

P10 Working Group

Minutes

Meeting #2 – 30.09.2025

Session A: 8am CEST

Session B: 4pm CEST

Attendance

Name	Email	Session
Alli Devlin	ADevlin@responsiblesteel.org	A & B
Amy Jackson	AJackson@responsiblesteel.org	A & B
Melav Salih	msalih@responsiblesteel.org	A & B
Juna Hwang	juna.hwang@forourclimate.org	A
Heather Lee	heather.lee@forourclimate.org	A
Harshal Limdi	harshal.limdi@jsw.in	A
Kendall, Rohan	rohan.kendall@bluescope.com	A
Kenta	kenta@transitionasia.org	A
Manal Al Badawi	Manal.AIBadawi@emsteel.com	A
Dr. Dimitrios Dimitriou	Dimitrios.Dimitriou@emsteel.com	A
Romain Su	romain@steelwatch.org	A
Sakshi	sakshi@climatecatalyst.org	A
Shirish BHARDWAJ	sbhardwaj@climategroup.org	A
Swaroop Banerjee	swaroop.banerjee@jsw.in	A
Becker, Jeffrey J	JBecker@uss.com	B
Ladin Camci	ladincamci@carescertification.com	B
Mark Samuels	mark@karmanterra.com	B
Matijasevic-Clarke, Milena	Milena.Matijasevic-Clarke@lr.org	B
Martinez, Veronica	veronica.martinez@arcelormittal.com	B
Streater, James	james.streater@arcelormittal.com	B
Sameen KHAN	SKhan@climategroup.org	B
Serkan ÜRKMEZ	surkmez@borcelik.com	B

Agenda & Intended Outcomes

1. Introduction of any new working group members
2. Reflections on last week's discussions – points of convergence & divergence + update on SBTi data
3. Review of current ResponsibleSteel Standard requirements (10.5, site-level transition planning)
4. Review of guiding principles for this revision work
5. What's considered "credible"? – exploring the balancing act of feasibility and ambition
6. A proposal for the use of DPLs in site-level transition planning
7. Further discussion & next steps

Intended Outcomes

- Define 'credibility' in the context of Climate Transition Plans (CTP)
- Explore the value of DPLs in site-level transition planning for steelmakers

Minutes

Last meeting's reflections

Point of Convergence

- Recognition of structural barriers to decarbonization, including high costs, policy inconsistency, lack of demand signals, and trade barriers.
- Support for flexibility in standards, especially through progress levels and qualitative measures.
- Agreement on the importance of harmonizing ResponsibleSteel with existing frameworks (e.g., SBTi, CDP, IFRS) to reduce administrative burden.
- Broad support for improved disclosure requirements to enhance transparency and accountability.
- Need to drive value for ResponsibleSteel certification and enhance the utilisation of DPLs (including understanding the value proposition for key stakeholders, e.g. steel buyers, investors).

Points of Divergence

- Mixed views on referencing sector-wide pathways (e.g., IEA, MPP) due to concerns about unrealistic assumptions and geographic limitations. Sector-wide pathways can be useful as directional tools, though not as strict benchmarks.
- Varied interpretations of what constitutes a "credible" or "good" transition plan.

Main Challenges Identified

- Low uptake of SBTi Steel Sector Decarbonisation Approach (SDA) among steelmakers, raising questions about its feasibility as a benchmark.
- Balancing ambition and feasibility in defining a 'credible' transition plan.
- Difficulty harmonizing emissions accounting between site-level and corporate-level planning.

- Challenges in obtaining reliable Scope 3 emissions data, especially from smaller suppliers.
- Mixed support for integrating Decarbonization Progress Levels (DPLs) into site-level transition planning.

Feedback from Participants: Session A & B

- Suggestion to send material ahead of meetings to allow participants time to prepare and provide informed feedback.
- Only a small number of steelmakers globally have adopted the SBTi Steel Decarbonisation Approach (SDA), and even fewer are ResponsibleSteel members.
- Remove 'financed' from the definition of credibility because it is unrealistic to expect long-term decarbonization investments to be financed upfront.
- Difficulty in obtaining Scope 3 emissions data from smaller suppliers makes achieving Decarbonization Progress Levels (DPLs) challenging.
- Site-level approaches are preferred for capturing detailed emissions data, especially in diversified operations.
- Mass balance approaches may not be suitable for site-level emissions accounting under current standards. This approach did not exist when the Standard was developed. This topic will be revisited in a future working group as it is currently out of scope.
- Clarification needed on the relationship between corporate-level and site-level transition plans, especially regarding Paris Agreement alignment.
- Science-based targets should not be limited to SBTi; other methodologies exist but lack verification mechanisms.
- Disclosure of DPL timelines is supported, but specific numerical targets may be commercially sensitive.
- Scope 3 emissions data should be aggregated to avoid commercial sensitivity; disaggregated data may expose proprietary information.
- Policy positions are often declared in CDP but not made public due to internal disagreements and affiliations with organizations holding conflicting views. Lobbying activities are typically managed at the corporate level and may conflict with site-level disclosures.
- Interest in integrating ResponsibleSteel with EU ETS to support financial additionality.
- Clarification needed on what constitutes 'science-based' targets and whether 1.5°C ambition remains a reference point.
- If demand for low-carbon steel increases, companies are willing to invest in achieving higher DPLs, but only if a return on investment is guaranteed(?)

Mentimeter results

- *Question 1: Rank in priority order the actions to improve the site-level transition plan requirements (10.5)*
 1. Point to best practice for credible transition plans
 2. Decarbonisation Progress Level (DPL) references
 3. Stronger links between corporate and site-level planning
- *Question 2: Which of the following criteria MUST be included for a credible transition plan (site-level)?*

Below the results that had more than 10/17 votes (note that 2 participants opted out of answering this question):

- Quantitative, detailed and time-bound interim emissions targets – 15/17
 - Public disclosure of emissions targets – 14/17
 - Emissions targets and data must include scope 1 + 2 + material 3 – 13/17
 - Independent verification of targets and emissions data – 13/17
 - Mitigation actions to near-term milestones (incl CapEx/OpEx) – 12/17
 - Publication of annual progress with regular review of transition plan – 11/17
- *Question 3: What data points are material AND not commercial sensitive?*
Below the results that had more than 9/16 votes (note that 3 participants opted out of answering this question):
 - Emissions intensity units for target setting – 14/16
 - Emissions intensity targets according to ResponsibleSteel's methodology in site-level planning – 12/16
 - *Question 4: Do you support the use of DPs in site-level transition planning?*
 - For steelmakers: 3.3/5 support – 14/18 voted
 - For downstream sites: 2.3/5 support – 14/18 voted

Next meeting

October 7th

Overarching topic: Championing accountability – *Criterion 10.7: GHG emissions disclosure and reporting* – determine material data points for auditor and public disclosure

Points of Convergence & Divergence

Credibility

Working definition on credibility and ambition:

- Credible transition plans are **sufficiently ambitious and feasible** for emissions reductions in line with the Paris Agreement.
- Credible transition plans are **internally consistent and integrated** into the company's broader strategy to provide confidence that the strategy will be effectively implemented.
- Credible transition plans are **comprehensive, well-maintained and verifiable** for users to make informed decisions.

A credible transition plan isn't credible because it *guarantees* success — it's credible because it's **aligned with science, transparent, measurable, governed, and open to verification**. Ambition (1.5°C / net zero) is the starting point set by the Paris Agreement/IPCC. Credibility is judged by whether the plan has the near-term actions and accountability to make that ambition *plausible*, even if ultimate success is uncertain.

Convergence

- Point to best practice for credible transition plans that includes:
 - Quantitative, detailed and time-bound interim emissions targets
 - Public disclosure of emissions targets
 - Emissions targets and data must include scope 1 + 2 + material 3
 - Independent verification of targets and emissions data
 - Mitigation actions to near-term milestones (incl CapEx/OpEx)
 - Publication of annual progress with regular review of transition plan
- Support for using intensity-based emissions metrics to improve comparability and align with DPL methodology.
- Need for stronger links between corporate and site-level planning to ensure consistency and auditability.
- Aggregating scope 3 data into a single number to be published can be possible, but difficult to obtain from smaller suppliers.
- Value in using DPLs for comparability and stakeholder communication.

Divergence

- Lobbying is a corporate-level topic and could be problematic due to conflicting affiliations
- Questions around what is science-based, whether 1.5C ambition remains a valid reference
- Disclosure of DPL timelines and allocated financial investments due to commercial sensitivity.
- While buyers ask for low-carbon steel, they are not always willing to pay a premium. The investment in higher DPLs would only happen if there's a clear return on investment.

Key Documents Referenced

1. Comparison table – [Target setting & transition plan comparisons.xlsx](#)
2. ResponsibleSteel's report – [Charting Progress to 1.5°C through Certification](#)