

MEMO# 33686

July 13, 2021

TCFD Consultation Response - Fatal Flaw Review Requested - by 15 July, COB

[33686]

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TO: ESG Task Force

EU ESG Disclosure Regulation Working Group RE: TCFD Consultation Response - Fatal Flaw Review Requested - by 15 July, COB

For your fatal flaw review, attached is our revised draft^[1] response to the TCFD's Consultation on Proposed Guidance on Climate-related Metrics, Targets and Transition Plans. Please provide your input by 15 July COB, to adriggs@ici.org.

Some points to highlight:

- We recognize the importance of the TCFD's work, especially as it will feed into the IFRS's work on developing global baseline standards for the corporate issuer disclosures.
- We are responding as users of the TCFD reporting disclosure.
- The letter does not respond to questions specifically directed at the financial services sector. We reiterate the point that the corporate issuer disclosure must come first.
- We welcome the development of metrics but we only support the inclusion of Absolute Scope 1 and Scope 2 GhG emissions in the Guidance at this time, recommending further work on the additional metrics, including on developing underlying methodologies.
- We state that the metrics should be subject to materiality assessment, and
- We look forward to further engagement and work with TCFD.

Thank you for your substantial input, including on the specific metrics, which we plan to use in our further work on metrics. If you are filing your own response, we would appreciate to see it to help us with further work on the metrics and the corporate issuer disclosure in US, EU, and globally.

Anna Driggs
Director and Associate Chief Counsel
ICI Global

endnotes

[1] For the prior draft and additional information on the consultation, see Memorandum No. 33639, dated July 1, 2021, *available at* <https://www.ici.org/memo33639>.

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