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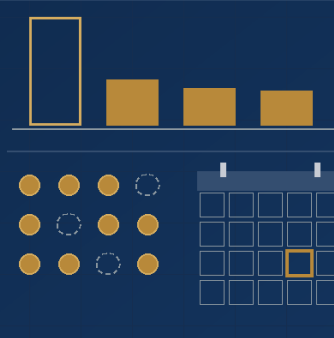
PARIS AGREEMENT · COP31 · SUDAN

Three Silent Countries Named. Sudan Answered. Now It Owes a Date.

The Paris Agreement compliance committee reports to COP31 in Antalya. Around 30 parties, Sudan among them, still lack a new NDC.

3Bi Research Team

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The Paris Agreement's compliance committee has named three countries that ignored its letters on missing climate plans. Sudan is not among them: it replied. Before COP31, 3Bi argues, Sudan should send the committee a dated timeline for its NDC 3.0.

The Paris Agreement Implementation and Compliance Committee reports to the CMA at COP31 in Antalya, 9–20 November 2026. Sudan has replied to the committee but has not yet communicated a new NDC. (Illustration: 3Bi)

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The Hook

Three weeks before COP31 opens in Antalya, the body that polices the Paris Agreement has done something it had avoided for months: it named names. In its annual report to the Paris Agreement's governing body (the CMA), published on 16 October, the Paris Agreement Implementation and Compliance Committee (PAICC) listed the Democratic Republic of the Congo, Senegal and North Korea as the three parties that had neither communicated a nationally determined contribution (NDC) nor submitted a Biennial Transparency Report (BTR), and had not answered any of its notifications "despite several reminders" (PAICC annual report, FCCC/PA/CMA/2026/2, 16 October 2026). Sudan is not on that list. It is still among the roughly 30 parties without a new NDC, but it wrote back. Climate Home News reports that a letter from a Sudanese official to the committee said the country's NDC preparation had been suspended, one of several governments citing exceptional circumstances (Climate Home News, 20 October 2026). That reply puts Sudan in the committee's facilitative track rather than its spotlight. The question for Khartoum before Antalya is what it does with that position.

The Argument

First, the committee's main tool is engagement, not punishment, and Sudan is on the right side of the line it has just drawn. The PAICC cannot fine anyone. Its report says it decided to name the three silent parties "with a view to facilitating engagement" and has invited them to a consultation at its next meeting "with the purpose of identifying any challenges and constraints". It also noted "that some delays may be due to the national capabilities and circumstances of the Parties" (PAICC annual report, 16 October 2026). The naming was contested. In July the committee counted 12 parties that had ignored its attempts to discuss their missing NDCs, and members were divided over whether to identify them (Climate Home News, 20 October 2026; PAICC annual report, 16 October 2026). By September only three remained silent. Tejas Rao, a Cambridge University researcher who studies the committee, told Climate Home News that



“engagement costs these governments very little and the committee has shown it will listen”, and that governments that explained capacity, finance or domestic-process constraints “have been met with follow-up and support rather than sanction” (Climate Home News, 20 October 2026). Sudan made that choice. The record now shows a government that answered, not one that ignored the process.

Second, answering was the first step; the committee is now chasing dates, and the group of late filers is shrinking fast. Most governments missed the February 2025 deadline for the third round of NDCs, which carry targets for 2035. Since then the committee’s count of parties without a new NDC has fallen from 130 at the close of its 15th meeting to 55 after its March 2026 meeting, 45 after its 17th meeting and 42 at its September meeting, out of 194 parties (PAICC annual report, 16 October 2026). Climate Home News puts the figure at around 30 today, mostly small emitters but including Egypt, Vietnam and Argentina (Climate Home News, 20 October 2026). Neighbours are filing: Chad submitted its NDC 3.0 on 5 October, with a 1.7% unconditional cut against business as usual by 2035 and 21.2% with international support (Enerdata, 7 October 2026). The report also makes clear what the committee will do next with governments like Sudan. It has decided to follow up through individual letters with the 23 parties that replied but whose cases remain open, “in particular with those that had indicated dates or timelines for the submission of their NDCs or BTRs that had since passed and with those Parties that had not yet indicated any dates or timelines” (PAICC annual report, 16 October 2026). A reply without a timeline places a government in the second of those groups. 3Bi has not seen Sudan’s letter and does not know whether it included a date. The point is that the committee’s next question will be “when”.

Third, the NDC is the document that climate finance reads, and Sudan’s current one stops at 2030. Sudan’s current NDC, filed with the UNFCCC as its “First NDC (Interim updated submission)”, was submitted on 31 May 2021 and published on 2 June 2022 (UNFCCC NDC registry). It sets conditional cuts against business as usual by 2030 of 38% in energy, 45% in forestry and 20% in waste, names agriculture as a key adaptation priority, proposes scaling up efficient irrigation powered by renewable energy, and estimates the support needed for mitigation and adaptation at US\$8.24bn (UNDP Climate Promise, Sudan page, accessed 21 October 2026). The NDC Partnership summarises the same plan as 27.1 MtCO₂e of reductions by 2030 at a total cost of US\$8.23bn (NDC Partnership, Sudan page, accessed 21 October 2026). Everything in it is framed to 2030. As donors and funds start to programme against 2035 targets, a country without a 2035 horizon has less to put in front of them. Support exists. Sudan has been a member of the NDC Partnership since 2019. It has requested help with mainstreaming its NDC into planning and budgeting, with the quality and ambition of the NDC and with monitoring and reporting systems, and it co-organised a session titled “Shaping Ambitious NDCs” at the partnership’s pavilion at COP30 on 15 November 2025 (NDC Partnership, Sudan page, accessed 21 October 2026). The committee itself has published a guide to the resources available to parties preparing NDCs and BTRs, and it plans to keep it as a living document (PAICC annual report, 16 October 2026). We are not suggesting a full NDC 3.0 can be written in three weeks. The narrower point is that the tools to



move from a suspended process to a dated one are already in reach.

Why It Matters to the Reader

If you advise Sudan's delegation, the Higher Council for Environment and Natural Resources (HCENR) or the Ministry of Finance, the PAICC report goes to the CMA in Antalya under agenda item 17 (PAICC annual report, 16 October 2026). Delegates will read it, and the "who is still missing" question will hang over the talks, especially for countries that want more adaptation and loss-and-damage finance. Two different deadlines matter. The NDC obligation applies to every party, including least developed countries (LDCs). Transparency reports are different: the committee's count of mandatory BTRs covers only the 119 parties that are not LDCs or small island states, because LDCs and SIDS "may submit the information ... at their discretion" (PAICC annual report, 16 October 2026). As an LDC, Sudan's most visible gap is therefore its NDC, not its BTR. The next BTR deadline, 31 December 2026, binds the other parties (PAICC annual report, 16 October 2026).

Our view is that Sudan can take three low-cost steps before or at COP31. First, the HCENR, as UNFCCC focal point, should send the committee a written timeline for the NDC 3.0, even if each step is conditional on support, so that Sudan moves from "replied" to "replied with a date". Second, Sudan should ask for a consultation with the committee, as two parties did at its September meeting, and use it to set out the specific technical and financial gaps (PAICC annual report, 16 October 2026). Third, Sudan should turn its existing NDC Partnership membership into a dated request for NDC 3.0 support, so that partners arrive at COP31 with an agreed task rather than a general offer. In our 18 October analysis we asked for a dated timeline for Sudan's National Adaptation Plan. The NDC needs the same treatment, and the two can share one work plan.

3Bi is not claiming that the committee will sanction Sudan, or that a timeline alone will unlock money. The committee is "facilitative and non-punitive", as Rao puts it (Climate Home News, 20 October 2026). That is the opportunity: a process designed to help governments that say what they need.

Close

The compliance committee drew a line between governments that stay silent and governments that explain themselves. Sudan is on the better side of it. Before Antalya, it should add a date.

Sourcing & Contact

Primary sources: Paris Agreement Implementation and Compliance Committee, "Annual report of the Paris Agreement Implementation and Compliance Committee to the Conference of the



Parties serving as the meeting of the Parties to the Paris Agreement”, FCCC/PA/CMA/2026/2, 16 October 2026; Climate Home News, “Paris Agreement committee names three countries snubbing it over NDCs”, 20 October 2026; UNFCCC NDC registry, “Sudan First NDC (Interim updated submission)”, submitted 31 May 2021, published 2 June 2022; UNDP Climate Promise, Sudan country page, accessed 21 October 2026; NDC Partnership, Sudan country page, accessed 21 October 2026; Enerdata, “Chad’s NDC 3.0 sets 1.7% unconditional GHG reduction target”, 7 October 2026. For methodology questions or to propose a correction, contact 3Bi’s Research Team via 3bisudan.org.

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