THE 100 GROUP
Stakeholder Communications and Reporting Committee

Department for Energy Security and Net Zero
55 Whitehall
London
SW1A 2HP

17 September 2025

Dear Board Members,

Please find enclosed our response to: **Transition plan requirements consultation**

This response has been prepared by the 100 Group Stakeholder Communications and Reporting Committee. The 100 Group membership represents around 90% of the FTSE100 market cap as well as a number of equally significant sized unlisted businesses. While this response is intended to speak on behalf of the Group as a whole, the views expressed are not necessarily those of individual members nor their respective employers.

We thank you for the opportunity to comment on your proposal and would invite any further dialogue which you would deem of value.

Section A: The benefits and use cases of transition plans

We agree there are benefits to the requirement for transition plans to be disclosed as this helps entities communicate effectively and be transparent with stakeholders, articulate challenges they face and explain the strategy to address these challenges. The extent of the benefit over the burden to complete the activity will depend on the nature of the entity.

Many of the 100Group members already prepare and produce a transition plan and we consider a balance of narrative disclosures and data points is helpful given the uncertainty of climate outcomes. The TPT framework has been helpful to provide a structure for producing transition plans.

We consider transition plan requirements should be aligned across jurisdictions and reciprocal provisions should be made for equivalence (for example between EU ESRS and S2 and between S2-adopting jurisdictions).

Section B: Implementation options

Some members consider the TPT framework has served its purpose and should be retired on the basis the requirements are now largely covered by company disclosure as part of S2. We think the requirements of S2 are sufficient and offer flexibility for companies to disclose how they consider transition in an integrated way as part of their company strategy, risks and opportunities and governance.

B1. Developing and disclosing a transition plan

To support the UK Government's ambition for credible and actionable transition plans, we believe the following elements are essential for development and disclosure:

- Robust governance and clear accountability: Transition planning must be owned at the highest levels of the organisation, with defined roles and oversight mechanisms to ensure delivery.

- Integration of climate risks into enterprise-wide risk management: Climate-related risks should be embedded within core risk frameworks, enabling informed decision-making and resilience across operations.

- Transparent metrics and targets, with progress reporting: Organisations should disclose measurable targets and report on progress, specifically demonstrating how material climate impacts are being addressed. This should be done in a way that protects commercially sensitive information and acknowledges the inherent risk uncertainty and legal risk in climate outcomes and forward looking statements.

We support Option 1 which would require entities to explain why they have not disclosed a transition plan or transition plan-related information. As it stands a 'Transition Plan' is too narrowly defined and we don't think should be a standalone disclosure, rather part of a company's disclosure on their strategy and the action they are taking regarding 'transition planning'. Option 1 aligns to the requirements of S2, allowing flexibility to report on a 'Transition Plan' or 'transition-plan related information', or explain why it has not done so, maintaining the flexibility for a company to determine how to manage its transition.

Section B.2 Mandating transition plan implementation

We had some diverging views on the government mandating transition plans with some members not supporting mandatory implementation given Companies and their Directors should manage strategic decisions (in line with their duties) and would likely need to adopt and disclose a transition plan to comply with other regulations. Other members considered it could be appropriate to mandate transition plans for certain entities which contribute a significant % to the UK's national GHG footprint.

Section B.3 Aligning transition plans to net zero by 2050

We consider that the achievement of targets and/or plans is dependent on supportive government policies. Many different factors need to come together, not all of which are within the company's control - this is important given the significant investment and extended payback periods involved in these sectors.

Regulations should not compel preparers to meet "Science/Paris aligned" targets. Companies need to retain flexibility in how they think about Paris-aligned pathways - there are many routes & actions that society or a company can take to support the Paris goals. Preparers should be able to set their own net-zero ambition as a benchmark and be able to determine the scope and mechanism used for their net-zero ambition.

We hope you find that they provide helpful insight as you move to the next stage of the project and invite you to contact us via our secretariat Claire Gallimore (secretariat@the100group.co.uk) should you wish to discuss any of our comments in further detail.

Yours sincerely,

Stephen Daintith,
Chair of the 100 Group Stakeholder Communications and Reporting Committee