

**To:** [Climate Reporting](#)  
**Subject:** Climate-related financial disclosure - Consultation Paper submission  
**Date:** Thursday, 16 February 2023 4:44:48 PM  
**Attachments:** [image001.png](#)  
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Dear Sir / Madam,

Thank you for providing the opportunity to comment on the Climate-related financial disclosure - Consultation Paper. I am a Sustainable Development and Climate Change Consultant with 25 years experience and currently work for advisory firm Nation Partners. This is my LinkedIn Profile [\[REDACTED\]](#)  
In relation to the specific questions. I am responding to question 8.

**Question 8. What level of assurance should be required for climate disclosures, who should provide assurance (for instance, auditor of the financial report or other expert), and should assurance providers be subject to independence and quality management standards?**

A level of independent assurance should be required for climate disclosures otherwise there will be significant variances in the assessments, which will undermine the value associated with disclosures and be a burden on industry. The question also suggests auditors of the financial report provide assurance. As a professional who has provided climate risk advisory services since 2009 has qualifications in Environmental Science, Environmental Law and is completing a Master of Environment in Climate Change, I feel that it needs to be recognised that there are a professional subset of climate risk specialists, such as myself, who are equally, if not better positioned to provide climate disclosure assurance. There is a risk that by ignoring this subset, those who are financial auditors, but not necessarily adept at understanding climate and transition risk, benefit from the design of the assurance approach. Further it penalises and locks out a profession from an existing stream of work and benefits large multinational financial auditing firms, few of which are headquartered in Australia.

The recognition of climate risk professionals already exists with profile such as the Green Building Council of Australia Green Star rating tool, the requirements for professionals to undertake the climate change risk assessment are:

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In terms of an assurance approach, in 2019 CSIRO held workshops with the advisory consulting community to inform the development of an assurance scheme in the use of its climate projections, due to wide range of assessments results companies were seeing. I think an organisations such as CSIRO could be engaged to understand how this scheme has progressed and to provide quality assurance of disclosure auditors, or accredited other academic institutions that were interested (for example ANU or University of Melbourne).

Kind regard, [\[REDACTED\]](#)



[\[REDACTED\]](#)  
Senior Principal

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I acknowledge the Traditional Custodians of the land on which I work and live, and recognise their continuing connection to land, water, and community. I pay my respects to Elders past, present and emerging.

