July 2026

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Strengthening BRSR for climate transition plan disclosures in India

A two-phase approach to embed transition planning in India's sustainability reporting framework

- *Embedding transition planning elements within the existing Business Responsibility and Sustainability Reporting (BRSR) framework through a phased approach, supported by clear guidance, offers a practical path to improving the credibility and usability of corporate transition plan disclosures in India.*
- *In the first phase, a transition plan snapshot disclosure can be introduced as a short, integrated summary populated from data already required under BRSR and voluntarily published by companies outside the framework.*
- *The second phase can add a focused set of new metrics to BRSR over time, prioritising those that are material, feasible to disclose, and aligned with the International Financial Reporting Standards (IFRS) Sustainability Disclosure Standards and the Transition Plan Taskforce (TPT) framework.*
- *The phased structure closely follows the rollout pattern of BRSR Core, allowing companies to build internal capacity, data systems, and assurance practices while regulators refine guidance.*

Introduction

This briefing note builds on two previous reports by the Institute for Energy Economics and Financial Analysis (IEEFA). The first report, titled Bridging the net-zero gap, is an empirical assessment of transition plan disclosures by 33 Indian companies across six high-emitting sectors. The second, titled Corporate climate transition planning and disclosures in India, is a comparative mapping of Business Responsibility and Sustainability Reporting (BRSR) and the International Sustainability Standards Board's (ISSB) International Financial Reporting Standards (IFRS) S2 Climate-related Disclosures standard against IEEFA's transition plan assessment framework. Both reports concluded that the BRSR provides a strong base for sustainability disclosures but does not, in its current form, support the forward-looking, financially integrated transition plan information that capital providers such as lenders and investors increasingly require.

This note translates those findings into a concrete, two-phase pathway that the Securities and Exchange Board of India (SEBI) and Indian companies can use to embed transition planning within BRSR. The objective is not to create a parallel disclosure regime, but to make BRSR fit for the purpose by reorganising existing disclosures, supplementing them with a small set of priority metrics, and sequencing the introduction of new requirements in a manner sensitive to corporate sector readiness.

Importance of transition plan disclosures for Indian companies and capital markets

Globally, 139 of 198 countries and 1,276 of 1,987 companies tracked by the Net Zero Tracker had set their net-zero targets as of May 2026, reflecting a broad alignment with global climate goals. However, without transparent and well-structured corporate plans, country-level ambitions risk remaining aspirational. The credibility of corporate sector transition plans directly shapes how capital providers price risk, allocate finance, and determine long-term access to domestic and global capital markets.

India's evolving climate policy architecture is increasingly reinforcing the importance of this transition. Building on the long-term vision of net-zero by 2070, India has updated its Nationally Determined Contribution (NDC), establishing more ambitious economy-wide targets to reduce emissions intensity and expand non-fossil fuel capacity. At the sectoral level, NITI Aayog, the Indian government's policy think tank, recently published study reports across key sectors outlining long-term decarbonisation scenarios and transition pathways to support India's broader net-zero and development objectives. Further, in 2025, India launched the operational framework for its carbon market under the Carbon Credit Trading Scheme (CCTS) to support emissions reduction across industries through market-based mechanisms. Together, these evolving frameworks indicate a broader shift towards integrating climate considerations into long-term economic planning. As these policy mechanisms mature and become more interconnected, market expectations from companies to demonstrate how their business strategies align with India's wider decarbonisation trajectory will grow.

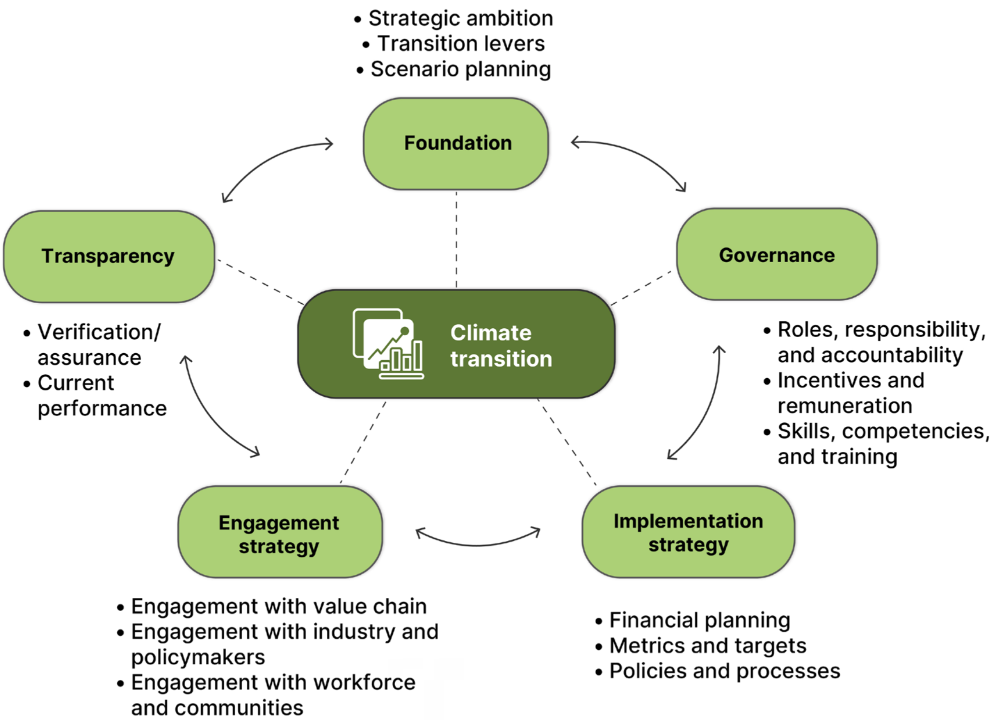
This has significant implications for India's financing and investment landscape. The country requires an estimated USD22.7 trillion (approximately INR2,167 lakh crore) in cumulative investment by 2070 to achieve its net-zero goal. Given India's projected cumulative financing gap of USD6.5 trillion (approximately INR620 lakh crore) by 2070, private capital markets will play a critical role, with international finance expected to meet up to 42% of the country's total investment needs. Capital providers are embedding transition plan credibility into their lending criteria, investment mandates, and pricing terms. The Reserve Bank of India's (RBI) recent directions, which note that banks may consider climate-related financial risks in borrower assessment, signal the direction it expects Indian banks to take on climate risk. Companies that cannot demonstrate a credible, comparable, and verifiable transition plan may risk losing access to capital, even if they have set ambitious targets [USD1 = INR95.4527 (as on 9 July 2026)].

India's corporate sector climate disclosures landscape

Indian companies have rapidly expanded their climate-related disclosures since SEBI's introduction of BRSR standards. However, these disclosures remain uneven in depth, comparability, and financial integration when assessed against the elements of a credible transition plan. To examine the state of corporate transition planning in India, IEEFA developed an assessment framework of 14 interconnected components grouped into the following five categories:

1. **Foundation:** Defines the company's strategic climate ambition, including net-zero targets, greenhouse gas (GHG) emission reduction plans, climate risk/opportunity management, and scenario analysis.
2. **Governance:** Establishes accountability through board/management oversight, clear responsibilities, climate-linked incentives, and capacity building via training.
3. **Implementation strategy:** Operationalises climate goals by aligning business decisions, financial planning, and operations with transition levers, thus translating ambition into concrete action.
4. **Engagement strategy:** Manages dependence on internal and external stakeholders (value chains, industry associations, policymakers, workforce, communities).
5. **Transparency:** Provides a holistic view of transition plan progress over time, consolidating outcomes to assess credibility on emissions reduction, capital allocation shifts, and business model transformation.

Figure 1: Components of IEEFA's transition plan assessment framework and their interlinkages



Source: IEEFA analysis

The framework uses 77 metrics across these categories, allowing a granular view of how Indian companies articulate decarbonisation ambition, align financial planning with transition pathways, manage climate-related risks, and disclose information to investors and regulators.

Sectoral performance

IEEFA applied the framework to analyse 33 Indian companies across power, steel, cement, chemicals, commodities, and oil and gas sectors in India. The analysis reveals four systemic gaps:

1. Transition ambition is rarely translated into quantified, time-bound, and financially integrated pathways. There are limited linkages between targets, capital expenditure (capex), revenues, and risk management.
2. Existing governance structures are often lacking in substance with limited accountability, capacity building, and incentive alignment to drive execution.
3. Disclosures remain fragmented and backward-looking, with inadequate Scope 3 coverage, weak scenario analysis, and limited assurance, reducing their utility to capital providers.
4. Disclosure quality correlates strongly with corporate scale and investor visibility, producing a dual-track landscape of a few leaders alongside a wide base of companies with compliance-driven reporting.

Gaps in BRSR in transition planning disclosures

To further analyse the extent to which the current BRSR standards support the transition plan disclosures among companies, IEEFA mapped BRSR and IFRS S2 against four forward-looking categories of its own transition plan assessment framework and found some shortcomings in both. IFRS S2 is more comprehensive on transition planning but still leaves certain elements partially or wholly unaddressed.

Table 1 summarises BRSR's alignment with the IEEFA framework through three levels: well-aligned (requires the relevant disclosure in adequate detail), moderately aligned (partly covers the requirement or covers it as guidance rather than as a mandatory indicator), and non-aligned (does not require the disclosure).

Table 1: BRSR alignment with IEEFA's transition plan assessment framework

Category	Well-aligned	Moderately aligned	Non-aligned
Foundation	-	• Strategic ambition • Transition levers	• Scenario planning
Governance	-	• Roles, responsibility, and accountability • Skills, competencies, and training	• Incentives and remuneration
Implementation strategy	-	• Metrics and targets • Policies and processes • Financial planning [capex, research and development (R&D)]	• Financial planning (revenue, carbon price, funding)
Engagement strategy	• Engagement with workforce and communities	• Engagement with value chain • Engagement with industry and policymakers	-

Source: IEEFA analysis

The assessment uncovered several key gaps. On targets, BRSR allows disclosure across Environmental, Social, and Governance (ESG) dimensions, but does not require structured GHG-specific elements such as scope, baseline, business boundary, offsets, or interim milestones.

Neither does it require scenario analysis or the mitigation potential of each transition lever. On governance, it asks for the highest authority and board committee overseeing sustainability but does not mandate dedicated personnel like a chief sustainability officer (CSO), climate-linked remuneration, or any assessment of climate competence on the board. Implementation strategy is similarly thin, with no forward-looking capex plans, low-carbon revenue projections, transition funding sources, internal carbon price, or financial outlay per lever. On engagement, BRSR is strong on social and community aspects but underdeveloped on climate-specific stakeholder dependencies, alignment of industry association positions, and just transition workforce plans.

Guiding principles to bridge the gaps

The following principles shape the design of this note's proposed approach to address the existing gaps in climate transition plan disclosures in the BRSR:

1. **A phased approach:** Indian companies sit at very different points on the transition planning curve. Mandating the full set of additional disclosures all at once would risk overwhelming smaller companies without materially improving the quality of disclosures from sector leaders. A phased rollout, similar to BRSR Core, balances ambition with feasibility.
2. **Building on existing disclosures:** A substantial share of the data needed for transition plan disclosures is either already required under BRSR (albeit broadly) or is voluntarily disclosed in integrated reports, sustainability reports, and investor presentations. The two-phase approach prioritises reorganising and surfacing this information before adding new requirements.
3. **Alignment with global standards:** Indian listed firms, particularly those raising capital offshore, are increasingly expected to align with Transition Plan Taskforce (TPT) and IFRS S2. The proposed snapshot and metrics are designed to map onto these standards, supporting interoperability.
4. **Sector- and size-sensitive design:** Decarbonisation pathways, capex profiles, and disclosure capacity vary materially across sectors. The proposed approach allows for sector-specific guidance, particularly for high-emitting sectors, and a staged extension from large caps to mid and small caps over time.

Phase 1: Creating a transition plan snapshot

The transition plan snapshot disclosure is a short, integrated summary that can be included within BRSR filings. It brings together information already required or commonly disclosed in public reporting documents. Instead of forcing disclosure on new metrics, it organises existing disclosures (both mandatory and voluntary) into a structured, comparable format aligned with the components of a credible transition plan.

The rationale for this is two-fold. Indian companies' disclosures on net-zero targets, transition levers, governance, and capital allocation remain scattered across multiple documents, sections, and formats. This makes it difficult for capital providers to get a coherent view of the company's transition readiness. A standardised snapshot solves the comparability problem at low cost. Additionally, the act of compiling the snapshot itself highlights internal gaps for the company. It makes explicit which disclosures seem contradictory or unaligned, which fields can be populated from existing disclosures, which can be populated by reorganising existing internal data, and which require new processes. This creates a natural progression to Phase 2 of adding a focused set of priority new metrics to BRSR over time.

Figure 2: Structure of the transition plan snapshot disclosure document

Company profile and reporting boundary

Company name | Reporting period and consolidation boundary | Ownership and size (private sector/public sector; large/mid/small cap)

Cross-reference: Source document, page/section, link to detailed disclosure

A. Strategic ambition and greenhouse gas (GHG) targets

- Net-zero target year, scopes covered, baseline year, alignment with global/domestic/sectoral benchmarks
- Other material GHGs included; use of carbon offsets (% of residual); business boundary
- Short-term and medium-term targets (% reduction by year, absolute or intensity)
- Current-year Scope 1, 2, and 3 emissions [tonnes of carbon dioxide equivalent (tCO_2e)]; Scope 3 categories covered (out of 15); top three GHGs by share
- Emission intensity per physical output; three-year historical trend; compound annual growth rate (CAGR); assurance provided

Cross-reference: Source document, page/section, link to detailed disclosure

B. Climate risk management

- Material physical and transition risks identified
- Material climate-related opportunities identified
- Linkage of risks and opportunities to transition levers in Section C

Cross-reference: Source document, page/section, link to detailed disclosure

C. Transition levers

- For each lever: Scope(s) addressed; linked risk or opportunity; target metric and year
- Linked strategic ambition target (% contribution to net-zero gap; mitigation potential, tCO_2e)
- Capex and R&D allocated (current and planned, INR crore; % of total); progress, current status, and pipeline
- Cumulative coverage across all levers (scopes addressed; mitigation as % of gap; capex as % of total)

Cross-reference: Source document, page/section, link to detailed disclosure

D. Scenario analysis

- Conducted (Yes/No); scenarios used, for example, International Energy Agency (IEA) Net Zero Emissions by 2050 (NZE), Network for Greening the Financial System (NGFS), IEA Stated Policies Scenario (STEPS)
- Organisational boundary covered; results (qualitative/quantitative/not disclosed)
- Financial impact assessed [Yes/No; Key Performance Indicators (KPIs) specified]

Cross-reference: Source document, page/section, link to detailed disclosure

E. Governance

- **Board, Sustainability/Environmental, Social and Governance (ESG) committee, Key Managerial Personnel (KMP) such as Chief Sustainability Officer (CSO), workforce: Responsibility in transition plan**
- **Climate KPIs in remuneration; climate skills and training; coverage of training (%)**

Cross-reference: Source document, page/section, link to detailed disclosure

F. Financial planning and integration

- **Capex and R&D on decarbonisation (current and planned, INR crore; % of total)**
- **Internal carbon price; revenue from green/low-carbon products (% of total)**
- **Financing strategy; sustainable finance instruments; sustainability-linked debt (SLD) KPIs linked to lever targets**

Cross-reference: Source document, page/section, link to detailed disclosure

G. Stakeholder engagement

- **Suppliers: GHG criteria in selection/renewal; capacity building (% covered)**
- **Customers; industry associations (alignment check); workforce reskilling and community consent**

Cross-reference: Source document, page/section, link to detailed disclosure

H. Policies, controls, and reporting alignment

- **Board-approved climate/environment policy; climate risk in Enterprise Risk Management (ERM)**
- **Internal controls on GHG reporting (standard); stakeholder grievance mechanism**

Cross-reference: Source document, page/section, link to detailed disclosure

Source: Metrics created from IEEFA's transition plan assessment framework and BRSR mapping.

See the sample snapshot for a hypothetical Indian steel company here. The snapshot fields are created in alignment with the guiding principles mentioned earlier in the document.

The snapshot is most decision-useful for sectors where transition risk is material to enterprise value, and where capital providers are expected to most actively re-price assets based on transition readiness. In the short term, mandatory adoption can therefore be proposed for entities in high-emitting sectors (such as power, steel, cement, oil and gas, chemicals, and commodities) among the top 500 listed companies by market capitalisation. Those outside these sectors within the top 500 can adopt the snapshot on a voluntary basis in the same period, with mandatory adoption extended to all top 1,000 BRSR reporting entities in the medium term as the format matures.

Realigning existing BRSR disclosures: Benefits and limitations

Most fields in the snapshot draw directly from data already required under BRSR. For instance, strategic ambition and target fields can be populated from Section B Question 5, the identified transition levers from Section A Disclosure 26, and the highest authority and ESG committee fields from Section B Questions 8 and 9.

Fields not directly mapped under BRSR can be flagged as 'leadership indicators' under the snapshot until they are introduced as part of Phase 2 (explained in next section). They signal elements missing in transition planning to capital providers and companies and create demand for Phase 2 metrics. Phase 1, therefore, includes certain indicators that are not mandatory to disclose in the short term but that highlight existing gaps and capacity building areas to regulators and the market.

The exercise improves comparability by providing capital providers a structured, standardised summary across companies. It also reduces analysts' time spent on getting relevant information from multiple sources, and the disclosures (or the lack of it) signal a company's level of transition readiness. As most required fields draw from existing disclosures, the compliance burden is limited in the short term. The snapshot is, therefore, best understood as a stepping stone, designed to shine a light on the strengths and weaknesses of current disclosures and to provide the regulator and companies with a structured basis for the targeted additions introduced in Phase 2.

Phase 2: Priority metrics to strengthen BRSR

Phase 2 introduces 23 new metrics within existing BRSR standard categories, designed to fill the most material gaps identified in the BRSR-IEEFA framework mapping. The selection is guided by three filters:

1. **Materiality:** The metric should address an element of credible transition planning that is currently absent or is weakly covered under BRSR and that capital providers and standard setters, such as ISSB, consistently identify as decision-useful through standards such as IFRS S2.

2. **Feasibility:** It should be a metric that leading Indian companies already disclose voluntarily, or that can be aligned with internationally recognised standards such as the GHG Protocol, so that early adopters do not need to build measurement frameworks from scratch.

3. **Interoperability:** It should map onto IFRS S2 and the TPT framework to work seamlessly with global standards.

While the 23 metrics are designed to be broadly applicable across high-emitting sectors, the materiality of specific metrics may vary by industry and firm size. For example, Scope 3 category coverage may be more immediately material for companies in oil and gas and commodities sectors. Similarly, smaller firms within the top 1,000 listed companies may need more time to build internal capacity for metrics such as lever-level capex allocation and alignment of workforce incentives with climate targets. The sector-specific templates proposed in the roadmap (discussed later in this note) can accommodate these differences. SEBI's guidance document can differentiate between the mandatory and the sector-conditional metrics for each industry group.

Tables 2 and 3 below illustrate these 23 metrics and group them into two batches. Batch 1 (13 of the 23) captures items that are either already available with large companies or are tightly linked to the corporate budgeting and strategy cycle. Batch 2 covers metrics that build on the foundation established by Batch 1 and require additional internal capacity. It is organised in two sub-groups. Sub-group A (4 metrics) extends Batch 1 metrics by deepening disclosure requirements in areas where Batch 1 established the base. Sub-group B (6 metrics) introduces new metrics, primarily around value-chain emissions, governance integration, stakeholder engagement, and just transition planning.

These batches map onto the snapshot disclosure introduced in Phase 1. Batch 1 establishes the base layer of disclosure across the snapshot's eight sections, and Batch 2 deepens and extends that disclosure in several of them over time. The remaining snapshot fields, those that lie outside the 23 priority metrics, are populated from disclosures already required or commonly reported under BRSR and so represent a reorganisation of existing data rather than additional reporting requirements.

Table 2: Batch 1 priority metrics

Metric	Detail	BRSR alignment	Rationale
Net-zero ambition	Net-zero commitment across Scope 1, 2, and 3 emissions (including baseline year, offset use, target boundary)	Section B, Question 5	Already disclosed by most large companies
Short-term target	Targets for short-term emissions reduction	Section B, Extension of Question 5	Companies have short-term visibility on actions and this aligns with corporate budgeting cycles
Transition levers	Identification of transition levers	Section A, Disclosure 26	Aligns with existing risks and opportunities (R&O) disclosures within BRSR
Transition levers metrics and targets (short-term)	Metrics and targets for levers identified	Section B, Extension of Question 5	Builds on existing target disclosure structure
Capex (short-term)	Allocation to short-term levers as a share of total capex	Section C, Extension of Principle 2	Tightly linked to capital budgeting
Scenario analysis	Narrative-level analysis describing scenarios considered, key assumptions, and high-level implications for strategy	Currently not covered	Aligns with TPT and IFRS S2 disclosures
Leadership accountability	Appointment of CSO or designated KMP	Section B, Question 8	Already common practice among large caps
Climate oversight by board committee	Oversight committee overseeing climate-related topics	Section B, Question 9	Builds on existing committee disclosure

Governance hierarchy	Defined roles and responsibilities	Section B, Extension of Questions 8 and 9	Mostly available internally
Capital allocation alignment	Current capex share linked to identified transition levers	Section C, Principle 2, Essential indicator 1	Builds on existing R&D and capex disclosure
Carbon pricing integration	Whether the company uses an internal carbon price (yes/no)? If yes, the level (INR or USD per tonne CO_2e) and how it is applied in investment decisions	Currently not covered	Aligns with IFRS S2 paragraph 29(f)
Climate risk integration into ERM	Whether climate-related risks are integrated into the ERM framework (yes/no)? If yes, how?	Currently not covered (relates to Section A R&O disclosure)	Most large companies already have an ERM framework, so climate risk integration is internally available
Identification and mitigation of physical risks	Material physical climate risks and mitigation actions	Section A, Extension of Disclosure 26	Available internally for most large companies

Source: Metric definitions consolidated from IEEFA's transition plan assessment framework and BRSR mapping.

Table 3: Batch 2 priority metrics

Metric	Detail	BRSR alignment	Rationale
Medium-term emission reduction target *(Sub-group A, Extension of Batch 1: Short-term target)*	Medium-term emission reduction target, specifying baseline year, metric (absolute or intensity), and scopes covered	Section B, Extension of Question 5	Essential for long-cycle sectors (steel, cement, oil and gas)
Green or low-carbon revenue share *(Sub-group A, Extension of Batch 1: Transition levers)*	Revenue from green or low-carbon products, services, or business lines as a percentage of total revenue. Definition of 'green' to be disclosed	Currently not covered	Signals business model alignment with transition
Scenario analysis: Financial impact assessment and KPIs *(Sub-group A, Extension of Batch 1: Scenario analysis)*	Whether the financial impact of scenario analysis has been quantified (yes/no)? If yes, the KPIs used	Currently not covered (extends Batch 1 narrative-level requirement)	Quantified financial impact is decision-useful for pricing transition risk

Transition financing sources and instruments *(Sub-group A, Extension of Batch 1: Capital allocation alignment)*	Planned sources of funding for transition activities, including sustainable finance instruments, and internal accruals	Currently not covered	Decision-useful for lenders assessing refinancing risk and KPI credibility, and for investors assessing feasibility of planned actions
Scope 3 categories coverage with respect to net-zero target *(Sub-group B)*	Inclusion of relevant Scope 3 categories (such as Category 11: Use of Sold Products, for oil and gas sector)	Section C, Principle 6, Leadership indicator 2	Internally available or easy to align with the GHG Protocol
Incentive coverage *(Sub-group B)*	Percentage of KMP, board, and employees linked to climate or ESG targets	Currently not covered	Builds on existing remuneration disclosure structures
Governance integration *(Sub-group B)*	Climate criteria in nomination policy and skill matrix	Currently not covered	Aligns with TPT framework and IFRS S2
Value chain climate engagement *(Sub-group B)*	Whether GHG screening or climate criteria applied to key suppliers (yes/no)? What is the share of upstream Scope 3 emissions covered? Whether low-carbon or green product offerings exist for customers (yes/no)?	Extension of BRSR Core value chain KPIs (which cover 75% of purchases and sales by value) and Section C, Principle 6	Extends BRSR Core from emissions reporting to active climate engagement across the upstream and downstream value chain Needed for Scope 3 reduction credibility and business model transition signal
Industry association climate alignment *(Sub-group B)*	Whether the company assessed alignment between the association's policy positions and its own net-zero target (yes/no)? What are the actions taken in case of misalignment?	Section C, Extension of Principle 7	Investors use association alignment as a credibility signal
Workforce reskilling and just transition planning *(Sub-group B)*	Does a workforce reskilling plan exist for employees in roles affected by transition? Number of workers covered, timeline, and is the plan developed with worker consultation?	Section C, Extension of Principle 3	Critical for sectors with large transition-exposed workforces Aligns with International Labour Organization (ILO) Just Transition Guidelines, and TPT

Source: Metric definitions consolidated from IEEFA's transition plan assessment framework and BRSR mapping.

Alignment with BRSR core requirements

There are some areas of overlap between the proposed Batch 1 and Batch 2 metrics and the BRSR Core requirements introduced by SEBI.

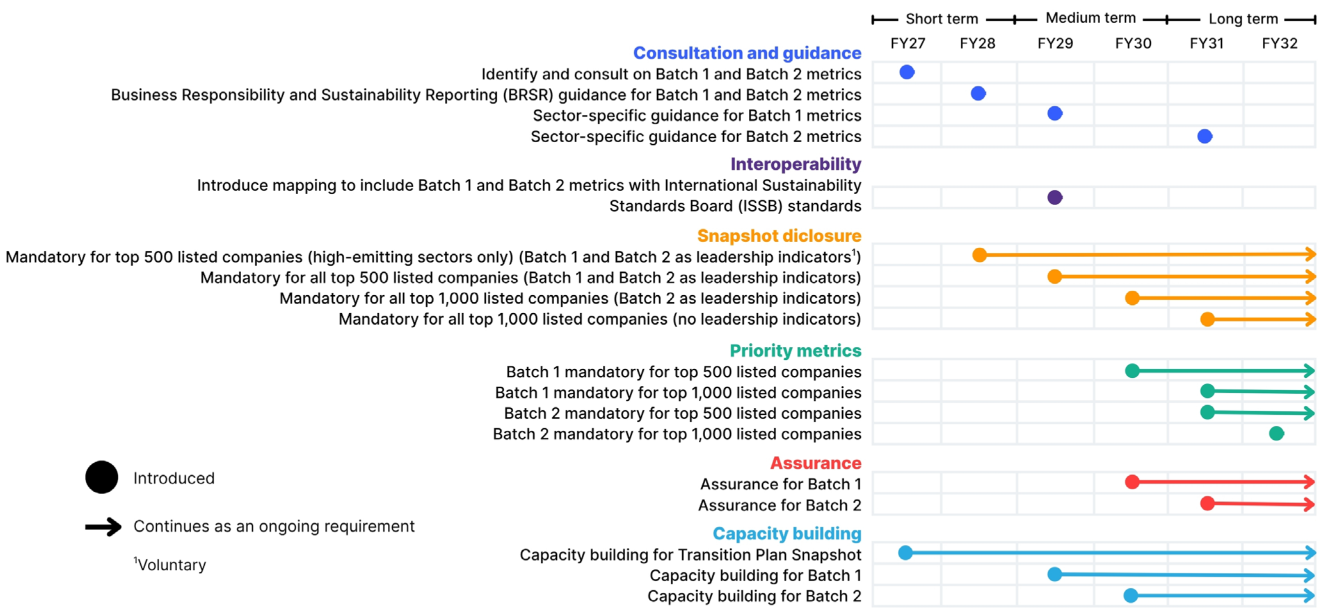
Batch 1 recommends disclosure of net-zero ambition supported by Scope 1 and 2 emissions coverage. This partially overlaps with the BRSR Core requirement for reporting and assurance of Scope 1 and 2 emissions. While BRSR Core does not explicitly require these emissions to be linked to net-zero targets, disclosure of emissions under these two scopes forms a necessary foundation for their inclusion within credible net-zero pathways.

Similarly, Batch 2 recommends greater integration of Scope 3 and value chain emissions, and value chain engagement within transition-related disclosures and targets. This overlaps indirectly with the BRSR Core value chain disclosure requirements, under which the top 250 listed entities are required to report KPIs for upstream and downstream partners individually comprising 2% or more of purchases and sales by value, with disclosure capped at 75%. Since the reported Scope 1 and 2 emissions of these value chain partners constitute a portion of the reporting company's Scope 3 emissions, the BRSR Core value chain requirements provide a data foundation for the proposed Batch 2 metrics on Scope 3 category coverage and value chain climate engagement.

Phased roadmap for implementation

The two phases of the proposed approach are sequenced through a short-, medium-, and long-term roadmap as depicted in Figure 3. The short-term covers one to two years [financial year (FY) 2027–FY 2028], the medium-term three to four years (FY2029–FY2030), and the long-term five to six years (FY2031–FY2032). The sequencing is designed to give companies time to build internal capacity for the most demanding new metrics, while delivering immediate gains in comparability and usability through the snapshot.

Figure 3: Roadmap for implementation



Source: IEEFA analysis

The phased roadmap should also be read alongside India's evolving domestic climate policy architecture. India's updated NDC 3.0, sectoral decarbonisation roadmaps like the one developed by the Ministry of Steel, and CCTS by the Bureau of Energy Efficiency (BEE), each set targets and timelines that regulators already expect companies in high-emitting sectors to engage with. Embedding transition plan disclosures within BRSR creates a natural linkage between these domestic policy commitments and company-level reporting, so that the disclosure framework aligns not only with global standards such as ISSB and TPT but also with India's own climate goals and sectoral pathways.

The expansion proposed above is designed to build on the BRSR Core rollout, under which assessment or assurance obligations will extend to the top 1,000 listed companies by FY2027. Companies in the top 500–1,000 bracket will therefore already have the BRSR Core data infrastructure in place by the time the transition plan snapshot and priority metrics are introduced. The snapshot can accordingly be introduced at a higher base (for example, mandating for companies in high-emitting sectors among the top 500 listed companies from the outset, rather than adopting the BRSR Core rollout which began with the top 150 listed companies before expanding to additional entities).

Similarly, assurance expectations for the new transition plan metrics should follow the current BRSR Core standard of assessment or assurance. Over the medium term, SEBI may consider requiring reasonable assurance specifically for material transition data such as GHG targets, capex allocation, and scenario analysis, given that these data points feed directly into capital allocation and pricing decisions by capital providers. Where proposed metrics overlap with existing BRSR questions (such as net-zero ambition mapping to Section B Question 5, or value-chain emissions assurance mapping to BRSR Core value-chain disclosures), the BRSR guidance document should specify whether the new metric adds sub-questions, replaces the existing field with a more structured format, or is an entirely new addition.

The BRSR guidance document is the most efficient instrument for introducing the priority metrics, since it allows targeted additions without requiring changes to the BRSR format itself. SEBI can use this guidance to clarify how each new metric should be disclosed within existing sections, where new sub-questions are needed, and how the metric maps onto BRSR Core, TPT, and ISSB's IFRS S2 elements.

The case for sector-specific guidance

SEBI's BRSR guidance document can also be used to operationalise the sector-sensitivity principle through sector-specific templates for high-emitting sectors. Each template would define sector-specific net-zero target specifications, transition levers, scenario analysis, mitigation measures for material physical risks, green revenue, value chain emissions, and just transition considerations and identify the most material Scope 3 categories for the sector and provide illustrative examples of transition levers and their expected disclosure format.

This approach is consistent with global standard-setting practice. The TPT (now part of ISSB) has published deep dives for seven sectors including metals and mining, electric utilities and power generators, and oil and gas, with sector-specific decarbonisation levers, metrics, and targets. Sector templates should be developed in consultation with industry bodies, drawing on existing sectoral decarbonisation roadmaps published by NITI Aayog and relevant line ministries. The phased roadmap (set out above) proposes introducing these templates in the medium and long term, after Batch 1 and Batch 2 metrics have been consulted on, so that companies have relevant guidance available per sector as disclosure requirements deepen.

Conclusion

India's corporate transition planning landscape stands at an inflection point. A small group of large, listed companies have developed transition plan disclosures broadly comparable to global peers. However, there is a substantial gap between leading and lagging firms. Also, in its current form BRSR does not give capital providers a comparable, forward-looking view of corporate transition readiness. With global transition plan frameworks such as TPT and IFRS S2 only recently being operationalised, India has a window to embed transition planning within BRSR before multiple competing reporting approaches become entrenched.

The two-phase approach proposed in this note is designed to use that window. Phase 1 introduces an integrated Transition Plan Snapshot Disclosure that draws on existing BRSR data, delivering immediate gains in comparability and usability. Phase 2 introduces a focused set of 23 priority metrics, sequenced across Batch 1 (13 metrics) and Batch 2 (4 extension metrics and 6 new metrics) over the medium and long term. These fill the most material gaps in BRSR's current coverage of transition planning. Both phases build on the existing BRSR architecture, align with the IFRS Sustainability Disclosure Standards and the TPT framework, and follow the BRSR Core rollout pattern of starting with large caps before expanding coverage.

If implemented cohesively, this approach can transform transition planning in India from a compliance exercise into a strategic tool for competitiveness and capital mobilisation. This would help Indian companies secure the confidence of domestic and offshore investors, deepen access to sustainable finance, and position India as a leader in credible disclosure among emerging markets.

About IEEFA

The Institute for Energy Economics and Financial Analysis (IEEFA) examines issues related to energy markets, trends and policies. The Institute's mission is to accelerate the transition to a diverse, sustainable and profitable energy economy. www.ieefa.org

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