

**MEMO# 33636**

June 30, 2021

## **FOR MEMBER REVIEW: TCFD Response Draft Letter - Input Due 5 July COB**

[33636]

June 30, 2021

TO: ESG Task Force

EU ESG Disclosure Regulation Working Group RE: FOR MEMBER REVIEW: TCFD Response  
Draft Letter - Input Due 5 July COB

Attached for your review is our draft response to the TCFD consultation, which incorporates our discussion on the member call and additional input we received from members.[\[1\]](#)  
Because of a short consultation period, we ask for your input by 5 July COB, to [adriggs@ici.org](mailto:adriggs@ici.org).

- The key message of our response is that we appreciate the TCFD's role and influence in developing climate-related reporting and we welcome the development of metrics but more time is needed to develop the metrics than one-month afforded by the current consultation.
- Also a number of members are providing examples of why the proposed metrics don't work as such. We are still collecting these examples so they are not included in this draft. If you'd like to offer your examples, please do. (We also will use this input in our future work on metrics)

For your reference, I also attach a summary of the TCFD consultation, along with the consultation questions (although we will be responding in the attached letter format rather than a question-by-question).

We look forward to your comments.

Anna Driggs  
Director and Associate Chief Counsel  
ICI Global

## endnotes

[1] See Memorandum No. 33598, dated June 21, 2021, *available at* <https://www.ici.org/memo33598>.

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