCCC Secretariat webpage.²⁶

Facilitative, Multilateral Consideration of Progress

23. The second step of BTR review—the FMCP—comprises a multilateral, in person Party-to-Party review session, where Parties in a group setting consider the implementation and achievement of a given country's NDC and, if applicable, financial support provided to developing countries. Congruent with the principles of the ETF, the FMCP is intended to be non-intrusive and non-punitive.²⁷
24. FMCP is composed of two phases:²⁸ a written question-and-answer phase, followed by a working group session where Parties can ask questions verbally after Party presentations. Parties therefore have a platform to highlight their domestic action while also building collective confidence that Parties are doing their part to contribute to the attainment of the objectives of the PA.

25. Only Parties are permitted to submit questions, though the sessions are open to registered UNFCCC observers and non-Party stakeholders.²⁹ The group setting allows Parties to learn from each other's experience and gather best practice and also incentivizes Parties to emphasize their action and ambition in the best light possible. As such, the FMCP could present a particular opportunity to build momentum within the climate regime, as well as domestically and highlight opportunities to enhance international cooperation.
26. To allow for comprehensive participation, the FMCP takes place over a two-year cycle, with timing staggered based on the order in which Party BTR were submitted and their TER completed. The first session of the FMCP will be held during the 62nd session of the Subsidiary Body for Implementation (**SBI62**) in June 2025, starting with the first three Parties that submitted their BTR1s.³⁰
27. Going forward, the number of Parties to be included in each FMCP session is projected to increase. To allow for engagement at all capacity levels, SIDS and LDCs may choose to participate as a group during the in-person phase.³¹
28. If a Party does not submit a BTR within 12 months of the December 2024 due date, the Secretariat will, in consultation with the Party concerned, make arrangements for them to participate in the FMCP process nonetheless.³² In this case, other climate-related reports such as NCs or AdComs can be used as the basis of evaluation.

Review of the Modalities, Procedures, and Guidelines

29. Parties agreed to undertake the first review and update of the transparency MPGs no later than 2028 on the basis of Parties' experience with the BTRs, TER, and FMCP.³³ Prudently, this allows Parties several years to test the ETF's reporting provisions and review procedures, as well as evaluate key elements, such as whether standardized reporting formats are capturing all needed information or whether flexibility provisions respond effectively to the capacity of developing country Parties.
30. By 2028, Parties will have: gained a clearer picture of NDC implementation; progressed toward implementing the new collective quantified goal on climate finance (**NCQG**) and the Baku to Belém Roadmap to 1.3T; adopted indicators for the GGA; and undertaken two GSTs. Anticipating these developments, Parties and other UNFCCC stakeholders should begin to take note of possible gaps in the MPGs that could be addressed and improvements made in 2028.

References

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- ³ UNFCCC, *Modalities, Procedures and Guidelines for transparency framework for action and support referred to in Article 13 of the Paris Agreement* [hereinafter MPGs], Decision 18/CMA.1 (March 19, 2019), https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf.
- ⁴ UNFCCC, *Guidance for operationalizing the modalities, procedures and guidelines for the enhanced transparency framework referred to in Article 13 of the Paris Agreement*, Decision 5/CMA.3 (March 8, 2022), https://unfccc.int/sites/default/files/resource/CMA2021_L10a2E.pdf.
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- ⁶ UNFCCC, *Adoption of the Paris Agreement*, Decision 1/CP.21, ¶85 (January 29, 2016), <https://unfccc.int/sites/default/files/resource/docs/2015/cop21/eng/10a01.pdf>.
- ⁷ UNFCCC, *Adoption of the Paris Agreement*, Decision 1/CP.21, ¶71.
- ⁸ Global Environment Facility, *Progress Report on the Capacity-Building Initiative for Transparency*, 68th GEF Council Meeting (November 18, 2024), https://www.thegef.org/sites/default/files/documents/2024-11/EN_GEF_C68_Inf.14_Progress%20Report%20on%20the%20Capacity-building%20Initiative%20for%20Transparency_ca_rev_Nov_6_clean.pdf.
- ⁹ UNFCCC, *Preparations for the implementation of the Paris Agreement and the first session of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement*, Decision 1/CP.24 (March 19, 2019) <https://unfccc.int/sites/default/files/resource/10a1.pdf>.
- ¹⁰ UNFCCC, *Report of the Conference of the Parties on its sixteenth session, held in Cancun from 29 November to 10 December 2010*, Decision 9/CP.16 (March 15, 2011), <https://unfccc.int/sites/default/files/resource/docs/2010/cop16/eng/07a02.pdf>.
- ¹¹ UNFCCC, *Revision of the UNFCCC reporting guidelines on national communications for Parties included in Annex I to the Convention*, Decision 6/CP.25 (March 16, 2020), https://unfccc.int/sites/default/files/resource/cp2019_13a01E.pdf.
- ¹² Reporting requirements for national communications and biennial transparency reports differ. However, as the two reports may be submitted simultaneously, Parties can add information to their BTR which satisfy NC requirements by including information on research and systematic observation, education, training, and public awareness.
- ¹³ UNFCCC, *First Biennial Transparency Reports*, accessed March 25, 2025, <https://unfccc.int/first-biennial-transparency-reports>.
- ¹⁴ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶59-79.
- ¹⁵ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶20-36.
- ¹⁶ UNFCCC, *Global goal on adaptation*, Decision -/CMA.6, ¶34 (November 24, 2024), <https://unfccc.int/documents/644457> (Advance unedited version).
- ¹⁷ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶104-117.
- ¹⁸ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶13.
- ¹⁹ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶ 123-145.
- ²⁰ UNFCCC, *UN Climate Change Quarterly Update: Q4 2024* (March 11, 2025), https://unfccc.int/sites/default/files/resource/message_to_parties_and_observers_q4_update.pdf.
- ²¹ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶148.
- ²² UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶151-161.
- ²³ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶158.

²⁴ "Roster of Experts," UNFCCC, accessed March 27, 2025, <https://www4.unfccc.int/sites/roestaging/Pages/Home.aspx>.

²⁵ UNFCCC, *Progress in development of the Technical Expert Reviewers training programme - SBSTA 2 d(viii)-Mandated event* (November 13, 2024), <https://unfccc.int/event/progress-in-development-of-the-technical-expert-reviewers-training-programme-sbsta-2-dviii-mandated>.

²⁶ "Technical Expert Review," UNFCCC, accessed March 27, 2025, <https://unfccc.int/technical-expert-review>.

²⁷ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶189-196.

²⁸ The FMPC process builds on experiences under the prior transparency regime established under the Convention, namely the facilitative sharing of views (*FSV*) and the multilateral assessment (*MA*).

²⁹ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶¶192-193.

³⁰ UNFCCC, *Launch of the facilitative, multilateral consideration of progress at the sixty-second session of the Subsidiary Body for Implementation* (March 12, 2025), https://unfccc.int/sites/default/files/resource/Message%20to%20Parties_FMCP1_final.pdf.

³¹ UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶194.

³² UNFCCC, *MPGs*, Decision 18/CMA.1, Annex, ¶198.

³³ UNFCCC, *MPGs*, Decision 18/CMA.1, ¶2.