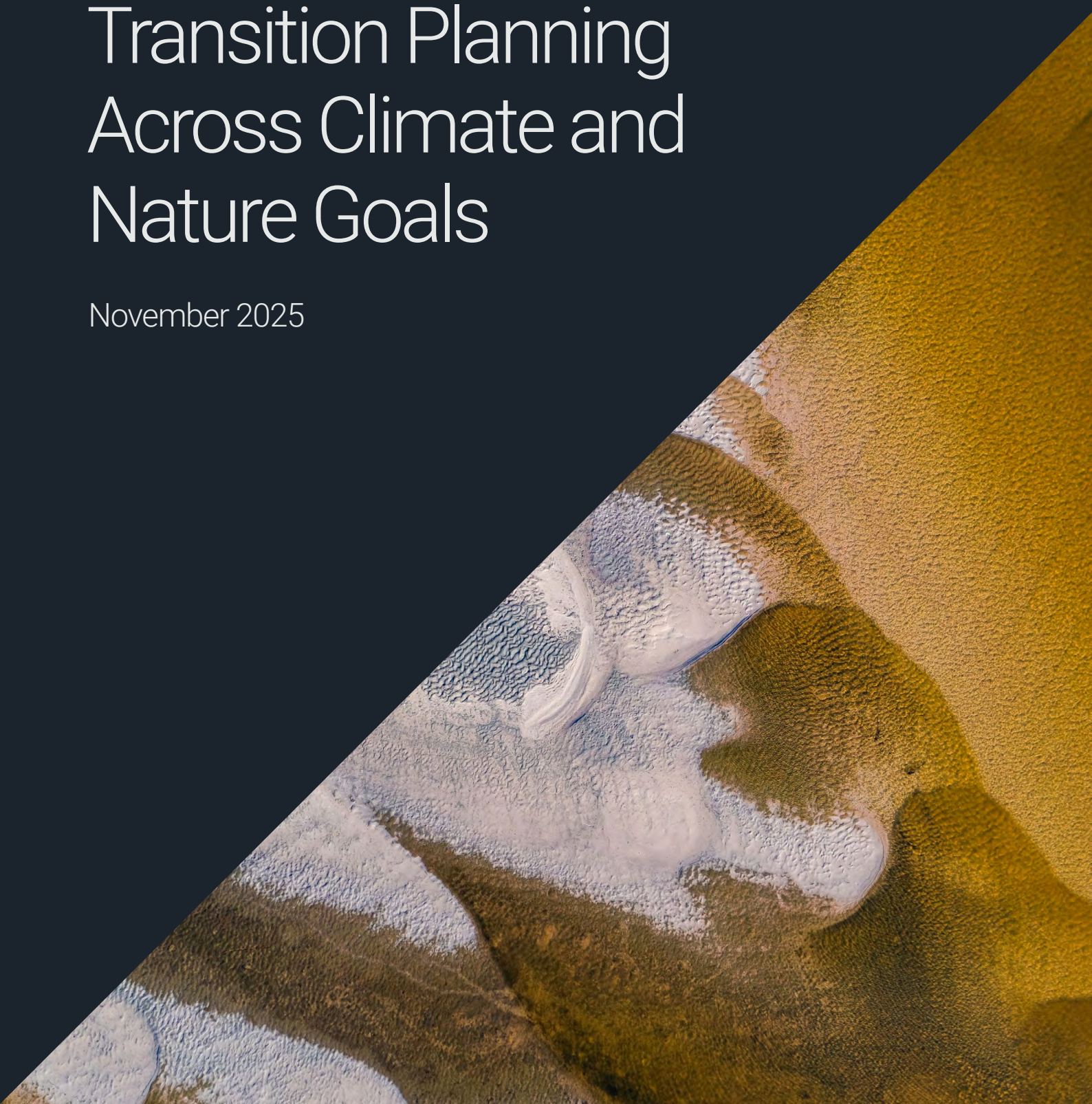
#Together4Transparency

Data as the Catalyst: Powering National Transition Planning Across Climate and Nature Goals

November 2025



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Foreword

Global investment in the transition reached US$2 trillion in 2024, while according to UNEP-FI, the world will need US$4–6 trillion annually by 2030 to stay on track for net zero by mid-century. The challenge of our time is not a lack of finance — it is a lack of coordination. Around the world, private capital is waiting to be deployed towards the green transition.

Yet, without government leadership to connect public priorities with private investment, that money will not flow at the pace or scale the planet demands. Governments must act not only as market regulators, but as architects of transformation — aligning every ministry, policy, and sector around a coherent and investable national vision.

That is what makes this report so timely and valuable. It takes a step back from the disclosure itself, to ask a deeper political question: what will it take for governments to steer whole economies toward a just, nature-positive, and climate-resilient future?

Closing the finance gap is not simply about mobilizing more capital; it is about organizing our economies to make investment possible. It is about national transition planning — using data not as a bureaucratic requirement, but as a tool for accountability, coherence, and confidence, enabling both public and private actors to move decisively in the same direction.

By positioning climate transition planning as the foundation for credible transition finance, this publication helps bridge the credibility gap and establishes a framework that can evolve to include nature, resilience, and adaptation. It calls on governments to integrate climate, biodiversity, and development strategies — anchored in decision-useful data — to create the enabling environments where finance can flow to real transformation.

For policymakers, it offers a roadmap. For investors and businesses, it signals what credible national leadership looks like. And for all of us working to align data, policy, and capital, it is a reminder that these are not separate systems — they are the connective tissue of transformation.

Pietro Bertazzi
Chief Policy & Projects Officer, CDP

If we are serious about making the transition to a Earth-positive economy reality, governments must move beyond setting targets and design and drive the systems that make those targets achievable. This report opens the dialogue, while shining a light on how environmental data can underpin credible national transition planning and enable the flow of finance toward real transformation we all need.

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Context

The cost of environmental inaction has never been higher, and countries are bearing the social, environmental and economic weight. A recent report published by CDP estimates that ignoring environmental risks will cost the global economy up to US$38 trillion by 2050 – more than a third of global gross domestic product (GDP).

With the window to limit global warming to 1.5 °C rapidly closing, accelerating global climate action – underpinned by necessary financing – is urgent. Reducing the risk of climate-induced events could prevent significant economic losses and increase global GDP by up to 3% by 2050.[1]

While commitments towards publicly financing the global environmental goals have increased – supported by the new collective quantified goal (NCQG) set at COP29 in 2024– the scale of investment required remains in the trillions. To move towards the U$1.3 trillion goal, direct investment is required, with a high percentage stemming from private finance.[2] **However, for private finance to be effectively allocated towards the transition, countries need to align their national commitments and plans in such a way that amplifies the synergies across the Rio Conventions –** instead of having them competing against one another for financing.

A unified and coordinated government-led process is needed.[3] Such a process should recognize and build on the synergies and shared goals of Nationally Determined Contributions (NDCs), Long-Term Strategies (LTSs), National Adaptation Plans (NAPs), and National Biodiversity Strategies and Action Plans (NBSAPs) to accelerate climate action, backed by adequate and innovative financing mechanisms and partnerships between the public and private sectors. It should promote a cohesive policy and regulatory environment, with supportive policy signals and plans for transition finance, by engaging different levels and branches of government (whole-of-government approach) and different sectors of the economy (whole-of-economy approach).

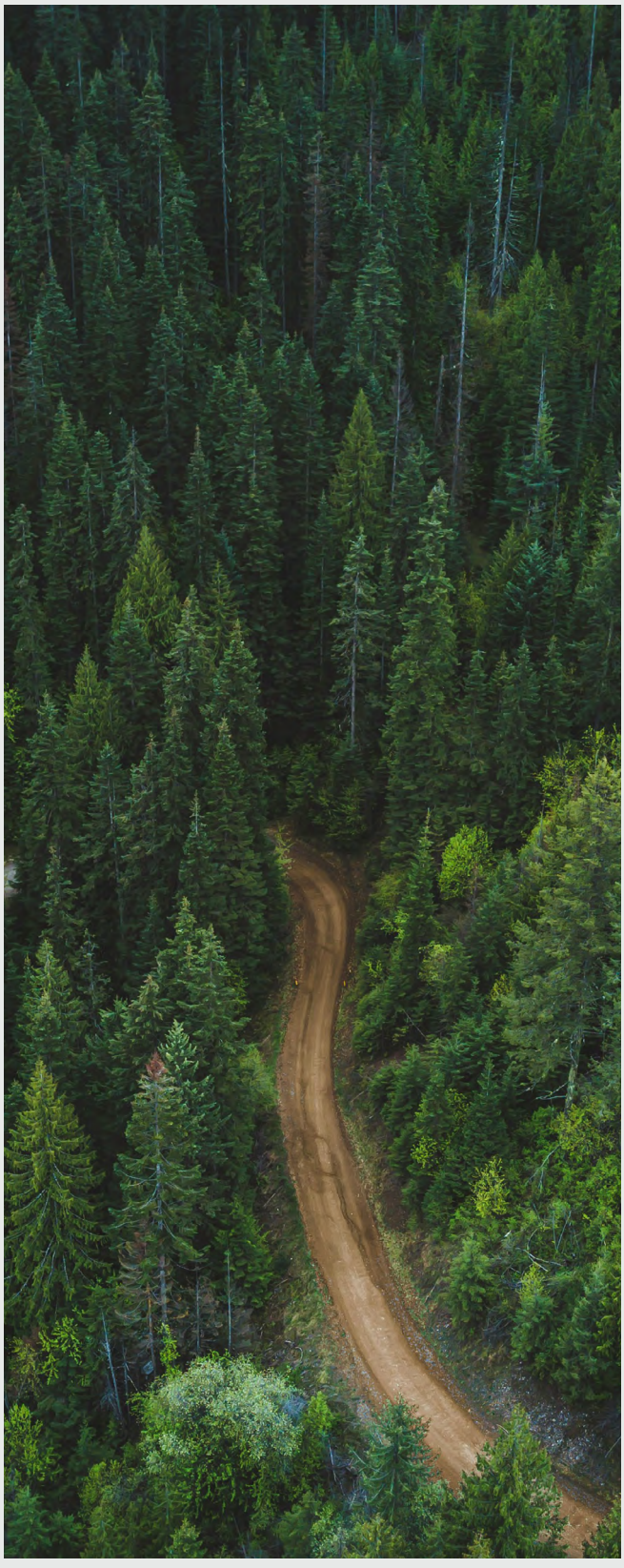
Instrument	Timeframe	Focus	Origin
NDCs (Nationally Determined Contributions)	5–10 years	Mitigation & adaptation targets and finance needed	Paris Agreement (Article 4)
LTS (Long-Term Strategies)	Up to 2050+	Long-term decarbonization & resilience pathways	Paris Agreement (Article 4.19)
NAPs (National Adaptation Plans)	Medium–long term	Reducing vulnerability & building climate resilience	UNFCCC (Cancún Adaptation Framework)
BTRs (Biennial Transparency Reports)	Every 2 years	National GHG inventories, tracking progress of NDCs, mitigation actions, climate change impacts and adaptation, finance, technology and capacity building needed and received (developing countries) or provided and mobilized (developed countries)	Paris Agreement (Enhanced Transparency Framework, Article 13)
NBSAPs (National Biodiversity Strategies and Action Plans)	10+ years	Biodiversity conservation, ecosystem restoration, sustainable use of biological diversity	Convention on Biological Diversity (CBD)

The role of national transition planning

National transition planning offers a practical pathway to unlock this unified and coordinated government-led process. National transition planning is a cyclical, government-led process that promotes policy coherence by aligning a country's NDCs, NBSAPs, NAPs, and LTSs and by implementing them in a cohesive way to mobilize finance and drive system-wide change.[4]

National transition planning requires:

- **A whole-of-government approach** with input and participation from different departments and levels of governments to design, align, and monitor national commitments and plans, like NDCs and NBSAPs, to be investable across all sectors.
- **A whole-of-economy approach** to ensure all sectors of the economy are considered. This could be delivered through sector transition plans, which are government-led plans or policies that define the country's direction and priorities for key sectors to decarbonize.[5]
- **Alignment between public policy** (including national commitments and plans, environmental and fiscal policies, and subnational policies) **and business strategies**, including transition planning and plans.
- **Credible, comparable and decision-useful data** disclosed by corporates (including small and medium enterprises (SMEs)), financial institutions (FIs), and subnational governments to inform policymaking, finance mechanisms (e.g., country platforms) and investment decisions, as well as to track progress of implementation and capital flows.[6,7]
- **A feedback loop between national and corporate transition planning,** designed to promote an integrated transition planning ecosystem, where transition planning approaches across the private sector and government align to promote a whole-of-system climate response.[8]



National transition planning streamlines the principles set out in the Sevilla Commitment, which calls upon Parties to enhance coordination and coherence across the Rio Conventions and to strengthen the synergies among climate, biodiversity, and land agendas.[9] It also strengthens cohesiveness within a country through robust multistakeholder engagement, and it fosters international alignment through interoperable planning frameworks and globally comparable data systems – thereby creating an enabling environment for sustainable and equitable trade.

National transition planning has been gaining attention in multilateral spaces, including in the G20,[10] the Coalition of Finance Ministers for Climate Change,[11] and the CHAMP Coalition.[12] In 2025, the United Kingdom and Australia have published consultations surfacing how corporates should align their transition planning and plans with

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international agreements, national climate policies, and net zero targets.

The United Nations Framework Convention on Climate Change (UNFCCC) secretariat reminded Parties and Observer States, ahead of the submission deadline for enhanced NDCs, that "NDCs 3.0 should also help to accelerate implementation of existing commitments and help unlock finance at scale."[13] In the lead up to Belém, Ambassador André Correa do Lago acknowledged in his Seventh Letter from the COP30 Presidency the need for public and private sector collaboration by calling the private sector 'co-architects' of NDC transformation and implementation.

To scale up finance to deliver on global environmental goals, investors are calling upon the need to provide more granular detail on sectoral pathways, to align policy and regulatory frameworks to achieve national targets, to strengthen stakeholder governance and engagement, and to enhance global harmonization and consistency across national commitments.[14]

Data as the conducive, coherent and connecting link

For finance to flow at scale and for action to be effectively incentivized, credible, comparable and decision-useful data is needed. This data enables investors and policymakers to assess risk, measure progress, and align incentives with confidence.

In this regard, data performs three interrelated functions. First, **data acts as a conduit for national coherence**, aligning the private sector and other domestic actors around shared evidence and metrics to develop integrated and investible transition plans.[15] Second, **data serves as a bridge between countries,** enabling the consistent communication of progress, needs, and outcomes that underpin trust, cooperation, and cross-border investment. Third, **robust data systems and/or tracking mechanisms provide the capacity for accountability and monitoring,** allowing governments and financiers to evaluate progress and redirect resources as needed. Together, these functions make data a cornerstone for national transition planning, de-risking investment and unlocking finance towards coherent and sustained implementation across the Rio Conventions.

Disclosure platforms like CDP can play a crucial role in helping countries surface the necessary data from corporates, financial institutions, and subnational governments (henceforth 'non-state actor data') **to monitor and direct investment towards national commitments and plans, as well as to track progress of their implementation.** Disclosure also feeds into data portals such as the UNFCCC Non-State Actor Zone for Climate Action (NAZCA), which aggregates data from multiple sources across different types of state and non-state actors. These portals serve as examples of how transparency mechanisms help coordinate information flows, track the implementation of climate action commitments, and inform future policymaking to enhance a conducive environment for data sharing and global climate action.

The role of disclosure platforms is shown in the diagram below, which outlines the continuous flow of data across key actors in the national transition planning process. Within this process, environmental non-state actor data is put into context with data on the national carbon budget, sectoral decarbonization pathways and information on relevant transition levers.

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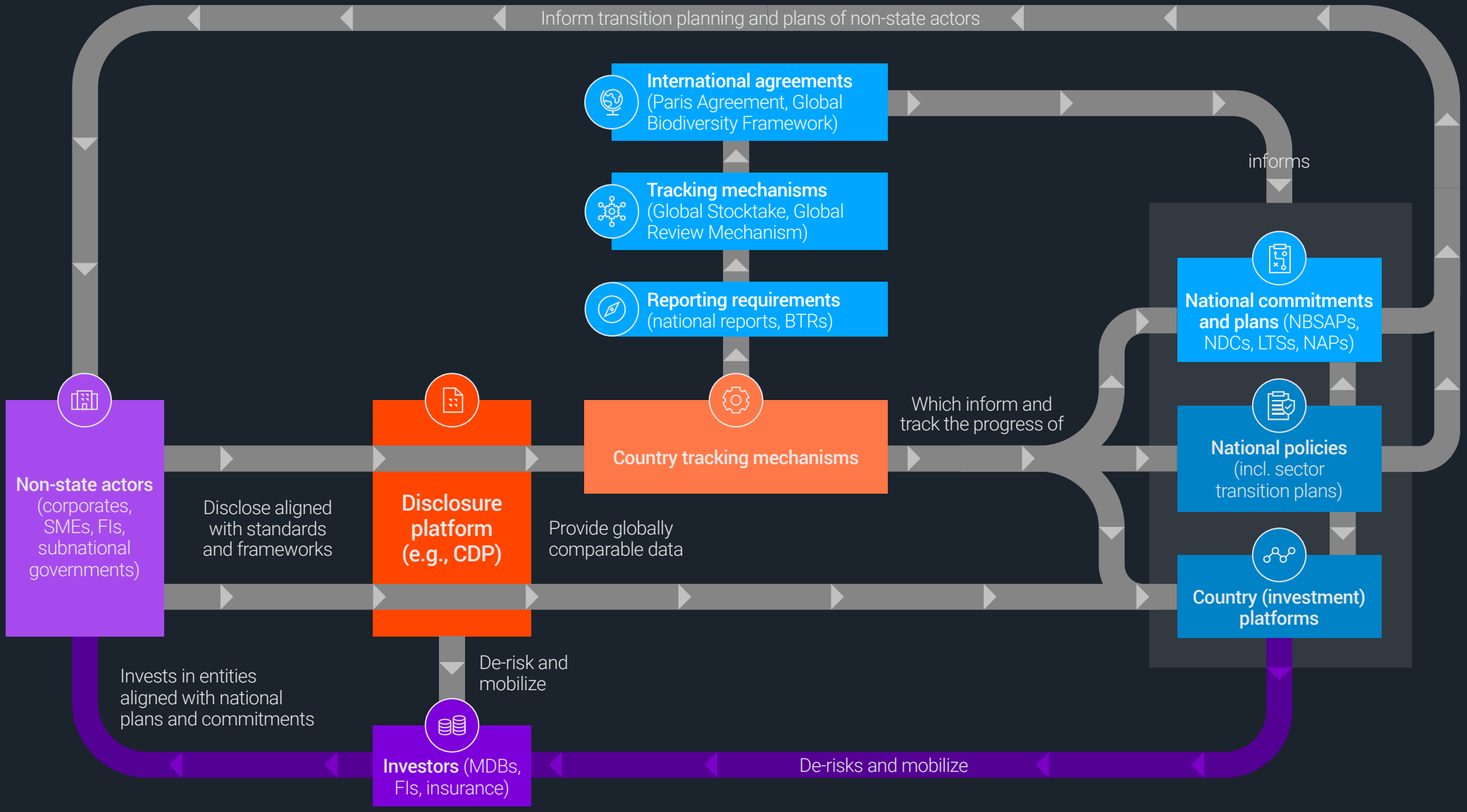
Data architecture for national transition planning



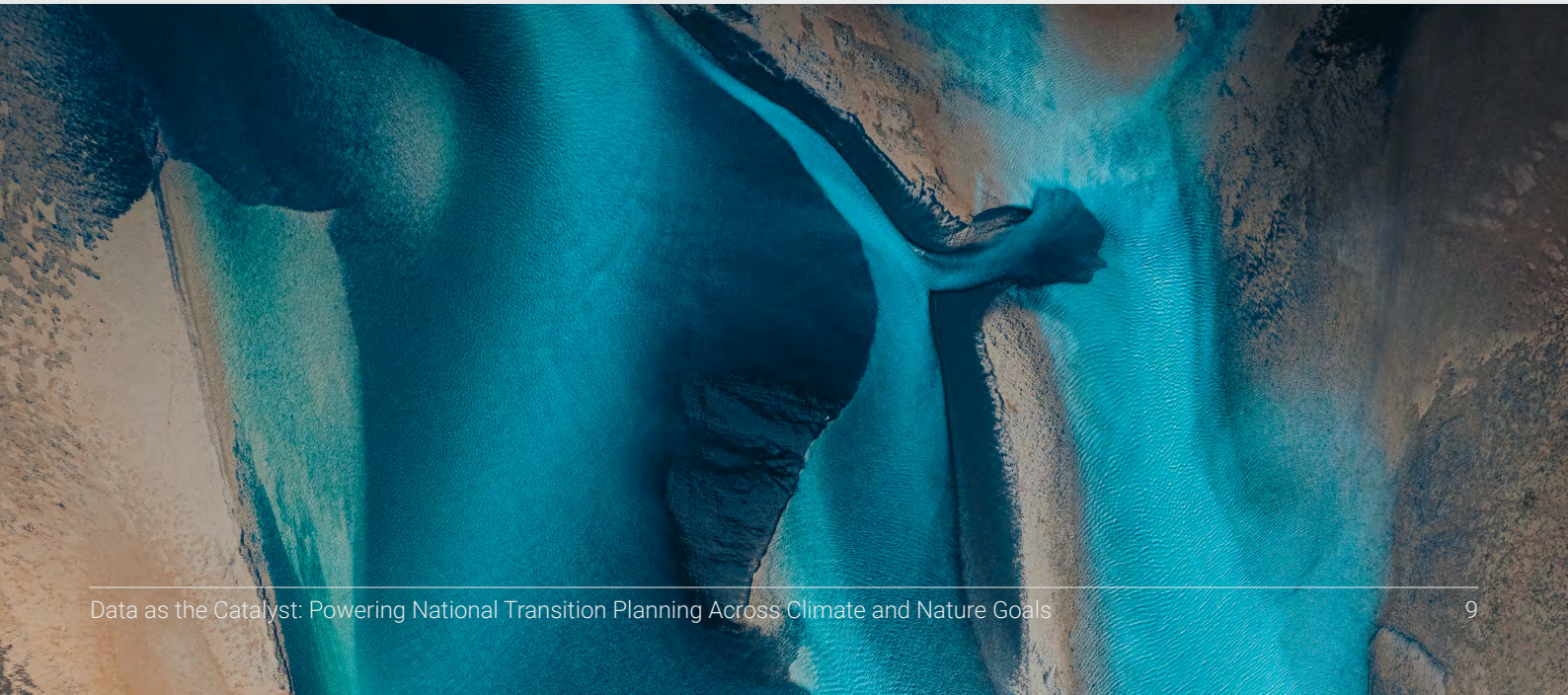
The feedback loop of national transition planning

Environmental data, including transition data, disclosed by non-state actors such as corporates (including SMEs), FIs and subnational governments can provide governments with critical information to inform the design, implementation and monitoring of national commitments and plans. Governments may access this information through disclosure platforms and data providers or through their own country tracking mechanisms.

Powered by disclosure, country tracking mechanisms can use non-state actor data to inform their reporting requirements under international agreements like the Paris Agreement and the Kunming-Montreal Global Biodiversity Framework (GBF). Countries are also able to use this data to enhance and track progress of their national plans, commitments, and policies (including sector transition plans and decarbonization pathways).[16] These, in turn, inform corporate and subnational transition planning and plans, which eventually leads to a new cycle of disclosure – creating the feedback loop of national transition planning.

Environmental data, including transition data, disclosed by non-state actors such as corporates can provide governments with critical information to inform the design, implementation and monitoring of national commitments and plans.

Environmental non-state actor data can also play a pivotal role in informing and monitoring capital flows towards global environmental goals. For this potential to be realized, data must be credible, comparable and decision-useful, thereby providing the confidence necessary to attract finance and de-risk investments. To help non-state actors meet these conditions in their disclosure, platforms such as CDP perform a critical function by integrating standards and frameworks, ensuring that data disclosed once can serve multiple purposes. By consolidating and harmonizing disclosures, these platforms generate reliable, interoperable information for investors (including FIs, insurers and multilateral development banks (MDBs), as well as for finance coordination mechanisms, such as country platforms. In doing so, they help orient and align capital flows with national transition priorities and the broader objectives of the Rio Conventions.



Disclosure in action: How non-state actor data powers national transition planning

Disclosure platforms like CDP play an important role in streamlining disclosure and ensuring countries have access to high-quality data aligned with global standards and frameworks. CDP has conducted work to understand the linkages between its question bank and key mechanisms of the Paris Agreement and GBF.

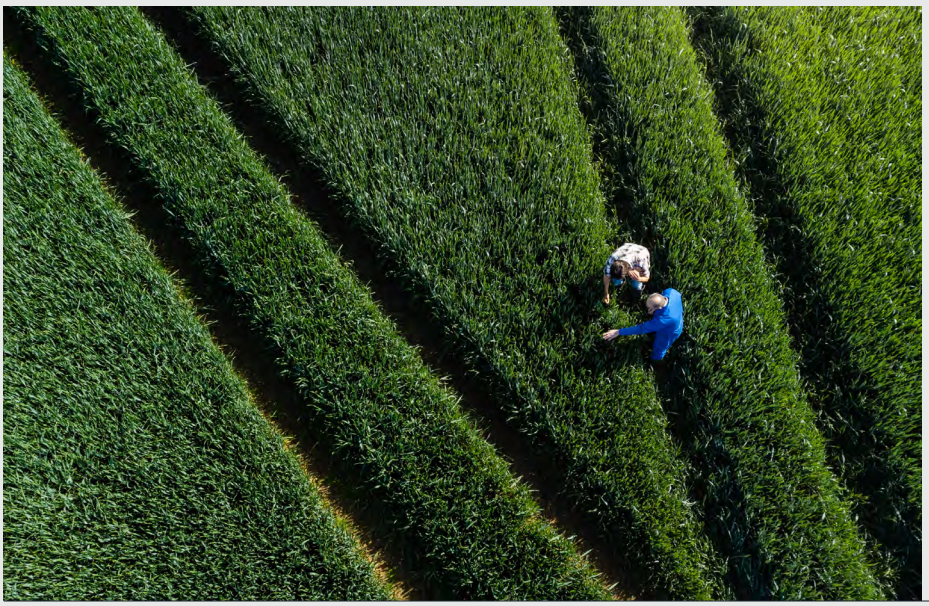
The CDP Corporate Questionnaire, CDP-ICLEI Track, and CDP States & Regions Questionnaire have been mapped to the targets of the GBF and the requirements of the BTRs, enabling the identification of datapoints that are relevant to implementing and tracking progress towards targets and commitments contained within these frameworks. CDP has also put this into practice, providing corporate environmental disclosure data to several governments to support the tracking of progress against national commitments.[17]

The examples below demonstrate how CDP data can provide insights for national governments on non-state actor climate action for mitigation, adaptation and finance.

Mitigation

Alongside datapoints such as Scope 1, 2 and 3 greenhouse gas emissions, emission reduction targets and transition plans, CDP data covers emission reduction initiatives, investment in emission reduction activities and low-carbon products and services offered by companies. These datapoints are not only useful for financial institutions to assess environmental impacts of companies and subnational governments to allocate investment, but also for national governments in assessing emission reduction efforts across the economy when developing their NDCs and NBSAPs.

For both subnational governments and companies, achieving emission reductions often hinge on factors beyond their direct control, making this link to national policy particularly important. For example, in 2024, the most commonly reported condition for implementing mitigation targets by subnational governments through CDP was the need to address emission sources controlled by higher levels of government, which was reported by 34% of subnational governments. This is followed by the decarbonization of electricity grids that are outside the direct control of subnational governments (reported by 33%) and the need for national funding for infrastructure (reported by 32%). This shows the need for better coordination of climate goals and action through all levels of government to ensure mitigation targets are fully achieved.



34%

of subnational governments reported the need to address emission sources controlled by higher levels of government

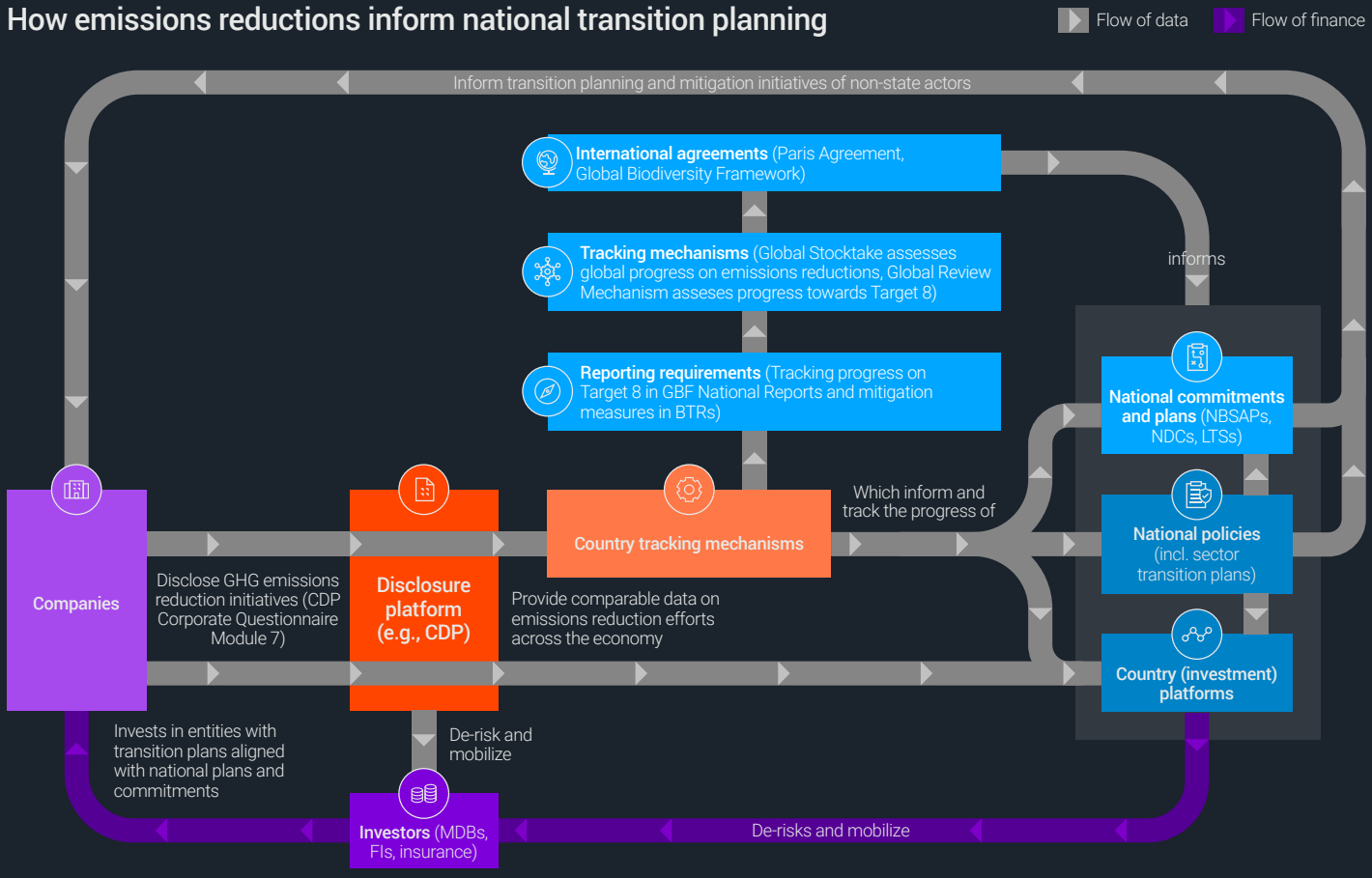
Alongside this coordination across levels of government, corporate data can provide governments with insights into how climate goals are being implemented. In 2024, large companies reported 15,728 emission reduction initiatives through CDP. The top three types of initiatives reported were energy efficiency production processes, followed by energy efficiency in buildings, and low-carbon energy consumption. Additionally, over 4,000 companies reported goods or services classified as low-carbon products. This corporate disclosure data – including credible transition plans - can also be broken down by sector for national and sectoral roadmaps, which can then be translated into programs and pathways to be financed. This data could be leveraged to benchmark current ambition and alignment of company goals, surface assumptions and dependencies on the enabling environment, and translate those dependencies into targeted policy (e.g., fiscal incentives or disincentives, government-led innovation, public infrastructure investment) and financial responses (e.g. risk mitigation, public procurement, blended finance). Embedding corporate disclosure data, particularly on dependencies, into a government-led, co-created process creates effective feedback loops and coordination architecture between firms, finance and policy so plans become living, investable roadmaps.[18]

For the Paris Agreement, governments can use this information in their BTRs to track progress towards achieving their NDCs, as well as on support for technology development. In relation to the GBF, this data, particularly on initiatives already implemented, is helpful to assess progress against Target 8, on minimizing the impacts of climate change on biodiversity and building resilience.

15,728

emission reduction initiatives were reported by large companies through CDP, in 2024

How emissions reductions inform national transition planning



Adaptation

Identifying physical risks is an important first step in companies' and subnational governments' adaptation journeys and a critical datapoint when embedding adaptation in transition plans.[19] It is also a critical component for countries when preparing and monitoring their national adaptation plans.

In 2024, companies disclosed more than 7,200 acute physical risks through CDP, and a further 5,300 chronic physical risks. The three most reported acute risks were flooding; cyclones, hurricanes and typhoons; and drought, while the top chronic risks were water stress, increased severity of extreme weather events, and changing temperature. Of these risks, over 3,600 were reported with a financial effect and a corresponding cost to mitigate the risk. Acute physical risks were estimated to have an effect of over US$420 billion with a cost of over US$80 billion to mitigate. Despite fewer risks being identified, the effect of chronic risks was valued higher, at over US$650 billion, with a cost of over US$680 billion to mitigate. A large proportion of the cost to respond to physical risks is allocated towards infrastructure and technological investments for both acute (45%) and chronic (93%) – with varying degrees of detail on the exact response measures. This is followed by diversification measures such as developing new products and services, which makes up 17% of the reported cost for responding to acute physical risks and 3% of the cost for responding to chronic physical risks.

7,200

acute physical risks disclosed by companies through CDP in 2024

5,300

chronic physical risks disclosed

A large proportion of the cost to respond to physical risks is allocated towards infrastructure and technological investments for both acute (45%) and chronic (93%) risks.

This information can help national governments gain insight into the identified risks and response measures across the economy in different sectors or geographic locations, which can be used to address vulnerabilities, identify the potential for avoided losses, and determine next steps in national plans and sectoral roadmaps. Information on responses to risk and cost estimates can be a useful indication of how businesses are planning to adapt and how much finance they may allocate towards these plans. **Governments can use this information to inform their adaptation finance strategies** including identifying where to deploy risk-transfer instruments and when to scale pre-arranged disaster-risk finance through sovereign insurance, contingent lines, and regional pools. They can manage the risk of maladaptation and steer adaptation investments towards measures that not only build business resilience but do so without undermining, and potentially enhancing, the resilience of the societies where they operate – thus contributing to national resilience.

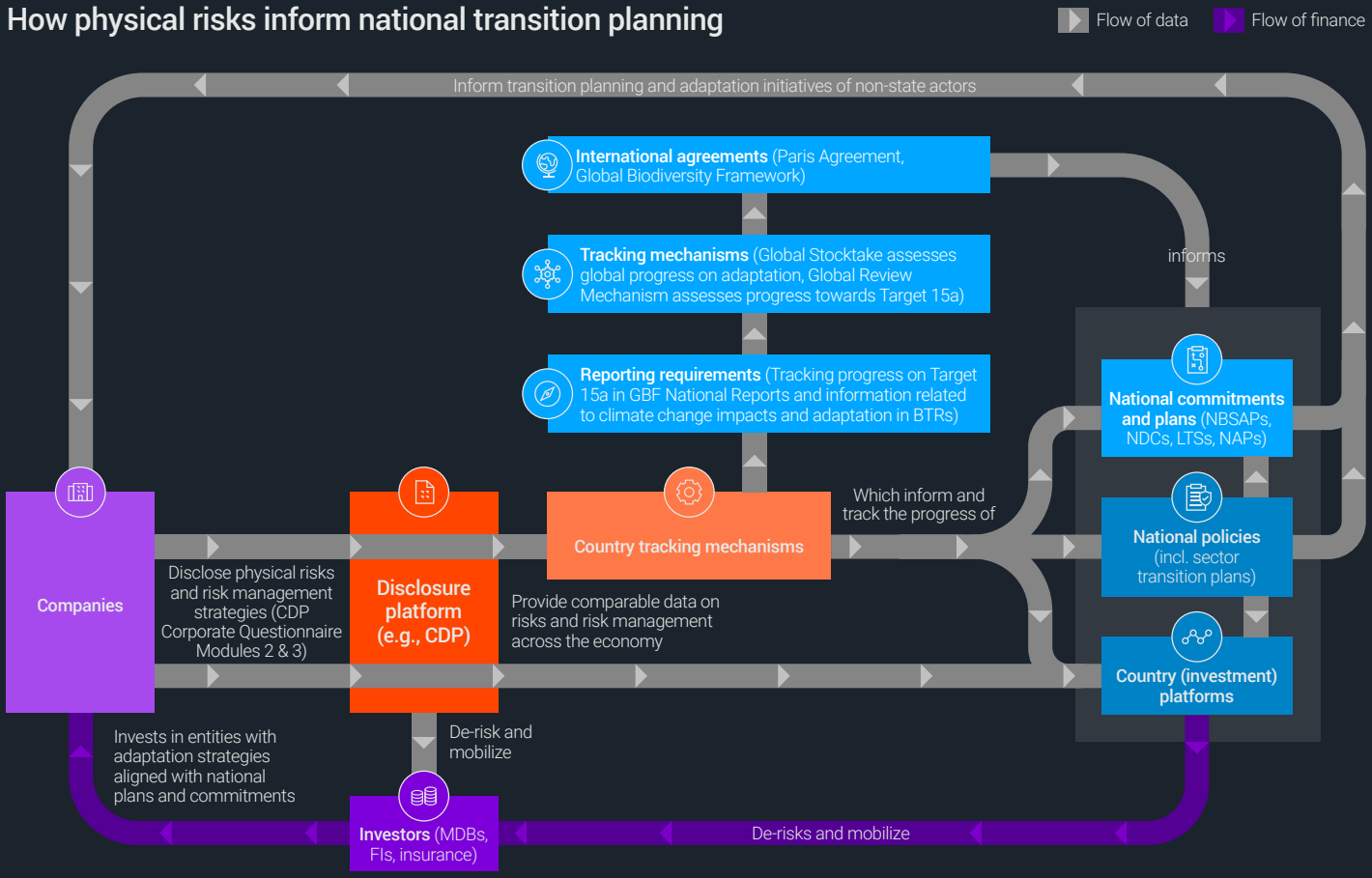
Data disclosed by subnational governments show the need for enhanced multilevel governance when it comes to increasing resilience to risks from climate change. In 2024, 48% of subnational governments reported working to integrate their adaptation goals, plans, and risk assessments, into NAPs. However, 39% of subnational governments are not engaging with other levels of government to better align and coordinate their efforts on climate action. This suggests that these governments could benefit from enhanced structures in institutional arrangements with clear roles and accountabilities, and systematic information sharing and capacity-building.

Over time, monitoring these disclosures supports tracking progress against national objectives and reporting through the BTRs under the Paris Agreement, where information on impacts, risks and vulnerabilities, as well as adaptation priorities, barriers, strategies and actions can all be included. Disclosure on adaptation measures taken by businesses also supports government efforts to track private finance contributions towards national adaptation priorities. Additionally, this information is also directly relevant to Target 15 under the GBF, which addresses the need for businesses to assess, disclose and reduce biodiversity-related risks and negative impacts, and therefore, should be captured in National Reports.

48%

of subnational governments reported working to integrate their adaptation goals, plans, and risk assessments, into NAPs in 2024

How physical risks inform national transition planning



City climate finance

CDP collects information from subnational governments on climate-related projects for which they hope to attract financing. In 2024, 2,508 projects were reported by 611 cities in 75 countries. The total investment needed was reported to be US$86 billion, with the top sectors in need of investment being water management, transport, and buildings and energy efficiency. Mitigation projects continue to be the most reported, with 1,419 projects, compared to 721 projects aimed at increasing urban adaptation and resilience to climate change. However, the demand for adaptation finance has risen from US$21 billion in 2023 to US$35 billion in 2024 – representing 41% of total reported investment needs.

This data from subnational governments presents projects, both early in the development stage and ready to be financed, that can be fed into country platforms. It provides national governments an opportunity to better integrate these subnational climate actions in the planning, financing, implementation, and monitoring of climate strategies – including in NDCs and BTRs, and specifically in their climate-related investment priorities. This is especially the case for the countries who have committed to CHAMP. Additionally, with regards to nature, this information is directly relevant for Target 19 of the GBF, on mobilizing $200 billion per year for biodiversity, as well as for tracking climate finance needs.

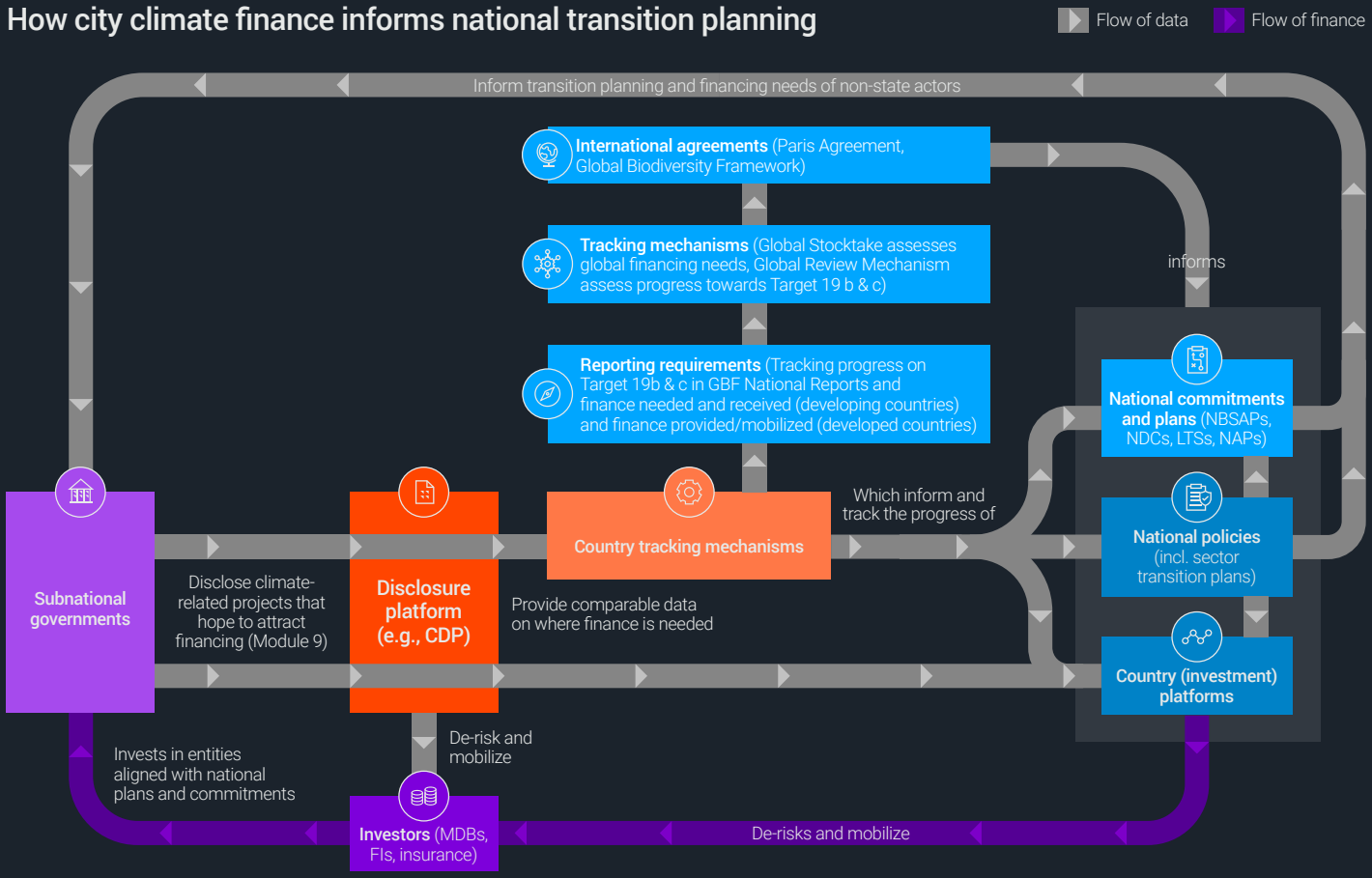
2,508

projects reported by 611 cities in 75 countries, in 2024

$86bn

reported total investment needed

How city climate finance informs national transition planning



Case study: Brazil

Brazil's Ministry of Science, Technology and Innovation (MCTI) is responsible for preparing the BTRs required from the Brazilian government as a member of the UNFCCC and a signatory of the Paris Agreement. MCTI has built mechanisms to strengthen national climate transparency and data governance, as well as to support decision-making and policy formulation.[20]

MCTI is establishing the National System for Climate Transparency (Sistema Nacional de Transparência Climática), also known as DataClima+, to strengthen Brazil's climate transparency and data governance infrastructure by consolidating MCTI's current data systems. DataClima+ will enable the Brazilian government to monitor the implementation of its NDC, as well as of its national climate policy, Plano Clima, which sets out Brazil's mitigation and adaptation strategies, in line with the 2050 net-zero target established by the country's NDC.

CDP is expanding the cooperation agreement with MCTI to include new datapoints, covering all aspects monitored for Brazil's NDC, the national communications, and BTRs. Through this partnership, CDP data will power the government's platform DataClima+. The CDP-MCTI partnership demonstrates how non-state actor data can support informing and tracking progress of NDCs. It also stresses the importance of high-quality corporate environmental disclosure to ensure comparable and decision-useful data is feeding into the design, monitoring and evaluation of national commitments, plans, and policies.

The CDP-MCTI partnership is one of a kind, as it includes the provision of datapoints that are covered by the IFRS S2 standard, such as Scope 1, 2, and 3 emissions, climate targets, physical risks and opportunities. In this regard, it will demonstrate how private sector disclosure, aligned with global standards and frameworks, can support the implementation and tracking progress of countries' NDCs. CDP's Scaling the Standard report shows that 76% of companies in Brazil that report through CDP responded to over 80% of CDP's IFRS S2-aligned questions, demonstrating that data is already available for governments to begin using.[21]

76%

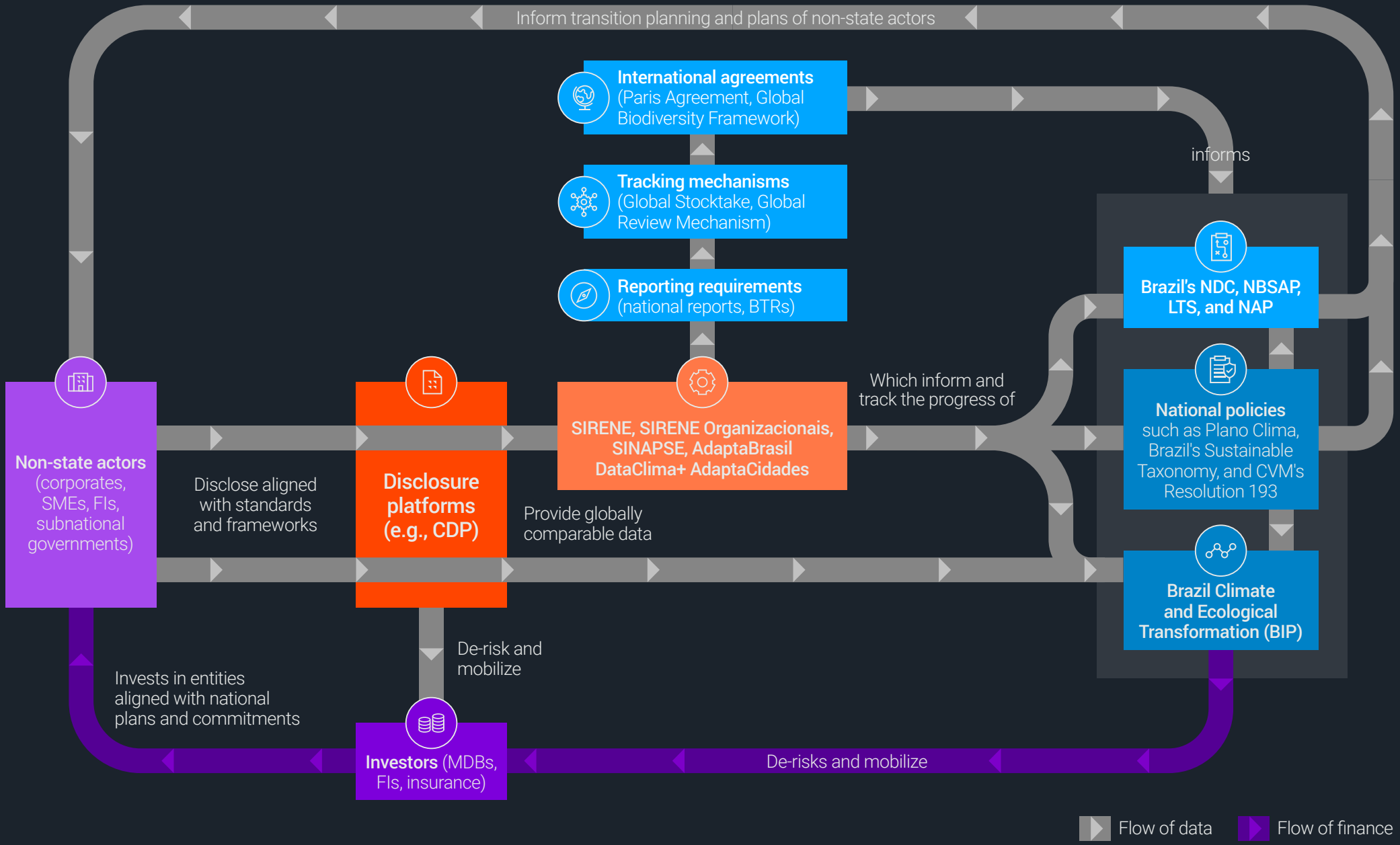
of companies in Brazil that report through CDP responded **to over 80% of CDP's IFRS S2-aligned questions**

The diagram below demonstrates how corporate environmental data supports unlocking an integrated, whole-of-economy approach to the transition in Brazil. CVM's Resolution 193 requires Brazilian listed companies to disclose on sustainability-related information, aligned with IFRS S1 and S2. Through this policy, Brazil fosters a conducive environment for high-quality disclosure from corporates and financial institutions. Through the partnerships established between CDP and the Brazilian government (CVM and MCTI), the information disclosed from the private sector, as well as from subnational governments, powers MCTI's SIRENE Organizational Module on GHG emissions and DataClima+. These data mechanisms support the Brazilian government in elaborating their national communications, BTRs, and monitoring the country's NDC. The data available through DataClima+ will also inform and monitor the implementation of national policies such as Plano Brasil, its subsequent national adaptation and mitigation strategies and sectoral plans. Such data could also inform investment decisions mediated by Brazil's Climate & Ecological Transformation Platform (BIP).

Through the partnerships established between CDP and the Brazilian government (CVM and MCTI), the information disclosed from the private sector, as well as from subnational governments, powers MCTI's SIRENE Organizational Module on GHG emissions and DataClima+.

Brazil's NDC and Plano Clima (including its sectoral plans) can inform private sector and subnational transition planning processes by setting the ambition, the target, and the timeframes for a whole-of-economy and whole-of-government transition. In turn, by disclosing environmental data, including transition data, non-state actors fuel the feedback loop of national transition planning.

National transition planning in Brazil



#Together4Transparency

In order for the Enhanced Transparency Framework (ETF) under the Paris Agreement to be a success, data from all actors in society needs to feed into the BTRs, enabling a full picture of how the world is doing in terms of GHG emissions and projections, progress towards NDCs, climate policies and measures, finance, technology transfer and capacity-building support mobilized and needed, as well as climate change impacts and adaptation. The status of these issues, as reported under BTRs, is included in the secretariat's BTR synthesis reports, to be published every two years.

Launched at COP27 by UN Climate Change, the #Together4Transparency collaborative initiative unites several groups of stakeholders committed to joining forces in the full implementation of the ETF, recognizing that all actors can play a role in ensuring the success of the Paris Agreement. In particular, the #Together4Transparency initiative seeks to engage different stakeholders —including subnational governments, private sector, and civil society organizations— in the national reporting processes under the ETF, including by providing capacity building and raising awareness on the reporting requirements and their role as data providers and data users.

Panama's example shown below demonstrates how #Together4Transparency works to showcase how different stakeholders are involved in the national reporting process to ensure data sits at the heart of countries' NDC implementation and tracking progress.

The #Together4Transparency collaborative initiative unites several groups of stakeholders committed to joining forces in the full implementation of the ETF.

Panama's National Climate Transparency Platform

Panama's National Climate Transparency Platform (PNTC), launched in 2022, is another example of a whole-of-government approach in designing and implementing an innovative institutional arrangement to centralize climate data transparently in a single portal.

The platform consolidates inputs from public, private, and civil society actors, ensuring consistency, accuracy, and accountability. With nearly 2,000 registered users, it serves as the backbone of Panama's climate action transparency. Its design embeds the requirements for reporting under the Paris Agreement's Enhanced Transparency Framework (ETF), combining top-down policy structures with bottom-up data inputs, creating a continuous feedback loop for policy and planning.

The PNTC is a core tool for NDC implementation. By integrating data into a single platform, the system streamlines reporting, avoids duplication, and strengthens coordination across ministries, financial institutions, businesses, and communities.

2,000

registered users of Panama's National Climate Transparency Platform (PNTC)

Moreover, the the National Registry of Means of Implementation (ReNMI), once operationalized, will allow to track financial resources, technology transfer, and capacity-building. In this regard, it will allow for a more efficient and effective national climate finance strategy through comparing planned finance with actual flows, identifying funding gaps, and ensuring resources are channeled effectively. This avoids double-counting, improves donor engagement, and supports private-sector investment. Finally, the platform provides the transparency and credibility of data required for investors and other finance providers to mobilize resources.

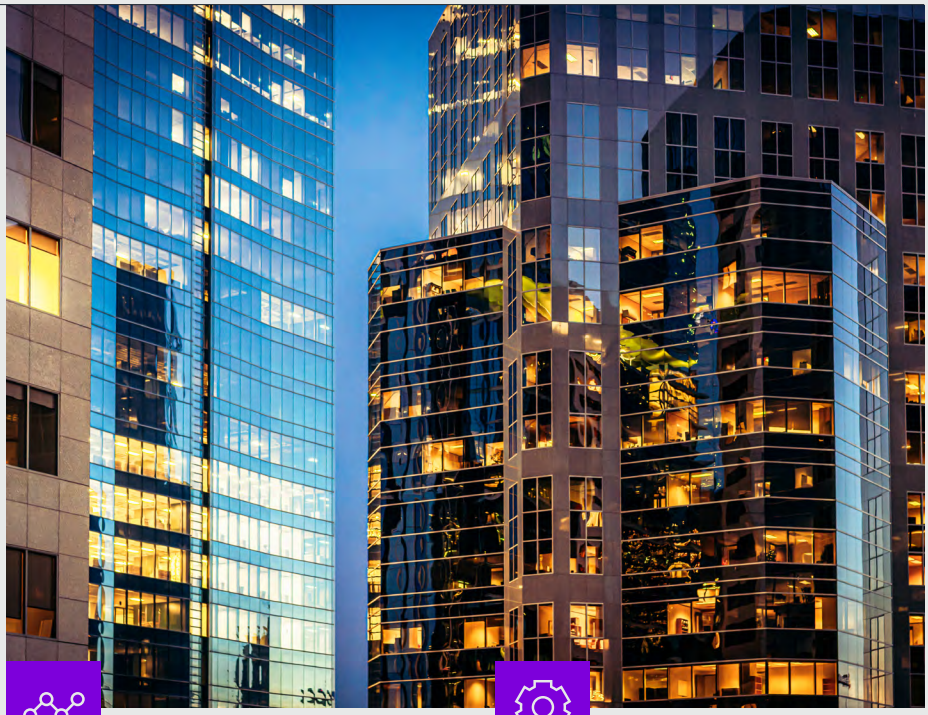
For more information, please access "Unlocking Climate Finance Through Transparency: Case Study – Panama's National Climate Transparency Platform"

Recommendations to policymakers

The examples and evidence presented throughout this report demonstrate that national transition planning provides a practical way for governments to deliver coherent, investable and accountable climate and nature action. By aligning commitments under the Rio Conventions and harnessing high-quality environmental data, countries can strengthen coordination across ministries, sectors and levels of government, while creating the conditions to unlock finance at scale. Building on these insights, the following recommendations outline key steps for policymakers seeking to operationalize national transition planning in their jurisdictions.

01.

Strengthen the enabling environment for high-quality disclosure, data use, and accountability



Prioritize measures that encourage credible, comparable and decision-useful disclosure and make it usable for national and corporate transition planning, as well as for finance deployment. This includes disclosure guidance aligned with global standards and frameworks such as the ISSB, GRI, and TNFD, proportionate supervisory guidance, and targeted capacity-building.

Where jurisdictions consider moving towards more formal approaches over time, CDP's High-Quality Mandatory Disclosure guidance provides a practical compass for policy design.

Utilize disclosure platforms like CDP to obtain non-state actor data necessary to inform, implement, monitor, and finance national commitments and plans.

Where accountability and transparency mechanisms such as DataClima+ are in place, expand their coverage on non-state actor data, by leveraging partnerships such as the CDP-MCTI case study, to support national reporting requirements under international agreements.

Use non-state actor data to monitor progress and identify system-wide barriers for key sectors and technologies, thereby targeting effective interventions that enable finance to flow at scale – turning disclosure into actionable intelligence that shapes the conditions firms need to transition successfully.

02.

Anchor private sector transition plans in national and sectoral pathways and integrate both mitigation and adaptation

Use national commitments and plans to set the ambition, targets and timelines that anchor private sector transition plans and ensure their alignment to the Paris Agreement and the GBF.

Require firms to disclose credible transition plans[22] to evidence their alignment with national and sectoral pathways, and to surface key assumptions and dependencies on the enabling environment, so governments can iterate policy and public finance tools accordingly.

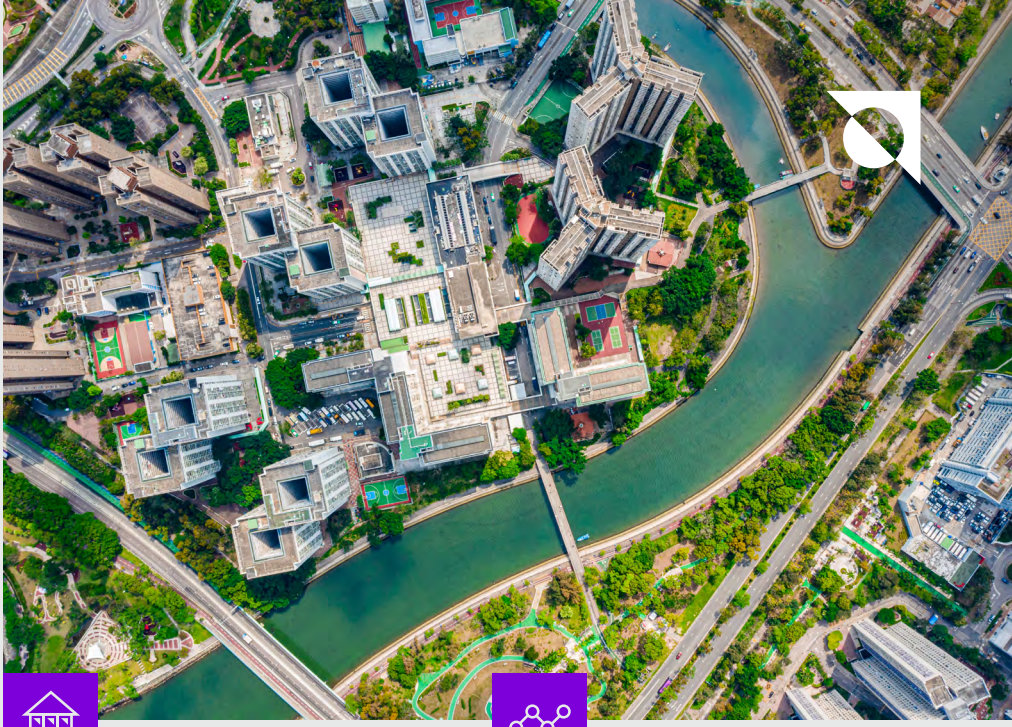
Require transition plans to incorporate adaptation alongside mitigation, with firms assessing physical climate risks identifying critical hotspots, and setting strategies—whether to avoid, accept, transfer, or reduce risk—while defining proportionate targets and metrics.

Design enabling environments that channel finance into both adaptation and mitigation, avoiding trade-offs and fostering synergies (e.g., resilient low-carbon infrastructure).

Provide data, tools, and metrics to help firms and financial institutions evaluate both transition and physical climate risks, consistent with the G20's call to improve availability and use of adaptation metrics.[23]

03.

Institutionalize national transition planning as a core government-led process to align climate and biodiversity goals



Adopt national transition planning as a formal and cyclical planning process to align climate and biodiversity goals across the whole of government and the whole of the economy. This approach should be designed to make NDCs, NBSAPs, NAPs, and LTSs coherent, investable, and implementable.

To operationalize national transition planning, governments should:

Mandate cross-ministerial coordination and multi-level governance, ensuring that national commitments are embedded across ministries, fiscal policy including annual budgets, sectoral strategies, and subnational action plans.

Provide clear communication, collaboration, and coordinated policy development among national, regional, and local governments. Drive vertical and horizontal integration of targets, actions and implementation needs by overcoming governance gaps and institutional silos. Coordination mechanisms such as multistakeholder consultations, state planning councils, industry coalitions, and intermunicipal consortia could be strong allies to disseminate the ambition and targets set out in national commitments, as well as to adopt local-based initiatives that are key for NDC, NAP or NBSAP implementation.

Develop sector transition plans, clearly signalling long-term priorities, timelines, pathways and investment needs to the private sector and financial institutions.

Rely on trusted, interoperable data systems that enable credible, comparable, and decision-useful disclosure across corporates, financial institutions, and subnational actors, informing policymaking, capital allocation, and tracking progress.

Align public policy and private-sector strategies by requiring companies — including SMEs and financial institutions — **to disclose transition plans** and demonstrate alignment with national and sectoral pathways.

Create a structured feedback loop between national and corporate transition planning, allowing policymakers to refine enabling conditions and financial instruments based on real-world implementation signals.

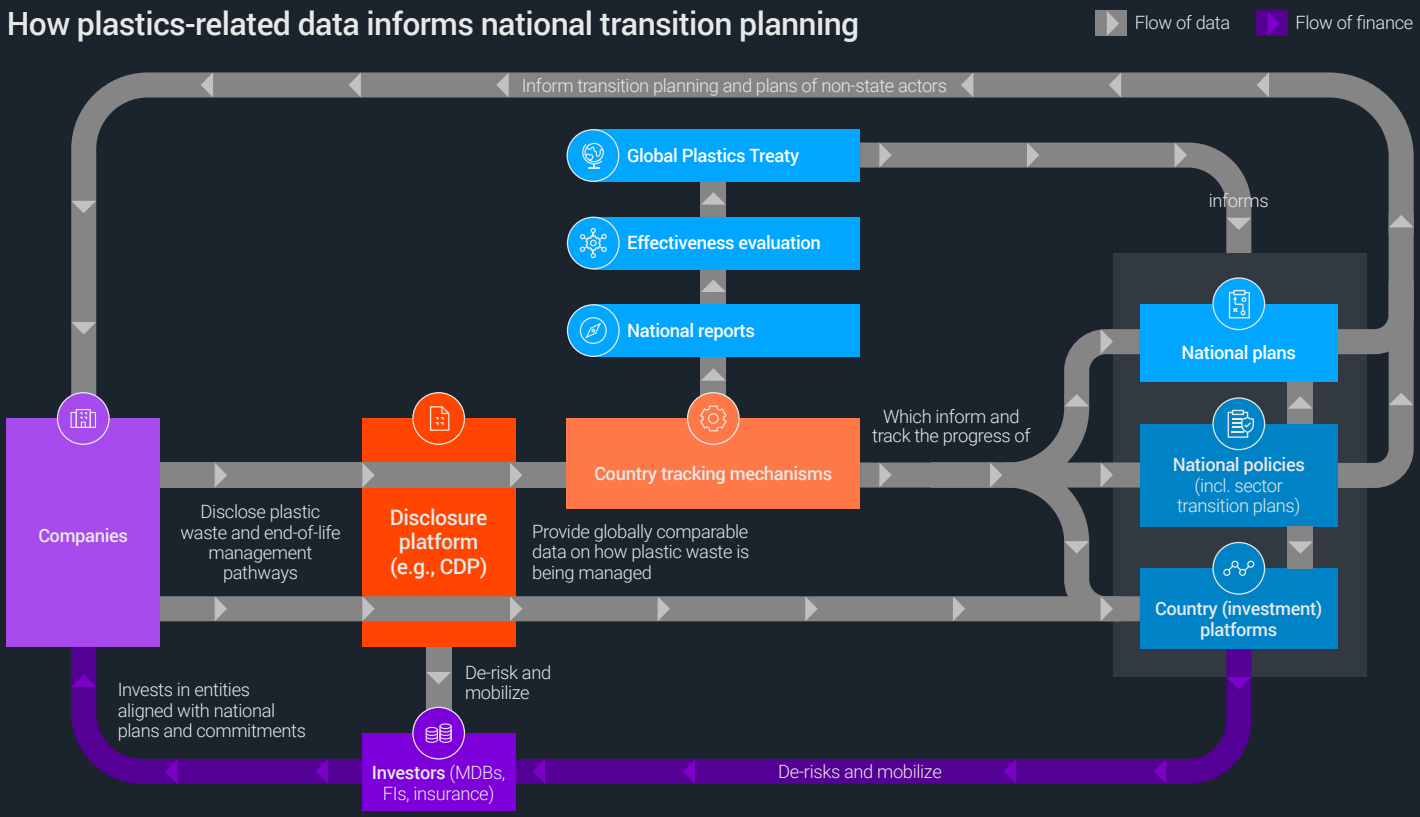
Annex: Integrating plastics into national transition planning

To generate a whole of system response to transition planning, plastic pollution and circular economy should also be taken into consideration. Although the legally binding Global Plastics Treaty continues to be negotiated among governments, CDP's Corporate Questionnaire already asks companies for information on the tonnages of plastic waste they generate or manage and the proportion of plastic waste going to end-of-life management pathways, aligned with the waste hierarchy. This includes waste prepared for reuse, recycling, composting (industrial/home), Waste to Energy, incineration, landfill, mismanaged waste, leakage and other. Corporates from any sector and from across the value chain are encouraged to disclose this data for a comprehensive view of plastic waste and waste management. These datapoints align with numerous frameworks including ESRS E2 and E5, TNFD, WWF ReSource Tracker and GRI 306: Waste.

The diagram below demonstrates a concrete example of how this corporate environmental data on plastic waste can redirect financial flows needed for the circular transition, inform national policymaking and policy evaluation and ultimately ensure countries meet the commitments from the outcomes of Global Plastics Treaty.

Without this corporate data, plastic waste management policies may not target areas of plastic waste collection, sorting and recycling which are at overcapacity, underdeveloped or need scaling up to meet demand and, therefore national waste management targets. This is also a feedback loop. Not only does corporate environmental data on waste inform national policies, aiding adherence, monitoring and evaluation of the Global Plastics Treaty, but national policies designed to implement the Global Plastics Treaty can inform disclosure of corporate environmental data, therefore increasing information flows between the two.

How plastics-related data informs national transition planning



Glossary

BIP	Brazil's Climate & Ecological Transformation Platform
BTR	Biennial Transparency Report
CBD	Convention on Biological Diversity
CVM	Brazil's Securities and Exchange Commission
ETF	Enhanced Transparency Framework
FIs	Financial institutions
GBF	Montreal-Kunming Global Biodiversity Framework
GDP	Gross Domestic Product
GRI	Global Reporting Initiative
ISSB	International Sustainability Standards Board
LTS	Long-Term Strategy
MCTI	Brazil's Ministry of Science, Technology and Innovation
MDBs	Multilateral Development Banks
NAP	National Adaptation Plan
NAZCA	Non-State Actor Zone for Climate Action
NBSAP	National Biodiversity Strategies and Action Plans
NCQG	New Collectively Quantified Goal on Climate Finance
NDC	Nationally Determined Contribution
SMEs	Small and medium enterprises
TNFD	Taskforce on Nature-Related Financial Disclosure
UNFCCC	United Nations Framework Convention on Climate Change

Footnotes

1 See Investing in Climate for Growth and Development | OECD

2 See The trillion-dollar challenge: Mobilizing private finance for NDC implementation and Mobilising private finance for development, climate and biodiversity in emerging markets and developing economies

3 See Mobilising Private Finance for Development, Climate and Biodiversity in Emerging Markets and Developing Economies

4 Taking into consideration the differences between transition planning and transition plans outlined by NGFS (see page 5), it is important to acknowledge that national transition planning is a process rather than an external-facing output. Therefore, in this report, CDP does not aim to propose a specific set of elements or framework that compose a national transition plan but rather demonstrate the role of data in informing the process of transition planning led by national governments.

5 For more information on sector transition plans, please see Sector Transition Plans: The Finance Playbook and ITPN's forthcoming publication Sector Transition Plans: A bridge between national ambition and company transition plans

6 See Taking the Lead on Climate Action and Sustainable Development

7 See From Plans to Capital: Unlocking Credible Transition Finance at Scale

8 Drawing upon the work done by the Transition Plan Taskforce, CETEx offers an outline indicating how private and public sector transition planning – and plans – should align with one another to drive change and unlock the finance needed for the transition. These recommendations have also been addressed by ECCO and E3G, who have looked into how an integrated transition planning ecosystem in the European Union could mobilize public and private finance towards its climate targets, including the EU's NDC and LTS. For more information, see: Taking the lead on climate action and sustainable development - CETEx and Moving towards a holistic transition planning framework in the EU - E3G and Ecco

9 The Sevilla Commitment provides renewed political momentum for countries to operationalize integrated and mutually reinforcing national strategies, aligning policy, planning, and financing frameworks. In this context, national transition planning serves as a concrete mechanism to translate the ambition of the Sevilla Commitment into actionable pathways that advance implementation across the Conventions while promoting sustainable development and resilience.

10 In 2024, the two priorities of the G20 Task Force on a Global Mobilization against Climate Change, convened under the Brazilian Presidency, connected to national transition planning: i) resetting action: advancing credible, robust and just transition plans; and ii) resetting finance: frameworks for alignment with the Paris Agreement.

11 Following up discussions among members on national transition plans, the 2024 Climate Action Statement of the Coalition of Finance Ministers for Climate Action also calls upon the need of a whole-of-government response to align public and private spending with NDCs and broader climate goals. See: CFMCA Climate Action Statement 2024.pdf

12 The CHAMP coalition, launched at COP28 and joined by 77+ national governments, represents a commitment to a new model of collaboration between national and subnational governments. It aims to help nations achieve the goals of the Paris Agreement by working with local and subnational governments for planning, financing, and implementing climate strategies and actions. See https://iclei.org/champ/ for more information.

13 See From Vision to Reality: NDCs 3.0 - bending the curve - United Nations, p. 1

14 See Making NDCs investable – the investor perspective - IIGCC

15 This is further explored by Jahn and Manning in their proposal of a transition planning coordination architecture, which relies on an engagement and an information architecture, of which data is a critical component. For more information, see: How can we Coordinate the Low Carbon Transition? Building a Global Information and Engagement Architecture - SSRN

16 Recent publications by the Transition Finance Council and the International Transition Plan Network outline the role of sector transition plans in bridging national and corporate transition planning. Sector transition plans are a strategic tool to support national governments unlocking a whole-of-economy approach by informing real-economy players the direction, timeframe, and pace needed for the transition. By doing so, sector transition plans inform corporate transition planning and plans, which in turn provide data and insights for governments to monitor and update (if need be) their national and sector transition planning processes. For more information, see: Sector Transition Plans: The Finance Playbook - Transition Finance Council and ITPN's forthcoming publication Sector Transition Plans: A bridge between national ambition and company transition plans

17 Disclosure data from subnational governments are also made publicly available on the CDP Open Data Portal.

18 The use of corporate transition plan disclosures by policymakers, including data on dependencies, is discussed further in CDP's report, From Plans to Capital: Unlocking Credible Transition Finance at Scale

19 For more information, see NGFS Input paper on Integrating Adaptation and Resilience into Transition Plans

20 Among the key mechanisms developed by MCTI are the National Emissions Registry System (SIRENE) which makes available data obtained through the National GHG Inventory; the SIRENE Organizational Module (SIRENE Organizacionais), which allows companies to voluntarily report their GHG emissions and which is powered by CDP data; AdaptaBrasil, which discloses impact indicators on climate change for strategic sectors in Brazil; and the National Simulator for Sectoral Policies and Emissions (Simulador Nacional de Políticas Setoriais e Emissões, SINAPSE), which provides scenarios for the implementation of sectoral policies and reduction of GHG emissions aligned with the targets set out by Brazil's NDC.

21 The provision of IFRS S2-aligned data to the Brazilian government builds on the CDP-CVM partnership announced in 2024. By collecting data through CDP's global platform, information is made available in a way that can also be shared and repurposed by other mechanisms and institutions, strengthening the evidence base for decision-making.

22 A credible climate transition plan is a time-bound action plan that outlines how an organization will achieve its strategy to pivot its existing assets, operations, and entire business model towards a trajectory aligned with the latest and most ambitious environmental science1 recommendations, i.e., halving greenhouse gas (GHG) emissions by 2030 and reaching net-zero by 2050 at the latest, thereby limiting global warming to 1.5°C. For more information, see CDP Technical Note on Reporting on Climate Transition Plans

23 For more information, see 2025 G20 Presidency and SFWG Co-chairs Sustainable Fiannce Report

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