



Template for comments

Guide on the management and disclosure of climate-related and environmental risks

Institution/Company

Banking and Payments Federation Ireland

Contact person

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First name

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Telephone number

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General comments

Template for comments

Guide on the management and disclosure of climate-related and environmental risks

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 25 September 2020

ID	Chapter	Paragraph	Expectation or box number	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Chapter 2			6	Clarification	Guidance is applicable as of its date of publication. However it is important to recognise that in order to comply with expectations, data from clients is required. GHG emissions including Scopes 1 and 2 have gaps since not all companies disclose the data. Other pressing data needs include asset level information (e.g., location data, asset type) to assess exposure to transition and physical risk, and information about client transition strategies, resilience and adaptation plans, etc. Timelines to address the final requirements will need to be considered across a number of internal processes (Material risk assessment, Risk appetite, Stress testing etc.) and adequate time to consider these requirements in order to address them will be needed.		,	Don't publish
2	Chapter 2			6	Clarification	These guidelines apply to SIs and there is reference to application of the guidelines to LSIs by the NCAs. It is important for the SSM to coordinate proportional application of the final guidelines by the NCAs for LSIs as well as monitor developments in this area both from a policy and application perspective in other jurisdictions so a consistent approach is achieved as well as level playing field.		,	Don't publish
3	Chapter 2			6	Clarification	The Guide makes reference to existing regulations and guidance however it is important to align this guidance with referred guidance or regulations in terms of timelines. For example EBA roadmap in relation to inclusion of ESG factors runs from 2020 to 2025 and EBA loan origination guidelines are applicable from end of June 2021 with transitional arrangements up to 3 years.		,	Don't publish
4	Chapter 2			6	Amendment	The Guide should be applied at the consolidated level hence we believe wording should be included in the Guide to this effect.		,	Don't publish
5	Chapter 4		Expectation 2.1		Amendment	Scenarios are used to test different possible future outcomes so management can consider a range of future outcomes and determine how they may respond to different scenarios. It is only when there is further clarity around different scenarios then business strategy can be changed as it is not fixed. Hence expectation 2.1 should be amended so that only short and medium term analysis should in practice lead to strategy modification and implementation		,	Don't publish

