



The Paris Agreement Implementation and Compliance Committee (PAICC) was established in the Paris Agreement to facilitate its implementation and promote compliance. Under the Paris Agreement, Parties have procedural obligations to communicate and maintain Nationally Determined Contributions (NDCs) under Article 4.2; submit a mandatory report or communication of information under Article 13; participate in the facilitative multilateral consideration of progress and submit a mandatory communication of information under Article 9.5 and participate in their review. The effectiveness of the PAICC is thus key to provide momentum to global climate ambition as well as accountability in the regime. As a relatively newly established subsidiary body – operationalised only after the first cycle of NDCs – its mechanisms have been used twice and have yet to be developed further. This explainer provides clarity on it.

What is the PAICC?

The PAICC was established under Article 15 of the Paris Agreement (PA) which refers to a **“mechanism to facilitate implementation of and promote compliance”** with the provisions of the PA, which mainly establish procedural obligations (of conduct and not of result). Therefore, the PAICC has competence to act if Parties fail to deliver on these, for example, failing to submit their Nationally Determined Contributions (NDCs) or Biennial Transparency Reports (BTRs) – but cannot review if Parties are meeting their own commitments and targets contained in those instruments.

The Committee is “expert-based and facilitative in nature and functions in a manner that is transparent, non-adversarial and non-punitive. Further, it is required to pay particular attention to the respective national capabilities and circumstances of the Parties to the PA. Hence the Committee distinguishes itself from the Kyoto Compliance mechanism that had facilitative and enforcement branches, with the latter able to impose penalties to non-compliant Annex I Parties over breaches in their substantive obligations as well in regards to mitigation.

The Committee consists of 12 members who have recognised

competence in relevant scientific, technical, socioeconomic or legal fields and serve in their personal capacity.

The members are elected by the Conference of Parties serving as the meeting of the Parties to the Paris Agreement (CMA) based on equitable geographical representation, with two members each from the five regional groups of the UN and one member each from the Small Island Developing States and the Least Developed Countries, considering gender balance.

The Committee also comprises of 12 alternate members following the same rules of representation, that are entitled to participate in the proceedings without a right to vote. Members are elected to serve for a period of three years with a maximum of two consecutive terms. Current PAICC membership is available [here](#). The Committee operates with two co-chairs and meets between twice and three times a year, each time, producing a [meeting report](#).

Every effort is made to reach decisions by consensus, in the absence thereof, a decision may be adopted by at least three quarters of the members present and voting. The PAICC reports annually to the CMA and may receive guidance from it. The annual report of the Committee includes formation on any decision adopted by the Committee and is made publicly available.

Role of the Committee

The work of the Committee is guided by the provisions of the PA, and relevant CMA decisions. After the PA came into force, a major focus was setting up the necessary frameworks, rules and procedures for the Committee to operate. Decision [20/CMA.1](#) contains the modalities and procedures of the Committee which were adopted at the first meeting of the CMA in 2018. The Committee began its active role in supporting Parties to meet their commitments under the PA in 2020, despite the CMA not having finalised its rules and procedures until December 2022 by Decision [24/CMA.4](#).

Under the PA, Parties have procedural obligations to communicate and maintain NDC under Article 4.2; submit a mandatory report or communication of information under Article 13; participate in the facilitative multilateral consideration of progress and submit a mandatory communication of information under Article 9.5 and participate in their review. Therefore, the Committee’s competence includes the consideration of issues in the case a Party has not fulfilled one or more of these obligations. The modalities and procedures reiterate that the Committee shall not function as an enforcement or dispute settlement mechanism, nor impose penalties or sanctions and shall respect national

sovereignty. In carrying out its work, the Committee strives to avoid duplication of effort and to support Parties in the implementation of NDCs.

The modalities and procedures set out a number of factors which guide the Committee in exercising its functions, as well as applying the relevant rules of procedure. The guiding factors include the legal character of the provisions of the PA; the comments received from the Party concerned; the work undertaken by other bodies; and the national capabilities and circumstances of the Party concerned. In addition, the Committee should avoid duplication of mandated work and take into account considerations related to the impacts of response measures.

In the course of its work, the Committee may seek expert advice, and seek and receive information from processes, bodies, arrangements and forums under or serving the PA.

Processes of the PAICC

Initiation of engagement. The Committee operates through several mechanisms that depend on how the process is initiated and by whom. There are different ways the Committee may initiate engagement or consider issues. The processes are established in the 'Rules of procedure of the committee to facilitate implementation and promote compliance' (rules) and in the 'Modalities and procedures for the effective operation of the committee' (modalities and procedures).

By a Party: a Party can request the Committee's support on any provision of the PA (however, Parties may not refer other Parties). This amounts to a 'self-referral' (rule 17).

Non-discretionary initiation by the Committee: The Committee is to initiate engagement where a specific mandatory requirement of the PA is not met. The mandatory

requirements of the PA include communicating or maintaining an NDC; submitting mandatory reports or communications under Articles 13.7, 13.9 and 9.7; participating in the facilitative, multilateral consideration of progress under Article 13 and submitting mandatory communication of information under Article 9.5 on ex-ante finance (rule 18). This procedure is non-discretionary, which means that the PAICC must initiate it.

Discretionary initiation by the Committee: The Committee can also initiate engagement, with the consent of the Party, in cases of 'significant and persistent inconsistencies' in a Party's mandatory reporting submitted pursuant to Articles 13.7 and 13.9 (rule 19). The Technical Expert Review (TER) team reviews the BTRs and may issue a recommendation to an area of improvement. Where significant and persistent inconsistencies in reporting that has been subject to a recommendation in a TER report remain, the PAICC may consider such issues. The Committee reviews both the recommendation and any written comments provided by the Party to determine whether a significant and persistent inconsistency exists.

Consideration of issues. To facilitate implementation and promote compliance, the Committee shall take appropriate measures.

These may include engaging in dialogue with the Party concerned, assisting the Party in the engagement with appropriate finance, technology and capacity-building bodies or arrangement (but not duplicating the work of those bodies), make recommendations to the Party concerned including recommending and assisting in the development of an action plan and issue findings of fact in relation to matters of implementation and compliance.

The Committee will also take into account the respective national capabilities and circumstances of Parties, recognising the special circumstances of Least Developed Countries and Small Island Developing States.

Systemic issues. The Committee may identify issues of a systemic nature concerning the implementation of and compliance with PA provisions faced by a number of Parties and bring those issues and, as appropriate, any recommendations to the CMA for its consideration (rule 23, para 1).

The PAICC may further develop working arrangements for the consideration of systemic issues on the basis of experience gained in its work (rule 23, para 2). In addition, the CMA may request the Committee to examine issues of a systemic nature (Modalities and procedures, para 33). After consideration of these issues, the Committee must report back to the CMA, and where appropriate, make recommendations.

Main features

Facilitative and non-adversarial nature. The Committee helps Parties to identify appropriate measures, findings or recommendations to facilitate their implementation and compliance. It engages with Parties in a dialogue to identify challenges and recommend solutions. The Party concerned may provide to the Committee, in the form of written submissions and comments, information on capacity constraints, needs or challenges, including in relation to support received, for the Committee's consideration in its identification of measures, findings or recommendations.

Flexibility. The Committee, when presenting a proposed timeline to the Party concerned, may accord flexibility with respect to timelines of procedures under Article 15 of the PA to Parties that respond to the proposed timeline of the Committee in writing within 3 weeks, stating reasons for the request (rule 16). The PAICC will accord this flexibility to the extent it deems appropriate, paying particular attention to the respective national capabilities and circumstances of the Party concerned, and the reasons set out in the request.

Additional functions of the PAICC

Transparency and Reporting. The Committee produces meeting reports and annual reports to the CMA detailing its activities and findings.

Capacity-building. The Committee organises capacity-building activities – such as events, side-events and provides e-learning resources – to enhance the technical and institutional capabilities of Parties and support them in their compliance efforts.

PAICC summary of work in 2025

In 2025, updated NDCs and BTRs were due, as Parties must submit their NDCs 9–12 months prior to the relevant CMA session. In April 2025, at its [13th meeting](#), the Committee found that 171 Parties had not communicated their NDCs and initiated consideration of issues with respect to these Parties pursuant to rule 18.2(a) of its rules of procedure, sending notification letters to remind Parties of their obligation to submit updated NDCs. In addition, the Committee ‘acknowledged that there is a potential for identifying issues of a systemic nature and agreed that it will keep this aspect under review, under its function under paragraph 32 of the modalities and procedures’, given the high number of absent submissions. It is important to consider that, as mentioned earlier, the PAICC can develop further working arrangements for the consideration of systemic issues on the basis of experience gained in its work.

The Committee also deliberated on the meaning of the term ‘successive’ NDCs in Article 4.2 of the PA (para 18). Certain PAICC members interpret it to mean that each new NDC has a time frame or end date that goes beyond the one of the then current NDC, drawing on paragraph 2 of decision 6/CMA.3, contains and encouragement but not an obligation, that in 2025, Parties communicate an NDC with an end date of 2035.

◆◆ The PAICC and previous NDC cycle



In 2023, the Committee received information from the Secretariat that one Party had not communicated its NDC, and thus initiated a consideration of issues pursuant to rule 18.2(a) of its rules of procedure.

In addition, the Committee also initiated a consideration of issues in accordance with rule 18.2(d) for a Party did not submit its mandatory biennial communication under Article 9.5. The Committee has notified the Party concerned, requesting them to: ‘(1) submit information on the matter at hand on or before 30 June 2023, (2) communicate any request for flexibility on or before 30 May 2023 and (3) communicate any request for a consultation at the 10th meeting of the Committee on or before 30 June 2023.’

Following this notification, one Party submitted its NDC on 31 May 2023 and the other Party submitted the information on 30 June 2023. The Committee thus considered the issues being resolved.

Other Committee members found that ‘successive’ NDCs could refer to an NDC that follows the previously submitted NDC and which go beyond the previous NDC in terms of commitment and not of time frame.

Finally, other members viewed ‘successive’ NDCs to refer to NDCs communicated every 5 years and informed by the outcomes of the global stocktake in accordance with Article 4.9 PA. Regardless, the PAICC noted that new NDCs need to be informed by the global stocktake. The PAICC also reiterated its concern that the NDC registry could result in a Party’s NDC that is currently being implemented being archived and alternatively, in a Party’s NDC that is not yet being implemented being labelled as “active”. This would prevent the Committee, and the public, from determining, which NDC is active and being maintained by a Party at any point in time (para 21).

After Parties also raised this issue at CMA 6 in the PAICC informal consultations, the Committee has again asked the Secretariat to reflect on how to address this concern. The Committee then considered the submission of BTRs or communication of information under Article 13, paragraphs 7 and 9, and Article 9, paragraph 7, of the Paris Agreement. Among others, PAICC welcomed that even when LDCs and SIDS have flexibility on

when to submit their reports and information under Article 13, 14 Parties from LDCs and SIDS had submitted their BTRs and information under the Enhanced Transparency Framework (see our advice on [flexibility](#)).

Concerning the submission of mandatory reports or communication of information under Articles 13.7, 13.9 and 9.7 of the PA, 30 Parties did not submit a mandatory national inventory report of anthropogenic emissions by sources and removals by sinks of greenhouse gases under Article 13 paragraph 7(a); 33 Parties did not submit mandatory information necessary to track progress made in implementing and achieving their NDCs under Article 13.7(b); and 2 developed country Parties did not submit mandatory information on financial, technology transfer and capacity-building support provided and mobilised under Articles 13.9 and 9.7.

Hence, the Committee initiated consideration of issues with respect to these Parties following rule of procedure 18.2(b). Finally, PAICC also noted that some Parties reporting financial technology and capacity building support in their BTRs are not within the group of Parties that are obliged to provide financial resources in continuation of their existing obligations under the Convention.



The deadline for Parties regarding the communication and maintenance of NDCs was 10 February 2025. While six Parties communicated their NDCs thereafter – but before the end of the 13th meeting of the PAICC – 171 Parties did not communicate an NDC by the deadline. The PAICC, therefore, initiated consideration of issues in conformity with paragraph 22(a)(i) of its modalities and procedures and rule 18(2)(a), as well as considered the identification of issues of a systemic nature, keeping the situation under review (CCC/PA/CMA/2025/9, paras 9–11). The PAICC specified that it understands ‘maintaining’ an NDC as having an ‘active’ NDC in the public registry, thus finding that all 195 Parties to the Paris Agreement conform to this (CCC/PA/CMA/2025/9, para 14).

By the 14th meeting of the PAICC in July, eight additional Parties communicated their NDCs and 23 Parties had responded to the PAICC’s notification of its decision to initiate consideration of issues on their NDCs, some requested consultation with the PAICC. The Committee examined the challenges and constraints identified.

Ahead of the 15th meeting, 33 Parties had communicated an NDC since its 14th meeting. The PAICC thus considered the issue resolved. In response to PAICC’s notification of initiation of consideration of issues regarding the delayed NDCs and BTRs, the Committee noted the following challenges encountered by Parties (ibid, paras 57–62):

Financial 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 changes in their regulations or rules.

Technical challenges:

- Technical limitations, such as the absence of a fully functional GHG inventory system, gaps in sectoral emission data and in modelling expertise, and limitations in monitoring, reporting and verification frameworks;
- Limited data availability, data collection and data-sharing.

Institutional challenges:

- Cross-sectoral coordination challenges;
- Changes in government, national regulations, staffing, institutional structures and arrangement of ministries;
- Challenges with regard to stakeholder engagement;
- Lengthy national review and internal approval processes;
- Time required for participatory processes;
- Difficulties in contracting or procurement and delays in recruitment;

Other challenges:

- Major sociopolitical constraints, including political instability;
- Armed conflict, illegal occupation, genocide, and possible instances of force majeure.

In response to these issues, the PAICC intends to prepare a guide or tool, which would guide Parties to the resources available that supports their NDC and BTR preparation (ibid, para 61).

With regards to the compliance procedure under the Paris Agreement, even though four Parties were in consultations with the PAICC, the Committee did note with concern that over 45 Parties had not provided any information relating to the consideration of issues (ibid, para 62) and a large number had not communicated an NDC by October 2025, a month before the COP (ibid, para 69), thus not engaging with the process. Some PAICC members noted that the clear and explicit submission deadline set by the CMA and its effective communication to Parties and public was “of critical importance” for the next round of NDCs. Others reiterated the importance of support to developing countries Parties for the preparation, communication and accounting of their NDCs (ibid, para 70).

Despite the significance of compliance, discussions on the work of the Committee and the outcomes of its annual reports have not taken place this year. At CMA 6, the first review of the modalities and procedures of the PAICC was postponed, with a view to making recommendations for consideration and adoption by CMA 9 ([Decision 23/CMA.6](#)). In addition, last November, at CMA 7, Parties decided to forgo the consideration of matters relating to the PAICC.