February 16, 2022

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Financial and Consumer Affairs Authority of Saskatchewan
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Nunavut Securities Office
Office of the Superintendent of Securities, Newfoundland and Labrador
Ontario Securities Commission
Office of the Superintendent of Securities, Northwest Territories
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**Re: Request for Comment - Proposed National Instrument 51-107 *Disclosure of Climate-related Matters***

We are writing in response to the Canadian Securities Administrators (CSA) request for comments on proposed National Instrument 51-107 *Disclosure of Climate-related Matters* ("proposed requirements").

**ESG Global Advisors** is an advisory firm that focuses on bridging the gap between companies and investors on environmental, social and governance (ESG) factors. As a multi-disciplinary team with significant investor and corporate experience, we offer expert advice to companies and investors on material ESG factors that drive long-term value, including climate change. We help companies to identify, address and disclose the ESG factors that are financially material and of most interest to the capital markets; and we help institutional investors to develop and implement responsible investment strategies that meet emerging industry expectations. Our work advising on ESG best practice gives us insight, from the perspective of both issuers and investors, into some of the questions posed by the CSA in the consultation.

Our team has extensive expertise relating to climate disclosure, including the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), which form the basis for the proposed requirements. Our CEO, Sarah Keyes, participated in consultations on the development of the TCFD recommendations in her former role at Chartered Professional Accountants Canada (CPA Canada). She is the National Academic Director for the Institute of Corporate Directors (ICD) Board Oversight of Climate Change program, and an accredited greenhouse gas (GHG) verifier under ISO 14064-3 with experience in quantifying and reporting GHG emissions for corporate clients. Our Principal, Karen Clarke-Whistler, participated in the United Nations

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Environment Program Finance Initiative (UNEP-FI) pilot projects for the implementation of the TCFD recommendations in the financial sector in her former role at TD Bank Group.

ESG Global regularly facilitates training sessions for investor and corporate clients on the TCFD recommendations, as well as assisting issuers and investors in developing TCFD-aligned climate strategies. We have recently shared our expertise on climate disclosure at the invitation of CSA members. Our CEO, Sarah Keyes, participated in a panel session on climate disclosure regulation at the Ontario Securities Commission 2021 Dialogue. Our Principal, Michelle de Cordova, has participated in consultations on the proposed requirements in her capacity as a member of the British Columbia Securities Commission Corporate Finance Stakeholder Forum.

**Key Observations**

- Climate disclosure is increasingly important to ensure that Canadian issuers can meet the emerging expectations of Canadian and international investors and other capital markets participants. By establishing climate disclosure requirements, the CSA can provide much-needed clarity for issuers on whether, how and where to provide climate disclosure, within a context of multiple voluntary ESG and climate change disclosure frameworks and standards.
- More than 130 countries, including Canada, have committed or are considering committing to a target of net-zero GHG emissions by 2050, in line with the Paris Climate Agreement goal of limiting global average temperature rise to 1.5°C above pre-industrial levels.There is also growing impetus in the capital markets for meaningful action to address the systemic issue of climate change, with investors and issuers in Canada and internationally making their own net-zero commitments. The Glasgow Financial Alliance for Net Zero is a coalition over 450 financial institutions representing assets of over U.S.$ 130 trillion across 45 countries, consisting of participants in the Net-Zero Asset Owner Alliance (NZAOA), the Net Zero Asset Managers Initiative (NZAMI), the Net-Zero Banking Alliance, the Net-Zero Insurance Alliance and the Net Zero Financial Service Providers Alliance. According to Canadian Business for Social Responsibility (CBSR)'s Net-Zero Leaderboard, 124 Canadian companies across all sectors have set net-zero GHG emissions targets. Achieving the global net-zero ambition requires an economic transition that will depend in part on consistent, comparable climate-related disclosure, including GHG emissions, encompassing all companies and sectors.
- There is a significant global trend toward regulation of climate disclosure that already impacts Canadian issuers and investors. For example, the European Union (EU) Sustainable Finance Disclosure Regulation (SFDR) will require investors that fall under its remit to disclose aggregate portfolio-level climate indicators, including GHG emissions. These investors will need to access climate-related information covering all issuers within their portfolios, including any Canadian issuers. Canadian asset managers are also telling us that EU-based institutional clients are communicating the expectation that non-EU external asset managers should support them in fulfilling their SFDR obligations.
- The CSA is considering whether to require GHG emissions disclosure or allow issuers to "disclose or explain" on a materiality basis. There may be a gap between the perspective of issuers and investors on the financial materiality of GHG emissions disclosure. Up to now Canadian issuers have largely disclosed GHG emissions in voluntary ESG reporting, rather than regulatory filings, whereas in our experience institutional investors view climate change as a systemic issue that is assumed to be material unless proven otherwise. Specifically, an increasing number of mainstream investors are using GHG emissions disclosure to undertake portfolio carbon measurement and set portfolio carbon reduction targets and budgets. For these investors, issuer GHG emissions disclosure and decarbonization strategies may directly influence the decision to "buy, sell or hold" an investment. As such, under the "reasonable investor" standard for defining materiality, GHG emissions disclosure can increasingly be considered as material information for all issuers.
- The CSA is also considering which GHG emissions scopes should be included within any requirement to disclose GHG emissions. Currently, most issuers disclose Scope 1 and 2 emissions, and most investors undertaking portfolio carbon analysis also focus on issuer Scope 1 and 2 GHG emissions. However, emerging standards such as the NZAOA Target Setting Protocol are creating expectations for investors to integrate issuer Scope 3 emissions into their analysis over time, beginning with high-carbon sectors and industries such as oil and gas, utilities, transportation and materials. Where issuers fail to provide GHG emissions disclosure, investors will rely on estimates from ESG data providers based on industry averages, which may overestimate the emissions of some issuers.
- Climate change risks and opportunities have unique characteristics, including systemic implications, an extended time horizon and significant uncertainties, which justify adopting innovative approaches to securities regulation. There is also a gap between best practice expectations for climate disclosure and what is currently practicable for many issuers, given

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the state of evolution of key tools such as climate scenario analysis. This justifies adopting a phased approach to the introduction of requirements and subjecting those requirements to more frequent review and update than is typical for securities regulation.
- Setting requirements relating to the process by which issuers identify climate-related risks could help to improve the quality of risk disclosure overall. At present, many issuers do not explain their risk materiality assessment process clearly in regulatory filings. For consistency, the process for determining the materiality of climate risks should be consistent with the International Financial Reporting Standards (IFRS) *Practice Statement 2: Making Materiality Judgements*, as is the case for other business risks.
- In our experience of assisting issuers to develop robust climate strategies that respond to the TCFD recommendations, significant lead time is required, given the need to obtain Board and senior management approvals at various stages. Typically, it can take an issuer at least six to eight months to complete all the basic elements of a climate strategy, including climate change materiality assessment, development of strategic climate positioning, identifying and addressing gaps in climate governance and risk management, and establishing an appropriate set of climate-related metrics and targets. Full implementation of the TCFD recommendations can take up to three years. The CSA may wish to take this timeframe into consideration in determining the phase-in schedule for the proposed requirements.
- Reflecting Canada's natural resource-focused economy, the Canadian equities asset class is often perceived as a relatively high-carbon investment. Some investors tell us they are allocating capital away from the Canadian market, or considering doing so, as part of their effort to reduce portfolio carbon. Better climate-related data across the Canadian market could help to demonstrate that "divesting Canada" is not the best pathway to portfolio carbon reduction. The CSA has a critical role to play in helping Canada to build a reputation for strong climate disclosure, which could help to offset its image as a carbon-heavy market.

**Responses to CSA Questions Relating to the Proposed Requirements**

Below we provide responses to specific questions posed by the CSA relating to the proposed requirements.

***Disclosure of GHG Emissions and Scenario Analysis***

***CSA Question 4:*** *Under the Proposed Instrument, scenario analysis would not be required. Is this approach appropriate? Should the Proposed Instrument require this disclosure? Should issuers have the option to not provide this disclosure and explain why they have not done so?*

By undertaking climate scenario analysis based on a range of climate scenarios that model different pathways to achieving defined climate outcomes, issuers can test the resilience of their climate strategy over different time periods and address uncertainties about how the transition and physical risks of climate change will play out and interact over time. However, requiring climate scenario analysis disclosure from all issuers would not be practicable in the short term, and at this stage investors are likely to be most interested in the scenario analysis of larger issuers and issuers in high-climate-risk sectors. Issuers may also have legitimate reasons for not providing disclosure on climate scenario analysis: for example, an issuer may be in the process of developing its analysis, and not yet ready to disclose. An alternative to omitting the scenario analysis element of the TCFD recommendations entirely from the proposed requirements would be to adopt a "disclose or explain" approach. This could encourage issuers in high-climate-risk sectors that have already undertaken climate scenario analysis to provide disclosure, while the requirement to explain non-disclosure would allow investors to reach their own conclusions as to whether an issuer's decision not to provide disclosure was reasonable.

If climate scenario analysis disclosure is not mandated in the first iteration of the proposed requirements, setting out a timeframe over which issuers will be expected to adopt the practice and provide disclosure could encourage issuers to begin developing their scenario analysis and allow them sufficient time to prepare for future disclosure.

***CSA Question 5:*** *The TCFD recommendations contemplate disclosure of GHG emissions, where such information is material.*
- *The Proposed Instrument contemplates issuers having the option to disclose GHG emissions or explain why they have not done so. Is this approach appropriate?*

As noted above, achieving the global net-zero ambition will require consistent, comparable climate-related disclosure, including GHG emissions disclosure, encompassing all companies and sectors. Although it is a sound principle only to require disclosure of material information, the CSA may wish to consider the following points in applying this principle to GHG emissions disclosure.

Many issuers are currently providing GHG emissions disclosure in voluntary reporting, but not in regulatory filings. Some issuers may hesitate to include GHG emissions data in regulatory filings because of uncertainty about the accuracy of the data and the methodologies used to calculate it, while others may not consider GHG emissions to be financially material information. Under a "disclose or explain" approach, the latter issuers might simply choose to explain that they do not consider GHG emissions to be material information. Therefore, if CSA seeks to encourage more issuers to disclose GHG emissions in regulatory filings, it may be necessary to mandate that disclosure, or provide new guidance as to how issuers should assess the materiality of GHG emissions.

A consideration that may be overlooked by some issuers when assessing the materiality of GHG emissions information is the emerging investor demand for this information. As highlighted in the consultation document, CSA defines materiality as follows: "*Would a reasonable investor's decision whether or not to buy, sell or hold securities in the issuer likely be influenced or changed if the information in question was omitted or misstated*?" (p25). Based on this definition, GHG emissions disclosure is likely to become increasingly material, in response to developments in investment industry practice.

Specifically, a growing number of institutional investors are undertaking portfolio carbon measurement and setting portfolio carbon targets or budgets, or are planning to do so in future:

- The Net-Zero Asset Owner Alliance consists of 69 asset owners representing over U.S. $10 trillion in AUM. Members commit to transition their investment portfolios to net-zero GHG emissions by 2050, in line with the Paris Climate Agreement goal of limiting global average temperature rise to 1.5°C above pre-industrial levels. The NZAOA Target Setting Protocol sets out expectations for this commitment, which include setting targets covering the Scope 1 and 2 emissions of underlying portfolio holdings with a timeframe of 2025, 2030 and every five years thereafter.
- The Net Zero Asset Managers Initiative consists of 220 asset managers representing U.S. $57 trillion in AUM. Members commit to support investment aligned with the Paris Agreement goal, to work with asset owners on portfolio decarbonization, and to set interim portfolio carbon reduction targets on the pathway to net-zero emissions by 2050.
- The Canadian Investor Statement on Climate Change is a pledge by 37 Canadian institutional investors to develop a climate action plan that supports net-zero emissions by 2050, including a commitment to provide TCFD-aligned disclosure with best-efforts reporting on portfolio carbon emissions.
- Investing to Address Climate Change: A Charter for Canadian Universities, which has been endorsed by 17 Canadian universities, includes a commitment to regularly measure the carbon intensity of investment portfolios and set targets for reduction over time.

For an investor that has set a portfolio carbon target or budget, the GHG emissions of a potential or current investee can be assumed to fit the category of information that could impact the decision whether to buy, sell or hold the issuer's securities. Even for issuers with relatively low GHG emissions, the emerging investor focus on portfolio carbon measurement and management creates an imperative to provide GHG emissions disclosure. Investors need GHG emissions data across their portfolios to undertake portfolio carbon analysis. In many cases, they obtain this information from third-party ESG research and ratings providers. Where issuers do not disclose their GHG emissions data, the ESG research and ratings providers are obliged to fill the gaps with estimates based on industry-average data, which may disadvantage issuers with above-average energy efficiency performance, or whose location or unique business model results in lower-than-average GHG emissions.

While investor demand for GHG emissions data is a key consideration for the decision on whether to mandate GHG emissions disclosure through securities regulation, it should also be noted that governments and companies are setting net-zero targets, adding to the regulatory and competitive impetus for issuers to provide GHG emissions disclosure. More than 130 countries, including Canada, have made, or are considering making, net-zero commitments; while CBSR's Net-Zero Leaderboard includes 124 Canadian companies across all sectors that have set net-zero GHG emissions targets.

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- *As an alternative, the CSA is consulting on requiring issuers to disclose Scope 1 GHG emissions. Is this approach appropriate? Should disclosure of Scope 1 GHG emissions only be required where such information is material?*

If the CSA determines that it should mandate GHG emissions disclosure, to ensure this disclosure meets investor needs it should cover both Scope 1 and Scope 2 GHG emissions disclosure. To mandate only Scope 1 emissions would not reflect current issuer practice or respond to investor needs. Companies typically report both Scope 1 and Scope 2 GHG emissions. Among investors undertaking portfolio carbon measurement and target-setting, the current standard practice is to consider issuers' Scope 1 and 2 GHG emissions. For example, under the NZAOA Target Setting Protocol (see above) asset owners are expected to set short-term targets covering the Scope 1 and 2 emissions of underlying portfolio holdings. Requiring only Scope 1 GHG emissions disclosure would not meet the information needs of most investors undertaking portfolio carbon analysis. Furthermore, many "office-based" issuers in sectors such as Financials and Information Technology have little or no Scope 1 GHG emissions, with the majority of their operational GHG emissions consisting of indirect Scope 2 GHG emissions from purchased electricity. These Scope 2 emissions may vary significantly depending on the generation sources used by the utilities from which electricity is purchased. As noted above, investors undertaking portfolio carbon analysis may be forced to make use of potentially inaccurate estimates if Scope 2 GHG emissions data is not provided by an issuer.

Since the CSA published the proposed requirements, the TCFD has updated its recommendations on GHG emissions disclosure. TCFD now recommends disclosure of Scope 1 and 2 GHG emissions for companies in all sectors, independent of materiality, and encourages disclosure of Scope 3 emissions.

- *Should disclosure of Scope 2 GHG emissions and Scope 3 GHG emissions be mandatory?*

As noted above, to meet current investor needs, issuers should provide both Scope 1 and Scope 2 GHG emissions disclosure. While most investors undertaking portfolio carbon analysis are focusing on Scope 1 and 2 GHG emissions initially, it is widely recognized that the overwhelming proportion of GHG emissions for many issuers are Scope 3 indirect GHG emissions within the value chain. However, Scope 3 GHG emissions disclosure is less prevalent due to data collection challenges, double-counting concerns and methodologies that continue to be refined. Where Scope 3 GHG emissions disclosure is not provided, disclosure revealing why it is not provided, and whether it will be provided in future, would likely be of interest to investors. For example, investors might find it useful to understand whether Scope 3 GHG emissions have been assessed as immaterial, or whether the issuer is working on a data collection approach.

Investor demand for issuer Scope 3 emissions disclosure is likely to increase over time. For example, the NZAOA Target Setting Protocol (see above) recommends setting targets for Scope 3 emissions of underlying portfolio holdings as soon as possible for assets in high-carbon sectors such as oil and gas.

***CSA Question 6:*** *The Proposed Instrument contemplates that those issuers providing GHG disclosures would be required to use a GHG emissions reporting standard in measuring their GHG emissions, being the GHG Protocol or a reporting standard comparable with the GHG Protocol (as described in the Proposed Policy). Further, where an issuer uses a reporting standard that is not the GHG Protocol, it would be required to disclose how the reporting standard used is comparable with the GHG Protocol.*

- *As issuers have the option of providing GHG disclosures, should a specific reporting standard, such as the GHG Protocol, be mandated when such disclosures are provided?*

The CSA should consider mandating a specific reporting standard, as a consistent methodology needs to be applied to ensure comparability of the GHG emissions data reported. If the data is not comparable, it will be less useful to investors. The GHG Protocol is the most widely-recognized standard across all sectors.

***CSA Question 7:*** *The Proposed Instrument does not require the GHG emissions to be audited. Should there be a requirement for some form of assurance on GHG emissions reporting?*

Third-party verification of GHG emissions is an important tool to ensure accuracy and reliability of GHG emissions data included in regulatory filings. However, this process can be onerous for issuers, and typically they will need to establish processes for collecting data and calculating GHG emissions before they can obtain third-party verification. As such, while we emphasize the value of third-party verification of GHG emissions, particularly if they are to be included in regulatory filings, a phased approach with a timeframe of at least two years would be advisable, enabling issuers to establish robust reporting processes before seeking verification.

**Usefulness and benefits of disclosures contemplated by the Proposed Instrument**

***CSA Question 9:*** *What climate-related information is most important for investors' investment and voting decisions? How is this information incorporated into these decisions? Is there additional information that investors require?*

While investors are best placed to respond to this question, we offer the following observations from our practice:

- As noted above, investors undertaking portfolio carbon measurement and target-setting currently seek issuer Scope 1 and 2 GHG emissions data to enable portfolio carbon analysis. Over the longer term, investors following portfolio carbon best practice standards such as the NZAOA Target Setting Protocol (see above) will seek to integrate issuer Scope 3 emissions data to their analysis.
- The EU SFDR regulation (see above) will require investors that fall under the regulation to disclose aggregate portfolio-level climate indicators including GHG emissions data. To fulfil this requirement, these investors will need to access climate-related information relating to all issuers within their portfolios, including any Canadian issuers.
- Climate Action 100+ (CA 100+) is a global coalition of 617 investors representing U.S. $60 trillion in AUM, which seeks to engage the world's highest GHG emitters to improve climate performance and ensure transparent GHG emissions disclosure. CA 100+'s Net-Zero Company Benchmark is a helpful source for insight into the information sought by investors conducting engagement with issuers on climate change. This information includes GHG emissions targets, decarbonization strategy, capital allocation alignment, climate policy alignment, climate governance, and disclosure based on the TCFD recommendations. While CA 100+ only targets a handful of Canadian issuers for engagement, the newly-formed Climate Engagement Canada coalition will target around 40 of Canada's highest GHG emitters with a similar program of engagement.
- Proxy advisors ISS and Glass Lewis are responding to demand from investor clients by publishing new proxy voting guidelines that will focus on issuer's climate governance disclosure. For example, in 2022 Glass Lewis will generally recommend a vote against the Chair of the Governance Committee or equivalent at a TSX60 company that does not provide disclosure on the board's role with respect to oversight of ESG issues.

**Guidance on disclosure requirements**

***CSA Question 14:*** *We have provided guidance in the Proposed Policy on the disclosure required by the Proposed Instrument. Are there any other tools, guidance or data sources that would be helpful in preparing these disclosures that the Proposed Policy should refer to?*

As CSA is no doubt aware, in October 2021 the TCFD updated the document *Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures* that is referenced in the CSA's guidance accompanying the proposed requirements. The TCFD also published *Guidance on Metrics, Targets and Transition Plans*, describing recent developments in climate-related metrics.

The following may be helpful for issuers preparing disclosures under the proposed requirements:

- The TMX/CPA Canada guidance *A Primer for Environmental and Social Disclosure* provides advice on the process steps for developing effective ESG disclosure, which is broadly relevant in the climate change context.
- The Canadian Coalition for Good Governance (CCGG) guidance *The Directors' E&S Guidebook* provides insights for issuers on investor expectations for board oversight of ESG factors, including climate change, drawing on the TCFD recommendations.
- CPA Canada/Deloitte's *Review of Net Zero Disclosures: Challenges and Opportunities* outlines the findings of a study on the climate action plans of Canadian issuers, and how they are communicated.
- The Value Reporting Foundation's Sustainability Accounting Standards Board (SASB) Standards are interoperable with the TCFD recommendations. The TCFD sets out a framework for disclosure on climate risk and recommends that if climate is identified as a material issue, relevant climate-related metrics should be disclosed. The specific set of metrics that

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should be disclosed is not prescribed, although guidance is provided. In contrast, SASB focuses on defining and detailing appropriate metrics for reporting on a range of industry-specific ESG topics, including climate change, while its recommendations on narrative disclosure of governance, strategy and risk management relating to each material topic correspond exactly with the structure of the TCFD framework.
- ICD's Board Oversight of Climate Change program includes a module on oversight of climate change communication and reporting.

***CSA Question 15:*** *Does the guidance set out in the Proposed Policy sufficiently explain the interaction of the risk disclosure requirement in the Proposed Instrument with the existing risk disclosure requirements in NI 51-102?*

Further clarification may be helpful, as the existing risk disclosure requirements are subject to materiality. The TCFD disclosure recommendations under the Risk Management pillar are not materiality-based and focus on the risk process, while discussion of the climate-related risks and opportunities identified and their potential impacts on the business fall under the Strategy pillar of TCFD, which is subject to materiality.

To apply the TCFD framework as intended, issuers need to undertake a materiality assessment to determine which climate change risks and opportunities are financially material and should therefore be disclosed. From our experience of reviewing securities filings, we observe that while issuers provide extensive disclosure on risks that could impact value, and many refer to climate-related risks within that risk disclosure, relatively few provide insight into the process through which the potential risks were assessed and identified as being financially material. In contrast, voluntary sustainability reports targeted at a wider audience of stakeholders such as employees, customers and communities will often include a detailed explanation of the process by which environmental and social topics, including climate change, were identified and prioritized, based on areas of interest for a range of company stakeholders.[1] Enacting a requirement for issuers to disclose how they identify the climate change risks and opportunities that are financially material for the company, and the results of this materiality assessment, would not only encourage issuers to undertake the risk and opportunity analysis necessary to apply the TCFD disclosure framework effectively, but would also enable investors to better assess the risk process and engage with issuers if it appeared to lack appropriate rigor. Furthermore, setting requirements relating to the process by which issuers identify climate-related risks could help to improve the quality of risk disclosure overall. For consistency, the process for determining the materiality of climate risks should be consistent with the International Financial Reporting Standards (IFRS) *Practice Statement 2: Making Materiality Judgements*, as is the case for other business risks.

**Phased-in implementation**

***CSA Question 17:*** *The Proposed Instrument contemplates a phased-in transition of the disclosure requirements, with non-venture issuers subject to a one-year transition phase and venture issuers subject to a three-year transition phase. Assuming the Proposed Instrument comes into force December 31, 2022, and the issuer has a December 31 year-end, these disclosures would be included in annual filings due in 2024 and 2026 for non-venture issuers and venture issuers, respectively.*
- *Would the transition provisions in the Proposed Instrument provide reporting issuers with sufficient time to review the Proposed Instrument and prepare and file the required disclosures?*
- *Does the phased-in implementation based on non-venture or venture status address the concerns, if any, regarding the challenges and costs associated with providing the disclosures contemplated by the Proposed Instrument, particularly for venture issuers? If not, how could these concerns be addressed?*

We have assisted, or are in the process of assisting, a range of Canadian issuers to develop climate strategies responding to the TCFD recommendations. Companies seeking to develop a climate strategy need to undertake a series of activities, including a climate change-focused materiality assessment, development of strategic positioning on climate change, identifying and addressing gaps in climate governance and risk management, and establishing appropriate climate-related metrics and targets. Typically, it can take a period of six to eight months for an issuer to complete a climate strategy project leading to initial robust TCFD disclosure, given the need for board or senior management approval of key steps in the process.

[1] Providing this process disclosure is a requirement under the Global Reporting Initiative (GRI), the most widely-recognized framework for voluntary sustainability reporting. Note that the definition of materiality used by GRI in the 2021 iteration of its Standards differs from the concept of financial materiality. GRI defines material topics as "topics that represent the organization's most significant impacts on the economy, environment, and people, including impacts on their human rights."

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Full implementation of the TCFD recommendations can take up to three years. The CSA may wish to consider this in determining the phase-in timeline for the proposed requirements.

In this context, it is worth noting the expectation that asset owner members of NZAOA (see above) should set portfolio carbon targets for 2025, to be assessed based on portfolio carbon data for 2024. If Canadian non-venture issuers were to provide climate disclosures under the proposed requirements beginning in 2024, including Scope 1 and 2 GHG emissions disclosure, this would likely be welcomed by investors committed to 2025 portfolio carbon targets.

In conclusion, we commend the CSA for addressing the important issue of climate disclosure through the proposed requirements and for providing the opportunity to comment. Please do not hesitate to contact us if you have questions regarding the content of this submission.

Yours truly,

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[redacted]

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