

# **Stimulate sustainable economic growth through climate change management**

**Iberia 125 Climate Change Report 2012**  
**On behalf of 655 investors**  
**with assets of US\$ 78 trillion**

Report writer:



Scoring partner:





# CDP Investor Members 2012

CDP works with investors globally to advance the investment opportunities and reduce the risks posed by climate change by asking almost 6,000 of the world's largest companies to report on their climate strategies, GHG emissions and energy use in the standardized Investor CDP format. To learn more about CDP's member offering and becoming a member, please contact us or visit the CDP Investor Member section at <https://www.cdproject.net/investormembers>

**Aegon**

**AKBANK T.A.S.**

**Allianz Global Investors**

**Aviva Investors**

**AXA Group**

**Bank of America Merrill Lynch**

**Bendigo and Adelaide Bank**

**Blackrock**

**BP Investment Management**

**California Public Employees Retirement System - CalPERS**

**California State Teachers Retirement Fund - CalSTRS**

**Calvert Asset Management Company**

**Catholic Super**

**CCLA**

**Daiwa Asset Management Co. Ltd.**

**Generation Investment Management**

**HSBC Holdings**

**KLP**

**Legg Mason**

**London Pension Fund Authority**

**Mongeral Aegon Seguros e Previdência S/A**

**Morgan Stanley**

**National Australia Bank**

**NEI Investments**

**Neuberger Berman**

**Newton Investment Management Ltd**

**Nordea Investment Management**

**Norges Bank Investment Management**

**PFA Pension**

**Robeco**

**Rockefeller & Co.**

**SAM Group**

**Sampension KP**

**Livsforsikring A/S**

**Schroders**

**Scottish Widows Investment Partnership**

**SEB**

**Sompo Japan Insurance Inc**

**Standard Chartered**

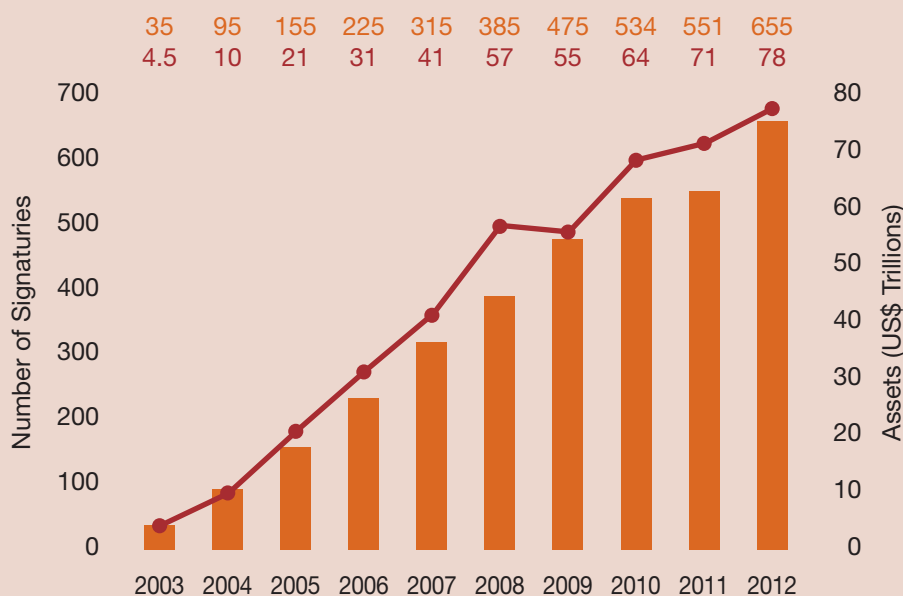
**TD Asset Management Inc. and TDAM USA Inc.**

**The RBS Group**

**The Wellcome Trust**

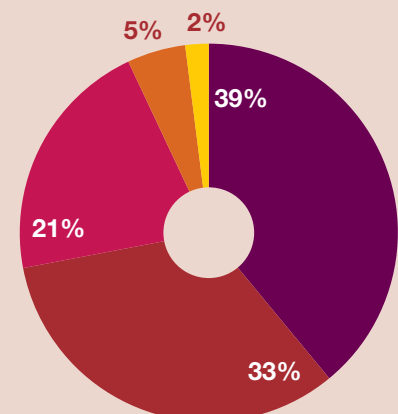
## 1 CDP INVESTOR SIGNATORIES & ASSETS (US\$ TRILLION) AGAINST TIME

- Investor CDP Signatories
- Investor CDP Signatory Assets



## 2 2012 SIGNATORY INVESTOR BREAKDOWN

- 259 Asset Managers
- 220 Asset Owners
- 143 Banks
- 33 Insurance
- 13 Other



# CDP Signatory Investors 2012

655 financial institutions with assets of US\$78 trillion were signatories to the CDP 2012 information request dated February 1st, 2012

Aberdeen Asset Managers  
 Aberden Immobilien KAG mbH  
 ABRAPP - Associação Brasileira das Entidades Fechadas de Previdência Complementar  
 Achmea NV  
 Active Earth Investment Management  
 Acuity Investment Management  
 Addenda Capital Inc.  
 Advanced Investment Partners  
 AEGON N.V.  
 AEGON-INDUSTRIAL Fund Management Co., Ltd  
 AFP Integra  
 AIG Asset Management  
 AK Asset Management Inc.  
 AKBANK T.A. .  
 Alberta Investment Management Corporation (AIMCo)  
 Alberta Teachers Retirement Fund  
 Alcyone Finance  
 AllenbridgeEpic Investment Advisers Limited  
 Allianz Elementar Versicherungs-AG  
 Allianz Global Investors Kapitalanlagegesellschaft mbH  
 Allianz Group  
 Altira Group  
 Amalgamated Bank  
 AMP Capital Investors  
 AmpegaGerling Investment GmbH  
 Amundi AM  
 ANBIMA – Associação Brasileira das Entidades dos Mercados Financeiro e de Capitais  
 Antera Gestão de Recursos S.A.  
 APG  
 AQEX LLC  
 Aquila Capital  
 Arisaig Partners Asia Pte Ltd  
 Arma Portföy Yönetimi A. .  
 ASM Administradora de Recursos S.A.  
 ASN Bank  
 Assicurazioni Generali Spa  
 ATI Asset Management  
 ATP Group  
 Australia and New Zealand Banking Group Limited  
 Australian Ethical Investment  
 AustralianSuper  
 Avaron Asset Management AS  
 Aviva Investors  
 Aviva plc  
 AXA Group  
 Baillie Gifford & Co.  
 BaltCap  
 BANCA CÍVICA S.A.  
 Banca Monte dei Paschi di Siena Group  
 Banco Bradesco S/A  
 Banco Comercial Português S.A.  
 Banco de Credito del Peru BCP  
 Banco de Galicia y Buenos Aires S.A.  
 Banco do Brasil S/A  
 Banco Espírito Santo, SA  
 Banco Nacional de Desenvolvimento Econômico e Social - BNDES  
 Banco Popular Español  
 Banco Sabadell, S.A.  
 Banco Santander  
 Banesprev – Fundo Banespa de Seguridade Social  
 Banesto  
 Bank Handlowy w Warszawie S.A.  
 Bank of America Merrill Lynch  
 Bank of Montreal  
 Bank Vontobel  
 Bankhaus Schelhammer & Schattera  
 Kapitalanlagegesellschaft m.b.H.  
 BANKIA S.A.  
 BANKINTER  
 BankInvest  
 Banque Degroof  
 Banque Libano-Francaise  
 Barclays  
 Basellandschaftliche Kantonalbank  
 BASF Sociedade de Previdência Complementar  
 Basler Kantonalbank  
 Bâtirente

Baumann and Partners S.A.  
 Bayern LB  
 BayernInvest Kapitalanlagegesellschaft mbH  
 BBC Pension Trust Ltd  
 BBVA  
 Bedfordshire Pension Fund  
 Beetle Capital  
 BEFIMMO SCA  
 Bendigo & Adelaide Bank Limited  
 Bentall Kennedy  
 Berenberg Bank  
 Berti Investments  
 BioFinance Administração de Recursos de Terceiros Ltda  
 BlackRock  
 Blom Bank SAL  
 Blumenthal Foundation  
 BNP Paribas Investment Partners  
 BNY Mellon  
 BNY Mellon Service Kapitalanlage Gesellschaft  
 Boston Common Asset Management, LLC  
 BP Investment Management Limited  
 Brasilprev Seguros e Previdência S/A.  
 British Airways Pension Investment Management Limited  
 British Columbia Investment Management Corporation (bcIMC)  
 BT Investment Management  
 Busan Bank  
 CAAT Pension Plan  
 Cadiz Holdings Limited  
 Caisse de dépôt et placement du Québec  
 Caisse des Dépôts  
 Caixa Beneficente dos Empregados da Companhia Siderurgica Nacional - CBS  
 Caixa de Previdência dos Funcionários do Banco do Nordeste do Brasil (CAPEF)  
 Caixa Econômica Federal  
 Caixa Geral de Depositos  
 CaixaBank, S.A  
 California Public Employees' Retirement System  
 California State Teachers' Retirement System  
 California State Treasurer  
 Calvert Investment Management, Inc  
 Canada Pension Plan Investment Board  
 Canadian Friends Service Committee (Quakers)  
 Canadian Imperial Bank of Commerce (CIBC)  
 Canadian Labour Congress Staff Pension Fund  
 CAPESESP  
 Capital Innovations, LLC  
 CARE Super  
 Carmignac Gestion  
 Catherine Donnelly Foundation  
 Catholic Super  
 CBF Church of England Funds  
 CBRE  
 Cbus Superannuation Fund  
 CCLA Investment Management Ltd  
 Celeste Funds Management Limited  
 Central Finance Board of the Methodist Church  
 Ceres  
 CERES-Fundação de Seguridade Social  
 Change Investment Management  
 Christian Brothers Investment Services  
 Christian Super  
 Christopher Reynolds Foundation  
 Church Commissioners for England  
 Church of England Pensions Board  
 CI Mutual Funds' Signature Global Advisors  
 City Developments Limited  
 Clean Yield Asset Management  
 ClearBridge Advisors  
 Climate Change Capital Group Ltd  
 CM-CIC Asset Management  
 Colonial First State Global Asset Management  
 Comerica Incorporated  
 COMGEST  
 Commerzbank AG  
 Commlnsure  
 Commonwealth Bank Australia  
 Commonwealth Superannuation Corporation  
 Compton Foundation  
 Concordia Versicherungsgruppe  
 Connecticut Retirement Plans and Trust Funds  
 Co-operative Financial Services (CFS)  
 Credit Suisse  
 Daegu Bank  
 Daesung Capital Management  
 Daiwa Asset Management Co. Ltd.  
 Daiwa Securities Group Inc.  
 Dalton Nicol Reid

de Pury Pictet Turretini & Cie S.A.  
 DekaBank Deutsche Girozentrale  
 Delta Lloyd Asset Management  
 Deutsche Asset Management Investmentgesellschaft mbH  
 Deutsche Bank AG  
 Development Bank of Japan Inc.  
 Development Bank of the Philippines (DBP)  
 Dexia Asset Management  
 Dexus Property Group  
 DnB ASA  
 Domini Social Investments LLC  
 Dongbu Insurance  
 DWS Investment GmbH  
 Earth Capital Partners LLP  
 East Sussex Pension Fund  
 Ecclesiastical Investment Management  
 Ecofi Investissements - Groupe Credit Cooperatif  
 Edward W. Hazen Foundation  
 EEA Group Ltd  
 Elan Capital Partners  
 Element Investment Managers  
 ELETRA - Fundação Celg de Seguros e Previdência  
 Environment Agency Active Pension fund  
 Epworth Investment Management  
 Equilibrium Capital Group  
 equinet Bank AG  
 Erik Penser Fondkommission  
 Erste Asset Management  
 Erste Group Bank  
 Essex Investment Management Company, LLC  
 ESSSuper  
 Ethos Foundation  
 Etica Sgr  
 Eureka Funds Management  
 Eurizon Capital SGR  
 Evangelical Lutheran Church in Canada Pension Plan for Clergy and Lay Workers  
 Evangelical Lutheran Foundation of Eastern Canada  
 Evli Bank Plc  
 F&C Investments  
 FACEB – FUNDAÇÃO DE PREVIDÊNCIA DOS EMPREGADOS DA CEB  
 FAELCE – Fundacao Coelce de Seguridade Social  
 FAPERS - Fundação Assistencial e Previdenciária da Extensão Rural do Rio Grande do Sul  
 FASERN - Fundação COSERN de Previdência Complementar  
 Fédérés Gestion d'Actifs  
 FIDURA Capital Consult GmbH  
 FIM Asset Management Ltd  
 FIM Services  
 FIPECq - Fundação de Previdência Complementar dos Empregados e Servidores da FINEP, do IPEA, do CNPq  
 FIRA. - Banco de Mexico  
 First Affirmative Financial Network, LLC  
 First Swedish National Pension Fund (AP1)  
 Firstrand Group Limited  
 Five Oceans Asset Management  
 Florida State Board of Administration (SBA)  
 Folketrygdfondet  
 Folksam  
 Fondation CSN  
 Fondation de Luxembourg  
 Forma Futura Invest AG  
 Fourth Swedish National Pension Fund, (AP4)  
 FRANKFURT-TRUST Investment-Gesellschaft mbH  
 Fukoku Capital Management Inc  
 FUNCEF - Fundação dos Economistas Federais  
 Fundação AMPLA de Seguridade Social - Brasileiros  
 Fundação Atlântico de Seguridade Social  
 Fundação Attilio Francisco Xavier Fontana  
 Fundação Banrisul de Seguridade Social  
 Fundação BRDE de Previdência Complementar - ISBRE  
 Fundação Chef de Assistência e Seguridade Social - Fachesf  
 Fundação Corsan - dos Funcionários da Companhia Riograndense de Saneamento  
 Fundação de Assistência e Previdência Social do BNDES - FAPES  
 FUNDAÇÃO ELETROBRÁS DE SEGURIDADE SOCIAL - ELETROS  
 Fundação Forluminas de Seguridade Social - FORLUZ  
 Fundação Itaipu BR - de Previdência e Assistência Social  
 FUNDAÇÃO ITAUBANCO  
 Fundação Itaúsa Industrial  
 Fundação Promon de Previdência Social  
 Fundação Rede Ferroviária de Seguridade Social - Refer  
 FUNDAÇÃO SANEPAR DE PREVIDÊNCIA E ASSISTÊNCIA SOCIAL - FUSAN

Fundação Sistel de Seguridade Social (Sistel)  
Fundação Vale do Rio Doce de Seguridade Social - VALIA  
FUNDIAGUA - FUNDAÇÃO DE PREVIDENCIA  
COMPLEMENTAR DA CAESB  
Futuregrowth Asset Management  
Garanti Bank  
GEAP Fundação de Seguridade Social  
Generali Deutschland Holding AG  
Generation Investment Management  
Genus Capital Management  
Gjensidige Forsikring ASA  
Global Forestry Capital SARL  
GLS Gemeinschaftsbank eG  
Goldman Sachs Group Inc.  
GOOD GROWTH INSTITUT für globale  
Vermögensentwicklung mbH  
Governance for Owners  
Government Employees Pension Fund ("GEPF"), Republic of  
South Africa  
GPT Group  
Graubündner Kantonalbank  
Greater Manchester Pension Fund  
Green Cay Asset Management  
Green Century Capital Management  
GROUPAMA EMEKLILIK A. .  
GROUPAMA SIGORTA A. .  
Groupe Crédit Coopératif  
Groupe Investissement Responsable Inc.  
GROUPE OFI AM  
Grupo Financiero Banorte SAB de CV  
Grupo Santander Brasil  
Gruppo Bancario Credito Valtellinese  
Guardians of New Zealand Superannuation  
Hanwha Asset Management Company  
Harbour Asset Management  
Harrington Investments, Inc  
Hauck & Aufhäuser Asset Management GmbH  
Hazel Capital LLP  
HDFC Bank Ltd  
Healthcare of Ontario Pension Plan (HOOPP)  
Helaba Invest Kapitalanlagegesellschaft mbH  
Henderson Global Investors  
Hermes Fund Managers  
HESTA Super  
HIP Investor  
Holden & Partners  
HSBC Global Asset Management (Deutschland) GmbH  
HSBC Holdings plc  
HSBC INKA Internationale Kapitalanlagegesellschaft mbH  
HUMANIS  
Hyundai Marine & Fire Insurance. Co., Ltd.  
Hyundai Securities Co., Ltd.  
IBK Securities  
IDBI Bank Ltd  
Illinois State Board of Investment  
Imarinen Mutual Pension Insurance Company  
Impax Asset Management  
IndusInd Bank Limited  
Industrial Alliance Insurance and Financial Services Inc.  
Industrial Bank (A)  
Industrial Bank of Korea  
Industrial Development Corporation  
Industry Funds Management  
Infrastructure Development Finance Company  
ING Group N.V.  
Insight Investment Management (Global) Ltd  
Instituto de Seguridade Social dos Correios e Telégrafos-  
Postalis  
Instituto Infraero de Seguridade Social - INFRAPREV  
Instituto Sebrae De Seguridade Social - SEBRAEPREV  
Insurance Australia Group  
IntReal KAG  
Investec Asset Management  
Investing for Good CIC Ltd  
Irish Life Investment Managers  
Itau Asset Management  
Itaú Unibanco Holding S A  
Janus Capital Group Inc.  
Jarislowsky Fraser Limited  
JOHNSON & JOHNSON SOCIEDADE PREVIDENCIARIA  
JPMorgan Chase & Co.  
Jubitz Family Foundation  
Jupiter Asset Management  
Kaiser Ritter Partner (Schweiz) AG  
KB Kookmin Bank  
KBC Asset Management NV  
KBC Group  
KCPS Private Wealth Management  
KDB Asset Management Co., Ltd.

KDB Daewoo Securities  
KEPLER-FONDS Kapitalanlagegesellschaft m. b. H.  
Keva  
KfW Bankengruppe  
Killik & Co LLP  
Kiwi Income Property Trust  
Kleinwort Benson Investors  
KlimaINVEST  
KLP  
Korea Investment Management Co., Ltd.  
Korea Technology Finance Corporation (KOTEC)  
KPA Pension  
Kyrkans pensionskassa  
La Banque Postale Asset Management  
La Financiere Responsable  
Lampe Asset Management GmbH  
Landsorganisationen i Sverige  
LBBW - Landesbank Baden-Württemberg  
LBBW Asset Management Investmentgesellschaft mbH  
LD Lönmodtagernes Dyrtidsfond  
Legal & General Investment Management  
Legg Mason Global Asset Management  
LGT Capital Management Ltd.  
LIG Insurance Co., Ltd  
Light Green Advisors, LLC  
Living Planet Fund Management Company S.A.  
Lloyds Banking Group  
Local Authority Pension Fund Forum  
Local Government Super  
Local Super  
Logos portföy Yönetimi A. .  
London Pensions Fund Authority  
Lothian Pension Fund  
LUCRF Super  
Lupus alpha Asset Management GmbH  
Macquarie Group Limited  
MagNet Magyar Közösségi Bank Zrt.  
MainFirst Bank AG  
MAMA Sustainable Incubation AG  
Man  
MAPFRE  
Maple-Brown Abbott  
Marc J. Lane Investment Management, Inc.  
Maryland State Treasurer  
Matrix Asset Management  
MATRIX GROUP LTD  
McLean Budden  
MEAG MUNICH ERGO AssetManagement GmbH  
Meeschaert Gestion Privée  
Meiji Yasuda Life Insurance Company  
Mendesprev Sociedade Previdenciária  
Merck Family Fund  
Mercy Investment Services, Inc.  
Mergence Investment Managers  
Meritas Mutual Funds  
MetallRente GmbH  
Metrus - Instituto de Seguridade Social  
Metzler Asset Management GmbH  
MFS Investment Management  
Midas International Asset Management  
Miller/Howard Investments  
Mirae Asset Global Investments Co. Ltd.  
Mirae Asset Securities  
Mirvac Group Ltd  
Missionary Oblates of Mary Immaculate  
Mistra, Foundation for Strategic Environmental Research  
Mitsubishi UFJ Financial Group  
Mitsui Sumitomo Insurance Co.,Ltd  
Mizuho Financial Group, Inc.  
Mn Services  
Momentum Manager of Managers (Pty) Limited  
Monega Kapitalanlagegesellschaft mbH  
Mongeral Aegon Seguros e Previdência S/A  
Morgan Stanley  
Mountain Cleantech AG  
MTAA Superannuation Fund  
Mutual Insurance Company Pension-Fennia  
Nanuk Asset Management  
Natcan Investment Management  
Nathan Cummings Foundation, The  
National Australia Bank  
National Bank of Canada  
NATIONAL BANK OF GREECE S.A.  
National Grid Electricity Group of the Electricity Supply  
Pension Scheme  
National Grid UK Pension Scheme  
National Pensions Reserve Fund of Ireland  
National Union of Public and General Employees (NUPGE)  
NATIXIS

**“Banco Santander and the FC2E (Carbon Fund for Spanish Companies) are analyzing the business potential and participation in the emission reduction sector in the post-Kyoto period as well as the development of regulations and national and international legislation that will govern this market.”**

**Banco Santander**

Nedbank Limited  
 Needmor Fund  
 NEI Investments  
 Nelson Capital Management, LLC  
 Neuberger Berman  
 New Alternatives Fund Inc.  
 New Amsterdam Partners LLC  
 New Mexico State Treasurer  
 New York City Employees Retirement System  
 New York City Teachers Retirement System  
 New York State Common Retirement Fund (NYSCRF)  
 Newton Investment Management Limited  
 NGS Super  
 NH-CA Asset Management  
 Nikko Asset Management Co., Ltd.  
 Nipponkoa Insurance Company, Ltd  
 Nissay Asset Management Corporation  
 NORD/LB Kapitalanlagegesellschaft AG  
 Nordea Investment Management  
 Norfolk Pension Fund  
 Norges Bank Investment Management  
 North Carolina Retirement System  
 Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC)  
 NORTHERN STAR GROUP  
 Northern Trust  
 Northward Capital Pty Ltd  
 Nykredit  
 Oddo & Cie  
 OECO Capital Lebensversicherung AG  
 ÖKOWORLD  
 Old Mutual plc  
 OMERS Administration Corporation  
 Ontario Teachers' Pension Plan  
 OP Fund Management Company Ltd  
 Oppenheim & Co. Limited  
 Oppenheim Fonds Trust GmbH  
 Opplysningsvesenets fond (The Norwegian Church Endowment)  
 OPTrust  
 Oregon State Treasurer  
 Orion Energy Systems  
 Osmosis Investment Management  
 Parnassus Investments  
 Pax World Funds  
 Pensioenfonds Vervoer  
 Pension Denmark  
 Pension Fund for Danish Lawyers and Economists  
 Pension Protection Fund  
 Pensionsmyndigheten  
 Perpetual Investments  
 PETROS - The Fundação Petrobras de Seguridade Social  
 PFA Pension  
 PGGM Vermogensbeheer  
 Phillips, Hager & North Investment Management Ltd.  
 PhiTrust Active Investors  
 Pictet Asset Management SA  
 Pioneer Investments  
 PIRAEUS BANK  
 PKA  
 Pluris Sustainable Investments SA  
 PNC Financial Services Group, Inc.  
 Pohjola Asset Management Ltd  
 Polden-Puckham Charitable Foundation  
 Portfolio 21 Investments  
 Porto Seguro S.A.  
 Power Finance Corporation Limited  
 PREVHAB PREVIDÊNCIA COMPLEMENTAR  
 PREVI Caixa de Previdência dos Funcionários do Banco do Brasil  
 PREVIG Sociedade de Previdência Complementar  
 ProLogis  
 Provinzial Rheinland Holding  
 Prudential Investment Management  
 Prudential Plc  
 Psagot Investment House Ltd  
 PSP Investments  
 Q Capital Partners  
 QBE Insurance Group  
 Rabobank  
 Raiffeisen Fund Management Hungary Ltd.  
 Raiffeisen Kapitalanlage-Gesellschaft m.b.H.  
 Raiffeisen Schweiz Genossenschaft  
 Rathbones / Rathbone Greenbank Investments  
 RCM (Allianz Global Investors)  
 Real Grandeza Fundação de Previdência e Assistência Social  
 Rei Super  
 Reliance Capital Ltd

Resolution  
 Resona Bank, Limited  
 Reynders McVeigh Capital Management  
 RLAM  
 Robeco  
 Robert & Patricia Switzer Foundation  
 Rockefeller Financial (trade name used by Rockefeller & Co., Inc.)  
 Rose Foundation for Communities and the Environment  
 Rothschild  
 Royal Bank of Canada  
 Royal Bank of Scotland Group  
 RPMI Railpen Investments  
 RREEF Investment GmbH  
 Russell Investments  
 SAM Group  
 SAMPENSION KP LIVSFORSIKRING A/S  
 SAMSUNG FIRE & MARINE INSURANCE  
 Samsung Securities  
 Sanlam Life Insurance Ltd  
 Santa Fé Portfolios Ltda  
 Santam  
 Sarasin & Cie AG  
 SAS Trustee Corporation  
 Sauren Finanzdienstleistungen GmbH & Co. KG  
 Schroders  
 Scotiabank  
 Scottish Widows Investment Partnership  
 SEB  
 SEB Asset Management AG  
 Second Swedish National Pension Fund (AP2)  
 Seligson & Co Fund Management Plc  
 Sentinel Investments  
 SERPROS - Fundo Multipatrocinado  
 Service Employees International Union Pension Fund  
 Seventh Swedish National Pension Fund (AP7)  
 Shinhan Bank  
 Shinhan BNP Paribas Investment Trust Management Co., Ltd  
 Shinkin Asset Management Co., Ltd  
 Siemens Kapitalanlagegesellschaft mbH  
 Signet Capital Management Ltd  
 Smith Pierce, LLC  
 SNS Asset Management  
 Social(k)  
 Sociedade de Previdência Complementar da Dataprev - Prevdada  
 Socrates Fund Management  
 Solaris Investment Management Limited  
 Sompoo Japan Insurance Inc.  
 Sopher Investment Management  
 SouthPeak Investment Management  
 SPF Beheer bv  
 Sprucegrove Investment Management Ltd  
 Standard Bank Group  
 Standard Chartered  
 Standard Chartered Korea Limited  
 Standard Life Investments  
 State Bank of India  
 State Street Corporation  
 StatewideSuper  
 StoreBrand ASA  
 Strathclyde Pension Fund  
 Stratus Group  
 Sumitomo Mitsui Financial Group  
 Sumitomo Mitsui Trust Holdings, Inc.  
 Sun Life Financial Inc.  
 Superfund Asset Management GmbH  
 SUSI Partners AG  
 Sustainable Capital  
 Sustainable Development Capital  
 Svenska Kyrkan, Church of Sweden  
 Swedbank AB  
 Swift Foundation  
 Swiss Re  
 Swisscanto Asset Management AG  
 Syntrus Achmea Asset Management  
 T. Rowe Price  
 T. SINAI KALKINMA BANKASI A. .  
 Tata Capital Limited  
 TD Asset Management Inc. and TDAM USA Inc.  
 Teachers Insurance and Annuity Association - College Retirement Equities Fund  
 Telluride Association  
 Tempis Asset Management Co. Ltd  
 Terra Forvaltning AS  
 TerraVerde Capital Management LLC  
 TFL Pension Fund  
 The ASB Community Trust  
 The Brainerd Foundation

The Bullitt Foundation  
 The Central Church Fund of Finland  
 The Children's Investment Fund Management (UK) LLP  
 The Collins Foundation  
 The Co-operative Asset Management  
 The Co-operators Group Ltd  
 The Daly Foundation  
 The Environmental Investment Partnership LLP  
 The Hartford Financial Services Group, Inc.  
 The Joseph Rowntree Charitable Trust  
 The Korea Teachers Pension (KTP)  
 The Pension Plan For Employees of the Public Service Alliance of Canada  
 The Pinch Group  
 The Presbyterian Church in Canada  
 The Russell Family Foundation  
 The Sandy River Charitable Foundation  
 The Shiga Bank, Ltd.  
 The Sisters of St. Ann  
 The United Church of Canada - General Council  
 The University of Edinburgh Endowment Fund  
 The Wellcome Trust  
 Third Swedish National Pension Fund (AP3)  
 Threadneedle Asset Management  
 TOBAM  
 Tokio Marine Holdings, Inc  
 Toronto Atmospheric Fund  
 Trillium Asset Management Corporation  
 Triodos Investment Management  
 Tri-State Coalition for Responsible Investment  
 Tryg  
 UBS  
 Unibail-Rodamco  
 UniCredit SpA  
 Union Asset Management Holding AG  
 Union Investment Privatfonds GmbH  
 Unione di Banche Italiane S.c.p.a.  
 Unionen  
 Unipension  
 UNISON staff pension scheme  
 UniSuper  
 Unitarian Universalist Association  
 United Methodist Church General Board of Pension and Health Benefits  
 United Nations Foundation  
 Unity Trust Bank  
 Universities Superannuation Scheme (USS)  
 Vancity Group of Companies  
 VCH Vermögensverwaltung AG  
 Ventas, Inc.  
 Veris Wealth Partners  
 Veritas Investment Trust GmbH  
 Vermont State Treasurer  
 Vexiom Capital, L.P.  
 VicSuper  
 Victorian Funds Management Corporation  
 VietNam Holding Ltd.  
 Voigt & Coll. GmbH  
 VOLKSBANK INVESTMENTS  
 Waikato Community Trust Inc  
 Walden Asset Management, a division of Boston Trust & Investment Management Company  
 WARBURG - HENDERSON Kapitalanlagegesellschaft für Immobilien mbH  
 WARBURG INVEST KAPITALANLAGEGESELLSCHAFT MBH  
 Water Asset Management, LLC  
 Wells Fargo & Company  
 West Yorkshire Pension Fund  
 WestLB Mellon Asset Management (WMAM)  
 Westpac Banking Corporation  
 WHEB Asset Management  
 White Owl Capital AG  
 Winslow Management, A Brown Advisory Investment Group  
 Woori Bank  
 Woori Investment & Securities Co., Ltd.  
 YES BANK Limited  
 York University Pension Fund  
 Youville Provident Fund Inc.  
 Zegora Investment Management  
 Zevin Asset Management  
 Zurich Cantonal Bank

# Contents

“Development of low carbon financial products and services aligned with the banks climate change strategy represents new business opportunities and with them the possibility of expanding the banks market share.”

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# Guest Foreword



**“We need to promote competitiveness, prosperity and quality of life within the limits of our planet.”**

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As the world struggles to exit from the financial and economic turmoil, we must look ahead and focus not only on jobs and growth, but also on the type of growth we want. We can no longer continue to ignore the severity of debt in our natural capital. Environmental degradation is becoming more and more evident everywhere. The state of our oceans, soils, forests and biodiversity, and the impacts of climate change are just some of the signs that we are beginning to see. This will have severe consequences not only on health and the environment but also on the economy.

If we do not want resource scarcities and pressures to be a major constraint on growth in the near future, we need to promote competitiveness, prosperity and quality of life within the limits of our planet. This is why the European Commission places resource efficiency at the centre of its agenda for economic transformation. The objective is to achieve environmentally compatible growth, decoupling resource use from economic growth and reducing greenhouse gas emissions.

The important impact of better resource efficiency on climate change is too often underestimated. This is why I welcome CDP's vision to widen its scope to include

natural capital and resources. It reflects an important change in the approach of corporations. Companies need stronger, more long-term price signals to produce returns on investment, and it is for public authorities to provide the right signals, incentives, direction and most importantly leadership. We need to move from a short-term to a more long-term vision that will help us see that there is a clear link between resource efficiency and increased profitability, and improve on both.

Our most important resource is our natural capital and the benefits that we draw from nature year after year. If we erode that capital for short-term gains, we are simply gambling with our future. There will be no growth in the future if it is not sustainable, if it is not resource efficient. This is already necessary for our generation, but indispensable for the next.

**Dr. Janez Potočnik**  
European Commissioner for the Environment



# CEO Foreword



**“CDP has pioneered the only global system that collects information about corporate behaviour on climate change and water scarcity, on behalf of market forces, including shareholders and purchasing corporations.”**

The pressure is growing for companies to build long-term resilience in their business. The unprecedented debt crisis that has hit many parts of the world has sparked a growing understanding that short-termism can bring an established economic system to breaking point. As some national economies have been brought to their knees in recent months, we are reminded that nature’s system is under threat through the depletion of the world’s finite natural resources and the rise of greenhouse gas emissions.

Business and economies globally have already been impacted by the increased frequency and severity of extreme weather events, which scientists are increasingly linking to climate change<sup>1</sup>. Bad harvests due to unusual weather have this year rocked the agricultural industry, with the price of grain, corn and soybeans reaching an all time high. Last year, Intel lost \$1 billion in revenue and the Japanese automotive industry were expected to lose around \$450 million of profits as a result of the business interruption floods caused to their Thailand-based suppliers.

It is vital that we internalize the costs of future environmental damage into today’s decisions by putting an effective price on carbon. Whilst regulation is slow, a growing number of jurisdictions have introduced carbon pricing with carbon taxes or cap-and-trade schemes. The most established remains the EU Emissions Trading Scheme but moves have also been made in Australia, California, China and South Korea among others.

Enabling better decisions by providing investors, companies and governments with high quality information on how companies are managing their response to climate change and mitigating the risks from natural resource constraints has never been more important.

CDP has pioneered the only global system that collects information about corporate behaviour on climate change and water scarcity, on behalf of market forces, including shareholders and purchasing corporations. CDP works to accelerate action on climate change through disclosure and more recently through its Carbon Action program. In 2012, on behalf of its Carbon Action signatory investors CDP engaged 205 companies in the Global 500 to request they set an emissions reduction target; 61 of these companies have now done so.

CDP continues to evolve and respond to market needs. This year we announced that the Global Canopy Programme’s Forest Footprint Disclosure Project will merge with CDP over the next two years. Bringing forests, which are critically linked to both climate and water security, into the CDP system will enable companies and investors to rely on one source of primary data for this set of interrelated issues.

Accounting for and valuing the world’s natural capital is fundamental to building economic stability and prosperity. Companies that work to decouple greenhouse gas emissions from financial returns have the potential for both short and long-term cost savings, sustainable revenue generation and a more resilient future.

A handwritten signature in black ink that reads "Paul Simpson". The signature is written in a cursive, flowing style.

**Paul Simpson**  
CEO Carbon Disclosure Project

1: The State of the Climate in 2011 report, led by the National Oceanographic and Atmospheric Administration (NOAA) in the US and published as part of the Bulletin of the American Meteorological Society (BAMS)

# Letter from Spain



**"The Spanish environmental industry is a key factor of the competitiveness of our economy, a key exporter and a generator of employment."**

Since assuming the portfolio of Minister of Agriculture, Food and the Environment, I have witnessed the importance of climate change for the Spanish business sector as well as the leadership role that our enterprises are playing in the necessary transition to a green, sustainable and low-carbon economy.

The transition to a green and low-carbon economy, imposed by the reality of climate change and the current economic crisis, requires leadership and important mutual and cooperative efforts by all involved stakeholders. The leadership of the Spanish business sector will help us to bring about this change.

The Spanish environmental industry is a key factor of the competitiveness of our economy, a key exporter and a generator of employment. Despite the effects of the economic crisis, the Spanish clean technology companies have demonstrated maturity, strength and an ability to adapt to new challenges.

Moreover, the major Spanish companies confirm, for the fifth consecutive year as reflected in this CDP Iberia 125 Climate Change Report 2012, their unwavering commitment and show strong leadership to confront the important challenges posed by climate change.

The public sector is also firmly committed to this common enterprise. The government of Spain has launched important initiatives to promote the transition to a low carbon economy in our country. The Carbon Fund for a Sustainable Economy (FES-CO2) is proving to be an essential tool for supporting the transformation of Spain's system of production. With nearly 200 project applications submitted under the first call for Climate Projects for the

reduction of carbon emissions in the diffuse sectors, the FES-CO2 is a clear indicator of the high activity of Spanish companies and their desire for and commitment to a low carbon economy. Furthermore, the implementation of initiatives such as the promotion of carbon footprints awareness and the development of a strategy for the reduction of emissions from the diffuse sectors by 10% by 2020, establish key components that help us move towards more sustainable production and consumption patterns.

In the transition to a green economy, the role of the private sector and public-private partnerships are key to success. All business and productive sectors should help trigger and drive this change. The private sector should take the initiative, take risks and seize opportunities in strategic sectors. From the public sector, we must continue working to create a stable regulatory framework to minimize the risks, facilitate investment and encourage private participation.

The CDP Iberia 125 Climate Change Report 2012 confirms that Spanish and Portuguese companies are engaged in this common effort, have taken firm steps towards more sustainable, low-carbon models, have integrated climate change in their business strategies and consider climate change a source of opportunity.

I express my gratitude to CDP, ECODES and PwC, as well as to all those involved in this year's edition of the report for their efforts and good results, and encourage you to continue working in this endeavor to turn the opportunities associated with climate change into reality.

**Miguel Arias Cañete**  
Minister of Agriculture, Food and the Environment

# Letter from Portugal



“With investors making climate risks and opportunities a part of the investment equation, sustainable projects and companies will surely gain leverage to attract capital.”

Climate change presents itself as one of the biggest challenges of our time. The environmental transformations caused by climate change can result in an acute competition for scarce natural resources, affecting social and political stability in many regions and placing global security and development under threat.

In order to find solutions for such a complex problem, governments should count on the cooperation of the business sector. Challenging as it may be, lowering the carbon intensity of the world economy is now as pressing as economically advantageous. There is economic value attached to energy efficiency beyond direct money savings, are the positive gains as to investors' assessments.

The Carbon Disclosure Project, as an investor-driven initiative, shows how the capital markets and investors, by using this data to appraise investment decisions, are able to set in motion best practices concerning corporations' climate related performance, strategy and transparency.

With investors making climate risks and opportunities a part of the investment equation, sustainable projects and companies will surely gain leverage to attract capital; this is a unique asset that the Carbon Disclosure Project is bringing to the Portuguese corporate and investment landscape. The Portuguese Government understands the competitive advantage the country can obtain by achieving leadership on low-carbon technology and industries, thereby enabling the economy to promote job creation in a carbon-constrained world.

It is encouraging to see how companies in Portugal are able and willing to disclose their emissions data, carbon strategies and opportunities/risks associated with climate change. The efforts companies are currently undertaking to assess and manage their emissions, as portrayed in this report, preempts future national policies that should include companies that are presently not covered by the EU ETS. These policies will add to the recently launched “National Low-Carbon Road Map 2050” as tools for guiding business into an emissions reduction path, which we predict will spur innovation within companies. These two aspects combined – innovation and low emissions – are key to re-launch national economic growth, as they generate “green” jobs and decrease foreign energy dependence and lessen the trade deficit.

In the future I hope to see more Portuguese companies ready to respond to the Carbon Disclosure Project, as it continues its important mission of accelerating solutions to climate change by putting relevant information at the heart of business, policy and investment decisions.

**Assunção Cristas**  
Minister of Agriculture, Sea,  
Environment and Regional Planning

# Prologue from ECODES



**“If a company does not take sufficient account of the risks that climate change poses for its business, investors will rightfully be more reluctant to invest in it.”**

## **The crisis has not slowed the climate commitment**

Hurricane Sandy, and its undeniable link to global climate change, marked the last phase of the U.S. presidential election campaign, demonstrating the impossibility of ignoring or minimizing the real and destructive threat posed by such a complex problem. Unfortunately we are seeing, close to home and far away, growing evidence of climate change.

However, the current structure of nation states is proving to be wholly inadequate to properly safeguard and manage the global public commons. The Rio+20 summit earlier this year demonstrated once again the difficulties of the current model of global governance. The short-termism that results from the ongoing electoral processes of different countries, among other problems, is delaying global agreements that go beyond the Kyoto Protocol.

But there are signs of hope. The Carbon Disclosure Project is one of these signs. In recent years, this initiative has become the gold standard for access to information about the carbon management of large companies across the globe. And it has established itself as the leading source of data and information for the major financial institutions around the world performing due diligence prior to investing in or financing to these companies. If a company does not take sufficient account of the risks that climate change poses for its business, investors will rightfully be more reluctant to invest in it. If a large company does not take advantage of the opportunities that the fight against climate change also provides, it is not a smart company. The financial sector demonstrates its wisdom using CDP data to make more informed economic decisions in relation to listed companies.

**The CDP Iberia 125 Climate Change Report 2012** shows that the relevance of climate change on the decision making processes of the major Spanish and Portuguese companies has not diminished. On the contrary, those that performed well in 2011 have now improved their performance. The number of companies that exceed 70 points in the Disclosure Score has risen from 25 to 34 this year. And companies with more modest performance in terms of climate change management have also improved.

Overall, the average disclosure score obtained has improved 6 points from the previous year. More companies are reporting information on their emissions, offering incentives for meeting objectives, setting goals, and verifying their emissions.

Furthermore not only are the overall results better compared to last year's results, they also compare very favorably with the results of other surrounding countries. Both improvements are very relevant because both Spain and Portugal are nations mired in a severe economic crisis in which the issue of climate change could very well be relegated to a second plane. In our opinion it has not been relegated because the leading companies of Spain and Portugal, many with a growing international reach, know that their efforts to achieve leadership positions in the international sphere are intrinsically tied to their performance in the fight against climate change.

An additional important finding of this report is that many companies have seen the results of their particular efforts to reduce their emissions diminished by two external factors. One has been a severe drought in both countries, which has significantly reduced the contribution of hydropower to the energy mix. This leads us to the paradoxical conclusion that climate change is to a certain extent undermining the fight against climate change. The other factor in Spain has been the continued government policy of supporting the coal industry. In other words, the progress of companies is strongly conditioned by government policy.

Many companies perceive as a risk the current uncertainty regarding the legislative and regulatory frameworks post-Kyoto. Governments should live up to their responsibilities and not shun scientific evidence, and act together to build an ambitious regulatory framework to provide a context of certainty for business investment. Governments must encourage change.

A handwritten signature in black ink that reads "Victor Viñuales".

**Víctor Viñuales**  
CEO ECODES



**“Value chain analysis allows companies to take into consideration broader emissions-related risk and opportunity in the definition of their climate change strategy.”**

## **Opportunity in the value chain**

### **Knowledge for strategy**

As climate change becomes a greater issue for stakeholders, governments are expected to set new policies and provide market-based incentives to drive emissions reduction activity, which will in turn set the path towards a low carbon economy. Organizations need to start thinking and developing their strategy for this future, in order to position themselves well relative to the competition and make informed decisions for their investments.

An effective corporate climate change strategy requires a detailed understanding of a company’s GHG impact and influence. This understanding is not complete without substantial knowledge not only of its own operational emissions, but of its wider value chain. For most sectors GHG impact under direct company control is a small part relative to that under their indirect influence. Value chain analysis allows companies to take into consideration broader emissions-related risk and opportunity in the definition of their climate change strategy, focusing their efforts on the greatest source of GHG impact. CDP provides us with valuable insight on current business practices on value chain emissions through both its Investor and Supply Chain initiatives. For example, from our analysis of the Iberia 125 2012 CDP responses we can see that currently only 16% are disclosing emissions from purchased goods and services.

Even organizations that have taken steps towards the calculation of the wider value chain impact are in most cases still far from a comprehensive management strategy. Key reasons that keep companies from an understanding of the impacts include lack of transparency on data quality, large numbers of suppliers, lack of supplier knowledge or experience with GHG reporting, lack of supplier resources, and supplier confidentiality.

## **Cost efficient insight**

Where companies are able to measure GHG impacts in the value chain benefits for the business will follow. Reduction of supply risk, positive collaboration with suppliers, efficiency and cost reduction, innovation and informed product strategy are just some of the positive outcomes to be gained. Companies should not miss this opportunity to improve their business functions, and consequently, reduce their GHG impact.

Several methods have now been developed which allow organizations to measure supply chain emissions in a time, cost and resource efficient way. For example, one of PwC’s recommended approaches is primarily based on an input – output model that identifies emission hot spots in the supply chain. This approach can give companies not only an efficient way to calculate their whole supply chain emissions, including all tiers, but also the ability to focus on key suppliers in order to take further steps towards data requests and emission reduction activities.

## **Beyond GHG**

Impacts and influence relating to the value chain go beyond GHG emissions and include water, biodiversity, land use and other environmental pollution. Collectively the health of environmental assets, in particular as an input and service provider for economic production, can be referred to as natural capital. Its measurement, both for corporates and government is a key element in the future of sustainability and natural capital accounting was a major theme at this year’s Rio +20 summit. PwC recently worked with Puma in developing the world’s first corporate environmental profit & loss account, valuing the impact of their operations and four tiers of their supply chain. Over time, we will see companies make radical changes to their environmental accounting for emissions and resource use along their entire value chain.

**María Luz Castilla**

Director of Sustainability and Climate Change, PwC Spain

# Executive summary

The Iberia 125 Climate Change Report 2012, Stimulate sustainable economic growth through climate change management, aims to promote corporate transparency on climate change management in Spain and Portugal and offers investors and other stakeholders an analysis of the current trends and strategies put forward to manage climate change risks and identify the opportunities that can create long-term value for companies in times of economic difficulties. For the second time in a row, Carbon Disclosure Project (CDP) has requested carbon disclosure from the largest 125 companies in Spain and Portugal by market capitalisation. The analysis in this report is based on the information provided by the 51 companies that responded to the 2012 CDP information request, 2 of which referred to their parent company's response. This year's response rate is 41% just above last year's response rate (40%).<sup>1</sup>

Both Iberian countries, Spain and Portugal, are suffering from economic crisis and face an uncertain future. Many of the assumptions that have been shaping the policies and actions for preventing climate change over the past two decades are now under quarantine. During the 90s and most of the first decade of this century the challenge for Spain and Portugal was to converge with the other European regions while limiting the growth of carbon emissions. The biggest problems in controlling carbon emissions in the region were related to growing consumption and transport. It was also a time of momentum for legislation promoting the development of renewable energy that saw spectacular growth during this period.

Nowadays priorities have completely changed. The economic crisis has halted the rising trend in carbon emissions in Spain and Portugal. From 2008 to 2010

emissions in Iberia stabilised and slightly decreased. But crisis also slowed investments in areas such as clean technologies. This will undoubtedly delay the transition to a low carbon economy and make it thus more difficult to achieve. The challenge for many companies today is to reduce their greenhouse gas emissions (GHG) despite the difficulty to finance their business operations. Those companies delaying their climate change policies, waiting for economic recovery, will face competitive disadvantages once the economy will grow again. On the other hand, those companies that are already having comparatively low GHG emissions and are integrating climate change into their business strategy will be more likely to grow and expand their activities while meeting emission limits on carbon, which are expected to become increasingly stringent.

Even in times of deep economic recession, companies are still finding more opportunities than risks in climate change, especially in the short-term. The efficient use of resources has become for many companies a strategic decision for survival. Resource-efficient companies have not only better financial results<sup>2</sup>, but energy efficiency has also become a necessity to reduce consumption and costs while abating carbon emissions. Never before had companies used so much information and communication technology to reduce business travels.

Some of the Iberian companies state they are currently experiencing difficulties and growing competition in attracting financing; as a result, sustainability issues have gained interest for companies that are looking for competitive advantages. Companies like Acciona, BBVA, CaixaBank, Ferrovial, Inditex, OHL, Repsol and Telefónica see in carbon management an opportunity to attract

## 3 IBERIAN DISCLOSING COMPANIES (2008-2012)

- Spain (Response rate)
- Portugal (Response rate)

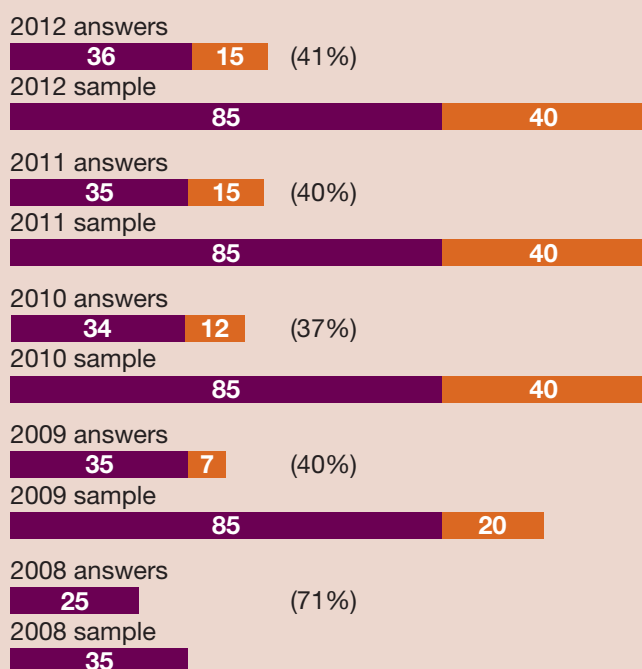


Table 1. IBERIAN COMPANIES INCLUDED IN THE CDLI AND/OR CPLI (2012)

Company Name	Sector	Disclosure Score	Performance Score	CDLI	CPLI
Gas Natural	Utilities	99	A	Yes	Yes
Repsol YPF	Energy	98	A-	Yes	
Abengoa	Industrials	96	A	Yes	Yes
Acciona	Industrials	96	A	Yes	Yes
EDP	Utilities	96	B	Yes	
Iberdrola	Utilities	95	A	Yes	Yes
Banco Espírito Santo	Financials	94	A-	Yes	
OHL	Industrials	94	B	Yes	
Sonae	Consumer Staples	93	B	Yes	
Galp Energia	Energy	93	B	Yes	
Telefónica	Telecommunication Services	92	B	Yes	
Endesa	Utilities	92	C	Yes	
Ferrovial	Industrials	90	A		Yes
Caixa Geral de Depósitos <sup>5</sup>	Financials	87	A		Yes

1. This percentage and the ones provided in figure 3 incorporate all the 51 Iberian companies that responded to CDP. When referring to response rates, we have included all the 51 responses. However the remaining report analysis, including CDLI and CPLI, is based on the lower total of 49 which excludes the 2 companies which referred to their parent company's response.

2. HBR. Companies that Invest in Sustainability Do Better Financially.

[http://blogs.hbr.org/cs/2012/09/sustainable\\_investing\\_time\\_to.html](http://blogs.hbr.org/cs/2012/09/sustainable_investing_time_to.html)

3. SustainAbility. Rate the Raters, Phase Five: Polling the Experts 2012. <http://www.sustainability.com/library/rate-the-raters-phase-five-polling-the-experts-2012#.UlrJzm8xqN8>

4. Please note that these emissions are due to companies' worldwide operations and are not exclusively generated in the Iberian Peninsula.

5. As in 2011, we have included Caixa Geral de Depositos in the analysis. This company is not a public listed company, but it has answered CDP questionnaire for four consecutive years.

investors. Again, the efficient use of resources translates into greater profitability, and a growing number of investors are taking into account environmental criteria in their decision-making processes. CDP scores are one of these criteria. They help investors to identify the most advanced practices in climate change management and business strategies for a low carbon economy. CDP scores were recently recognised as the most credible sustainability rating in a survey among international sustainability professionals<sup>3</sup>.

Another main reason behind companies' decision to engage in carbon management lies in the need to comply with current regulation. In the past, government measures such as the European Union Emission Trading Scheme (EU ETS) carbon market have created a stable framework to facilitate investment in emissions reduction. In addition, some Iberian disclosing companies have found significant business opportunities in fighting against climate change and they have targeted their long-term strategy in this way. For these companies it is essential to limit regulatory uncertainty to a minimum. We need both a post-Kyoto agreement to ensure continuity in emission reductions and commitments, as well as European and national legislative security to provide a stable framework for the execution of investment and long-term infrastructures.

Uncertainty is precisely one of the investment barriers disclosing companies mention the most in their response to the CDP questionnaire: uncertainty on regulation, but also on the future price of energy, on the social and economic landscape and on consumer demands and behaviour.

However, as the effects of climate change are already tangible, waiting for legislative security while resources are becoming increasingly scarce is not the way forward. Action is needed now to future proof our business, re-launch the economy and secure a leader business position in a future low carbon world.

Companies in water-intensive sectors in Iberia witnessed how last year's droughts affected their business operations. The hydroelectric power production fell, which made difficult that carbon emissions slowed at the same

pace as the economy. Moreover, since we are living in an interconnected, globalised world, the increase in the electricity carbon footprint led to a rise in companies' Scope 2 emissions from electricity consumption, which in some cases cancelled out the positive effect of their emission reduction measures. Thus, despite the fall in economic activity, responding companies as a whole have reported a 7 % increase in Scope 1 emissions and only a 6 % reduction in Scope 2 for 2011<sup>4</sup>.

On the other hand, 55 % of the Iberian responders have reported to have been able to reduce emissions (combined Scope 1 and 2 emissions) during the year of disclosure. Up to 72 % of these reductions have been generated through the implementation of emission reduction measures, unrelated to cyclical reasons and not linked either to the shrinking in activity or divestitures. The number of emission reduction initiatives reported by companies has remained at the previous year's levels, while all indicators of climate change governance have improved once again and place the Iberian responding companies at comparable levels, or even better, than the main regional samples. However, as a deeper analysis shows later in this report, there is still a need for improvement in the quality of carbon management of the Iberia disclosers.

Table 1 shows the Iberian disclosing companies that this year have been included in the Carbon Disclosure Leadership Index (CDLI) and Carbon Disclosure Performance Index (CPLI). For more information about CDP scores, the CDLI and the CPLI please see chapter *Leaders 2012*.

The average score of companies included in the CDLI is 95, showing that there has again been a great improvement from the previous year's average score of 88. The average score of CDLI companies is still significantly higher than the average score of all reporting companies in Iberia, which results in 76 points and has increased from 68 in 2011. Looking at the performance index, six companies (double than in the previous year) have made it into the CPLI, having achieved the performance band A despite a stricter methodology this year.

# Key Themes and Highlights

## Progress towards a low carbon economy

Total GHG emissions<sup>6</sup> in Iberia decreased each year from 2008 to 2010. Since 2010, emissions have stabilised at around 426 million metric tons CO<sub>2</sub>e (425.5 million metric tons CO<sub>2</sub>e in 2010 and 426.1 million metric tons in 2011). According to the respective ministries, total emissions in 2011 were 356.1 million metric tons CO<sub>2</sub>e in Spain and 70.0 million metric tons CO<sub>2</sub>e in Portugal.

Nevertheless, with a 27.9% of emissions increase, Spain has exceeded his 15% increase Kyoto target and is in a difficult position to meet its Kyoto commitment by 2012. Portugal will meet their 27% increase Kyoto limit, as average 2008–2011 emissions in Portugal were 21.7 % higher than 1990.

With an uncertain future regarding mandatory GHG limitations for developed countries under a possible second commitment period of the Kyoto Protocol, it is necessary to have a benchmark against which to assess the reduction targets of Iberian companies and in particular their progress towards compliance with these targets. In the specific case of the European Union, the Europe 2020 strategy has been adopted establishing an emissions reduction target of 20 % from 1990 by 2020. This strategy seeks to ensure that it meets the “target 20-20-20” while also promoting green growth and jobs.

Nevertheless, most of the Iberian disclosers have operations outside Spain, Portugal and the EU itself and therefore, we need to evaluate their actions against climate change from a global perspective. As indicated by the CDP Global 500 Climate Change report this year, the PwC Low Carbon Economy Index specifies that in order to avoid surpassing the limit of 2°C of temperature rise, G20 countries must reduce their emissions intensity by approximately 5.1% per year from 2020 to 2050. Are the Spanish and Portuguese companies on course to meet this huge challenge?

From the analysis of the data disclosed by Iberian companies this year, we can identify that companies have progressed in setting emissions reduction targets. The percentage of companies without targets in place has been reduced to 24 % (35% in 2011)<sup>7</sup>, while the percentage of companies that rely exclusively on intensity targets rather than absolute targets, decreased from 33% to 31%. However, most companies have not set targets beyond 2020 and only 30% (9) have reduction targets with a term of more than five years from now.

Table 2 shows the main absolute targets Iberian disclosers have in place. Given the wide range of targets, to develop this table we have considered only absolute targets for Scope 1 (direct emissions) and Scope 2 (indirect from energy consumption). In those cases where targets refer to only a portion of the emissions in the scope, in the third column we have indicated the percentage of emissions covered. When the target was referring to total emissions, including Scope 3 (indirect along the supply chain), we have indicated that the target covers 100% of Scope 1 and Scope 2 emissions. Please notice that no company has a multi-year reduction target bigger than 5.1% annual for Scope 1 and Scope 2 emissions (column 7). The last column shows the conversion of these objectives into annual absolute reductions.

In short, although the number of disclosers having emission reduction targets has increased from 65% to 76%, both the level of ambition as well as the timeframe

6. All Spanish and Portuguese GHG national emissions according to the definition in the IPCC methodology for national inventories.

7. Disclosure of emission reduction targets is stricter in 2012 than it was in 2011. The number of companies without targets in 2011 would be bigger using the 2012 methodology.

8. Companies disclosing absolute or intensity targets have only been included in this section where they have been fully described, providing base year, target year, percentage reduction and for intensity targets, target metric.

## 4 EMISSION REDUCTION TARGETS<sup>8</sup>

- No target
- Absolute and intensity targets
- Intensity target
- Absolute target

2012

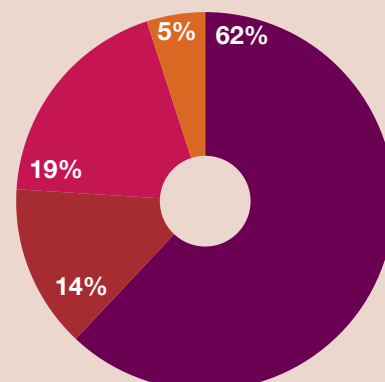


2011



## 5 EMISSION REDUCTION ABSOLUTE TARGETS TIMEFRAME<sup>9</sup>

- 1-5 years
- 6-10 years
- 11-15 years
- More than 15 years





**Table 2. EMISSION REDUCTION ABSOLUTE TARGETS (Scope 1 and 2)**

Company Name	Scope	% of emissions in scope	% of reduction	Base year	Target year	% annual reduction <sup>10</sup>	Equivalent annual emission reductions (tCO <sub>2</sub> e)
Abengoa	Scope 2	98%	10.00%	2010	2013	3.17%	18,303
Acciona	Scope 1+2	100%	3.20%	2010	2011	3.20%	34,018
Acerinox	Scope 1+2	100%	20.00%	2005	2020	1.22%	7,036
Banco Sabadell	Scope 1+2	100%	3.00%	2009	2014	0.59%	130
Bankinter	Scope 2	100%	5.00%	2010	2011	5.00%	332
Brisa	Scope 1+2	100%	6.00%	2009	2012	1.96%	476
CaixaBank	Scope 2	100%	5.00%	2010	2011	5.00%	2,253
EDP	Scope 1	100%	20.00%	2008	2015	2.64%	566,104
Enagás	Scope 1	81%	20.00%	2009	2020	1.37%	2,992
Ferrovial	Scope 1+2	100%	0.00%	2009	2020	0.00%	0
Gas Natural	Scope 1+2+3	100%	12.47%	2009	2014	2.38%	3,279,135
Grifols	Scope 1	18%	18.20%	2010	2013	1.08%	430
International Consolidated Airlines Group	Scope 1+2	100%	50.00%	2005	2050	0.91%	251,876
Mapfre	Scope 1+2	67%	2.00%	2009	2013	0.33%	126
NH Hoteles	Scope 2	11%	100.00%	2010	2011	11.10%	14,599
Portugal Telecom	Scope 1+2+3	100%	20.00%	2008	2020	1.53%	3,578
R.E.E.	Scope 1+2	9%	20.00%	2010	2020	0.18%	1,337
REN	Scope 1	5%	0.50%	2010	2011	0.02%	4
Repsol YPF	Scope 1+2	100%	9.26%	2005	2013	1.11%	312,358

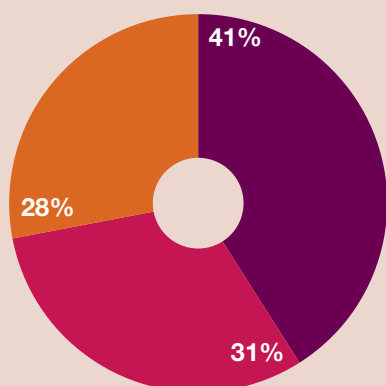
9. Companies may report multiple emission reductions due to implementation of activities, targets and reward incentives. In all of these cases, companies are only counted once in the statistics presented in this report, with the exception of the statistics on absolute and intensity targets where companies that have both types of target will be counted once in each type.

10. Annual reduction equivalent rate calculated assuming an equal reduction from base year to target year. Please notice that according to the second column, some targets cover Scope 1 or Scope 2 emissions, and other cover Scope 1 and 2 or even Scope 3. So they are not fully comparable.

11. This figure shows the percentage of companies for which absolute emissions within the reporting year have decreased, increased or remained unchanged. It does not include the magnitude of emissions increase or decrease.

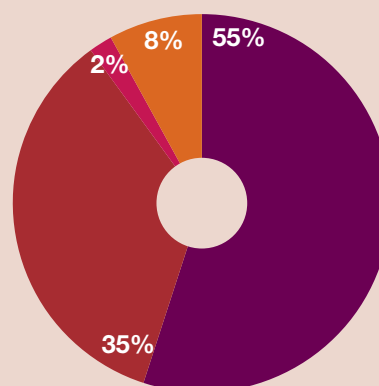
## 6 PROGRESS TOWARDS REDUCTION TARGETS ACHIEVEMENT

- Absolute targets achieved or in progress
- Intensity targets achieved or in progress
- Non achieved targets



## 7 DIRECTION OF CHANGE IN ABSOLUTE EMISSIONS FROM THE PREVIOUS YEAR IN IBERIAN COMPANIES<sup>11</sup>

- Decreased
- Increased
- No change
- First year of estimation



over which targets are set seem insufficient to provide a shift in emissions trends when the economy eventually recovers. On the other hand, we can see that 72 % of responding companies have achieved their targets or are on track to meet them with only 28 % of responders falling behind them.

A review of the overall emissions reported by the responding companies shows an increasing trend, although 55% (27) of respondents indicate a reduction of emissions compared to the previous year. This means that the reduction declared by these 27 companies is lower than the increase in total emissions reported this year by Iberian disclosers, thus resulting in a net emissions increase for the overall sample compared to the previous year.

Although four new Iberian companies reported their emissions for the first time this year, the 5.6% growth in reported Scope 1 and 2 GHG emissions, which reached 393 million metric tons CO<sub>2</sub>e in 2012 (from 372 million metric tons CO<sub>2</sub>e in 2011) cannot only be explained by these new additions.

For those respondent companies that reported an increase in their emissions, Table 3 indicates the percentage increase and the main reasons for it. In this table we find some of the largest Iberian net emitters such as Endesa (with a 29.9% increase), Gas Natural (17.9% increase), EDP (15% increase), Galp (4.9% increase) and Abengoa (14.4% increase), all of them among the top 10 emitters (please see Appendix). Four of these companies are operating in the electricity market. The main cause of the increase in emissions for those companies in the Utilities sector has to do with the increased use of coal for electricity generation in Spain as a result of the entry into force of Decree RD 134/2010 which sets quotas for domestic coal use<sup>13</sup>. This change in law, in addition to

extreme weather conditions and droughts in the Iberian Peninsula, has caused the hydroelectric production index to fall in 2011 to 0.82 in Spain and 0.92 in Portugal, which resulted in a decrease in renewable energy production. Endesa, Gas Natural and EDP reduced hydropower production while significantly increasing electricity generation from coal.

As a result, the emissions factor for electricity in Spain grew by 20.8% in 2011 compared to 2010. This is also reflected in the increased Scope 2 emissions from many other companies, such as Portugal Telecom, which states it has consumed 40% less renewable electricity in 2011 compared to the previous year.

In addition to the above, we should also take into account that emissions reported by companies come from their global operations and are not exclusively generated in the Iberian Peninsula (even if the majority is). Other reasons that contribute to increased emissions are improvements in the emissions inventory by updating the methodology or the inventory scope (reason cited in 27% of the cases), the acquisition of other companies (23%) or increased production (8%).

Although the extreme weather conditions together with the integration of a regulation that incentivises the consumption of coal as electricity generation are not the only reasons for the overall increase in emissions, it is important to highlight that their effects have indeed overcome the efforts of Iberian companies to decrease their level of emissions through the implementation of emission reduction initiatives.

This fact should be taken into discussion with regards to future trends and progress of Iberian companies into a low carbon economy.

## 8 IBERIAN DISCLOSERS TOTAL EMISSIONS (Scope 1 and 2) (Mt CO<sub>2</sub>e)<sup>12</sup>

- Scope 1
- Scope 2

2012 (49 disclosers)

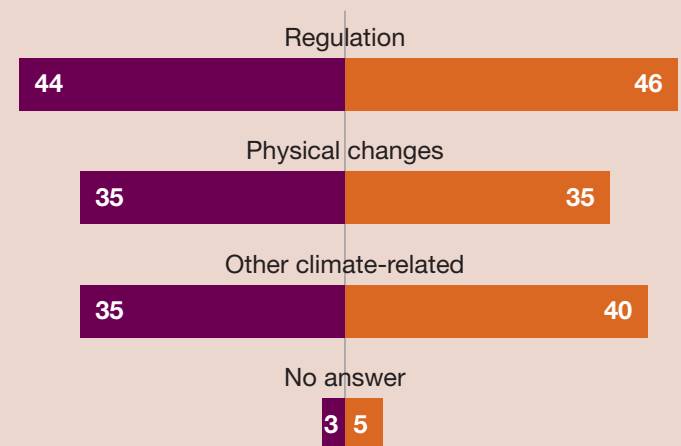


2011 (45 disclosers)



## 9 IDENTIFIED RISKS AND OPPORTUNITIES BY TYPE (2012)

- Risks
- Opportunities



**Table 3. EMISSION INCREASES AND REASONS (Scope 1 and 2)**

Company Name	Emissions increase (%)	Increase reason
Abengoa	14.43	Acquisitions, mergers, change in methodology.
Banco Popular Español	50.00	Change in methodology
BBVA	5.00	Weather conditions
EDP	15.00	Increased stationary combustion in thermal power plants owned by the company in the Iberian Peninsula
Endesa	29.90	Resources availability
Ercros	13.50	Increase of electricity emission factor
Galp Energia	4.90	Change in boundary
Gamesa	N/A	Acquisitions, Change in output
Gas Natural	17.90	Legal requirements
Grifols	261.70	Acquisitions
Indra	N/A	Acquisitions, Organic growth
Jerónimo Martins	30.00	Increase in the number of sites.
Mediaset España Comunicación	6.10	Acquisitions
OHL	18.00	Change in output
Portugal Telecom	21.00	Reduction of renewable energies integrated at the composition of the energy supplied
R.E.E.	10.46	Acquisitions, Change in methodology, New facilities built
Sonae	10.00	Acquisitions, Extension of opening hours
Sonaecom	12.00	Reduction of renewable energies integrated at the composition of the energy supplied

**The drivers and barriers to carbon action**

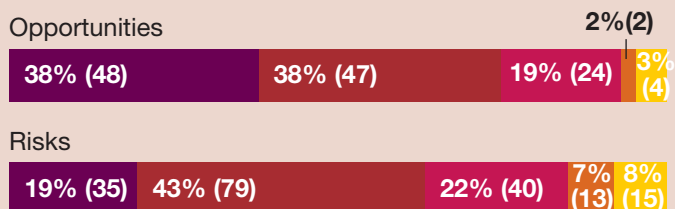
There are different reasons driving Iberian responding companies to engage in carbon management, but it seems that now, in a context of economic crisis, companies are placing greater emphasis on the opportunities that climate change management can provide, thus trying to avoid the risks of inaction, especially in the short-term. The percentage of companies that have identified regulatory opportunities

12. There has been a change in the way in which Scope 1 and 2 emissions reported under the Climate Change Reporting Framework (CCRF) are calculated although this is not expected to cause a major change in reported emissions. In 2011 the Scope 1 and 2 figure was taken as parent and subsidiaries under control of the parent whereas in 2012 joint ventures are also included.

13. Spanish Government passed this decree in February 2010. <http://www.boe.es/boe/dias/2010/02/27/pdfs/BOE-A-2010-3158.pdf>

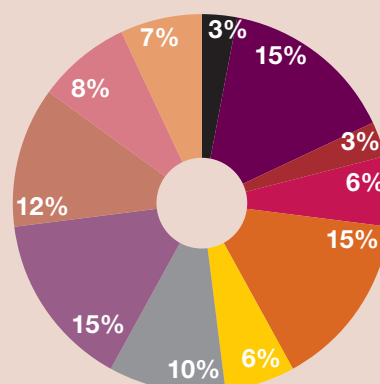
**10 RISKS AND OPPORTUNITIES TIMEFRAME**

- Current
- 1-5 years
- 6-10 years
- >10 years
- Unknown



**11 REGULATORY OPPORTUNITIES**

- Air pollution limits
- Cap and trade schemes
- Carbon taxes
- Emission reporting obligations
- Fuel/energy taxes and regulations
- General environmental regulations, including planning
- International agreements
- Other regulatory drivers
- Product efficiency regulations and standards
- Product labelling regulations and standards
- Voluntary agreements



(94%) and other opportunities such as corporate reputation or changing consumer behaviour (82%) is only slightly greater than the number of companies that have identified the same kind of risks (90% and 71% respectively).

The difference in the perception of risks and opportunities lies in the timeframe in which they are expected to impact the company operations. Almost all companies have identified opportunities that could materialise within a year's time (38% of all opportunities identified) or from 1 to 5 years from now (38% again). However, only 19% of the identified risks are considered as current (please see figure 10).

Regulation, especially that related to fuel/energy taxes and consumption and carbon emissions, has been identified as one of the main sources for both risks (costs associated with compliance) and opportunities (involving incentives for cost savings and enabling the growth of services to third parties). (See figure 11 and 12).

In addition to the above, if there is a regulatory element that concerns companies, it is the uncertainty in future legislation, which represents 10% of total regulatory risks identified. Although the expected scenario for responding companies is that in the medium-term there will be a gradual shift from fossil fuels to low-carbon renewable energy, legal uncertainty is already a barrier to long-term investments, for example the construction of infrastructure such as building renewable energy production plants. As other examples of regulation uncertainty, disclosing companies refer to the policies on use of biofuels, or waste and waste water management policies, that can prevent investing in these areas.

Furthermore, it is difficult for the power generation sector to combine and integrate EU policies like the climate and energy package with national regulations such as quotas for

domestic coal in Spain or the moratorium on incentives for renewable energy. According to companies' responses, uncertainty about post-Kyoto commitments particularly affects investments in renewable energy, modernisation of thermal power generation plants and projects in the Clean Development Mechanism and Joint Implementation (CDM/JI). Investments in the renewable energy sector in Spain decreased by 53% in 2010, and some respondents are delaying their decisions on CDM/JI project development.

As is the case with regulation, physical changes associated with climate change (extreme weather events, rising average temperatures and changes in rainfall patterns) are identified both as risk for businesses' value chain and also as a business opportunity for the necessary actions for prevention and mitigation.

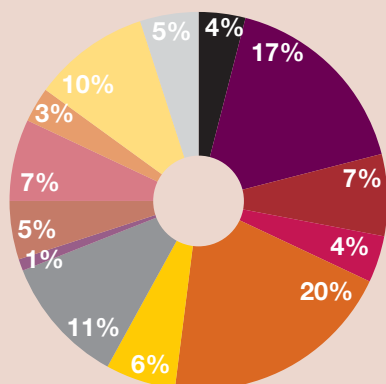
Other important drivers for company action and investment in carbon management are reputational issues and changes in consumption patterns, which together represent 60% and 65% respectively among the other climate-related risks and opportunities identified.

Figures 13 and 14 illustrate the factors that can generate risks and opportunities with a high potential impact for company operations, either now or within a period of 1 to 5 years. These figures are based on the number of times that companies point out these drivers in their response as with high potential impact.

Regulatory issues such as the EU ETS market and energy taxes present, according to responding companies, the most immediate risks and opportunities and, at the same time, those with a greater potential impact. Indeed the bulk of emissions reduction activities of companies are oriented towards reducing energy consumption. Energy efficiency in buildings and processes are by far the types of activities that most companies are implementing to reduce their

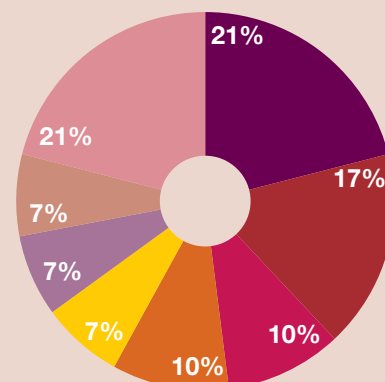
## 12 REGULATORY RISKS

- Air pollution limits
- Cap and trade schemes
- Carbon taxes
- Emission reporting obligations
- Fuel/energy taxes and regulations
- General environmental regulations, including planning
- International agreements
- Lack of regulation
- Other regulatory drivers
- Product efficiency regulations and standards
- Product labelling regulations and standards
- Uncertainty surrounding new regulation
- Voluntary agreements



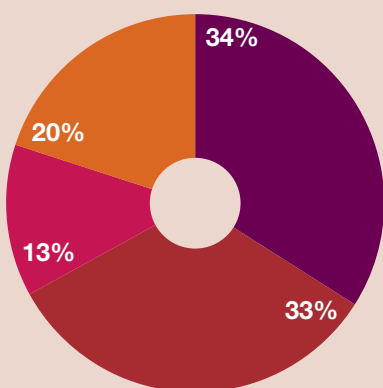
## 13 SHORT-TERM RISK DRIVERS WITH A HIGH POTENTIAL IMPACT

- Cap and trade schemes
- Fuel/energy taxes and regulations
- International agreements
- Change in precipitation extremes and droughts
- Uncertainty surrounding new regulation
- Fluctuating socio-economic conditions
- Reputation
- Other



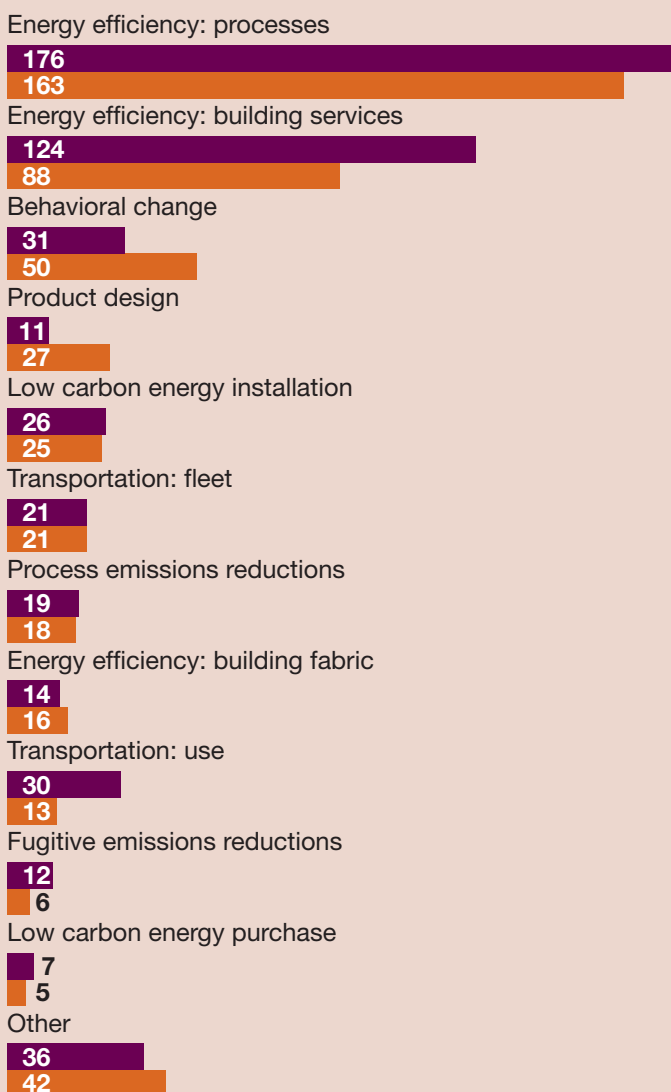
**14 SHORT-TERM OPPORTUNITY DRIVERS WITH HIGH POTENTIAL IMPACT**

- Cap and trade schemes
- Fuel/energy taxes and regulations
- Air pollution limits
- Other



**15 EMISSION REDUCTION ACTIVITY TYPES**

- 2012
- 2011

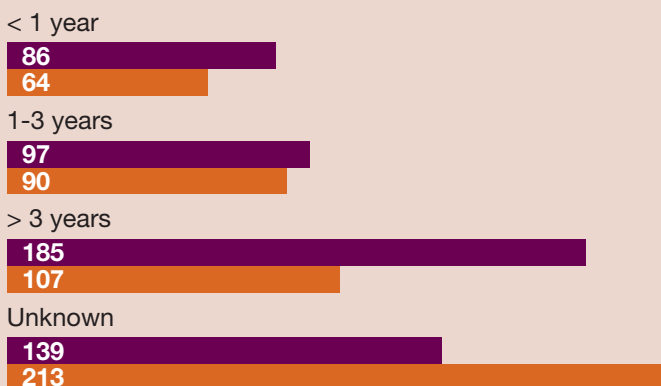


“BES has taken upon itself the responsibility of exerting a positive influence on its clients, encouraging them to adopt equipment that permit to reduce their energy bill and consequently the emission of GHG. The offer of innovative low-carbon products helps to engage employees and improve the Bank reputation, gaining new clients, being a competitive advantage”.

**Banco Espirito Santo**

**16 EMISSION REDUCTION ACTIVITIES BY PAYBACK PERIOD**

- 2012
- 2011



emissions. Both types of activities have grown in the last year despite the economic crisis, suggesting that they are bringing value to businesses during times of financial difficulties. 86% of the energy efficiency activities and processes and 40% of efficiency in buildings have payback periods of more than three years. If we take into account all emission reduction activities for which we have information on the financial analysis behind them, 50% of them have a payback period longer than three years, showing that fast returns are not one of the main criteria for company decisions on investment in reduction activities.

The existence of a dedicated budget for energy efficiency (23%) and the need to comply with regulatory requirements (16%) are the most frequently-used methods to drive investments in emissions reduction activities (see Figure 18). In addition, as much as 71% of emission reductions are reported to be due to emission reduction activities, compared to 29% that arise from a variety of reasons related to changes in the activity of the company or its environment. Its important to mention that companies without an emission reduction target are also implementing reduction activities. While these activities make sense to reduce GHG emissions and costs, companies without a reduction are missing out a wider financial analysis. Companies that set targets can measure their achievements against those targets and understand the extent to which their efforts are translating into actions, as well as benchmark themselves against their peers.

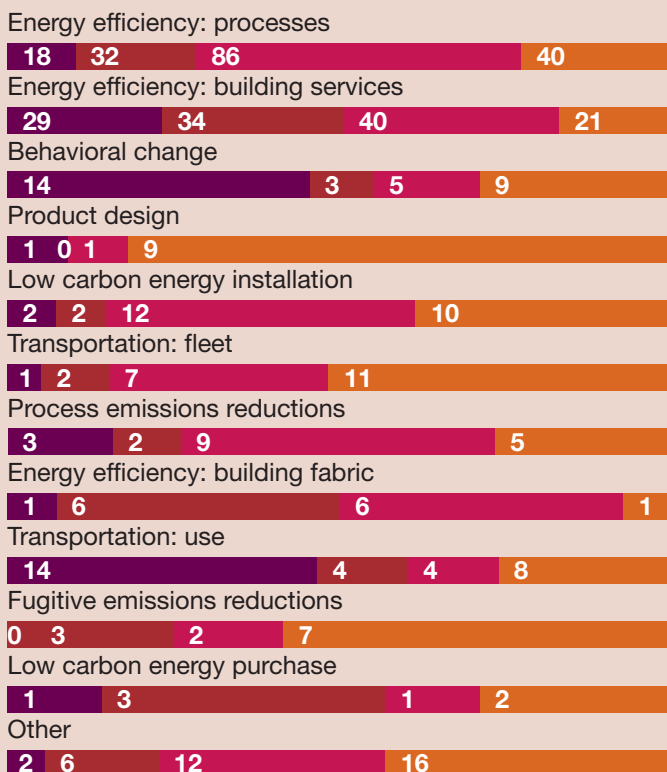
### Improving climate change governance?

In 2012 Iberian responding companies have again excelled, in particular in comparison to those of other CDP samples, in areas such as increased responsibility for climate change (86% of them indicate that the responsibility for climate change is anchored at the board or senior executive level) or the integration of climate change into the business strategy (94% of companies). In these areas, Iberian responding companies position themselves at the same level as Global 500 companies and above other samples such as Britain, France or Italy. The high level of corporate climate change responsibility that we find in responding companies in the Iberia sample is consistent with high values in other indicators such as the quality of climate change management, both in terms of transparency (86% of companies have externally verified Scope 1 emissions and 80% Scope 2 emissions) and performance (94% of companies have implemented initiatives to reduce emissions and 84% have products and services that help third parties to reduce emissions).

This fact however contrasts with the lack of emissions reduction targets in the long-term. These targets are necessary to put Iberia on a path towards a low carbon economy. The lack of a long-term commitment suggests that, for the responding companies, there are still areas for improvement in the governance and management of climate change.

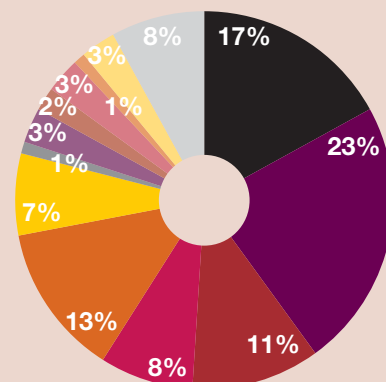
## 17 EMISSION REDUCTION ACTIVITIES SUMMARY

- < 1 year
- 1-3 years
- > 3 years
- Unknown



## 18 METHODS USED TO DRIVE INVESTMENT IN EMISSIONS REDUCTION ACTIVITIES

- Compliance with regulatory requirements/standards
- Dedicated budget for energy efficiency
- Dedicated budget for low carbon product R&D
- Dedicated budget for other emission reduction activities
- Employee engagement
- Financial optimization calculations
- Internal price of carbon
- Internal incentives/recognition programs
- Internal finance mechanisms
- Lower return of investment (ROI) specification
- Marginal abatement cost curve
- Partnering with governments on technology development
- Other



In order to identify the main areas for improvement in climate change management, we have compared the number of disclosers that have stated they comply with each of the requirements of the different areas of good corporate governance in climate change issues<sup>14</sup>, against the number of companies who have obtained the highest score in the performance score for each of these areas<sup>15</sup>. The Performance Score awards actions that contribute to climate change mitigation, adaptation and transparency, so it can be interpreted as an indicator of the margin for improvement. For more information about CDP scores please refer to chapter *2012 Leaders*.

Figure 19 shows there is a big gap especially with regards to the integration of climate change into the business strategy and the creation of incentives for staff performance to achieve emissions targets.

Regarding business strategy, 94% of responding companies (46) claim to have integrated climate change into the latter. However, only 33% of disclosing companies (16) have obtained the highest performance score in the corresponding question of the CDP questionnaire. The remaining 61% of responding companies (30) have begun integrating climate change in their business strategy but we cannot state that this is reflected directly in their business and operations. To do this, companies must demonstrate that changes in their strategy, both short and long-term, have been influenced by the risks and opportunities identified in climate change. These changes should be then reflected in the establishment of long-term emission reduction targets and activities.

Progress since 2011 is remarkable with regards to the number of companies using incentives to improve the performance of their climate change management. In 2012, 67% of responding companies (33) report having incentives in place, compared to 56% in 2011. However, only 31% of companies (15) have obtained the highest performance score for this question. There are thus 36% of companies (18) who have some kind of incentive for

climate change management but there is no assurance that these incentives are directly contributing to a significant reduction in emissions.

Although 86% of responding companies (42) have integrated climate risk management into their comprehensive risk management system, a majority of them cannot yet ensure that these risks have been effectively integrated into their business strategy (51% (25) do not get the maximum performance score for this question). To prove that, these companies will need to ensure that the risk evaluation is done at least once every year and that the results of the analysis are reported directly to the board.

The gap between simply complying and scoring the maximum performance points shows the way to excellence in carbon management. Following this path will help Iberian disclosing companies to be ready for a low carbon future. Since most of the companies that answered the questionnaire (98%) assigned the responsibility for climate change to the board of directors or a senior executive, improvements in the above-mentioned areas should be possible.

14. By complying with the requirements of good governance we mean the following:

- Companies in which climate change risks and opportunities management procedures are integrated into a multi-disciplinary company wide risk management process
- Companies in which climate change is integrated into their business strategy
- Companies providing incentives for the management of climate change issues, including the attainment of targets
- Companies engaging with policy makers to encourage further action on mitigation and/or adaptation

15. The CDP scoring methodology include a detailed description on which characteristics the previous governance areas should include to obtain the maximum score. Please see CDP scoring methodology: <https://www.cdproject.net/en-US/Pages/guidance.aspx>

## 19 GOVERNANCE QUESTIONS: NUMBER OF COMPANIES COMPLYING AND ATTAINING MAXIMUM PERFORMANCE SCORE

- Companies complying
- Companies attaining maximum performance score

### Risk Management Integration



### Strategy Integration



### Incentives



### Engagement with policymakers



## 20 TRENDS IN KEY GOVERNANCE INDICATORS

- 2012
- 2011

### Monetary incentives



### Engagement with policy makers for further action



### Integrated climate change risk management



### Board level responsibility



### Integrated strategy



# Commentary from Euronatura

**“Putting in place efficiency and emission reduction targets drives innovation and sends an important message to stakeholders.”**

## **Carbon Management Landscape in Portugal**

Portuguese companies currently view carbon management as a tool for tackling increasing energy costs and pressure from competitors. Related advantages such as being relevant criteria on the consumer, investor or procurement side is looked-at by companies with growing significance. The Carbon Disclosure Project - with its Investor and Supply Chain Programmes pushing carbon management higher on the corporate agenda - is now playing a key-role in shifting to this mind-frame.

There is a significant number of Portuguese companies with a rigorous carbon inventory, since establishing this carbon baseline is mandatory for sketching a strategy. Many companies have also started to enlarge their Scope 3 inventories, acknowledging its relevance in the company's carbon footprint. It is also worth noting a wide-spread willingness to put in place efficiency and emission-reduction targets. This decision drives innovation and sends an important message to stakeholders. In fact, the first movers in Portugal go beyond inventory and target-setting; they also forecast emissions scenarios and study the future effects of climate change in the company's activity.

## **Roadmap to an Effective Strategy**

Companies are setting multiple targets based on the relationship between reducing carbon emissions and saving money. However, most of those targets are limited in scope and do not translate into absolute emissions reductions. Also, there is a lack of connection between sustainability goals and employees incentives: 31% (4) of Portuguese companies in the sample do not provide them. Furthermore, letting other departments within the company know about the financial benefits of “carbon savings” can help achieve those targets. Several Portuguese companies have expressed that this practice has had positive impacts on the way in which their carbon and sustainability strategy is perceived and engaged internally.

Being aware of low-hanging fruits embodied in behavioural changes can make for good results and big savings with minimum capital investment: convey information on good workplace practices and processes to all employees. Track and benchmark the company's carbon performance, and pass on this information for better engaging within and outside the company. If capital is available, companies can start by investing in energy efficiency in activities' with high carbon intensity levels or

where state or European incentives and rebates are available, to minimise return periods. Companies can also consider doing energy audits or third-party evaluations to identify where to act and how to obtain good results.

A company's influence is not limited to their employees; suppliers' engagement is a key part of a carbon strategy. Suppliers participation can have tremendous impacts in the companies' products and services and on how companies are perceived in the market both by other suppliers and consumers. Portuguese companies started their suppliers programs focusing on product-quality indicators. Nevertheless, as these programmes take a more complex format, there is a delay in adding weight to the energy and carbon aspect.

## **Shifting Scenario**

The debate on European and national strategies on climate change are not centre stage when it comes to the media and political Portuguese agenda. The European drive in promoting the fight on climate change as a vector of economic development was muffled by the European crisis: both companies and Government have their path questioned by budget constraints.

In Portugal, some business sectors have already been pointed out as experiencing climate change impacts. Notwithstanding, both public and private programs to promote renewables and energy efficiency have decreased. Surely, there is a link between these programmes' decrease – or postponement – and the financial sector credit crunch. In fact, as a result of the economic crisis, Portuguese companies are experiencing changes in fiscal and labour policies, all the while reacting to the economic downturn. Therefore, unless Portuguese companies had already integrated “carbon management” as key vector of their business strategy - which few had - this economic context can cause a shift of focus away from that issue.

There are a few governmental carbon policy frameworks expected to be released soon. They target companies that so far have not been requested by law to deal with carbon management. At present, this can be a huge challenge for some companies. However, it is a necessary challenge if it helps companies to adjust and cut costs while also decreasing their carbon intensity per revenue.

**André Baltazar**  
Researcher, Euronatura



# 2012 Leaders



## **Introduction to the Carbon Disclosure Leadership Index (CDLI) and the Carbon Performance Leadership Index (CPLI)**

Each year, company responses are reviewed, analyzed and scored for the quality of disclosure and performance on actions taken to mitigate climate change. The highest scoring companies for disclosure and/or performance enter the CDLI and the CPLI.

### **What are the CDLI and CPLI criteria?**

To enter the CDLI, a company must:

- Make their responses public and submit them via CDP's Online Response System
- Achieve a score within the top 10% of the total population

To enter the CPLI (Performance Band A), a company must:

- Make their responses public and submit them via CDP's Online Response System
- Attain a performance score greater than 85
- Score maximum performance points on question 13.1a (absolute emissions performance) for GHG reductions due to emission reduction actions over the past year
- Disclose gross global Scope 1 and Scope 2 figures
- Score maximum performance points for verification of Scope 1 and Scope 2 emissions

Notes: Companies that achieve a performance score high enough to warrant inclusion in the CPLI, but do not meet all of the other CPLI requirements are classed as Performance Band A- but are not included in the CPLI.

### **Why are the CDLI and CPLI important to investors?**

Analyses of the CDLI and CPLI provide insights into the characteristics and common trends among the leading companies on carbon disclosure and performance. They highlight good practices in reporting, governance, risk management, verification and emissions reductions activities toward climate change adaptation and mitigation.

Additionally, good carbon management and disclosure may be used as a proxy for superior, forward-looking management with a better understanding of the companies' risk profile.

The inter-relations between CDLI and CPLI companies show how companies with better data can use this advantage within the business to drive value-adding activities.

Companies in the CDLI and CPLI typically show a deeper understanding of, and address more pro-actively, the risks and opportunities presented by climate change. Their transparency and willingness to disclose information is attractive to investors. For further information on the CDLI and the CPLI and how scores are determined, please visit [www.cdproject.net/guidance](http://www.cdproject.net/guidance).

## CDLI

Carbon disclosure scores attained by Iberian disclosers have significantly improved from the previous year although the scoring methodology became stricter in 2012. 78% (38) of the disclosers improved their score from previous year. The greatest improvements are achieved by Arcelor Mittal with a jump of 51 points and CaixaBank with 31 points<sup>16</sup>.

Companies with a disclosure score above 70 points are considered high scorers, though they are not necessarily Carbon Disclosure Leaders. Being a high scorer may indicate that senior management has an understanding of the business issues related to climate change and that they are incorporating climate related risks and opportunities into their core business. High scores represent 69% of the Iberian disclosers (34), growing from 52% (25) in 2011. The overall improvement proves that the quality of carbon disclosure has increased dramatically in Iberia. Companies' responses to CDP's information request ensure them high visibility and the opportunity to benchmark themselves against their peers. Therefore, reaching a good CDP score can contribute and support companies in their sustainability positioning.

The companies included in this year's CDLI have a disclosure score ranging from 92 to 99. The average disclosure score for CDLI companies is 95, which means an increase of 7 points compared to the 2011 CDLI average score (88). The average score of CDLI companies is significantly higher than the average score of all reporting companies of the Iberian sample, which results in 76 points and has increased from 68 in 2011.

Gas Natural leads the CDLI with 99 points. Repsol YPF earns the second best score with 98 points, closely followed by Acciona, Abengoa and EDP with 96 disclosure points each. All the latter companies are listed in the CDLI for the second consecutive year, while Gas Natural has managed to remain disclosure leader for another year. Iberdrola, Banco Espírito Santo, Sonae and Galp are among the newly-listed disclosure leaders.

**Table 4. CARBON DISCLOSURE LEADERSHIP INDEX FOR IBERIA SAMPLE 2012**

Name	Country	Sector	Disclosure Score
Gas Natural	Spain	Utilities	99
Repsol YPF	Spain	Energy	98
Abengoa	Spain	Industrials	96
Acciona	Spain	Industrials	96
EDP	Portugal	Utilities	96
Iberdrola	Spain	Utilities	95
Banco Espírito Santo	Portugal	Financials	94
OHL	Spain	Industrials	94
Galp Energia	Portugal	Energy	93
Sonae	Portugal	Consumer Staples	93
Endesa	Spain	Utilities	92
Telefónica	Spain	Telecommunication Services	92

## 21 CDLI VS. NON-CDLI METRICS<sup>17</sup>

- CDLI
- Non-CDLI

Disclose Scope 1+2



Disclose Scope 3



Verify Scope 1+2



Verify Scope 3



## 22 CPLI VS. NON-CPLI KEY PERFORMANCE INDICATORS

- CDLI
- Non-CDLI

Verification of emissions



Quantify emissions reductions from activities



Integrated risk management



High level governance



Integrated strategy



Monetary incentives



Products and services enabling emissions reductions



## CPLI

Looking at the performance index, six companies have made it into the CPLI, having achieved the performance band A. This means doubling the CPLI number of companies from 2011, despite a stricter methodology this year<sup>18</sup>.

Companies in the CPLI are demonstrating best practice in terms of governance, strategy and emissions reductions. These companies are strongly outperforming the rest of the Iberian sample in all of the key metrics.

Abengoa, Caixa Geral de Depositos and Iberdrola are new among the performance leaders, and the latter succeeded also in being included as performance leader within the CPLI of the G500 population. Acciona, Gas Natural and Ferrovial are included in the CPLI for the second consecutive year.

**Table 5. CARBON PERFORMANCE LEADERSHIP INDEX FOR IBERIA SAMPLE 2012**

Name	Country	Sector	Performance Band
Abengoa	Spain	Industrials	A
Acciona	Spain	Industrials	A
Ferrovial	Spain	Industrials	A
Caixa Geral de Depositos	Portugal	Financials	A
Gas Natural	Spain	Utilities	A
Iberdrola	Spain	Utilities	A

35 companies populate the top three bands (A, B and C) and only seven are in the lowest two (D and E). Another seven companies have not been scored for performance because they have a disclosure score below the 50 points threshold.

In conclusion, the analysis shows that the huge majority of responding companies of the Iberian sample is not only improving in terms of disclosure and performance, but has already reached a very good level of both.

16. CaixaBank 2012 score is compared to Criteria Caixa Corp 2011 score.

17. CDP has been working to encourage greater levels of third party verification/assurance of data in response to demands for higher levels of data quality. This led to a change in the way in which verification/assurance was reported and scored in 2011. Therefore only data for 2011 and 2012 for verification/assurance is included here. The term "reported and approved" refers to the fact that the number of companies with verification is based on the scoring of the verification statements attached to their response. Where companies report verification/assurance of more than one scope, they are only counted once in the statistic provided.

18. Please notice that according to CDP scoring methodology performance bands are relative to the companies' responses in that particular year. That makes difficult to compare CPLI over time. Moreover, the criteria to enter the CPLI were raised in 2012. Please see CDP scoring methodology: <https://www.cdproject.net/en-US/Pages/guidance.aspx>

## Why is investing in climate change related R&D with regards to new products so important to obtain a comparative advantage in your sector? Why do you think innovation projects pay off and are important even in times of financial crisis?

The role that energy technologies must play in curving CO2 emissions is key to mitigate the potential impacts associated to climate change.

Although the financial crisis is forcing our society to pay attention in some other urgent questions, only those companies working with the most suitable technology will be able to operate and compete properly in the markets giving society the level of security of supply, sustainability and satisfaction demanded.

## Which benefits did you obtain from measuring and verifying Scope 3 emissions? How does it help you to develop a better carbon management?

The starting point to develop a better carbon management is an accurate measurement of the GHG emissions. Measuring GHG emissions Scope 3 allows our company to comprehensively know the energy efficiency of these processes, enabling us to allocate resources in a cost-effective way, focusing the company's efforts on those with the greatest impact or higher room for improvement.

Verifying the whole of GNF's carbon footprint gives all these work the necessary level of assurance and external recognition.

**Antonio Gella, HSEQA Director.  
Gas Natural**

# Telefónica perspective



**“We believe that the Information and Communication Technology (ICT) Sector has a major role in promoting a low carbon economy, which has been put into value within CDP with the creation of a particular supplement of our sector.”**

For the third year in a row, Telefónica is one of the leading telecommunications companies in the Carbon Disclosure Project. We are proud to be part of the top businesses that respond to institutional investors with millionaire assets, interested in the transparency and the performance of companies with regard to climate change. We also believe that the Information and Communication Technology (ICT) Sector has a major role in promoting a low carbon economy, which for the first year has been put into value within CDP, with the creation of a particular supplement of our sector.

In this edition, Telefónica has achieved a score of 92 points out of 100 in the Carbon Disclosure Score, increasing 2 points since last year. Our efforts to include climate change as part of our core business and the transparent carbon management that we carry out every year has taken us to this position. Furthermore, Telefónica has remained in category B of the Carbon Performance Score that includes companies with initiatives in progress, which they will conclude shortly, to mitigate, adapt to climate change and to drive green ICT innovation for a low carbon economy.

The strategy of the Climate Change and Energy Efficiency of Telefónica has three fronts: 1) Green ICTs, the basis for the identification of risks and opportunities that climate change present to us and helps to drive our positioning as the leading ICT company in this field; 2) Green from ICTs, to promote internal energy efficiency and to reduce our GHG emissions; and 3) Green with ICTs, with initiatives to develop competitive solutions and services that improve clients' efficiency and enhance emissions reductions in other sector of the economy by the use of our technology.

On the Green from ICTs front, where the CDP focuses, Telefónica has improved its operational energy efficiency including data centers by almost 20%, putting it at a third from reaching its target for 2015: an improvement of 30% compared to 2007, measured in kWh/equivalent access. To achieve this, the 30 energy efficiency projects developed in the company in 2011 have been essential. With them, we have saved 7.6 million euros and reduced 265,000 tons CO<sub>2</sub>e.

Similarly, Telefónica consolidated the energy consumption and greenhouse gas emissions inventory accounting & development processes – essential for taking the right decisions – maintaining total greenhouse gases at 1.8 million tons. At the same time, for the third year running, An independent auditor performed a specialised energy and emissions review of all of the group's operations, and for the first time, we included the verification of the emissions reduced by every project developed.

Referring to transparency, another valued aspect by CDP, Telefónica regularly informs its interest groups about its progress in energy and carbon management through various 2.0 channels, the Annual Sustainability Report and an annual workshop on energy and climate change.

Our score in CDP reflects the efforts in the past, the results of the present and our commitment to the future. We consider that CDP is a good reference for our investors at this moment. In this sense we will do our best to improve in the coming years.

# Sector analysis

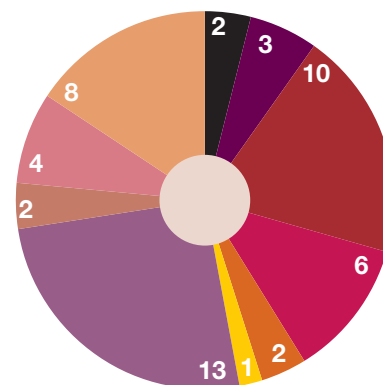


All of the companies covered in the Iberian sample can be categorized into 10 sectors based on the Global Industry Classification Standard (GICS). Examining companies by sector often provides insight into the challenges faced by a particular sector. Moreover, the nature and scale of climate related activities are often best compared on a sector by sector basis. The largest number of responding companies of the 51 companies that responded<sup>19</sup> to the CDP questionnaire can be found in the Financials (13), Industrials (10) and Utilities (8) sectors as illustrated in figure 23.

All 10 sectors are very diverse and this is reflected in the range of response rates as well as by the disclosure and performance scores obtained in each of them. The highest scoring sector in both in terms of disclosure and performance is the Energy sector with an average disclosure score of 96 points. Nevertheless, this sector includes only two companies, a small sample not representative for comparisons. From those sectors including more than five companies, Utilities has the best disclosing and performance scores with an average disclosure score of 88 points. The Consumer discretionary sector has the lowest average scores both for disclosure and performance.

## 23 DISTRIBUTION OF RESPONDING COMPANIES BY SECTOR

- Energy
- Materials
- Industrial
- Consumer Discretionary
- Consumer Staples
- Health Care
- Financials
- Information Technology
- Telecommunication Services
- Utilities



19. This analysis includes all responses, including non public responses and subsidiary companies which responded via their parent company. This year, those companies that send a non public response and that are only included in the Iberian report can have non public scores. Nevertheless, those companies that are included in other reports such as Euro 300 and Global 500, cannot have non public scores despite having sent non public responses. From next year all scores will be public despite the company's response is sent as public or non public.

# Financials

## Sector response rate:

Financials overall: 52% (13 out of 25)

## Key industries in within the financial responders:

Banks (10 out of 13)

Diversified financials (2 out of 13)

Insurance (1 out of 13)

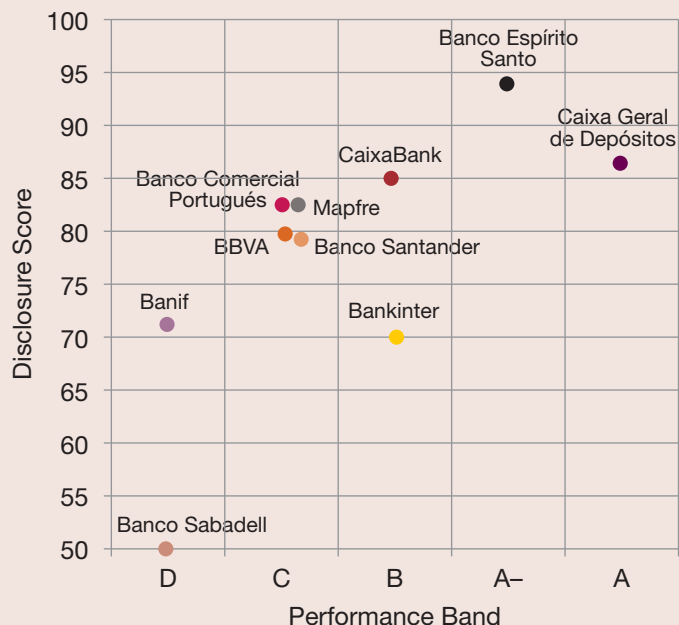
## Respondents:

Banco Comercial Portugues, Banco Espírito Santo, Banco Popular Español, Banco Sabadell, Banco Santander, Banif, Bankinter, BBVA, Bolsas y Mercados Españoles, Caixa Geral de Depósitos, CaixaBank, Espirito Santo Financial Group, Mapfre.

## Non-respondents<sup>20</sup>:

Banca Cívica, Banco BPI, Banco de Valencia, Banco Pastor, Bankia, Corporación Financiera Alba, Dinamia Capital Privado, Grupo Catalana Occidente, Quabit Inmobiliaria, Realia Business, Sonae Capital.

## 25 PUBLIC CARBON DISCLOSURE SCORE AND PERFORMANCE BAND<sup>21</sup>



## 24 KEY PERFORMANCE INDICATORS

- Overall Iberian disclosers
- Financials

Board or other senior management oversight of climate change



Provide incentives for the management of climate change



Have emissions reductions targets



Have emissions reductions initiatives



Have products and services that enable GHG emissions reductions



Integrate climate change risks and opportunities management



Integrate climate change into business strategy



Decreased absolute emissions (Scope 1 and 2 combined)

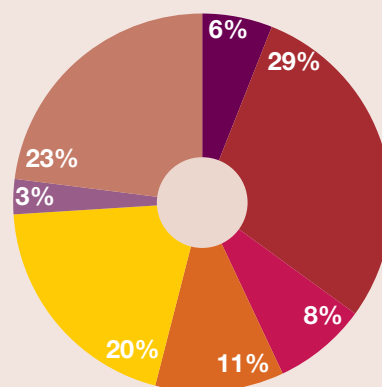


Engage with police makers



## 26 METHODS TO DRIVE INVESTMENT IN EMISSION REDUCTION ACTIVITIES

- Compliance with regulatory requirements/standards
- Dedicated budget for energy efficiency
- Dedicated budget for low carbon product R&D
- Dedicated budget for other emission reduction activities
- Employee engagement
- Financial optimisation calculations
- Other



**27 NUMBER OF EMISSION REDUCTIONS ACTIVITIES BY ACTIVITY TYPE AND PAYBACK PERIOD**

- < 1 year
- 1-3 years
- > 3 years
- Unknown

Energy efficiency: processes



Energy efficiency: building services



Behavioral change



Product design



Low carbon energy installation

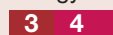


Transportation: fleet



Process emissions reductions

Energy efficiency: building fabric



Transportation: use



Fugitive emissions reductions

Low carbon energy purchase

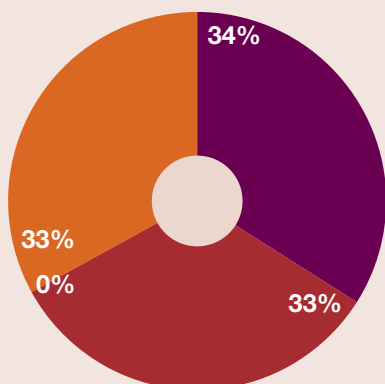


Other



**28 EMISSION REDUCTION TARGETS**

- Absolute target
- Intensity target
- Absolute and intensity target
- No target



**Why are you engaging in sharing best practices and sustainability knowledge, which benefits do you see in it?**

We are committed to sustainable development, so it's our mission to be the leaders in best practices, but also in promoting them inside the community. We believe that creating value in a company is not only to generate wealth but also to promote our values and knowledge. If we manage to do that, we will be contributing for a better society and we will also be spreading the benefits of progress and innovation to an increasing number of people.

**Which benefits do you see in monitoring your supply chain emissions and how does it help you to get truly hold of your carbon footprint?**

Sustainability in the supply chain is a relevant theme across all areas of Sonae's activity, by directly affecting its overall performance. Therefore Sonae has developed mechanisms for selection and qualification of suppliers, taking account of sustainability requirements to minimize any impacts related to climate change. The relationship between Sonae and its suppliers ensures that the company is well placed to identify the effects of a changing climate on supply and find ways to benefit from any possible opportunity.

**Luís Reis. Chief Corporate Center Officer and President of Sonae's Sustainable Forum. Sonae**

20. See footnote 19

21. The 2012 score is comprised of the disclosure score number and performance score letter. Only companies that have scored more than 50 for their disclosure score are given a performance score and have been included here. Scores for companies with a non-public response are also non-public, except for companies that are also included in the Global 500 or Euro 300 samples.

# Industrials

## Sector response rate:

Industrials overall: 38% (10 out of 26)

## Key industries in within the industrials responders:

Capital goods (6 out of 10)

Transportation (3 out of 10)

Commercial and professional services (1 out of 10)

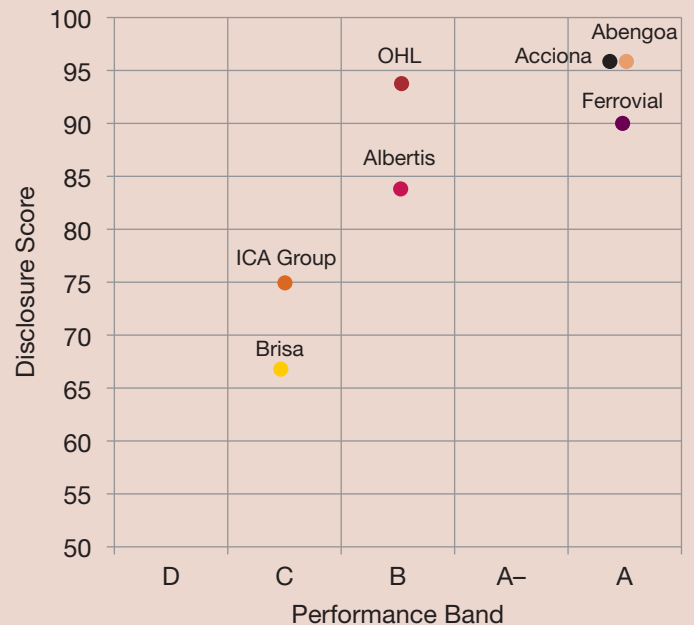
## Respondents:

Abengoa, Abertis, Acciona, ACS, Brisa, Ferrovial, FCC, Gamesa, International Consolidated Airlines Group, OHL.

## Non-respondents<sup>22</sup>:

Acciones Unipapel, Construcciones y Auxiliar de Ferrocarriles, Duro Felguera, Fersa Energias Renovables, Grupo Soares da Costa, Martifer, Mota-Engil, Prosegur, Sacyr Vallehermoso, Semapa - Sociedade de Investimento e Gestao, Service Point Solutions, Solaria Energía y Medio Ambiente, Sonae Indústria, Teixeira Duarte, Vueling, Zardoya Otis.

## 30 PUBLIC CARBON DISCLOSURE SCORE AND PERFORMANCE BAND<sup>23</sup>



## 29 KEY PERFORMANCE INDICATORS

- Overall Iberian disclosers
- Industrials

Board or other senior management oversight of climate change



Provide incentives for the management of climate change



Have emissions reductions targets



Have emissions reductions initiatives



Have products and services that enable GHG emissions reductions



Integrate climate change risks and opportunities management



Integrate climate change into business strategy



Decreased absolute emissions (Scope 1 and 2 combined)

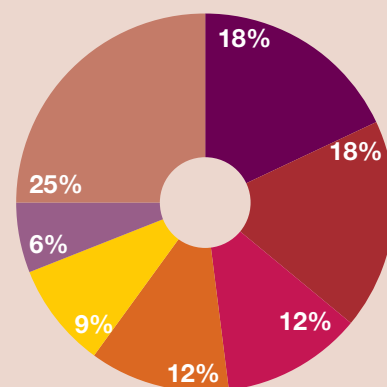


Engage with police makers



## 31 METHODS TO DRIVE INVESTMENT IN EMISSION REDUCTION ACTIVITIES

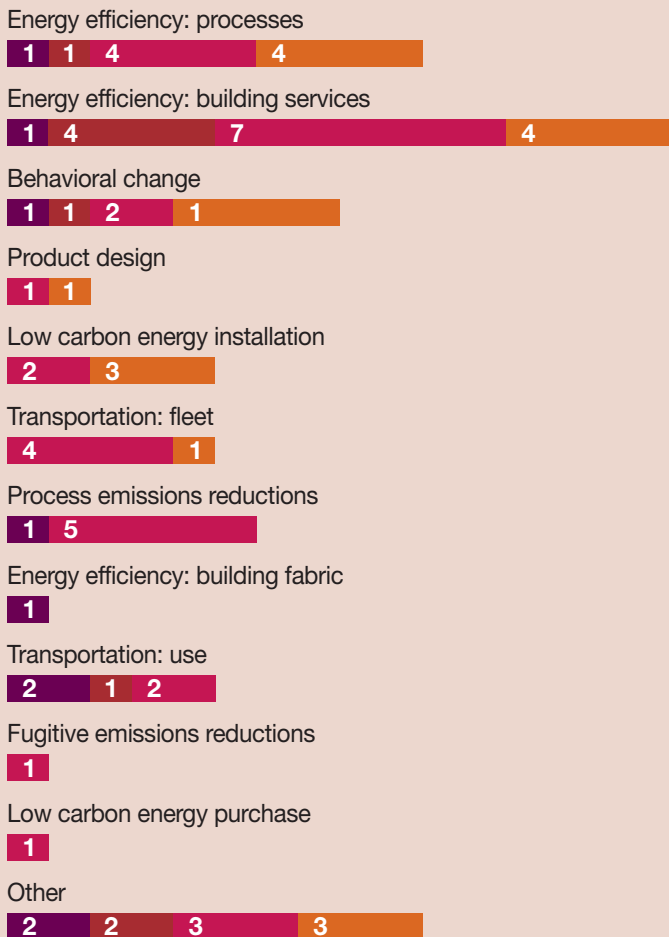
- Compliance with regulatory requirements/standards
- Dedicated budget for energy efficiency
- Dedicated budget for low carbon product R&D
- Dedicated budget for other emission reduction activities
- Employee engagement
- Financial optimisation calculations
- Other





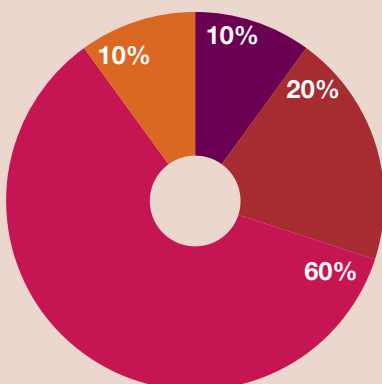
**32 NUMBER OF EMISSION REDUCTIONS ACTIVITIES BY ACTIVITY TYPE AND PAYBACK PERIOD**

- < 1 year
- 1-3 years
- > 3 years
- Unknown



**33 EMISSION REDUCTION TARGETS**

- Absolute target
- Intensity target
- Absolute and intensity target
- No target



**With regards to corporate action against climate change, why do you think it is important to have incentives in place which are linked to targets?**

No doubt incentives help big organizations to be focused on objectives at the corporate level. From that perspective, our challenge is how to design reliable metrics to make sure that (a) decision makers understand and agree with the objectives, and (b) incentives are properly linked with such targets, so decision makers are aware they are contributing to achieving the challenge.

**Which role does regulatory uncertainty play with regards to delaying investment decisions and climate protection in your company?**

We do have to provide certainty in the medium and long term for companies and investors. Regulatory uncertainty is probably jeopardizing many business opportunities emerging worldwide in the context of the global climate change regulatory framework. In particular, lack of reliable reduction objectives at both global and regional levels make it more difficult for players to forecast the market environment, and reduce legal security on long-term investments.

**Iñigo Meirás. CEO Ferrovial**

22. See footnote 19

23. See footnote 21

# Utilities

## Sector response rate:

Utilities overall: 100% (8 out of 8)

## Key industries in within the utilities responders:

Utilities (8 out of 8)

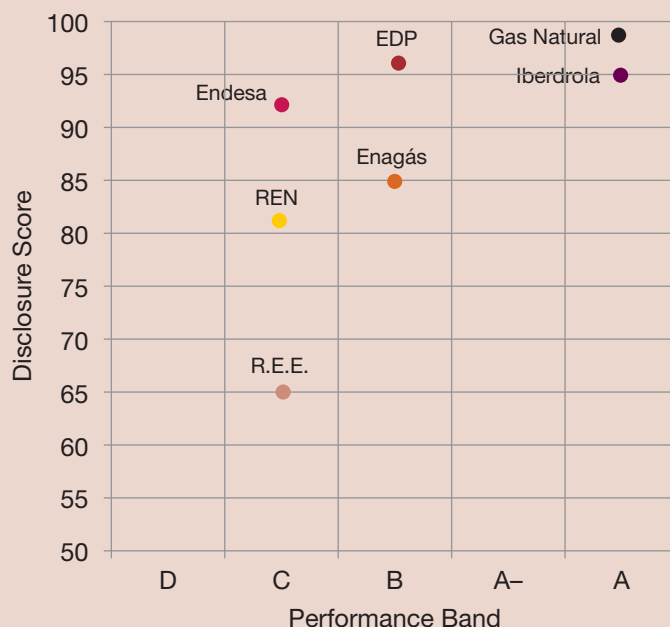
## Respondents:

EDP, EDP Renováveis, Enagás, Endesa, Gas Natural, Iberdrola, R.E.E., REN

## Non-respondents<sup>24</sup>:

There are no non-responders within this sector

## 35 PUBLIC CARBON DISCLOSURE SCORE AND PERFORMANCE BAND<sup>25</sup>



## 34 KEY PERFORMANCE INDICATORS

- Overall Iberian disclosers
- Utilities

Board or other senior management oversight of climate change



Provide incentives for the management of climate change



Have emissions reductions targets



Have emissions reductions initiatives



Have products and services that enable GHG emissions reductions



Integrate climate change risks and opportunities management



Integrate climate change into business strategy



Decreased absolute emissions (Scope 1 and 2 combined)

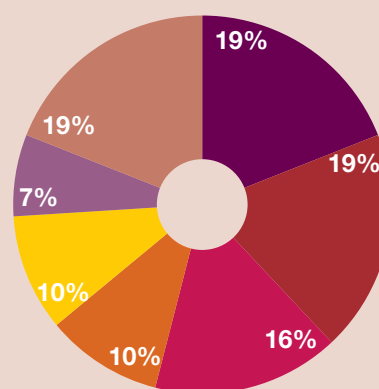


Engage with police makers



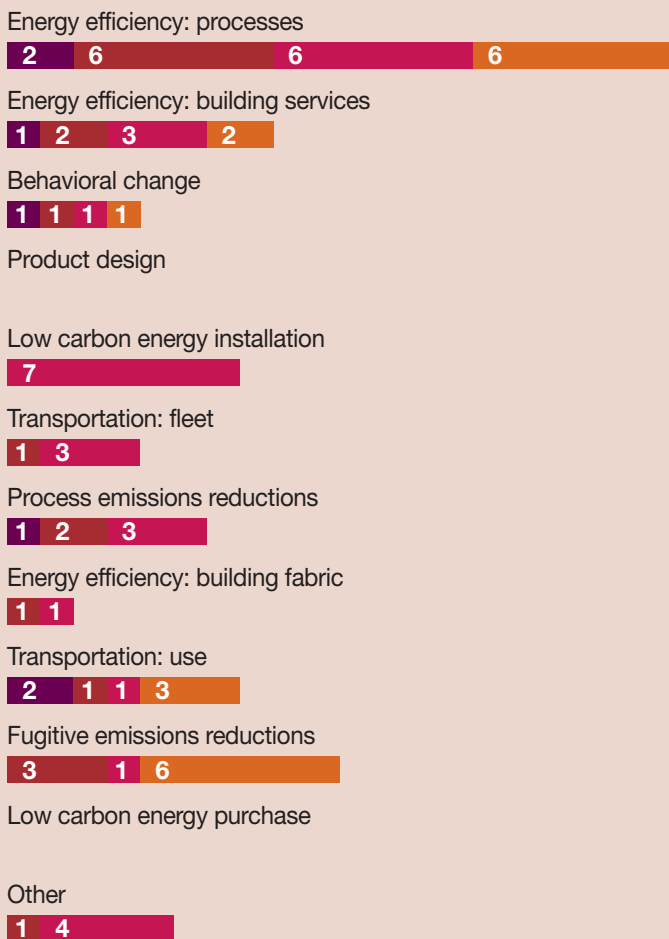
## 36 METHODS TO DRIVE INVESTMENT IN EMISSION REDUCTION ACTIVITIES

- Compliance with regulatory requirements/standards
- Dedicated budget for energy efficiency
- Dedicated budget for low carbon product R&D
- Dedicated budget for other emission reduction activities
- Employee engagement
- Financial optimisation calculations
- Other



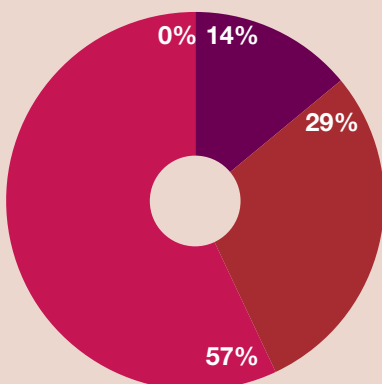
**37 NUMBER OF EMISSION REDUCTIONS ACTIVITIES BY ACTIVITY TYPE AND PAYBACK PERIOD**

- < 1 year
- 1-3 years
- > 3 years
- Unknown



**38 EMISSION REDUCTION TARGETS**

- Absolute target
- Intensity target
- Absolute and intensity target
- No target



**What are the benefits of anticipating climate change consequences for your business and how do you make sure that adaptation is already taken place?**

ACCIONA mitigates risks and successfully responds to opportunities arising from different climate change scenarios by adapting its products and services portfolio. This results in electricity generation from renewable sources only (17,749 GWh and 11.31 million tCO<sub>2</sub> avoided in 2011), participation in voluntary carbon markets, and reduction in energy consumption, GHG emissions and costs. ACCIONA also works towards giving solutions to water scarcity through desalinization and water treatment (508Hm<sup>3</sup> water treated in 2011).

**What would be your message to investors with regards to climate change?**

Climate change is one of the major challenges faced by all of us today, and joint actions are taking place from all the political, economic and social sectors. Investors could play a key role by giving precedence in its investment decisions to low-carbon production models and sustainable business practices which bring environmental, social and economic benefits. ACCIONA has set itself the challenge to lead the transition to a low carbon economy.

**Juan Ramón Silva Executive Director, Sustainability. Acciona**

24. See footnote 19

25. See footnote 21

# Investor perspective



“It will allow our portfolio managers to identify whether companies are meeting our expectation with regards to climate change risk management, reporting, and performance, and compare data across time, and across relevant peers.”

## What is NBIM's policy on corporate climate risk management?

We expect portfolio companies to identify material risks, define an optimal mitigation strategy and take action to implement that strategy. Companies should also have a well-functioning governance structure for risk and be transparent in their interaction with policy-makers and regulators. They should disclose sufficient information demonstrating an effective approach to climate change risk, including key performance indicators on greenhouse gas emissions.

## How does NBIM use CDP data?

NBIM uses CDP data as a source of company-level information on climate change risk for our portfolio managers. We are supportive of the standardised questions and answers in the CDP Information Request, as this helps us integrate CDP data with our internal data platforms in ways that we find beneficial. The growth in the number of companies reporting to CDP means a greater share of our global equities portfolio is covered each successive year.

We are in the process of incorporating CDP data into our internal investment data platform. It will allow our portfolio managers to identify whether companies are meeting our expectation with regards to climate change risk management, reporting, and performance, and compare data across time, and across relevant peers. In turn, each portfolio manager can form an opinion about the significance and relevance of the information for the companies they cover.

## Which CDP data points are disseminated to NBIM's portfolio managers?

We have produced a framework for assessing companies relative to climate change risk based on our own weighting of individual CDP data points. The framework considers indicators related to governance structure, risk assessment, strategy implementation, reporting, and performance, each of which is linked to a CDP data point. For example, we review the companies' own assessment of their exposure to various climate change risks, and the actions they have taken to reduce their risk exposure.

We also use CDP data to identify whether companies have lines of reporting up to board level and whether they disclose their position and political activities relative to climate change regulation. We measure performance by considering emissions reduction targets and tracking whether greenhouse gas emission intensity is increasing or decreasing, and whether emissions data have been independently verified.

## Christopher Wright

Senior Analyst at Norges Bank Investment Management (NBIM)

*NBIM manages the Norwegian Government Pension Fund Global which owns approximately 2% of European equities. As of 31.12.11, it held shares in 75 companies in Spain, with a combined market value of 5.8 billion euros, and 23 companies in Portugal, with a combined market value of 860 million euros.*

# Key statistics

From the 125 Iberian companies invited to disclose (the 85 largest Spanish companies and the 40 largest Portuguese companies by market capitalisation), 51 companies responded to the CDP Investor request 2012<sup>26</sup>. Figure KS1 is based on all these companies, including those that reference a holding company's response (EDP Renováveis and Espírito Santo Financial Group). Analysis in the remainder of this report is based on data provided to CDP by 15/07/2012 on 49 unique responses submitted up to 30/06/2012 to the 2012 Investor programme.

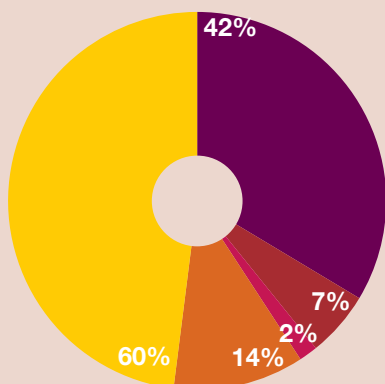
In 2012, we see a modest increase in the unique response rate reaching 39% (49), up from 37% (46) last year. Nevertheless, there is still much room for improvement as this number is still far from the response rate of the Global 500 companies (81%). The highest rate of respondents can be found in the Utilities sector (100%) where all seven companies disclosed information while companies in the Health Care sector are the least responsive (14%). In fact, only one out of seven companies provided information from this sector. 14 companies declined to respond to the request and 60 chose to not respond at all.

Climate change is gaining in importance for corporations. Indeed, 86% of responding companies appointed board or other senior management as those with the oversight for climate change. Companies are also increasing the use of incentives to manage climate change (71% in 2012 compared to 56% in 2011).

26. This includes all responses, including non public responses and subsidiary companies which responded via their parent company.

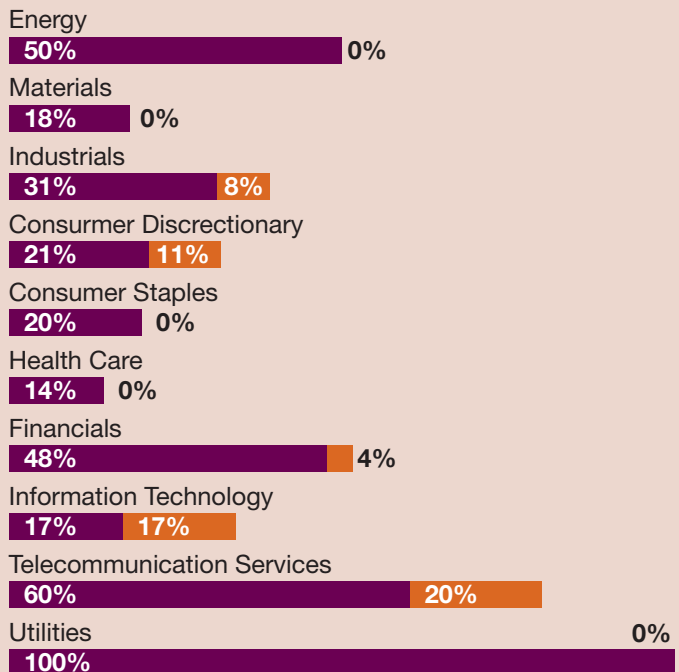
## KS1 RESPONSES STATUS

- Answered questionnaire, response publicly available
- Answered questionnaire, response not publicly available
- Indirect answer. The company refers to parent
- Declined to participate
- No answer



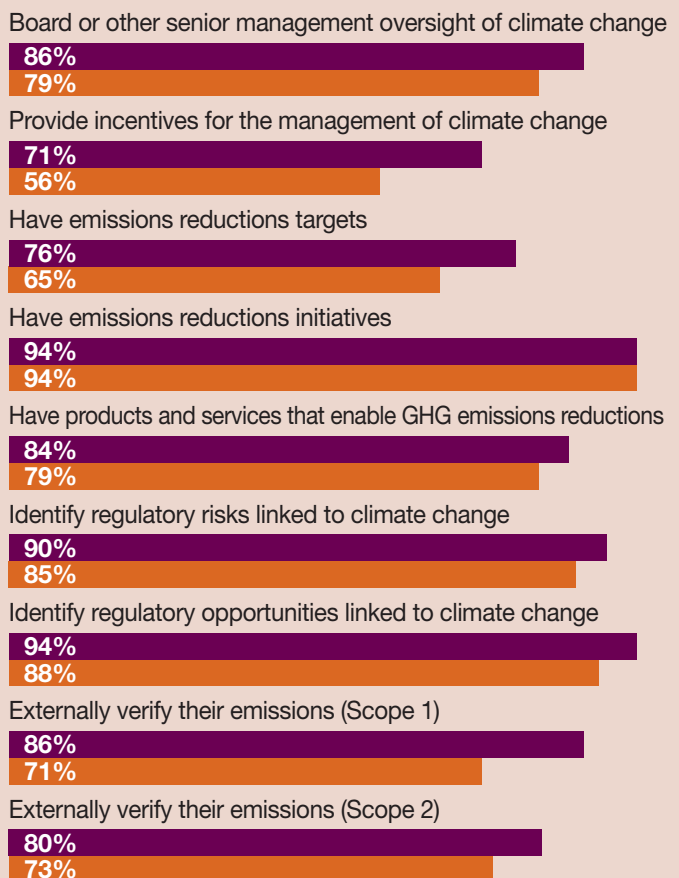
## KS2 SECTOR RESPONSE RATES 2012

- Public
- Non-Public



## KS3 KEY PERFORMANCE STATISTICS 2011-2012

- 2012 (Overall Iberian disclosers)
- 2011 (Overall Iberian disclosers)



Companies disclosing absolute or intensity targets have only been included in this section where they have been fully described, providing base year, target year, percentage reduction and for intensity targets, target metric.

Companies may report multiple emissions reductions due to implementation of activities, targets and reward incentives. In all of these cases, companies are only counted once in the statistics presented below.

The number of companies disclosing Scope 1 or 2 emissions includes those that have disclosed their emissions as zero. This is a change in approach from previous years.

Only four sectors reported more than one million metric tons CO<sub>2</sub>e (Energy, Materials, Industrials and Utilities), jointly accounting for 98.67% of Scope 1 and 2 emissions. The Materials sector, responsible for 45% of Scope 1 emissions and 52% of Scope 2 emissions, is the biggest emitter. The Utilities sector accounts for 36% and 24% Scope 1 and Scope 2 emissions respectively.

The number of companies reporting Scope 3 emissions is constantly rising. In 2012, 46 companies<sup>27</sup> identified 15 different sources of Scope 3 emissions with business travel mentioned by 84% (41) of companies and employee commuting mentioned by 41% (20) of companies, being the categories most often enumerated and which accounted for 4% of disclosed Scope 3 emissions. Usually companies beginning Scope 3 inventories start reporting these categories. Companies that reported business travel and employee commuting in the past are now involved in reporting other upstream and downstream categories such as purchasing (20%) or transportation and distribution of products (12%). The Scope 3 categories with a bigger contribution to total Scope 3 emissions are 'Use of sold products' (51% of total Scope 3 emissions) and 'Waste generated in operations' (27%).

Most of the companies that reduced their emissions from the previous year, reported emission reduction activities (72%) and changes in input materials (12%) as the main reasons for this decrease. According to this companies emissions reductions are a result of a proactive climate change strategy driving to an improvement in carbon intensity.

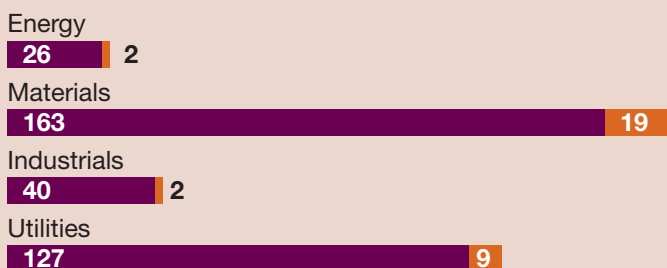
#### KS4 NUMBER OF COMPANIES REPORTING SCOPE 3 EMISSIONS<sup>28</sup>

- Yes
- No



#### KS5 IBERIAN DISCLOSERS TOTAL EMISSIONS BY SECTOR (Scope 1 and 2) (Mt CO<sub>2</sub>e)

- Scope 1
- Scope 2



Total emissions do not reach 1 Mt CO<sub>2</sub>e for the following sectors: Consumer Discretionary, Consumer Staples, Health Care, Financials, Information Technology and Telecommunication Services.

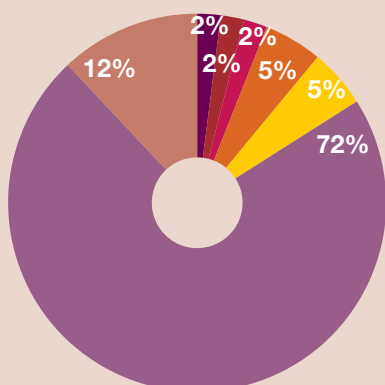
#### KS6 COMMONLY REPORTED SCOPE 3 CATEGORIES (WITH EMISSIONS DATA PROVIDED)



On the other hand, 50% of the companies that increased emissions from the previous year explain this increase by reasons not related to carbon intensity: changes in boundary (12%) or methodology (15%), and acquisitions (23%). Companies reporting 'other' reasons to explain increases include several mixed causes as increase of the electricity emission factor or the company activity growth.

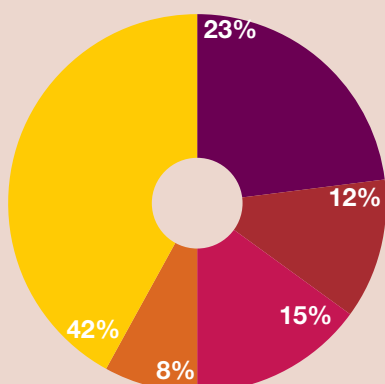
#### KS7 REASONS FOR EMISSIONS DECREASE

- Change in boundary
- Change in methodology
- Change in output
- Change in physical operating conditions
- Divestment
- Emissions reduction activities
- Other: Change in input materials



#### KS8 REASONS FOR EMISSIONS INCREASE

- Acquisitions
- Change in boundary
- Change in methodology
- Change in output
- Other



**The Climate Disclosure Standards Board (CDSB), a special project of CDP, is an international organization committed to the integration of climate change-related information into mainstream corporate reporting. CDSB's internationally accepted Climate Change Reporting Framework is designed for use by companies in making disclosures in, or linked to, their mainstream financial reports about the risks and opportunities that climate change presents to their strategy, financial performance and condition. Designed in-line with the objectives of financial reporting and rules on non-financial reporting, the Climate Change Reporting Framework offers a leading example of how to apply the principles of integrated reporting with respect to reporting on climate change.**

27. Whilst in some cases "Other upstream" or "Other downstream" are legitimate selections, in most circumstances the data contained in these categories should be allocated to one of the named categories. Reporting companies are encouraged to use these specific categories where appropriate as not doing so and using "Other" greatly affects data quality and therefore the usefulness of the data for investors. An attempt to subjectively attribute categories where companies have selected "Other" has not been undertaken. In addition, only those categories for which emissions figures have been provided have been included.

28. Only companies reporting Scope 3 emissions using the Greenhouse Gas Protocol Scope 3 Standard named categories have been included.

# Appendix

Table of emissions, scores and sector information by company

Company name	Country	Sector <sup>a</sup>	2012 Score <sup>c</sup>	2012 response status <sup>b</sup>	2011 response status <sup>b</sup>	Total Scope 1 + Scope 2 emissions	Scope 1	Scope 2	Number of Scope 3 categories reported <sup>d</sup>	Verification/Assurance status <sup>e</sup>	Target(s) reported <sup>f</sup>
Abengoa	Spain	IND	96 A	AQ	AQ	3,597,229	2,953,020	644,209	4	VAA S1, S2, S3	Abs, Int
Abertis Infraestructuras	Spain	IND	84 B	AQ	AQ	149,967	34,331	115,636	1	VAA S1, S2	
Acciona	Spain	IND	96 A	AQ	AQ	857,215	666,977	190,238	6	VAA S1, S2, S3	Abs, Int
Acciones Unipapel	Spain	IND	NR	NR	—	NR	NR	NR	NR	NR	NR
Acerinox	Spain	MAT	78 B	AQ	AQ(NP)	380,215	167,502	212,713*	2	"VAR S1, S2, VAF S3"	Abs, Int
ACS Actividades de Construcción y Servicios <sup>g</sup>	Spain	IND	41	AQ(NP)	AQ	NP	NP	NP	NP	NP	NP
Adolfo Domínguez	Spain	CD	NR	NR	—	NR	NR	NR	NR	NR	NR
Almirall	Spain	HC	NR	NR	NR	NR	NR	NR	NR	NR	NR
Altri	Portugal	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Amadeus IT Holding <sup>g</sup>	Spain	IT	60 C	AQ(NP)	AQ(NP)	NP	NP	NP	NP	NP	NP
Amper	Spain	TCOM	NR	NR	NR	NR	NR	NR	NR	NR	NR
Antena 3 Televisión	Spain	CD	NP	AQ(NP)	DP	NP	NP	NP	NP	NP	NP
Arcelor Mittal	Luxembourg	MAT	85 C	AQ	AQ	179,930,000	162,028,000	17,902,000*	1	VAA S1, S2, S3	Int
Azkoyen	Spain	CD	NR	NR	—	NR	NR	NR	NR	NR	NR
Banca Cívica	Spain	FIN	DP	DP	—	DP	DP	DP	DP	DP	DP
Banco BPI	Portugal	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Banco Comercial Português	Portugal	FIN	83 C	AQ	AQ	73,384	17,629	55,755	2	VAA S1, S2, S3	
Banco de Valencia	Spain	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Banco Espírito Santo	Portugal	FIN	94 A-	AQ	AQ	28,028	7,378	20,650	3*	VAA S1, S2, S3	Int
Banco Pastor	Spain	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Banco Popular Español	Spain	FIN	41	AQ	AQ	7,601	845	6,756	2	VAR S1, S2, S3	
Banco Sabadell	Spain	FIN	50 D	AQ	AQ	20,598	379	20,219*	1		Abs
Banco Santander	Spain	FIN	79 C	AQ	AQ	414,846	30,272	384,574	2	VAR S1, S2, S3	Int
Banif	Portugal	FIN	71 D	AQ	AQ	9,878	3,690	6,188	1		
Bankia	Spain	FIN	DP	DP	—	DP	DP	DP	DP	DP	DP
Bankinter	Spain	FIN	70 B	AQ	AQ	6,571	243	6,328	3*	VAA S1, S2, S3	Abs
Barón de Ley	Spain	CS	NR	NR	NR	NR	NR	NR	NR	NR	NR
BBVA	Spain	FIN	80 C	AQ	AQ	345,523	9,964	335,559	1	VAR S1, S2, S3	Int
Bolsas y Mercados Españoles	Spain	FIN	NP	AQ(NP)	AQ(NP)	NP	NP	NP	NP	NP	NP
Brisa- Auto-Estradas de Portugal	Portugal	IND	67 C	AQ	AQ	16,367	7,511	8,856	1	VAA S1, S2	Abs
Caixa Geral de Depósitos <sup>h</sup>	Portugal	FIN	87 A	AQ	AQ	46,478	4,426	42,052*	2	VAA S1, S2, S3	Int
CaixaBank	Spain	FIN	85 B	AQ	AQ	3,131	1,821	1,310	4*	VAA S1, S2, S3	Abs
Campofrío Alimentación	Spain	CS	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cementos Portland Valderrivas	Spain	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
CIE Automotive	Spain	CD	27	AQ	AQ	57,120	57,120				Abs
Cimpor	Portugal	MAT	DP	DP	DP	DP	DP	DP	DP	DP	DP
Codere	Spain	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cofina	Portugal	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Construcciones y Auxiliar de Ferrocarriles	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Corporación Financiera Alba	Spain	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Corticeira Amorim	Portugal	MAT	DP	DP	DP	DP	DP	DP	DP	DP	DP
Día	Spain	CS	NR	NR	—	NR	NR	NR	NR	NR	NR
Dinamia Capital Privado	Spain	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Duro Felguera	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Ebro Foods	Spain	CS	NR	NR	NR	NR	NR	NR	NR	NR	NR
EDP - Energias de Portugal	Portugal	UTIL	96 B	AQ	AQ	18,237,580	16,957,182	1,280,398	5	VAA S1, S2, S3	Abs, Int
"EDP Renováveis (See EDP)"	Portugal	UTIL	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)
Enagás	Spain	UTIL	85 B	AQ	AQ	292,613	239,861	52,752	2	"VAA S1, S2, VAR S3"	Abs, Int
Endesa	Spain	UTIL	92 C	AQ	AQ	51,046,755	50,694,969	351,786	2*	VAA S1	Int



Company name	Country	Sector <sup>a</sup>	2012 Score <sup>c</sup>	2012 response status <sup>b</sup>	2011 response status <sup>b</sup>	Total Scope 1 + Scope 2 emissions	Scope 1	Scope 2	Number of Scope 3 categories reported <sup>d</sup>	Verification/Assurance status <sup>e</sup>	Target(s) reported <sup>f</sup>
Ercros	Spain	MAT	66 D	AQ	NR	788,603	339,910	448,693		VAR S1, S2	
"Espírito Santo Financial Group (See Banco Espírito Santo)"	Luxembourg	FIN	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)	AQ(SA)
Estoril Sol	Portugal	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Europac	Spain	MAT	NR	NR	—	NR	NR	NR	NR	NR	NR
Faes Farma	Spain	HC	NR	NR	NR	NR	NR	NR	NR	NR	NR
Ferrovial	Spain	IND	90 A	AQ	AQ	1,070,951	638,019	432,932	4*	VAA S1, S2, S3	Abs, Int
Fersa Energias Renovables	Spain	IND	DP	DP	NR	DP	DP	DP	DP	DP	DP
Fibras Sintéticas de Portugal	Portugal	MAT	NR	NR	—	NR	NR	NR	NR	NR	NR
Fluidra	Spain	CD	DP	DP	DP	DP	DP	DP	DP	DP	DP
Fomento de Construcciones y Contratas	Spain	IND	NP	AQ(NP)	AQ(NP)	NP	NP	NP	NP	NP	NP
Galp Energia	Portugal	EGY	93 B	AQ	AQ(NP)	3,392,027	3,199,557	192,470	3	VAA S1, S2, S3	Int
Gamesa Corporación Tecnológica	Spain	IND	46	AQ	AQ	57,583	15,991	41,592		VAR S1, S2	Int
Gas Natural	Spain	UTIL	99 A	AQ	AQ	24,131,361	23,177,862	953,498*	8	VAA S1, S2, S3	Abs, Int
Grífols	Spain	HC	88 C	AQ	AQ	197,773	88,159	109,614	2	"VAA S1, VAR S2, S3"	Abs
Grupo Catalana Occidente	Spain	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Grupo Empresarial Ence	Spain	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Grupo Ezentis	Spain	IT	NR	NR	—	NR	NR	NR	NR	NR	NR
Grupo Soares da Costa	Portugal	IND	NR	NR	DP	NR	NR	NR	NR	NR	NR
Iberdrola	Spain	UTIL	95 A	AQ	AQ	41,381,862	36,193,156	5,188,706	4	VAA S1, S2, S3	Int
Ibersol	Portugal	CD	DP	DP	NR	DP	DP	DP	DP	DP	DP
Impresa	Portugal	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Inapa	Portugal	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Inditex	Spain	CD	81 B	AQ	AQ	313,332	21,919	291,413	1	VAA S1, S2, S3	Int
Indra	Spain	IT	64 D	AQ	AQ	34,004	6,971	27,033	1	"VAA S1, S2, VAR S3"	Int
International Consolidated Airlines Group	Spain	IND	75 C	AQ	AQ	22,699,731	22,578,170	121,561	2	VAA S1, S2, S3	Abs, Int
Jazztel	Spain	IT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Jerónimo Martins	Portugal	CS	54 E	AQ	AQ	1,006,606	199,133	807,473	4		
La Seda de Barcelona	Spain	MAT	NR	NR	—	NR	NR	NR	NR	NR	NR
Laboratorios Farmaceuticos Rovi	Spain	HC	DP	DP	NR	DP	DP	DP	DP	DP	DP
Mapfre	Spain	FIN	83 C	AQ	AQ	31,945	3,054	28,891	2	"VAA S1, S2, VAR S3"	Abs
Martifer	Portugal	IND	NR	NR	DP	NR	NR	NR	NR	NR	NR
Media Capital	Portugal	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mediaset Espana Comunicación	Spain	CD	NP	AQ(NP)	AQ	NP	NP	NP	NP	NP	NP
Meliá Hotels International	Spain	CD	85 C	AQ	AQ	189,626	47,348	142,278	4	VAA S1, S2, S3	Int
Miquel y Costas	Spain	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mota-Engil	Portugal	IND	DP	DP	DP	DP	DP	DP	DP	DP	DP
Natra	Spain	HC	NR	NR	NR	NR	NR	NR	NR	NR	NR
Natraceutical	Spain	HC	NR	NR	—	NR	NR	NR	NR	NR	NR
NH Hoteles	Spain	CD	87 B	AQ	AQ	149,407	65,010	84,397	2	VAA S1, S2, S3	Abs, Int
Novabase	Portugal	IT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Obrascon Huarte Lain (OHL)	Spain	IND	94 B	AQ	AQ	416,586	342,938	73,648	2	VAA S1, S2, S3	Abs, Int
Pescanova	Spain	CS	NR	NR	NR	NR	NR	NR	NR	NR	NR
Portucel Empresa Produtora	Portugal	MAT	DP	DP	DP	DP	DP	DP	DP	DP	DP
Portugal Telecom	Portugal	TCOM	82 C	AQ	AQ	168,254	16,851	151,403	1	VAA S1, S2, S3	Abs
Prisa	Spain	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Prosegur	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR

Company name	Country	Sector <sup>a</sup>	2012 Score <sup>c</sup>	2012 response status <sup>b</sup>	2011 response status <sup>b</sup>	Total Scope 1 + Scope 2 emissions	Scope 1	Scope 2	Number of Scope 3 categories reported <sup>d</sup>	Verification/Assurance status <sup>e</sup>	Target(s) reported <sup>f</sup>
Quabit Inmobiliaria	Spain	FIN	NR	NR	—	NR	NR	NR	NR	NR	NR
R.E.E.	Spain	UTIL	65 C	AQ	AQ	873,120	68,325	804,795	2*		Abs, Int
Realia Business	Spain	FIN	NR	NR	NR	NR	NR	NR	NR	NR	NR
Reditus	Portugal	IT	NR	NR	NR	NR	NR	NR	NR	NR	NR
REN - Redes Energéticas Nacionais	Portugal	UTIL	81 C	AQ	AQ	181,481	17,288	164,193	1	VAA S1, S2, S3	Abs
Repsol YPF	Spain	EGY	<b>98 A-</b>	AQ	AQ	24,696,516	23,138,229	1,558,287	5	VAA S1, S2, S3	Abs
Sacyr Vallehermoso	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
SAG GEST	Portugal	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Semapa	Portugal	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Service Point Solutions	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Sniace	Spain	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Solaria Energía y Medio Ambiente	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Sonae	Portugal	CS	<b>93 B</b>	AQ	AQ	304,828	62,065	242,763	3*	VAA S1, S2, S3	Int
Sonae Capital	Portugal	FIN	DP	DP	DP	DP	DP	DP	DP	DP	DP
Sonae Indústria	Portugal	IND	DP	DP	NR	DP	DP	DP	DP	DP	DP
Sonaecom	Portugal	TCOM	83 B	AQ	AQ	34,358	4,199	30,159	3*	VAA S1, S2, S3	
Sumol Compal	Portugal	CS	DP	DP	DP	DP	DP	DP	DP	DP	DP
Técnicas Reunidas	Spain	EGY	DP	DP	NR	DP	DP	DP	DP	DP	DP
Teixeira Duarte	Portugal	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Telefónica	Spain	TCOM	<b>92 B</b>	AQ	AQ	1,727,044	111,516	1,615,528	3	VAA S1, S2, S3	Int
Toyota Caetano	Portugal	CD	NR	NR	NR	NR	NR	NR	NR	NR	NR
Tubacex	Spain	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Tubos Reunidos	Spain	MAT	NR	NR	NR	NR	NR	NR	NR	NR	NR
Vértice 360	Spain	CD	NR	NR	—	NR	NR	NR	NR	NR	NR
Viscofán	Spain	CS	NR	NR	NR	NR	NR	NR	NR	NR	NR
Vista Alegre Atlantis	Portugal	CS	NR	NR	NR	NR	NR	NR	NR	NR	NR
Vueling	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Zardoya Otis	Spain	IND	NR	NR	NR	NR	NR	NR	NR	NR	NR
Zeltia	Spain	HC	NR	NR	NR	NR	NR	NR	NR	NR	NR
ZON Multimédia	Portugal	TCOM	NP	AQ(NP)	AQ(NP)	NP	NP	NP	NP	NP	NP

#### KEY TO APPENDIX

- a **CD** Consumer Discretionary  
**CS** Consumer Staples  
**EGY** Energy  
**FIN** Financials  
**HC** Health Care  
**IND** Industrials  
**IT** Information Technology  
**MAT** Materials  
**TCOM** Telecommunications  
**UTIL** Utilities
- b **AQ** Answered Questionnaire  
**DP** Declined to Participate  
**NR** Not Responded  
**NP** Non Public  
**SA** See Another

c The 2012 score is comprised of the disclosure score number and performance score letter. Only companies that have scored more than 50 for their disclosure score are given a performance score. Companies that are in the CDLI or CPLI have the relevant part of the score (disclosure or performance) in bold text. Companies that have not responded have the relevant response status code in this column.

d Only Scope 3 categories reported using the Greenhouse Gas Protocol Scope 3 named categories (as provided in the Online Response System) are included when determining the number of categories reported. Companies that have reported one or more additional categories of "Other upstream" and/or "Other downstream" are indicated with an asterisk (\*). Where companies have not provided emissions data or where they have not reported a named Scope 3 category according to the GHG Protocol Scope 3 standard, this column is blank.

- e **VAR:** Verification/Assurance reported; companies have reported that they have verification complete or underway with last year's statement available but the verification statement provided has not been awarded the full points available, or they have not been scored and therefore their verification statement has not been assessed.  
**VAF:** Verification/Assurance reported as underway, first year; companies have reported that they have verification underway but that it is the first year they have undertaken verification. In this case there is no verification statement available for assessment.  
**VAA:** Verification/Assurance approved; companies have reported that they have verification complete or underway with last year's certificate available and they have been awarded the full points available for their statement.  
**S1:** Scope 1; verification/assurance applies to Scope 1 emissions.  
**S2:** Scope 2; verification/assurance applies to Scope 2 emissions.  
**S3:** Scope 3; verification/assurance applies to Scope 3 emissions.

- f **Abs** Absolute target  
**Int** Intensity target

g Iberian companies disclosing in 2012 that also belong to other CDP samples such as Euro 300 and Global 500 cannot have non public scores even if their response is non public. Other companies that respond to CDP request as non public and that because of their market capitalization are only included in the Italian sample are allowed to have non public scores. This will change for 2013, when all scores will be published, independently from the fact that the company response will be public or non.

h As in 2011, we have included Caixa Geral de Depositos in the analysis. This company is not a public listed company, but it has answered CDP questionnaire for four consecutive years.



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