



Template for comments

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

Institution/Company

The Principles for Responsible Investment

Contact person

Mr/Ms

Ms

First name

Hazell

Surname

Ransome

Email address

hazell.ransome@unpri.org

Telephone number

4.42074E+11

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General comments

Climate change is the most pressing environmental issue facing the global economy. The PRI's Inevitable Policy Response (IPR) project [<https://www.unpri.org/what-is-the-inevitable-policy-response/4787.article>] has demonstrated that a delay in implementing the policies necessary to transitioning our economy would result in an eventual policy response that is forceful, abrupt and disorderly undermining the value of investments and challenging the stability of the financial system

The PRI is predominantly focussed on the investment industry. Nonetheless, we welcome the European Central Bank's (ECB) guidance on climate risk for banks for the following reasons

- a) Banks are integral to the function of the European and global economy, and as such must be resilient to the consequences of a changing climate
- b) Investors require evidence of better-quality management of climate risk, and better disclosure, from the companies in which they invest – this includes financial companies such as banks
- c) The Task Force on Climate-related Financial Disclosures' (TCFD) recommendations are recognised as the global gold standard for this and have been widely supported across industry. Although banking and investment have many differences, integration of TCFD into supervisory expectations of banks could provide inspiration or best practice for future integration of TCFD into supervisory expectations of investors

The PRI strongly welcomes the ECB Guidance, which is both necessary and timely. We make the following recommendations for improvement, which are given in more detail in the comments section 1. Provide greater clarity on the climate scenarios to be used 2 Integrate the EU Taxonomy further into the guidelines

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 6	6.5	Expectation 11	37	Amendment	<p>We believe the second bullet point after 'When conducting scenario analysis and stress testing with respect to climate-related and environmental risks, at least the following aspects are expected to be considered:' should be replaced by "how climate-related and environmental risks might evolve under various scenarios, taking into account that these risks may not be fully reflected in historical data; a common starting point for analysing climate-related risk and opportunities are provided by The Network of Central Banks and Supervisors for Greening the Financial System (NGFS) which has developed a framework and set of representative scenarios."</p> <p>The Network of Central Banks and Supervisors for Greening the Financial System (NGFS) issued NGFS Climate Scenarios for central banks and supervisors [https://www.ngfs.net/sites/default/files/medias/documents/820184_ngfs_scenarios_final_version_v6.pdf] in June 2020. The report sets out a climate scenarios framework, which different scenarios of future climate change and climate policy impacts can be mapped to. The framework considers future scenarios ranging from low to high physical and transition risks and considers whether climate targets are met. This is represented in 4 quadrants: Orderly, Disorderly, Hot House World and Too Little Too Late.</p> <p>The PRI has done related work on the NGFS' disorderly scenario quadrant as part of the Inevitable Policy Response (IPR) project [https://www.unpri.org/sustainability-issues/climate-change/inevitable-policy-response] As the realities of climate change become increasingly apparent, it is inevitable that governments will be forced to act more decisively than they have so far. The IPR project forecasts a response by 2025 that will be forceful, abrupt, and disorderly because of the delay. Financial markets today have not adequately priced-in these likely near-term policy responses to climate change. The IPR project aims to prepare investors for the associated portfolio risks.</p>	Being specific about what are the relevant climate scenarios for banks, insurers as well as regulators is recommended.	Ransome, Hazell	Publish

2					<p>The PRI welcomes the ECB's support for the Taxonomy, including the ECB's recent announcement to accept sustainability-linked bonds based on the EU taxonomy as central bank collateral. The draft guidelines do make reference to the use of taxonomies, but only explicitly describe the EU Taxonomy once in its report [Section 7: Supervisory expectations relating to disclosures states that there is political agreement on the EU Taxonomy and its application to NFRD institutions, and that the EC intends to review the NFRD].</p> <p>The Taxonomy regulation requires the EU to establish screening criteria for determining how an activity can avoid significant harm, as well as create a substantial contribution. The delegated acts containing technical screening criteria due by the end of 2020, will embed both "substantial contribution" and "significant harm" criteria. This is closely aligned to recommendation no.6 of the NGFS First Comprehensive Report [https://www.banque-france.fr/sites/default/files/media/2019/04/17/ngfs_first_comprehensive_report_-_17042019_0.pdf], which called for Members to support the development of taxonomies which contribute to the transition to a low-carbon economy, and those which may be exposed to greater climate-related (physical or transition) risk.</p> <p>Many banks qualify as undertakings for the purposes of the Taxonomy regulation and will therefore be required to disclose their alignment to the Taxonomy. Therefore the PRI recommends the ECB consider using the Taxonomy further in these guidelines.</p> <p>In particular, the Taxonomy could be relevant to Expectation 13 regarding key metrics, and supporting expectations: For the purposes of their regulatory disclosures, institutions are expected to publish meaningful information and key metrics on climate-related and environmental risks that they deem to be material, as a minimum, in line with the European Commission's Guidelines on non-financial reporting: Supplement on reporting climate-related information.</p> <p>Beyond disclosure frameworks, we also encourage the ECB to think of broader benefits the Taxonomy can bring to the banking industry, and the work of supervisory authorities. In full, the Taxonomy will support this industry to:</p> <p>a) Define economically sustainable activities that will be referenced in policy products and instruments b) Enhance disclosures from the banking industry c) Guide and refine banks' business strategies to align with the SDGs d) Assess ESG and financial-related risk management by banks e) Assess whether a prudential treatment of exposures should be justified.</p> <p>The European Commission has issued several mandates to the European Banking Authority (EBA) to demonstrate that the Taxonomy is embedded in their strategy [https://eba.europa.eu/sites/default/documents/files/document_library/EBA%20Action%20plan%20on%20sustainable%20finance.pdf]. See section 3: Overview of EBA mandates on sustainable finance, paragraphs 12-14].</p> <p>As a major EU financial stakeholder, the ECB should consider this future progression of the EBA and increase its use of the Taxonomy, as part of a mix of tools, to guide its own strategy. Therefore, we recommend that the application of the Taxonomy to these guidelines, covering a broad range of areas including and beyond disclosure, be investigated further.</p>	<p>We recommend that the application of the Taxonomy to these guidelines, covering a broad range of areas including and beyond disclosure, be investigated further.</p>	Ransome, Hazell	Publish
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