

17 February 2023

Climate Disclosure Unit  
Market Conduct Division  
The Treasury  
Langton Crescent  
Parkes ACT 2600

By email: [climatereportingconsultation@Treasury.gov.au](mailto:climatereportingconsultation@Treasury.gov.au)

Dear Treasury

Thank you for the opportunity to provide feedback to the Treasury's consultation on climate-related financial disclosures.

ANZ supports the introduction of standardised, internationally aligned mandatory disclosure requirements in Australia.

Climate reporting will work best when it is comparable and consistent. This will avoid inefficiencies for preparers and ensure disclosures can be readily and clearly understood by users. Mandatory disclosures will assist investors and customers to make informed decisions and businesses identify and manage sustainability related risks and opportunities.<sup>1</sup>

In line with international developments, we think the requirements should be implemented as soon as practicable, particularly for large entities.

In stating our support, we draw on our experience in climate reporting, as well as the work we have done to help support the transition to net zero by 2050.

We support the use of the standard prepared by the International Sustainability Standards Board (**ISSB**) due to be finalised in mid-2023 as the standard for alignment. The ISSB standard is consistent with the recommendations of the Task force on Climate-Related Financial Disclosures and has been used to guide reporting requirements in New Zealand and the United Kingdom. Where appropriate, the disclosure framework should also align with existing reporting requirements, such as those under Australia's National Greenhouse and Energy Reporting Scheme.

A key challenge relates to the quality and availability of data. Banks rely on other entities to provide accurate Scope 1 and 2 data to report Scope 3 'financed' emissions. As the reporting capabilities of those entities develops, banks must be able to make appropriate 'forward looking' disclosures without taking on undue risk. We encourage consideration of the introduction of a safe harbour to address this concern (amongst others) without requiring a delay in the introduction of Scope 3 emissions reporting requirements.

Please let me know if we can assist the Treasury with anything further.

Yours sincerely

██████████

██████████  
**Head of Public Policy**

---

<sup>1</sup> As acknowledged in the Australian Sustainable Finance Institute's 'Accelerating Sustainable Finance: Joint Industry Statement', <<https://www.asfi.org.au/media-releases/joint-statement-on-accelerating-sustainable-finance>>.