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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:

We agree to this proposed extension as a minimum and note that our preference would be to extend this to three accounting periods to allow sufficient time to put in place appropriate systems and controls to disclose accurately from year 3.

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:

We agree to this proposed extension as a minimum and note that our preference would be to extend this to two accounting periods. This will allow time to develop systems and work with our suppliers to ensure that we can obtain sufficient audit evidence and data that is sufficiently low in uncertainty.

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?

No,

Comment:

We believe that we need a minimum of at least one additional year to adequately develop systems and build internal capability and to work with all suppliers to obtain sufficiently reliable data that is auditable.

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:

We agree to this proposed extension as a minimum and note that our preference would be to extend this to three accounting periods to allow sufficient time to develop adequate models to estimate the potential impacts of climate change on our financial performance and position. As noted this disclosure involves forward-looking numbers with significant uncertainties attached to them and there is very little guidance on what these projections might look like. We will need to build internal capability to be able to do this. We are a small company with limited financial resources at this time for this type of detailed non-core financial reporting. We feel that it is important for guidance to be provided to enable the analysis provided by other companies in the same industry to be compared.

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:

We agree to this proposed extension as a minimum and note that our preference would be to extend this to three accounting periods to allow us sufficient time to conduct a suitable strategic process to embed the climate-related risks and opportunities we have identified and to achieve quality disclosures. Given there is no comprehensive guidance on this we need more time to be able to disclose a compelling transition plan after identifying our climate-related risks and opportunities.

Q6

Please provide your contact details:

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Company

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