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Job title (if relevant):	GM Sustainability
Organisation	Sanford Ltd
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Yes

I find part of disclosure requirement 4(c) to go beyond what is really necessary to disclose how climate risks and opportunities are managed.

This part in particular:

"how the board holds management accountable for the implementation of climate-related policies, strategies, and targets,"

Disclosure of climate linked remuneration and/or incentives is addressed/disclosed under a separate requirement.

How a board holds its management accountable is not a unique feature for climate related issues - but also extends more broadly to across the strategy and organisation, and is typically disclosed elsewhere in a general sense.

I don't see the benefit of including this separate and specific requirement which goes beyond the TCFD's recommendations. I'd prefer to see that removed from NZ CS 1

Yes.

Supportive of the non-prescriptive approach relative to TCFD's Table A1.

Yes, and

I would suggest to include within transition risks examples - energy pricing and availabilities.

The heading of "physical risk" infers a risk directly linked to a physical process. However, in an agri dominant NZ context this has potential to infer exclusion of biological or bio-physical risks which themselves occur as a consequence of the physical event - e.g. temperature and rainfall patterns lead to increased pest insect presence in a horticulture setting. The insects themselves are not a 'physical' event (rather a biological one), but they are the result/outcome of changes to physical events.

Suggest that within the definitions and examples it is made clear if these type of outcomes from physical events/risks should be included under the 'physical risk' category or not.

yes.

yes

I wish to have my submit No