

Railpen responded to three key public policy consultations in July 2022 on climate-related disclosures on risks, opportunities and transition planning:

1. The UK Transition Planning Taskforce (TPT)
2. The Glasgow Financial Alliance on Net Zero (GFANZ)
3. International Sustainability Standards Board (ISSB)

Railpen responded with a view to enhance and standardise the form and substance of climate considerations in corporate and financial disclosures. A selection of Railpen's key recommendations include:

- To use existing TCFD recommendations as a foundation from which to build specific, consistent and comparable disclosure for investors.
  - To support ISSB to ensure interoperability of the standards with national and regional reporting frameworks to allow for comparability across jurisdictions.
  - For climate-related disclosures, to apply an 'inside-out' approach ('double materiality'), requiring corporates to consider and report issues financially material to their business and their own systemic impact on the environment, market and society.
  - To prioritise basic mandatory (quantitative & qualitative) disclosures from corporates, followed by investors, due to the dependencies of investors on corporate disclosures when implementing their own transition plans.
  - To ensure alignment with sector neutral and sectoral templates being developed by industry initiatives. Examples: IIGCC NZIF, Railpen's CRIANZA framework, TPT, Moody's, PACTA.
- To prioritise a standard framework and metrics for forward-looking alignment assessment, including additional forward-looking elements such as the long-term business vision and model for the corporate in a low carbon economy.
  - To adhere to best practice principles on offsets and their intended use to address residual emissions versus reaching emissions reductions targets as highlighted in the Exposure Draft.

