

#10

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Q1

Do you agree with Proposal 1 to extend Adoption Provisions 4, 5 and 7 for scope 3 GHG emissions disclosures from one accounting period to two accounting periods?

Yes,

Comment:

Please allow a brief introduction, as we are responding to the survey despite not being a CRE. While the regime targets large market participants, structural factors within the financial services industry mean that smaller fund managers like ourselves (SGAM) are also significantly affected. Although our business does not meet the \$1 billion threshold to be classified as a reporting entity, our contractual obligations with larger entities such as Booster and FundRock require us to support them in preparing their CRD disclosures. We believe that delaying mandatory scope 3 GHG emissions disclosure will provide more time for CREs to develop internal processes to quantify their emissions and to source reliable data of financed emissions from third party data providers.

Q2

Do you agree with Proposal 2 to add a new Adoption Provision 8 that gives relief of one accounting period before scope 3 GHG emissions assurance is mandatory?

Yes,

Comment:

As per the reasoning above. Added time will support both sourcing and assurance of reliable data.

Q3

Do you agree that a one-year delay for scope 3 GHG emissions assurance is sufficient to enable systems to mature to support the availability of sufficient reliable data and to enable increased consistency across the assurance market?

Unsure,

Comment:

As emissions data can largely vary depending on the data provider and methodology used, aligning the assurance market to have proper standards for all might need more time.

Q4

Do you agree with Proposal 3 to extend Adoption Provision 2 for anticipated financial impacts from one accounting period to two accounting periods?

Yes,

Comment:

Time, during which potential enhancements of domestic and international guidance will become available, can help CREs to produce a more comprehensive disclosure. Currently, accurate future forecasts of financial performance is a challenge.

Q5

Do you agree with Proposal 4 to extend Adoption Provision 3 for transition planning from one accounting period to two accounting periods?

Yes,

Comment:

Extra time will help CREs establish more appropriate strategic approach to climate resilience and to produce higher quality disclosure.

Q6

Please provide your contact details:

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