



Sustainable Finance Unit
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By email: sustainablefinanceconsultation@treasury.gov.au

Subject: Response to the Sustainable Finance Strategy

I am writing on behalf of the Group of 100 (G100), the industry association and advocacy body representing the Chief Financial Officers (CFOs) of Australia's leading businesses. As the pre-eminent voice in our field, our diverse membership includes a significant proportion of the ASX200, our shared purpose being to foster the development of better businesses for the future.

I would like to express our appreciation for the Australian Department of the Treasury's recent release of the Sustainable Finance Strategy. It is heartening to see efforts being made to address sustainability in financial practices and to acknowledge the critical role of aligning economic activities with environmental, social, and governance (ESG) considerations.

The G100 is pleased to see the Sustainable Finance Strategy recognises the importance of global alignment for reducing compliance burdens in international capital markets when seeking to introduce broader sustainability reporting.

We are concerned that the current Exposure Draft ED SR1 Australian Sustainability Reporting Standards – Disclosure of Climate-related Financial Information (as issued by the Australian Accounting Standards Board (AASB) in October 2023) may not enable such broader application beyond climate disclosures, and it deviates too much from the global baseline. Specifically, we note ED SR1 to be overly Australia-centric, prompting us to advocate for better global alignment. Our aim is to minimise duplication in reporting in other jurisdictions, emphasising the need for a strategy that transcends national borders.

Whilst we endorse international alignment for sustainability reporting with the ISSB standards, we understand that further refinement and additions may be necessary for IFRS S1 to be truly relevant to the Australian market including, for example, considerations for the unique perspectives of First Nations people. However we are of the view that such considerations can be made in the context of the existing requirements of IFRS S1 whilst maintaining strong international alignment.

In conclusion, we believe that a collaborative and inclusive approach, involving all stakeholders, is paramount to enable the successful implementation of a Sustainable Finance Strategy. The G100 looks forward to continued dialogue and collaboration to refine and strengthen the strategy, ultimately contributing to a more sustainable and resilient future.

Thank you for your dedication in advancing sustainable finance. The G100 is open to participating in any future consultations or discussions related to this matter. We are committed to working together towards shared goals.

Yours faithfully



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GROUP OF 100

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