

Staff paper

Agenda reference: 4

IFRS Interpretations Committee

Date June 2023

Project Climate-related risks in the financial statements

Topic **Project scoping**

Contacts Paolo Dragone (pdragone@ifrs.org)

Karen Robson (karen.robson@ifrs.org)

This paper has been prepared for discussion at a public meeting of the IFRS Interpretations Committee (Committee). This paper does not represent the views of the International Accounting Standards Board (IASB), the Committee or any individual member of the IASB or the Committee. Any comments in the paper do not purport to set out what would be an acceptable or unacceptable application of IFRS® Accounting Standards. The IASB's technical decisions are made in public and are reported in the IASB *Update*. The Committee's technical decisions are made in public and are reported in the IFRIC *Update*.



Purpose of the session

- To provide background about the project
- To obtain your feedback on stakeholder concerns about the reporting of climate-related risks in the financial statements.



Background





Origin of the project



- Stakeholders, especially users of financial statements, are increasingly interested in the effects of climate-related risks on the financial statements
- Questions about why IFRS
 Accounting Standards do not explicitly refer to climate-related risks
- Concerns about possible inconsistent application of Accounting Standards to climaterelated risks and insufficient information about climate-related risks in financial statements



- Educational material published to explain how Accounting Standards already require entities to consider the effects of climaterelated risks in the financial statements
 - November 2020 educational material on the <u>Effects of</u> <u>climate-related matters on</u> financial statements
 - November 2019 article
 IFRS Standards and
 climate-related disclosures



- In the Third Agenda Consultation, respondents attributed high-priority to a project on climate-related risks in the financial statements
- IASB added a narrow-scope maintenance project to its agenda



Purpose and focus of the project



- Explore whether and how financial statements can better communicate information about climate-related risks;
- Explore the nature and causes of stakeholder concerns about the reporting of climate-related risks in the financial statements;
- Consider possible courses of action, if any.



- This project will not seek to:
 - develop an Accounting Standard on climate-related risks, or extensive application guidance on how to consider the effects of such risks when applying Accounting Standards;
 - broaden the objective of financial statements or change the definitions of assets and liabilities;
 - develop accounting requirements for pollutant pricing mechanisms¹.

¹ Pollutant Pricing Mechanisms is on a reserve list of projects that may be added to the IASB's work plan if stakeholders and the IASB have sufficient capacity.



How does this project relate to the work of the ISSB?

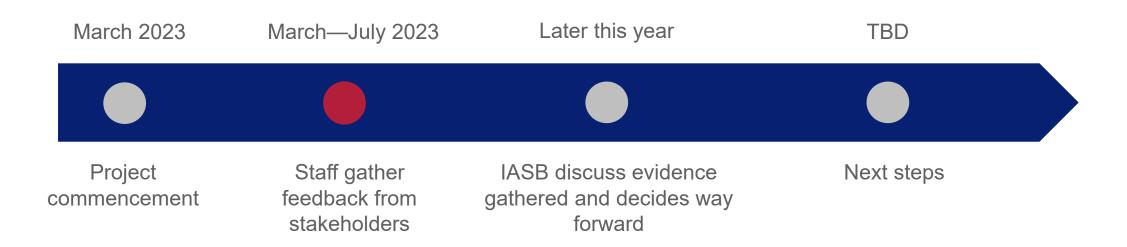


- This project and the work of the International Sustainability Standards Board (ISSB) complement each other, helping investors to connect information included in different parts of general purpose financial reports.
- Sustainability-related financial disclosures may explain the sustainability-related risks and opportunities arising from an entity's activities and its assets and liabilities. Such disclosures may also provide early indications of matters that will subsequently be reflected in financial statements. For example, a company's commitment to net zero emissions could, over time, result in liabilities being reported in the financial statements.
- We have a stable set of decisions on sustainability-related disclosures to inform this project¹.

¹ The ISSB has completed its deliberations on its first two standards and expects to issue an IFRS Sustainability Disclosure Standard around the end of Q2 2023.



Tentative project plan





Feedback requested in this meeting





Questions for Committee members

The Staff are seeking your feedback on:

1 Nature of concern

- a) What concerns do you have about the reporting of climate-related risks in the financial statements?
- b) How prevalent is the issue in your jurisdiction?

2 Causes of concern

What are the causes of the concerns you identified in question 1? See slides 12–13 for possible causes of concern.

Courses of action

- a) How could the IASB address these concerns? See slide 14 for possible courses of action.
- b) Do you think the benefits may outweigh the costs of those actions?

Note: In the Appendix we have included some examples of the type of feedback we are interested in.



Questions for Committee members

The Staff are seeking your feedback on:



Should the IASB consider expanding the scope of the project to cover:

- risks in addition to those related to climate? and
- opportunities as well as risks?



Possible nature of concerns

We would like your feedback on the nature of the concerns:



Financial statement information appears inconsistent with disclosures made elsewhere about climate-related risks

Recognition, measurement and disclosures in the financial statements cannot be reconciled to an entity's other disclosures



Insufficient information about how climate-related risks are reflected in the financial statements, in terms of:

- a) estimates, assumptions, judgments made;
- b) separate effects of climate-related risks on amounts recognised in the financial statements

Note: This project may not address all concerns identified. The purpose of this meeting is, in part, to identify concerns to facilitate scoping of this project.



Possible causes of concerns

We would like your feedback on the possible causes of the concerns:



Unclear requirements in Accounting Standards

Requirements might not be sufficiently clear and/or specific about whether and how the effects of climate-related risks should be considered when preparing an entity's financial statements.



Lack of compliance

Entities might not be (adequately) considering climate-related risks when applying IFRS Accounting Standards because of:

- lack of awareness of requirements;
- misunderstanding of requirements;
- cost and complexity (for example, judgements—including judgements about materiality—might be difficult, information might not be available); or
- other reasons?



Possible causes of concerns (cont.)

We would like your feedback on the possible causes of the concerns:



Limitations in IFRS Accounting Standards

Requirements appear to prohibit or do not capture climate-related risks in measuring and recognising assets and liabilities and in requiring the disclosure of relevant information.



User information needs beyond the objective of financial statements

Some information needs about climate-related risks might go beyond the objective of financial statements and may be more appropriately addressed by Sustainability Disclosure Standards.



Possible courses of action

We would like your feedback on courses of action:



To help entities properly consider climate-related risks, the IASB could explore

- possible minor amendments to IASB Accounting Standards
- limited new application guidance
- new illustrative examples
- educational materials



Expanding the scope of the project

Initial staff comments

The IASB could consider expanding the scope of the project to cover:

- risks in addition to those related to climate; and
- opportunities as well as risks.

Things to consider

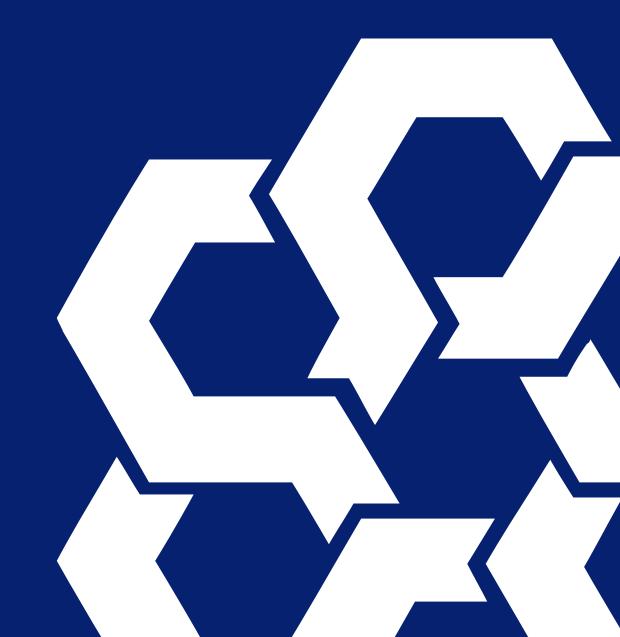
Consistency with the ISSB which in its work:

- reflects both opportunities and risks; and
- acknowledges that it is not always possible for preparers to separate the financial effects of climate-related risks and opportunities from other sustainability-related risks and opportunities.

Some of the solutions to improve the reporting of climate-related risks in the financial statements may apply to other long-term risks.



Appendix—Examples of the type of feedback we are interested in





Impairment of assets

1 Nature of concern

Inconsistencies between financial statement information and other information

Although entities have made net zero commitments they have not impaired the value of their assets as a result of those commitments.

What are the causes of concern?*

What are the possible courses of action?*

Limitations in IFRS Accounting Standards

IAS 36 *Impairment of Assets* requires cash flow projections to be based on the most recent budgets/forecasts for a maximum of five years, unless management is confident that its projections are reliable and it can demonstrate its ability, based on past experience, to forecast cash flows accurately over a longer period.

Minor amendments to Accounting Standards

The IASB could consider:

- removing the restriction in IAS 36 cash flow projections to cover a maximum period of five years;
- amending paragraph 35 of IAS 36 to make it easier to apply the exemption to use financial budgets/forecasts of future cash flows for periods longer than five years

Possible costs for this course of action include:

- more difficult judgments
- risk of less reasonable and supportable information reflected in cash flow projections

*Note: For simplicity, this example does not include analysis of all causes of concern and all possible courses of action for this issue.



Recognition of liabilities

Nature of concern	Inconsistencies between financial statement information and other information
<u>ن</u>	Although entities have made net zero commitments they may have not recognised liabilities as a result of those commitments.
What are the causes of concern?*	3 What are the possible courses of action?*
Unclear requirements in Accounting Standards	New illustrative examples
	The project Provisions—Targeted Improvements is exploring possible targeted amendments to IAS 37 <i>Provisions Contingent Liabilities and Contingent Assets</i> . The IASB could consider adding an Illustrative Example on a net zero commitment to clarify that simply making a commitment to offset future greenhouse gas emissions does not in itself give rise to a present obligation for an entity and, therefore a provision would not be recognised until the entity has emitted the gas it has promised to offset.
	Possible costs for this course of action – stakeholders may want to broaden the definition of liabilities, but that is beyond the scope of the Provisions—Targeted Improvements project and this project.
User information needs beyond the objective of financial statements	Educational materials
	The IASB could consider publishing educational material to explain the objective of financial statements, the reasons for the definition of a liability and the importance of analysing financial statements and sustainability-related financial disclosures together.
	Possible costs for this course of action – stakeholders may want to change the objective of financial statements, but that is beyond the scope of this project.

*Note: For simplicity, this example does not include analysis of all causes of concern and all possible courses of action for this issue.



Disclosure of assumptions and other sources of estimation uncertainty

1 Nature of concern

Insufficient information about how climate-related risks are reflected in the financial statements

What are the causes of concern?*

What are the possible courses of action?*

(Perceived) Limitations in IFRS Accounting Standards / Unclear requirements / Lack of compliance

Under IAS 1 *Presentation of Financial Statements*, an entity is required to disclose assumptions made about the future and other sources of estimation uncertainty if they have a significant risk of resulting in a material adjustment to the carrying amounts of assets and liabilities within the next financial year (paragraph 125 of IAS 1).

This paragraph may be perceived to prohibit disclosures of other assumptions and sources of estimation uncertainty.

Minor amendments to Accounting Standards

The IASB could consider whether removing the reference to 'the next financial year' from paragraph 125 of IAS 1 could result in the disclosure of more information about climate-related risks than entities currently disclose and improve the information available to users.

Possible costs for this course of action:

- could such an amendment result in the disclosure of large amounts of forward-looking information about a wide range of risks?
- consider amendments to Sustainability Disclosure Standards

Minor amendments to Accounting Standards

The IASB could add requirements to disclose assumptions to specific Accounting Standards.

Possible costs for this course of action – costly to implement?

*Note: For simplicity, this example does not include analysis of all causes of concern and all possible courses of action for this issue.



Follow us online



@IFRSFoundation

▶ IFRS Foundation

International Accounting Standards Board

