





Exploring the Frontier of Best Practice in Environmental Disclosure Policies

December 12

Opening Remarks





Ralitza Germanova
Corporate Governance
IFC Disclosure and Transparency
Program
IFC

LinkedIn QR



Opening Remarks





Pietro Bertazzi
Global Director
Policy Engagement and External Affairs
CDP

LinkedIn QR



Speakers

Evan Guy CDP



Ralitza Germanova **IFC**



Daniel Petrovics Research Consultant UN SSE initiative



Anthony Miller



Daniela Baccas **CMV** Brazil



TODAY'S AGENDA

Duration	Content
14 min	OPENING REMARKS
10 min	Context, methodology, and approach
8 min	Analysis of best practices in developed economies
8 min	Analysis of best practices in developing economies
5 min	Final recommendations
25 min	Panel discussion and Q&A
5 min	Closing and next steps

Learning objectives

- 1. Showcase the report's analyses and findings, which spanned 38 jurisdictions
- 2. Share practical examples for developing high-quality regulations, based on five criteria developed by CDP for successful mandatory disclosure
- 3. Explore the future of environmental disclosure policy
- 4. Provide lessons for jurisdictions looking to build their own environmental disclosure policy frameworks

Context, methodology, and approach

Daniel Petrovics Research Consultant

Context

- 1. Environmental information at the forefront of information demands
- 2. Proliferation of sustainability reporting across developed economies
- 3. Shift from voluntary disclosure to mandatory requirements
- Majority of (environmental) risks and opportunities to be found in developing economies
- Opportunity for financial regulators to introduce more granular and efficient policy
- Opportunity to leapfrog policy and reporting practice alike in developing economies



Methodology and Approach

- 1. Review of over 100 policies regulation, laws and codes
- 2. 38 jurisdictions in focus primarily in IFC countries
- Aim: to understand how policy may influence mature reporting practice and to understand what best-practices exist in policy



Methodology and Approach

Analysis through the lens of 5 criteria developed by CDP on high-quality mandatory disclosure:

- 1. **Environmental integrity**, addressing sustainability-related financial disclosures as well as impact on people and planet, with a holistic environmental approach
- Ensure compatibility of disclosure standards required or recommended
- 3. Provide an **enforcement system**
- 4. Adhere to **technical quality and content** of the reporting process
- 5. Allow **space for innovation** and more mature disclosure



Summary of Key Findings

- 1. Shift from voluntary to mandatory is well under way
- 2. Varying degrees of granularity in policies
- 3. No policy to-date meets all 5 criteria set out by CDP
- Notable examples of best-practices for each criteria across the board
- Notable examples of best-practices also found in developing economies



Analysis of best practices in developed economies

Evan Guy

CDP

Developed Economies – Environmental Integrity

Box 3.1 Summary: Best Practices Linked to Environmental Integrity

- Grounding preambles in broad policy frameworks
- Incorporating long-term planning
- Establishing board responsibility in managing environmental impact and reporting
- Connecting investment focus with objective and including tools for investment screening
- ▶ Admitting and mitigating existing shortcomings of nonfinancial reporting
- Not limiting focus to sustainability-related financial disclosures but including impacts on people and the planet to ensure that the goals of the Paris Agreement and the 2030 Agenda are met



Environmental integrity, addressing sustainability-related financial disclosures as well as impact on people and planet, with a holistic environmental approach



Developed Economies – Compatibility of Disclosure Standards

Box 3.2 Summary: Best Practices Linked to the Compatibility of Disclosure Standards

- ► Reference to and requirement to use various reporting frameworks
- ► Constructive engagement with various frameworks
- The illustration of what the strength of various frameworks are and where they may be applicable
- The illustration of where overlaps and alignments between existing frameworks are found



Ensure compatibility of disclosure standards required or recommended



Developed Economies - Enforceability

Box 3.3 Summary: Best Practices Linked to Enforceability

- ► The establishment of monitoring responsibility and a relevant authority with sufficient enforcement powers and funding to carry out its mandate
- ► The introduction of penalty measures for noncompliance with reporting obligations



Provide an enforcement system



Developed Economies – Technical Quality & Content

Box 3.4 Summary: Best Practices Linked to Technical Quality and Content

- ► The digital tagging of information
- ► Balancing the reporting burden for SMEs
- Spelling out metrics based on existing reporting frameworks
- ► Connecting to technical initiatives such as Science-Based Targets
- Ensuring the continuous update of data
- Setting a clear timeframe for reporting obligation
- Requiring the use disclosure systems, which aggregate information



Adhere to technical quality and content of the reporting process



Developed Economies - Innovation

Box 3.5 Summary: Best Practices Linked to Innovation

- Invitation or incentives to implement latest developments in metrics, targets, and reporting frameworks
- A focus on models of best-practice reporting
- A focus on the audience and purpose of policy



Allow space for innovation and more mature disclosure



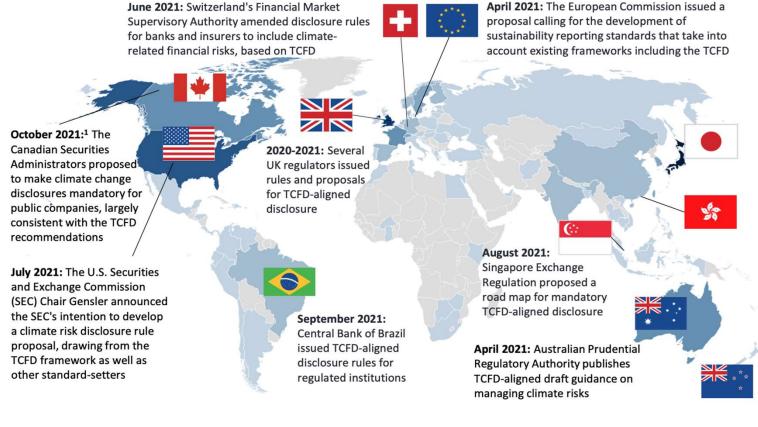
Analysis of best practices in developing economies

Ralitza Germanova IFC

Regulation on ESG Disclosure



The climate regulatory movement



June 2021: The Tokyo Stock Exchange issued a revised Corporate Governance Code, which now indicates certain companies should enhance disclosure based on TCFD recommendations

December 2020: The Hong Kong Monetary Authority issued draft guidance indicating authorized institutions should make TCFDaligned disclosures

October 2021:

New Zealand passed a bill to require mandatory TCFDaligned disclosure for large li financi

Legend 450+ 449-350 349-250 249-150 149-100 99-50 49-25 <25

Source: TCFD Fundamentals Workshop



Recommendation:

1.) Consult broad, global frameworks to better understand the overall trends in the environmental agenda.

Assess how the Paris Agreement, SDGs and the upcoming Global Biodiversity Framework are applicable to your local jurisdictions and how as (financial market) regulators you can frame policy within these overall frameworks.

Next to this, scope out potential linkages in already existing regulatory frameworks to see if any type of specific disclosure requirement or data collection process exists. If so, link it to your disclosure requirements to ensure quick wins.





Recommendation:

2) Familiarize with the various reporting frameworks, their purpose and use.

specific attention to the various conceptions of materiality - bearing in mind the concept of double materiality - and what this may mean for the purpose of your policy.

Include explicit references various to frameworks and if multiple are mentioned, make the rationale explicit for why these reporting frameworks are chosen and who is ... best suited to use them.



Recommendation:

3.) Incorporate enforcement mechanisms in policy.

To this end, ensure that non-compliance with policies carries repercussions and that there are appropriate actors equipped with capacity to monitor non-compliance and implement enforcement measures.





Recommendation:

- 4.) Ensure the quality and content of the information disclosed is appropriate for its intended use.
- The digital tagging of information,
- Proportionalizing the reporting burden for different types of reporting entities (e.g. SMEs) and graduate reporting practice over the years,
- Set up KPIs;
- Connecting to technical initiatives such as Science Based Targets,
- Ensuring the continuous update of data,
- Ensure timely disclosure



Recommendation:

5.) Ensure the timely incorporation of developments in reporting frameworks, potentially at the level of metrics and targets.

Ensure reporters have a good understanding of what is best-practice reporting (including long-term targets), not only minimum disclosure.

This can be done through providing trainings on good reporting practices for example.







BEYOND THE BALANCE SHEET

Enhancing Disclosure, Transparency, and Communication IFC's Beyond the Balance Sheet Toolkit and Program aim to enhance confidence and investment opportunities in emerging markets by improving the quality of corporate reporting by focusing on the most important components of an annual report – strategy, governance, risk management, and performance.

D&T FRAMEWORK

Helps disclose material aspects of:

- Strategy & sustainability
- Corporate governance
- Financial & nonfinancial performance
- Streamlined all reporting frameworks

ONLINE PLATFORM

Facilitates continuous process:

- Exploring global, local, industry resources
- Self-paced learning modules, blended with webinars
- Assessing via annual report self-assessment tool

CAPITAL MARKETS

- Policy support to stock exchanges and regulators, developing 145 codes & laws, 30 scorecards and 15 ESG reporting guidelines
- Strategic partnership with UN SSE

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Final Recommendations

Evan Guy

CDP

Developing Economies Analysis



Policy Recommendations



STEP 2 Formulate key indicators and align them with globally recognized standards and frameworks.

STEP 3 Consult with relevant stakeholders about the indicators.

STEP 4 Ensure a monitoring and implementation system is in place for receiving reports and analysing data.

STEP 5 Generate reports and publish information.

STEP 6 Revisit indicators for updates annually.



Analysis of Best Practices in Environmental Disclosure Policies

A review of 101 policies worldwide based on Five criteria for high-quality disclosure









Panel Discussion



Anthony Miller
Coordinator
UN Sustainable Stock Exchanges
Initiative



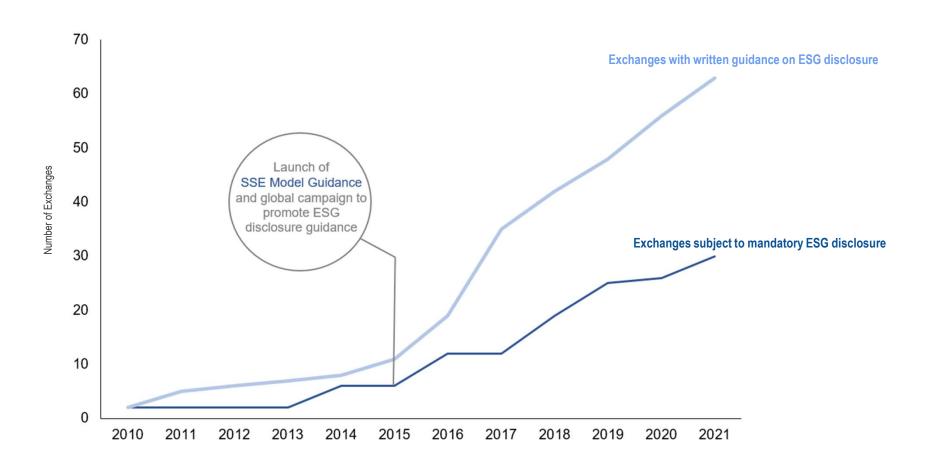


Daniela Baccas
Lead, Financial Innovation
Laboratory
Securities and Exchange
Commission, Brazil



Monitoring the Market











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