

1 March 2021

Climate Disclosure Standards Board
C/O CDP Worldwide
Plantation Place South
60 Great Tower Street
EC3R 5AD London
United Kingdom

Via email: francesca.recanati@cdsb.net

Dear Sir or Madam

Submission on the application guidance for water-related disclosures

Chartered Accountants Australia and New Zealand (CA ANZ) welcomes the opportunity to provide a submission to the Climate Disclosures Standards Board (CDSB) on its application guidance for water-related disclosure (the guidance).

We have focused our feedback on those areas where we consider we can add the most value as detailed below. Appendix A provides more information about CA ANZ.

Key Points:

- CA ANZ continues to be supportive of the resources being developed by the CDSB, including this guidance. Enabling investors and preparers to best understand how the CDSB Framework operates with respect to different natural resources is key for ensuring widespread and consistent adoption of environmental reporting.
- We consider that the inclusion of graphics in the guidance – such as a roadmap – would be helpful for the purposes of catering to a wide audience of possible preparers and investors with different learning styles.
- The lists of useful examples, resources, risks, opportunities and direct and indirect sources of water impacts will likely be particularly helpful to preparers and those charged with governance in assessing their organisations. Other risks and impacts that could be included are those relating to infrastructure managed by others or general pollution. For completeness, we suggest the CDSB consider including a brief statement that the lists provided are examples only and preparers need to assess what is material to their particular organisation.
- We note that the guidance focuses on the first six requirements of the CDSB Framework and consider that it would be useful to explain why this is the case for newer preparers.
- Similarly, it would also be useful to explicitly state that the guidance relates primarily to freshwater and the reasons for this.
- We suggest that references to mainstream reporting use recognised, consistent terminology as this enables preparers to better contextualise how the guidance relates to both the CDSB Framework but also other frameworks they comply with such as the Integrated Reporting Framework or the recommendations by the Task Force on Climate-related financial Disclosures.

Should you have any questions about this submission or wish to discuss it, please contact Karen McWilliams via email at karen.mcwilliams@charteredaccountantsanz.com or phone (612) 8078 5451.

Yours sincerely,

Simon Grant FCA
Group Executive – Advocacy, Professional
Standing and International Development
Chartered Accountants Australia and
New Zealand

Karen McWilliams FCA
Business Reform Leader
Advocacy & Professional Standing

Appendix A

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents more than 128,000 financial professionals, supporting them to build value and make a difference to the businesses, organisations and communities in which they work and live. Around the world, Chartered Accountants are known for their integrity, financial skills, adaptability and the rigour of their professional education and training.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate in the public interest. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations. We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 13 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.