

### **Contents**

- Acknowledgments
- Introduction: Climate Transition Plans (CTPs) as the Anchor of Corporate Climate Strategy
- Winds at Play in 2025: 5 Key Highlights on Climate Transition Plans
- Transition Plans of Tomorrow: Moving toward Integration
- Case Studies
- Disclaimer



### **Acknowledgements**



The following report was developed by BSR, a sustainable business network helping its members to see a changing world more clearly, create long-term value, and scale impact. It constitutes a follow-up to the BSR report Charting the Course: Navigating the Climate Transition Plan Landscape released in February 2025. The perspectives expressed solely reflect the views of BSR and the authors and have been informed by desktop research, insights and discussions fostered during BSR-facilitated learning labs.

This document was authored by Julie Dugard, Verena Nüchter, and Ameer Azim. Additionally, the authors thank participants in BSR's webinars, external partners from the World Benchmarking Alliance, Romain Poivet and Dara Karakolis and colleagues at BSR for their support in the creation of this report, including Ilona Andersen, Giulio Berruti, Elisabet Font Rovira, Eileen Gallagher, Katja Juthans, Jenna Kowalevsky, and Beatriz Osorio Marugán. Any errors that remain are those of the authors. Please direct comments or questions to Contact BSR.

This report contains research, findings, and recommendations, the content may be revised as the context, topic and company action on the climate transition, and stakeholder expectations evolve and advance.

#### **Suggested Citation**

Dugard et al., "Stay the Course: Advancing Integrated Transition Plans." BSR, 2025.



### Introduction

#### CTPs as the Anchor of Corporate Climate Strategy

Climate Transition Plans (CTPs) have become key in guiding companies from commitments to concrete action. Some companies are facing political headwinds and stakeholder backlash in some regions, while others are going full steam ahead on CTP development. As some businesses consider slowing down on climate commitments, recent data from the Science Based Targets initiative shows that the number of companies setting climate targets and commitments continues to grow (SBTi, 2025).

#### **Charting What Comes Next**

This report looks back at the key developments in the climate transition plan landscape during 2025, exploring how regulators, investors, and companies have evolved their expectations and approaches. It also looks forward and offers perspectives on how the future of CTPs may unfold. This report is a call to stay the course, positioning CTPs as the cornerstone for strategic integration of climate, nature, and people goals and the flagship disclosure vehicle in times of accelerated change.







### **Five Key Highlights on Climate Transition Plans**

**2025** marks a turning point in how companies approach climate transition plans. Global standards are converging, and investor scrutiny is intensifying. Looking ahead, the scope of expectations is set to expand further to include nature, adaptation, and the just transition.

In this report, we present **five key highlights** that capture the CTP evolving landscape and the implications for business strategy and disclosure:





A Wave of New CTPs, Yet Credibility and Rigor Remains Limited





Transition Plan Regulations: Progress Amidst Pushback





Institutional
Investor and
Regulatory
Pressure Remains
Strong





Voluntary Standards Keep Raising the Bar





Expanding Scope: Integrated Approaches





### A Wave of New CTPs, Yet Credibility and Rigor Remains Limited



The regulatory drive from the EU and global frameworks is fueling a surge in CTPs

More than half of CSRD preparers declare having a transition plan for climate change mitigation (55%).

The EU legal framework is driving progress in corporate sustainability reporting, with climate transition planning becoming a mainstream exercise.

41% of large companies
worldwide have published a
transition plan for climate
change mitigation.



Despite progress on disclosure, CTPs are often missing key elements affecting their credibility

### Many CTP disclosures lack key elements required by the ESRS, such as:

- Defined decarbonization levers
- Explanation of alignment with the 1.5°C target
- Robust information on investment strategies
- Assessment of external factors

Almost all of the 2,000 highest-emitting publicly listed companies evaluated by the TPI Centre show significant shortcomings in their transition planning and execution.

Companies often fall short on the quantification of transition plan actions and the alignment of future capital expenditure with decarbonization goals.





### **Transition Plan Regulations: Progress Amidst Pushback**

Despite challenges to CSRD, CSDDD, and SEC climate rules, momentum toward CTPs continues to build globally.

- ☐ Within the European Union, the proposed Omnibus Simplification Package seeks to clarify and align climate and transition plan reporting requirements. Notably, the draft ESRS E1 now explicitly identifies dependencies as core components of corporate transition plans which better aligns with IFRS S2.
- □ In 2025, new guidance on transition plan disclosure under IFRS S2 was released, drawing heavily on the UK Transition Plan Taskforce (TPT) framework, which is the most comprehensive CTP framework. Several major economies are now adopting or aligning with IFRS S2 in some capacity (see the map).
- At the same time, legislators in other jurisdictions are actively consulting on climate transition plan disclosure requirements. In Australia, the government ran a Climate-Related Transition Planning Guidance Consultation from August to September 2025, while in the United Kingdom, the Climate-related Transition Plan Requirements Consultation ran from June to September 2025.

Together, these developments signal a clear and accelerating trend toward globally consistent and transparent transition planning standards.



Image Credit: Istock, BianAJackson



#### 12345







### Q Transition Plan Regulations: Progress Amidst Pushback

This map highlights some selected transition plan developments.

IFRS Aligned Mandates in Effect

In the **UK**, companies disclose against the TCFD recommendations, which includes CTP considerations since FY2022. In June 2025, the UK government published draft UK SRS (aligned with IFRS S1 and 2). They also launched a Transition Plan Requirements Consultation (June – September 2025).

Modeled after the UK TPT, the Canadian Transition Task Force launched in October 2024 with the aim of developing CTP criteria for adoption by regulators.

#### **ISSB IFRS S2**

Climate-Related Disclosures (IFRS S2) require companies to provide information about transition plans. In 2025, guidance on transition plan disclosure under IFRS 2 was published.

Independent Mandates in Effect\*



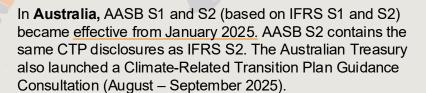


In the **EU**, the CSRD requires issuers in scope to disclose their CTP. In the updated ESRS E1 draft post-Omnibus proposal, dependencies has been added as part of the core elements of a CTP.



Hong Kong In 2025, new climate-related disclosure requirements (aligned with IFRS S2) for issuers under the Hong Kong Stock Exchange take effect.

Effective from FY2023, the Aotearoa New Zealand Climate Standards requires large listed companies to disclose the transition plan aspects of their strategy.







You can track Global Transition Plan Requirements using ITPN interactive map.





\*Some countries have both independent and IFRS aligned mandates.

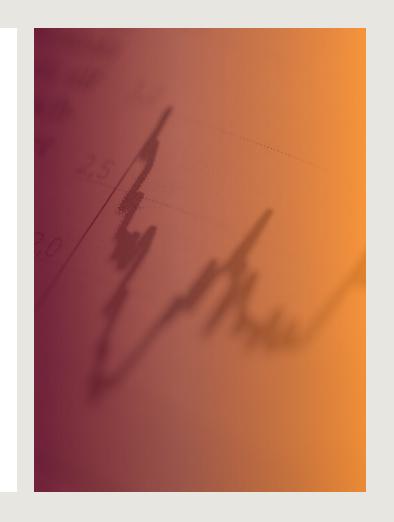


### Institutional Investor and Regulatory Pressure Remains Strong

Investor and supervisory expectations around credible climate transition plans (CTPs) continue to intensify in 2025.

- ☐ Investors increasingly rely on CTPs to guide capital allocation, portfolio construction, risk assessment, company valuation, and stewardship activities, viewing them as 'material business imperative.'
- Leaders of major government pension funds and the broader institutional investor community now expect—and are calling for requirements that—companies publish credible, time-bound climate transition plans and use them to judge the credibility of decarbonization strategies and exposure to climate risk.
- At the same time, <u>financial authorities</u> emphasize the role of CTPs in maintaining financial stability and reducing systemic risk to the financial system. Supervisors and regulators are moving from recommendation to expectation, signaling that transition planning is becoming a standard feature of corporate governance and disclosure.
- ☐ This global momentum is reinforced by political and diplomatic signals. The COP30 Presidency has explicitly called for credible transition plans from the private sector, affirming that "the private sector is both a beneficiary of the climate transition and an indispensable partner in driving its implementation."

Pressure is unified and persistent as companies are expected to prove credible, time-bound transition plans for a climate resilient economy.





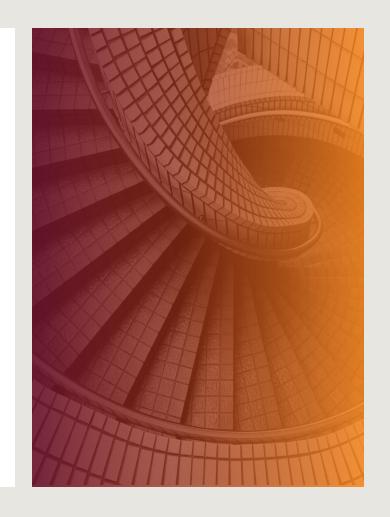


### **Voluntary Standards Keep Raising the Bar**

Key reporting frameworks are cementing transition planning as a core element of corporate accountability.

- ☐ The latest SBTi Corporate Net-Zero Standard draft introduces an expectation for companies to publish a CTP. Companies without a formal transition plan should disclose information providing strong context for their climate transition, signaling a shift toward greater accountability and transparency in corporate climate action.
- □ Similarly, the <u>upcoming 2025 update to the GRI 102 Standard</u> expands disclosure requirements to cover transition planning, climate adaptation, and the just transition, reflecting growing expectations for comprehensive and equitable climate strategies.

Together, these frameworks do more than reinforce regulatory developments—they shape market norms and peer expectations. By embedding transition planning into mainstream reporting and target-setting standards, they establish benchmarks that companies cannot afford to ignore, driving competition, scrutiny, and continuous improvement across sectors.







### **Expanding Scope: Integrated Approaches**

The scope of transition planning is widening as companies move toward integrated approaches that link climate, nature, and social goals—though this integration remains at an early stage.

- As climate transition plan disclosures mature and guidance becomes clearer, transition planning is moving beyond target setting updates toward integrated disclosure that sits at the heart of corporate strategy. Companies are connecting mitigation with adaptation, nature, and people, and are explaining governance, capital allocation, value chain engagement, and impacts on ecosystems and communities in one coherent plan. Early practice shows this shift in action. <a href="PepsiCo">PepsiCo</a>, <a href="General Mills">General Mills</a>, and <a href="Unilever">Unilever</a> pair deforestation-free supply chains, regenerative agriculture, and landscape restoration with farmer partnerships and just transition commitments that strengthen rural resilience. Climate transition plans are becoming the blueprint that links strategy, products, and risk management to credible delivery in a net zero and climate resilient economy.
- As shown by the proliferation of frameworks pushing for people, adaptation and nature integration into CTPs, the direction of travel is unmistakable: toward integrated business strategies that align climate, nature, and social objectives, guiding genuine business model transformation and positioning companies to thrive in a just, net-zero, and nature-positive economy.

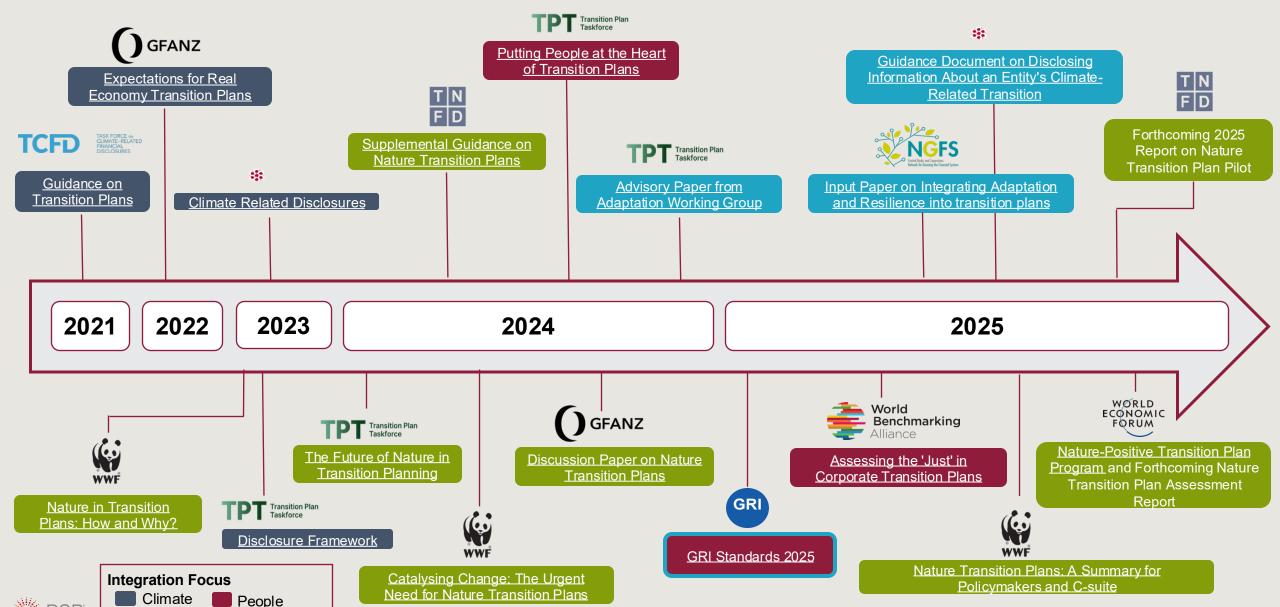


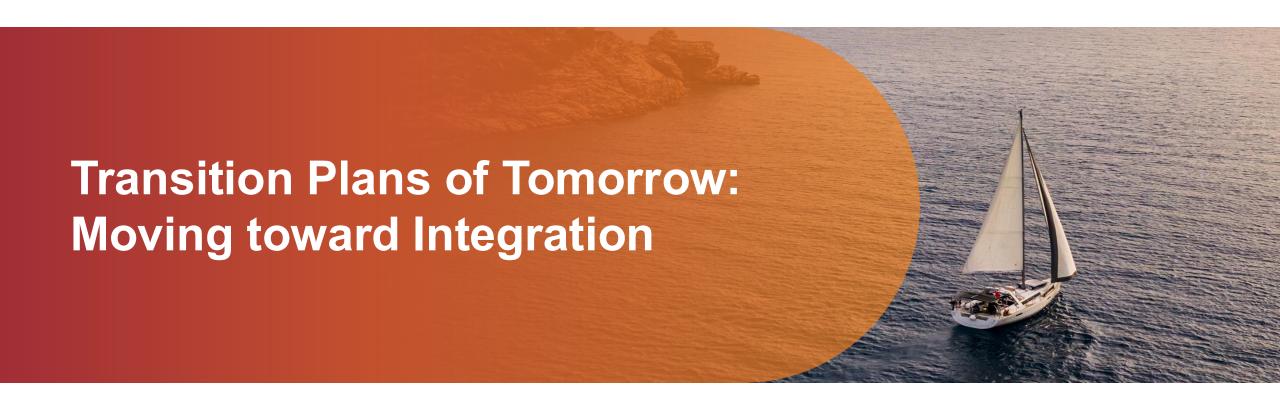


## The CTP Ecosystem Moves Toward Integration

Adaptation

Nature







### From Climate-Only to All-In: The Next Evolution of Transition Planning

- □ After years of setting commitments, many companies are beginning to publish transition plans. Most are still work in progress, but disclosures now look more like actionable plans than high-level commitments, signaling a clear shift from pledging to delivering. Even when the emphasis is mitigation, nature and people are not being ignored; these efforts are advancing in parallel, often in separate silos.
- Getting to a truly integrated CTP can be considered the North Star. Yet the path is rarely linear. It likely is complex and will benefit from being iterative, because companies are confronting systemic challenges that cut across climate, nature, and human rights, compelling them to revisit and redefine what progress means, and to reimagine goals that serve all three dimensions jointly.
- Achieving integration requires breaking down internal silos and integrating subject matter expertise on the three dimensions across relevant business functions.





### Q Where and How to Embed Human Rights, Adaptation, and Nature Into Your CTP?

- Commit to Just Transition Principles
- Start your SBTN journey and align commitments with the Global Biodiversity Framework 2030 and 2050 targets
- Establish Adaptation as Strategic Priority and align with GGA, NDCs, and/or NAPs
- Regularly review outdated or siloed assumptions

#### **Foundation**

#### **Implementation** Strategy

- Conduct climate risk and vulnerability assessments across operations and supply chains and nature risk assessment following TNFD's LEAP approach or SBTN's Steps 1&2
- Build resilience through early warning systems, diversification strategies, and local partnerships
- Anticipate, assess and minimize the social risks of the transition reinforcing human rights due diligence and identify, enable, and maximize opportunities and benefits of the transition
- Set up systems and processes to identify and subsequently avoid, minimize, mitigate and remediate potential trade-offs across nature, people and other competing climate priorities

- Collaborate with communities, suppliers, and partners to build shared adaptation capacity
- Participate in national and international adaptation planning
- Ensure meaningful participation and dialogue in planning and execution

#### **Engagement** Strategy

#### **Metrics and Targets**

- Develop metrics that assess vulnerability reduction, risk preparedness, and business continuity
- Include community resilience indicators where feasible
- Identify and define the key state of nature and state of biodiversity metrics, leveraging TNFD, SBTN and the Nature Positive Initiative proposed metrics. Consider setting SBTN targets by business unit, environmental realm and / or value chain segment

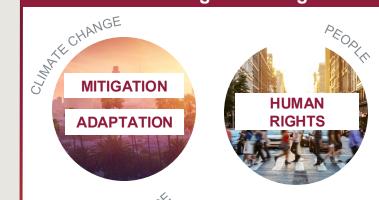
- Appoint internal leaders across business units
- Include adaptation. nature and human rights in scenario planning, enterprise risk management, and strategy reviews

Governance



### **Continuum of Integrated Transitioning**

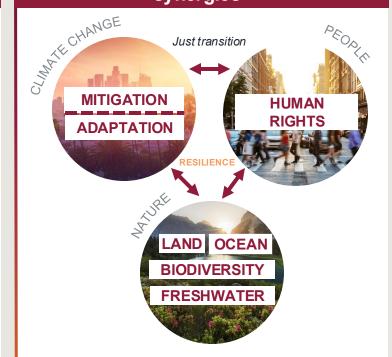
# Climate Strategies Alongside Nature and Human Rights Strategies





For most organizations, it is **pragmatic to begin with distinct plans** for climate, nature, and human rights while progressively building the connections among them. These separate streams allow for depth and focus but also create the foundation for future integration where strategies evolve from coexistence to coherence.

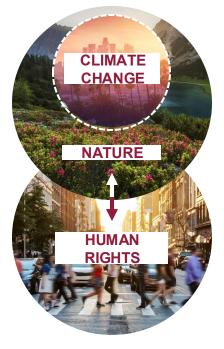
## Considerations of trade-offs and synergies



Even in the **early stages**, companies can begin to identify interdependencies and manage trade-offs across domains, for instance:

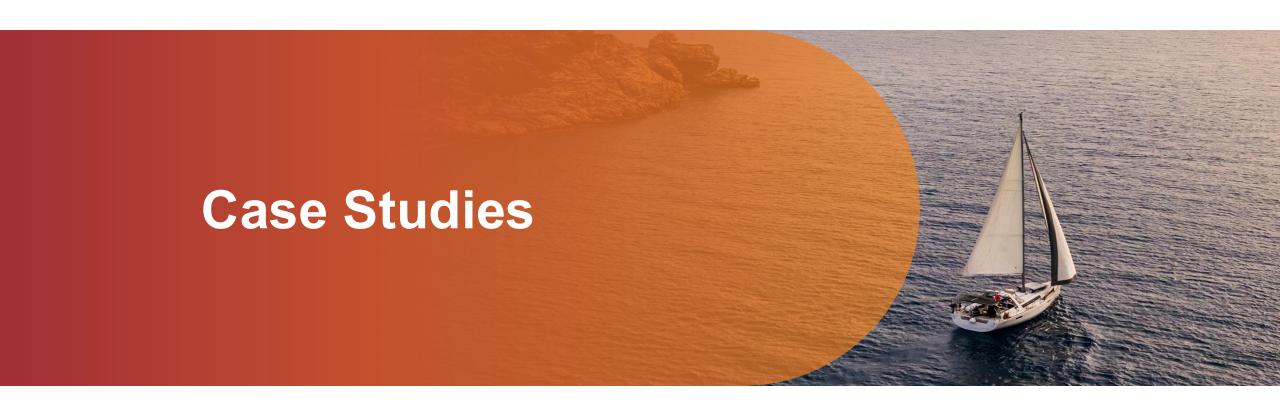
- How do decarbonization efforts affect people and communities? What does a just transition look like through workforce reskilling and upskilling?
- How can protecting and restoring ecosystems contribute to decarbonization objectives?

#### **Integrated Planning**



The ultimate goal is **holistic integration**—a single, strategic plan in which climate, nature, and social dimensions are inseparable. In this model, climate objectives are embedded within nature strategies, and social goals are treated as integral rather than additive. Such integration enables organizations to evaluate synergies and trade-offs dynamically, supporting credible and resilient transition pathways.

**Today** 





### **Grundfos** | Integrating People into Climate Transition Plans

#### The Why

Grundfos views people as integral to its net-zero transition and recognize the importance of a just and
equitable transition. As a leading global pump manufacturer and water solutions company, the company's
transition to its 2050 targets therefore must consider impacts on workers and communities across its value
chain.

#### The What

- Developed a Climate Transition Action
   Plan\* that includes a Just Transition lens
- Conducted a climate risk and opportunity assessment, incorporating a qualitative just transition analysis across the value chain
- Defined three pillars for just transition: (1)
  respecting human rights, (2) advancing
  decent work and focus on living wage, and
  (3) collaborating with stakeholders
- Drafted a Just Transition Statement including ten guiding principles to articulate their approach.

#### The How

- Cross-functional collaboration included sustainability, climate, human rights, human resources, strategy, finance, and procurement teams
- Participated in BSR's Just Transition Learning Lab to build internal knowledge and foster dialogue
- Leveraged climate risk assessment to identify key areas like supply chain, circularity and skills development
- Delivered expert-level training to local water operators, especially in underserved regions.

"For Grundfos, climate and people are closely connected, and people are an integral part of our climate transition plan. We see many opportunities, but for Grundfos, it really is about moving from bold ambitions and targets to concrete actions that make a real impact for people on the ground across the value chain."



**Gry Saul**Group Human Rights and Social Sustainability Lead

GRUNDFOS X



### Vattenfall | Developing a Nature Transition Plan

#### The Why

• As one of Europe's leading energy companies, Vattenfall has significant impacts on and dependencies upon nature. From land use to reliance on natural systems like water cycles and wind patterns, the company recognizes that achieving net zero is not possible without addressing nature-related risks and opportunities.

#### The What

- Vattenfall launched a dedicated Biodiversity Transition Plan in 2025 to embed nature more strategically into its energy transition.
- This followed several years of groundwork, including a full value chain biodiversity footprint assessment using the Global Biodiversity Score.
- The plan outlines three areas of focus: direct operations, supply chain, and broader ecosystems, including the aspiration to achieve collective restoration efforts

#### The How

- The plan was developed based off a clear understanding of Vattenfall's nature risks, opportunities and dependencies and an internal Environmental Action Plan covering climate, biodiversity, and circularity that all business units contributed to.
- Actions and targets were gathered from across the organization and consolidated into a living roadmap that will continue to develop.
- Internal awareness was supported through engagement tools such as a company-wide nature photo app and annual photo competition to inspire employees

"We have a high dependency on nature, including its ability to regulate the climate. For us, there is no question—nature and biodiversity are clearly strategic topics and go hand in hand with our commitment to work for a fossil free future."



Helle Herk-Hansen
Vice President Environment
VATTENFALL





BSR® is a sustainable business network that provides global insights, strategic advisory services, and collaborations to more than 300 member companies in Asia, Europe, and North America. BSR® helps its members to see a changing world more clearly, create long-term value, and scale impact.

www.bsr.org

### **DISCLAIMER**

BSR publishes occasional papers as a contribution to the understanding of the role of business in society and the trends related to corporate social responsibility and responsible business practices. BSR maintains a policy of not acting as a representative of its membership, nor does it endorse specific policies or standards. The views expressed in this publication are those of its authors and do not reflect those of BSR members.

The conclusions presented in this document represent BSR's best professional judgment, based upon the information available and conditions existing as of the date reviewed or delivered. In performing its assignment, BSR relies upon publicly available information, information provided as approved within the scope of work, and information provided by third parties. Accordingly, the conclusions in this document are valid only to the extent that the information provided or available to BSR was accurate and complete, and the strength and accuracy of the conclusions may be impacted by facts, data, and context to which BSR was not privy. As such, the facts or conclusions referenced in this document should not be considered an audit, certification, or any form of qualification. This document does not constitute and cannot be relied upon as legal or investment advice of any sort and cannot be considered an exhaustive review of legal, investment, or regulatory compliance. BSR makes no representations or warranties, express or implied, about the business or its operations. BSR maintains a policy of not acting as a representative of its membership, nor does it endorse specific policies or standards. The views expressed in this document do not reflect those of BSR member companies.



This publication is the property of BSR and Bloomberg Philanthropies and is licensed under a Creative Commons Attribution-ShareAlike 4.0 International License.

