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FA NB – Tischvorlage

Sitzung:	33. Sitzung FA NB / 05.11.2024 / 12:30 – 13:00 Uhr
TOP:	14 – Transition Plans
Thema:	Darstellung der aktuellen EFRAG-Aktivitäten
Unterlage:	33_14a_FA-NB_TranPlan_Tischvorlage

EFRAG-Prozess zur Erarbeitung der IG 4 Transition Plan



Überblick

- **Transition Plan Implementation Guidance (TP IG)**
Leitlinien zur Umsetzung der Angabepflichten gemäß ESRS E1-1.16 (a)-(j)
- **Erarbeitung gemeinsam mit Advisory Group / Interviews mit & Survey an ca. 50 Ersteller**
Vertreter von DG FIMSA, DG CLIMA, DG ENV, EBA, DG ENER, EIOPA, JRC, PSF, SR TEG
- **4. November 2024: erste öffentliche EFRAG-TEG-Sitzung**
 - Vorstellung der (überarbeiteten) Struktur (inkl. Begrenzung auf Berichterstattung über TP)
 - Diskussion des Entwurfs der IG4 (V2)
- **Zeitplan**
 - Freigabe durch EFRAG-TEG im Nov 24
 - Freigabe durch EFRAG-SRB im Dez 24
 - Veröffentlichung für die Kommentierung geplant für Jan 25
 - Kommentierungsfrist (für IG üblich): ein Monat
 - Finalisierung bis Juni 25



[Entwurf hier](#) abrufbar.

Struktur

Einleitung / Introduction

1. Introduction	7
1.1. Structure	8
1.2. Cross-references to the EFRAG document « Reference Practices on Climate Transition Planning »	8
1.3. Acronyms used	8

Europäischer Rechtsrahmen / European Framework

2. European framework for transition plans	10
2.1 Transition plan requirements in the European Union	10
2.2. Transition plan disclosures in ESRS	12
2.3. Disclosing on material negative impacts arising from a transition plan	15
2.3.1 Just transition in the context of transition plans for climate change mitigation	15
2.3.2 Biodiversity IROs in the context of transition plans for climate change mitigation	16
2.3.3 Adaptation and resilience in the context of transition plans for climate change mitigation .	16

Einleitung

- Unverbindlich (non-authoritative)
- Sektorübergreifend
- Bezugsrahmen / Fokus der IG ist TP for Climate change mitigation gem. ESRS E1-1 (Tz. 16) und ESRS 2
- Hinweis auf Schnittstellen zu anderen Themen („Biodiversity“, „just transition“ etc.) im Zusammenspiel mit TP for Climate change mitigation
- Hinweis auf (noch zu entwickelndes) EFRAG Dokument „Reference Practices on Climate Transition Planning“

Europäischer Rechtsrahmen

- **EU-Taxonomy**
(mit wichtigen Metriken für die Steuerung / Überwachung der Transformation)
- **CSDDD**
(Pflicht zur Erstellung eines TP aligned with Paris climate)
- Capital Requirements Directive (**CRD**) and the Capital Requirements Regulation (**CRR**) – transpose the global standards on bank capital (the Basel III agreement) into EU law, CRD/CRR risk-based transition plans proposed by EBA as part of the consultation paper on Draft Guidelines on ESG Risk Management (no disclosures, but assessment by banking prudential supervisors).
- **Solvency II**
- **European Green Bond Standard** (referring to criteria of EU-Taxonomy)
- EU Emissions Trading Scheme (**EU ETS** Directive, as amended in May 2023, requires certain operators to establish climate-neutrality plans)
- **Industrial and Livestock Rearing Emissions Directive** (IED2.0), Industries will have to develop transformation plans, describing how their installations will progress towards decarbonisation, zero pollution, and a circular economy
- Energy Efficiency Directive (**EED**), requires to create an action plan based on an energy audit every four years beginning in 2026
- Eco-management and Audit Scheme (**EMAS**), registered undertakings can use premium voluntary EMAS as a basis to draft their Transition Plan.

Verweise auf „impacts arising from a transition plan“

Summary in 10 key points

10. IROs arising from the transition plan for climate change mitigation: The guidance highlights the importance of considering social and biodiversity impacts, risks and opportunities connected to the climate transition plan. Undertakings must disclose how transition plans may affect workers, communities, and ecosystems and may be dependent from its adaptation actions.

Introduction

15. This guidance is focused on transition plans for climate change mitigation. However, due to their strategic nature, transition plans often interact also to other environmental and social topics (also referred to as just transition). Therefore, relevant interfaces are identified and briefly described in this guidance, for example regarding biodiversity or ensuring a just transition. However, this guidance exclusively focuses on clarification on disclosure requirements on transition plans for climate change mitigation as outlined in ESRS E1-1. Given the structure of the ESRS disclosures, disclosure requirements covering such information beyond climate are covered by the other topical ESRS; for example, ESRS S1 for employees or ESRS S3 for affected communities.

Verweise auf „impacts arising from a transition plan“

Section 2.2 Transition plan disclosures in ESRS

- **Definitions / Glossary**
(Actions, climate change mitigation, transition plan,)
- Referenz auf „materialy impact other topics“

43. In the context of a Transition Plan for Climate Change Mitigation, this may include disclosures on several non-climate related sustainability matters that interact with climate change mitigation such as: Just transition, related to impacts on own workforce [S1-SBM3], workers in the value chain [S2-SBM3] and impacts on communities [S3], as well as consumers and end-users [S4]; Business conduct policies and corporate culture [G1-1]; policy engagement [G1-5]; and it may also form part of the disclosures of stakeholder engagement [ESRS2-SBM2]; or other environmental impacts, e.g., biodiversity [E4]. These may be referenced in the context of E1§16(b) or

42. Undertaking actions in the context of a transition plan may materially impact other topics (this is also acknowledged in the Art 8 Taxonomy with the DNSH (Do No Significant Harm) principle³). Consequentially, in accordance with ESRS 1, chapter 3.6 “Material impacts or risks arising from actions to address sustainability matters”, the undertaking’s may identify situations in which its actions to address certain impacts or risks, or to benefit from certain opportunities in relation to a sustainability matter - such as the ones addressed through a Transition Plan - might have material IROs associated with other sustainability matters. ESRS 1§53 clarifies that in such situations the undertaking shall:

- a. disclose the existence of material negative impacts or material risks together with the actions that generate them, with a cross-reference to the topic to which the impacts or risks relate; and
- b. provide a description of how the material negative impacts or material risks are addressed under the topic to which they relate.

Verweise auf „impacts arising from a transition plan“

Section 2.3 Disclosing on material negative impacts arising from a transition plan

50. This Guidance **does not cover topics beyond climate change**. However, this section illustrates briefly the interaction with other topics.

2.3.1 Just transition in the context of transition plans for climate change mitigation

51. **Just transition**⁸ is relevant for undertakings to consider in relation to disclosures on transition plans for climate change mitigation. The concept of

2.3.2 **Biodiversity IROs** in the context of transition plans for climate change mitigation

53. Just as with social impacts, the actions need to implement in a CTP may have both positive and negative impacts on biodiversity. This often arises because climate mitigation actions – like expanding renewable energy, altering land use, and deploying large-scale energy storage – introduce new environmental dynamics that can affect ecosystems and species in significant ways.

54. When defining their decarbonization levers and actions to achieve their GHG emission reduction targets, the undertaking shall consider the risks and impacts to biodiversity and ecosystems that result from such actions to

2.3.3 **Adaptation and resilience** in the context of transition plans for climate change mitigation

55. Climate change mitigation and adaptation strategies are frequently interconnected, as effective mitigation efforts often depend on, and are influenced by, adaptation measures. Some of the ways mitigation and adaptation can be connected comprise:

Struktur

Transitionsplan für Klimaschutz / Transition Plan for Climate Change Mitigation

3. Transition Plan for climate change mitigation (E1-1)	18
3.1 Overall disclosure objective of ESRS E1-1	18
3.2 References to other ESRS requirements beyond E1-1	19
3.3. Explaining targets compatibility [16 (a)]	19
3.4. Explaining decarbonisation levers [E1-1 16 (b)]	22
3.5. Explaining investment and funding [E1-1 16(c)]	25
3.6. Explaining supporting disclosures	27
3.6.1 Explaining locked-in emissions [E1-1 16 (d)]	27
3.6.2 Explaining EU Taxonomy alignment [E1-1 16 (e)]	28
3.6.3 Explaining coal, oil and gas-related CapEx [E1-1 16 (f)].....	29
3.6.4 Explaining EU Paris-aligned Benchmarks [E1-1 16 (g)].....	31
3.7. Explaining governance, strategy and progress	32
3.7.1 Explaining transition plan inclusion in strategy and business model [E1-1 16 (h)].....	32
3.7.2 Explaining the approval of the transition plan [E1-1 16 (i)]	32
3.7.3. Explaining progress in implementing the climate transition plan [E1-1 16 (j)]	33
3.8. Whether and when a CTP will be adopted [E1-1 17]	34

Struktur

Weitere Quellen / Other Sources (EU-Verordnung und internationale Rahmenwerke)

4. Considering other sources	35
4.1 EU	35
4.1.1 EU Taxonomy	35
4.1.2 CSDDD	36
4.1.3 CRD/CRR - Pillar 3 ITS.....	37
4.1.4 Solvency II	37
4.1.5 EU Green Bonds.....	37
4.1.6 Climate Neutrality Plans (EU ETS).....	38
4.1.7 Transformation Plans (IED).....	38
4.1.8 Energy action plan (EED).....	39
4.2 International	40
4.2.1 SEC rules	40
4.2.2 TPT	41
4.2.3 GFANZ.....	42

Struktur

Häufig gestellte Fragen / FAQs

5. Frequently asked questions (FAQs)	44
5.1. Targets-related FAQ	44
FAQ 1: Can a climate target other than a GHG emission reduction target be used as reference under ESRS E1-1?	44
FAQ 2: Can an undertaking consider the purchased and planned carbon credits to achieve its GHG emission reduction target?	44
FAQ 3: Can an undertaking disclose a transition plan with a GHG emission reduction target not compatible with 1.5°C degrees under ESRS E1?	45
FAQ 4: If an undertaking has an already public GHG emission reduction target, does the associated base year need to be restated to follow ESRS recommendations?	45
FAQ 5: How to calculate and report on the GHG emission reduction target benchmark comparison with the reference target value?	46
5.2. Decarbonisation levers-related FAQ	46
FAQ 6: How does the scenario analysis in ESRS E1 interact with the transition plan disclosure and which scenario to use for which purpose?.....	46
5.3. Financial planning-related FAQ	48
FAQ 7: What is the difference between stranded assets and locked-in emissions?.....	48

Struktur

Häufig gestellte Fragen / FAQs

5.4. Supporting disclosures related FAQ	48
FAQ 8: What are the EU Paris-aligned Benchmarks (EU PABs)?	48
5.5. Strategy and progress-related FAQ	49
FAQ 9: How to determine if the undertaking Transition Plan for Climate Change mitigation disclosure is complete?	49
FAQ 10: Does an undertaking from a sector not related directly to coal, oil and gas economic activities (e.g. manufacturing) which builds a gas-fired power plant at its site need to disclose this investment under paragraph 16 (f) or not?.....	50

Struktur

Häufig gestellte Fragen / FAQs

5.6. IROs arising from the CTP related FAQ.....	51
FAQ 11: How can undertakings disclose on social impacts in the context of just transition?.....	51
FAQ 12: What sort of social impacts can undertakings disclose in relation to transition plans?....	51
FAQ 13: How can social dependencies and capabilities affect the credibility of transition plan disclosure?	52
FAQ14: What sort of biodiversity impacts may emerge in the context of climate transition plans	53
FAQ15: What sort of adaptation and resilience dependencies and impacts may emerge in the context of climate transition plans	54
FAQ 16: How does the business model's resilience to physical risks relate to the transition plan?	55
5.7. Other FAQ	56
FAQ 17: What are the key characteristics of transition plans?.....	56
FAQ 18: What should the undertaking disclose, if it does not have a transition plan for climate change mitigation?.....	57
FAQ 19: Can the undertaking conclude that transition planning is not material?	57
FAQ 20: Should subsidiaries be integrated in the transition plan for climate change mitigation or have their own?.....	58
FAQ 21: Does the undertaking need to disclose asset-level data as part of its CTP disclosures? .	58

Weitere Aktivitäten in Bezug auf TP



KOM-Projekt zu Credible & Climate Law-Aligned Transition Plans

Akteure

- Im Zuständigkeitsbereich der DGs CLIMA, FISMA und JRC
- Ausführung durch [ICF](#) und [CLIMACT](#)
- In Kooperation mit EFRAG

Ziel

- Erstellung eines zentralen Datenbezugspunkts für bestimmte Klima-KPIs (sektorenbezogen), die als Benchmarks dienen sollen; z.B. absolute/relative sektorale Emissionsreduktionen
- Leitlinien zur Verwendung der Klima-KPIs; Angabepflicht E1-1 „Übergangsplan für den Klimaschutz“

Zeitplan

- Von August 2024 bis Q1 2025 / Ende März
- Anschließend Einfließen in TP IG

Sustainable Finance Platform

...

DRSC-Prozess zur IG 4 Transition Plan



Vorschläge

- **FA NB-Befassung**
 - Dezember 24 / Januar 25
 - Finalisierung der Stellungnahme Februar / März 25
(abhängig von finalem EFRAG-Zeitplan)

- **Öffentliche Diskussion**
 - Anfang Februar 25
(abhängig von finalem EFRAG-Zeitplan)