INTERNATIONAL

# Harnessing the Opportunities of the Facilitative Multilateral Consideration of Progress (FMCP) for Ambition

Utilizing the Full Potential of the Paris Agreement's Transparency Regime August 13, 2025

The facilitative multilateral consideration of progress (*FMCP*) is much more than a niche reporting process—it is a powerful forum to share national climate action success stories and uncover opportunities for enhanced international cooperation among countries to overcome challenges to implementation. As the number of Parties participating in FMCP grows, it should be given space and attention in line with its potential to drive narratives of progress.

What is the FMCP? The FMCP is the second review of a country's biennial transparency report (*BTR*), conducted by peer review. Through presentations and a question-and-answer session, Parties share their progress toward achievement of nationally determined contributions (*NDCs*) and efforts related to climate finance.<sup>1,2</sup> See Annex for more detail.

The FMCP improves understanding of national climate action under the Paris Agreement. While important to set headline ambition through NDCs, it is equally critical for Parties to report on progress towards meeting their respective climate pledges.

**Reporting feeds implementation back into the UNFCCC system.** Tracking progress not only facilitates sharing of good practice and challenges; it also crucially recognizes countries for their climate action and strengthens assessment of collective progress, including by informing the global stocktake (*GST*).

FMCP sessions include discussion of Party climate finance efforts. Parties are expected to provide an update on their climate finance efforts during their FMCP presentations. This could complement other reporting on finance, bring greater clarity to climate finance provided and received by Parties, and even pave the way for conversation about whether conditionalities in NDCs have been met.

Transparency can usefully increase engagement and cooperation between Parties. The FMCP's mandated presentation and new informal dialogue afford Parties ample opportunity to interact and boost understanding of best practice.

Interest in the FMCP must be amplified. There are many options to elevate the political profile of the FMCP, some of which include: scheduling the FMCP to allow for maximum attendance; securing ministers or other high-level stakeholders to conduct their respective Party presentations; making Party presentations comprehensible to public audiences; encouraging Party meetings with their civil society to directly present reporting findings and solicit feedback; and driving greater outreach to media by Parties and non-Parties for greater press coverage.

#### **Contents**

A.	The Many Opportunities of the FMCP	2
В.	Championing Implementation	
C.	Spotlighting Climate Finance Efforts	
D.	Increasing Engagement Among Parties and Non-Parties	
E.	Additional C2ES Resources	5
F.	Annex: FMCP Mandates and Logistics	5
G.	References	6

#### **Questions for consideration**

- Given that the FMCP includes review of Parties' Article 9 efforts, how can it help assess progress towards meeting the requirements of conditional NDCs?
- How might a diverse set of actors be engaged to use the experiences and lessons shared during the FMCP to build narratives that spur and motivate greater momentum on climate?

## A. The Many Opportunities of the FMCP

- 1. To many, the climate regime's transparency system may seem to comprise complex technical processes that are singularly focused on satisfying reporting and review requirements, of value only to an accounting process. This is a misperception that misses the real potential to reach the wider international community. Mechanisms like the FMCP have the power to drive narratives about successful national implementation of climate objectives in service of the Paris Agreement. Read more about the specific logistics and mandates of the FMCP in the Annex.
- 2. While it is vitally important for Parties to set headline ambitious targets through their nationally determined contributions (**NDCs**), it is equally imperative that they follow through on the action needed to reach these climate pledges, as well as the measures to monitor and verify their efficacy. Without a clear understanding of individual progress towards NDCs, there can be no clarity on collective action through the global stocktake (**GST**). Without a "reporting-back" function, Parties' NDCs might otherwise be seen as hollow, aspirational goals.
- 3. For these reasons, the Paris Agreement's transparency regime, in particular the FMCP, is a critical part of UNFCCC meetings, including the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), and should be accorded the space and attention commensurate with its importance to the process.

## **B. Championing Implementation**

- 4. COP30 is the first to occur with the full architecture and implementing guidance of the Paris Agreement in place. It marks the end of a significant period—over a decade of negotiations around the adoption of the Paris Agreement have now concluded. These changes cue a natural shift, one in which Parties concentrate more on implementation and progress toward meeting their respective NDCs, and in which COPs take note of these advancements.
- 5. Expectations are high that submitted and forthcoming NDCs forecast high ambition through to 2035. Additionally, the action agenda is being refocused on non-Party stakeholders (*NPS*), following through



- on the targets and signals from the first GST.<sup>3</sup> As such, COP30 is well-positioned to demand that Parties and NPS forge ahead on implementation.
- 6. How can progress be determined without monitoring and analysis of existing measures? BTRs serve as the main avenue by which national implementation efforts can feed back into the CMA process. Tracking progress under the Paris Agreement through the FMCP therefore serves multiple purposes, including:
  - facilitating the sharing of best practice or common challenges
  - public recognition and commendation for national action, as well as the headway being made toward achieving NDCs
  - improving understanding of collective progress towards the first GST (*GST1*) targets and informing subsequent GSTs.
- 7. As a significant part of the reporting and review process, the FMCP is a potent tool to champion implementation. During the review of BTRs, "each Party shall participate in a facilitative, multilateral consideration of progress with respect to efforts under Article 9, and its respective implementation and achievement of its nationally determined contribution."<sup>4</sup>

# **C. Spotlighting Climate Finance Efforts**

- 8. It is clear from Party positions and agenda disputes at recent meetings that many are eager to see greater transparency regarding climate finance. All Parties must regularly publish BTRs that update not only on progress made towards achieving their NDCs,<sup>5</sup> but also on financial, technology development and transfer, and capacity-building (*FTC*) support provided and updates on FTC needed or received.<sup>6</sup> Though the modalities, procedures, and guidelines (*MPGs*) lay out varying levels of requirements for the numerous FTC elements,<sup>7</sup> all Parties should report both finance provided and finance received in BTRs, providing additional insight into the intricacies of project finance for Parties.
- 9. The FMCP contains an additional mandate with respect to finance—charging Parties to undertake the review "with respect to the Party's efforts under Article 9 of the Paris Agreement." Though broad, this mandate ensures that the breadth of activity under Article 9 might be assessed and acknowledged through the FMCP. As such, Parties' efforts with respect to Article 9 will be considered in their FMCP presentations. They might also expect to receive questions during the FMCP group review regarding the information provided in their BTR relevant to efforts under Article 9.
- 10. Many developing country Parties included conditional elements in mitigation and adaptation targets in their 2030 NDCs. 9,10 It remains to be seen how many 2035 NDCs are made conditional upon the provision of support. However, improved understanding of what support Parties have provided, as well as what developing country Parties have received, might allow for Parties to address conditionalities laid out in NDCs and other climate pledges. The FMCP could prompt conversation around Article 9, bringing greater clarity to conditionalities and how Party needs have been met thus far. It could also probe what more is necessary in order to fill the remaining conditionality gaps.
- 11. Given the scope of Article 9, the FMCP could also be used as an opportunity to seek clarification from Parties on their efforts and progress towards meeting the targets set under the new collective quantified goal (*NCQG*) on climate finance and to enact the recommendations of the Baku to Belém Roadmap to 1.3T.<sup>11</sup> Developed country Parties have the option to present not only on their climate finance provided but also their Article 9.5 communications to provide greater clarity on future budget availability. And given the importance of South-South cooperation in the NCQG, <sup>12</sup> developing country Parties that have provided finance could similarly give updates on climate finance provisions and their forecasted climate finance budget.

## D. Increasing Engagement Among Parties and Non-Parties

- 12. In designing the FMCP, Parties mandated that the multilateral review modality resemble a formal session comprising a presentation and written and verbal question and answer sessions. This is very similar to review formats under the previous reporting processes.<sup>13</sup> This group review format provides a good baseline for all Parties to engage in the process, either through written submissions or through in-person engagement.
- 13. At the 62<sup>nd</sup> session of the Subsidiary Bodies (*\$B62*), the UNFCCC Secretariat trialed a voluntary informal dialogue following the mandated, formal FMCP. This informal dialogue was well received by Parties for its format, which allowed for the sharing of best practice among technical transparency negotiators. The number of Parties participating in the FMCP will grow; Parties should be open to refining the informal dialogue or exploring similar approaches. For example, breaking the informal dialogue into thematic sessions for mitigation, adaptation, or FTC could improve the relevance of the discussion for specific actors or better focus group questions and conversations.
- 14. Of the BTRs which have gone through the individual review, a smaller number of Parties are expected to present at COP30, including the European Union and South Africa. The number of Parties is likely to increase at each subsequent meeting of the Parties at SBs and COPs. Recognizing that the first FMCP session at SB62 comprised 3 Parties and lasted several hours, it is likely that the next FMCP will take a considerable amount of time.
- 15. The potential for the FMCP to take place over many hours or days during COP could be seen as an opportunity rather than an additional demand on Parties' time. The FMCP is critical to showcase NDC progress and other country accomplishments. The FMCP should be accorded time at the COP proportional to its importance. Efforts to unnecessarily shorten FMCP could undermine its purpose and effectiveness.
- 16. Greater time for FMCP might create an opportunity for continental or regional coverage on particular days of the COP, with the potential to provide an avenue for increased coherence in NPS announcements. For instance, private sector NPS could coordinate statements with their Party on the same day to maximize coverage on national and subnational efforts.
- 17. Generating greater interest among civil society and the media regarding FMCP is possible,<sup>14</sup> but only if a diversity of Parties and NPS acknowledge its importance and use their resources to elevate its profile. These efforts might include:
  - Logistically, the COP schedule should maximize Party attendance at the FMCP, such as the approach taken to schedule the High-Level National Statements delivered during the COPs.
  - Ministers or other high-level Party officials could agree to conduct their Parties' presentations during the FMCP, instead of technical negotiators, heads of delegation, or state representatives. Allowing ministers to highlight their countries' achievements could increase exposure for Party presentations and result in greater participation. A collective agreement by ministers to give presentations could garner even greater attention.
  - Parties could make presentations less technical and more understandable to the public. As the
    presentations will be made available on the online platform, Parties can use their presentation to
    show general audiences how the Paris Agreement is working for, and relevant to, their countries by
    highlighting examples of implementation in their national context.
  - Parties could engage their respective civil society organizations to solicit feedback on their BTR and progress towards meeting their NDC at each COP.
  - Greater education and outreach to media by civil society organizations, Parties, and the Secretariat, highlighting the role of the FMCP process, could allow for greater press engagement on key findings, driving increased interest from civil society and the public at large.



#### E. Additional C2ES Resources

- Capitalizing on Transparency to Accelerate Climate Action (April 2025)
   https://www.c2es.org/document/capitalizing-on-transparency-to-accelerate-climate-action-discussion-paper/
- The Enhanced Transparency Framework (April 2025)
   https://www.c2es.org/document/the-enhanced-transparency-framework-discussion-paper/
- The Enhanced Transparency Framework in Practice (July 2024)

  https://www.c2es.org/document/the-enhanced-transparency-framework-in-practice/

#### F. Annex: FMCP Mandates and Logistics

- 1. For the first time since reporting began under the Convention in 1995,<sup>15</sup> the Paris Agreement's Enhanced Transparency Framework (*ETF*) has aligned all reporting requirements for developed and developing countries through a common reporting methodology for climate information and timeline.<sup>16</sup> The ETF leaves space for continuous improvement and capacity-building and allows developing countries to apply flexibility in light of their capacity.<sup>17,18</sup> Further, least developed countries (*LDCs*) and small island developing states (*SIDS*) may provide transparency reports at their discretion.<sup>19</sup>
- 2. The ETF now supersedes former guidance under the Cancún transparency arrangements, which prescribed different requirements for developed and developing countries.<sup>20</sup> The ETF is designed to be non-intrusive and non-punitive. With bifurcated reporting requirements now retired, all Parties follow the same reporting guidelines regardless of development status. Developing country Parties, particularly LDCs and SIDS, may apply flexibility to reporting provisions in light of their capacity.
- 3. The BTRs represent an important milestone in tracking progress toward achieving the goals of the Paris Agreement. Detailed information on the mandatory and voluntary reporting components of the BTRs is covered in a recent technical paper by C2ES, <u>The Enhanced Transparency Framework</u>. After a Party submits its BTR, it undergoes two review processes. The first is a technical expert review (**TER**), an assessment of the BTR conducted by independent experts. The second is the FMCP, which is conducted in a group peer review format during the COP or SBs.
- 4. The FMCP comprises several formal stages. Ahead of any meeting of the Parties, there is a written question-and-answer phase, and later, a working group session where Parties provide presentations on their progress and implementation, followed by a verbal question-and-answer session. The UNFCCC Secretariat has also trialed an informal dialogue to facilitate greater discussion and sharing of best practice among Parties. The FMCP serves as a platform for Parties to highlight their domestic action while also building collective confidence that Parties are doing their part to attain the objectives of the Paris Agreement. The process is well-suited to generating productive conversations among Parties to improve the implementation of their NDCs and encouraging enhanced international cooperation to overcome common emerging challenges to implementation.
- 5. Participation in the FMCP is obligatory for all Parties to the Paris Agreement. The transparency MPGs agreed at COP24 state that even if a Party does not submit a BTR within twelve months of the due date<sup>21</sup> the Secretariat will make arrangements for the Party concerned to participate in the FMCP process nonetheless.<sup>22</sup> Other reports, such as National Communications (*NCs*) or Adaptation Communications (*AdComs*), can be used as the basis for evaluation, but no Party is exempt from FMCP. Failure to submit a BTR will not absolve Parties of the need to present on their NDC progress.
- 6. Party engagement in the FMCP takes place over a two-year cycle. The timing of Parties is staggered based on the order in which Party BTRs were submitted and their TER completed. The UNFCCC Secretariat estimates that between 20 and 30 Parties would need to complete the FMCP during each session of the SBs and COPs in order to complete the two-year cycle in a timely fashion.



#### **G. References**

<sup>&</sup>lt;sup>1</sup> United Nations Framework Convention on Climate Change [hereinafter 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, Annex, ¶ 189 (March 19, 2019), <a href="https://unfccc.int/sites/default/files/resource/CMA2018">https://unfccc.int/sites/default/files/resource/CMA2018</a> 03a02E.pdf.

<sup>&</sup>lt;sup>2</sup> The ETF is meant to be conducted in a "facilitative, non-intrusive, non-punitive manner, respecting national sovereignty and avoiding placing undue burden on Parties" per Decision 18/CMA.1, Annex, ¶¶ 4-6.

<sup>&</sup>lt;sup>3</sup> André Aranha Correa do Lago, "Fourth Letter from the Presidency," (June 20, 2025), <a href="https://cop30.br/en/brazilian-presidency/letters-from-the-presidency/fourth-letter-from-the-presidency">https://cop30.br/en/brazilian-presidency/letters-from-the-presidency/fourth-letter-from-the-presidency</a>.

<sup>&</sup>lt;sup>4</sup> UNFCCC, Paris Agreement, Art. 13.3, December 12, 2015, T.I.A.S. No. 16-1104, https://unfccc.int/sites/default/files/english paris agreement.pdf.

<sup>&</sup>lt;sup>5</sup> Center for Climate and Energy Solutions [hereinafter C2ES], *The Enhanced Transparency Framework* (Washington, D.C.: C2ES, April 2025), https://www.c2es.org/document/the-enhanced-transparency-framework-discussion-paper/.

<sup>&</sup>lt;sup>6</sup> UNFCCC, MPGs, Decision 18/CMA.1, Annex, ¶ 10.

<sup>&</sup>lt;sup>7</sup> UNFCCC, MPGs, Decision 18/CMA.1, Annex, ¶¶ 118-145.

<sup>&</sup>lt;sup>8</sup> UNFCCC, Paris Agreement, Art. 13.11.

<sup>&</sup>lt;sup>9</sup> W. Pieter Pauw, P. Castro, J. Pickering, S. Bhasin, "Conditional nationally determined contributions in Paris Agreement: foothold for equity or Achilles heel?" *Climate Policy* (2019): 468-484, https://doi.org/10.1080/14693062.2019.1635874.

<sup>&</sup>lt;sup>10</sup> Abdulrasheed Isah, Florian Egli, Tobias S. Schmidt, Anna Stünzi, "Quantifying climate finance needs in the nationally determined contributions of developing countries," *Climate Policy* (2025): 1-18, https://doi.org/10.1080/14693062.2025.2460607.

<sup>&</sup>lt;sup>11</sup> The Baku to Belém Roadmap to 1.3T is expected to be published ahead of COP30 in accordance with the NCQG decision. UNFCCC, New collective quantified goal on climate finance, Decision 1/CMA.6, ¶ 27 (March 27, 2025), https://unfccc.int/sites/default/files/resource/cma2024\_17a01E.pdf.

 $<sup>^{12}</sup>$  UNFCCC, New collective quantified goal on climate finance, Decision 1/CMA.6,  $\P$  7.

<sup>&</sup>lt;sup>13</sup> 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*).

<sup>&</sup>lt;sup>14</sup> C2ES, *Capitalizing on Transparency to Accelerate Climate Action* (Washington, D.C.: C2ES, April 2025), https://www.c2es.org/document/the-enhanced-transparency-framework-discussion-paper/.

<sup>&</sup>lt;sup>15</sup> Parties first began to submit transparency reports as National Communications in 1995 following adoption of the UNFCCC.

<sup>&</sup>lt;sup>16</sup> C2ES, The Enhanced Transparency Framework.

<sup>&</sup>lt;sup>17</sup> UNFCCC, Paris Agreement, Article 13.3.

<sup>&</sup>lt;sup>18</sup> UNFCCC, MPGs, Decision 18/CMA.1, Annex ¶¶ 4-6.

<sup>&</sup>lt;sup>19</sup> UNFCCC, MPGs, Decision 18/CMA.1, Annex, ¶ 4.

<sup>&</sup>lt;sup>20</sup> 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.

<sup>&</sup>lt;sup>21</sup> The deadline for Parties' first BTRs was December 31, 2024.

<sup>&</sup>lt;sup>22</sup> UNFCCC, MPGs, Decision 18/CMA.1, Annex, ¶ 198.