Climate change: Recent regulatory developments in the financial sector

January 2021
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‘Net-zero by 2050’ is coming into focus globally

Progress has been made world-wide to tackle climate change. Around five years have passed since the ‘2030 Agenda for Sustainable Development’ and the ‘Paris Agreement’ were both adopted in 2015. In September 2015, the United Nations General Assembly adopted the agenda ‘Transforming our world: the 2030 Agenda for Sustainable Development’, which set out 17 sustainable development goals (SDGs). In December of the same year, the ‘Paris Agreement’ was adopted as a new international framework on climate change at the 21st Session of the Conference of the Parties to the United Nations Framework Convention on Climate Change (COP21) held in Paris, France. The Agreement aims to reduce greenhouse gas emissions and limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels.

Europe seems to have been taking a lead in this field. For example, in November 2018, the European Commission (EC) published a long-term strategy for achieving a climate-neutral economy, ‘A Clean Planet for All’ *1, which presents a vision towards the goal of net-zero greenhouse gas emissions by 2050. Then, in December 2019, the EC presented a new growth strategy for Europe: the ‘European Green Deal’ *2. It aims to transform Europe into a fair and prosperous society, with a modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases in 2050 and economic growth is decoupled from resource use. To achieve this, the European Green Deal set specific policy initiatives, which include (i) developing a draft of the European Sustainable Investment Plan (Green Deal Investment Plan) by January 2020, (ii) proposing a ‘European Climate Act’ by March 2020 to formulate a climate neutral target for 2050, and (iii) raising the EU’s 2030 greenhouse gas reduction target to 55% by summer 2020.

Globally, more than 110 countries and jurisdictions have expressed their intentions to work towards ‘Net-zero by 2050’ *3. Several countries have formulated legislation aiming at becoming carbon neutral. For example, Sweden adopted a climate policy framework in June 2017, in which it has committed to having net-zero greenhouse gas emissions by 2045 *4. The United Kingdom revised its ‘Climate Change Act 2008’ *5 in June 2019 and committed to bringing all greenhouse gas emissions to net zero by 2050. France *6 also legislated ‘Net-zero by 2050’ in June 2019, which was followed by New Zealand *7 in November 2019, Denmark *8 in December 2019, and Hungary *9 in June 2020. In Asia, China expressed its intention to achieve carbon neutrality by 2060 in its September 2020 address at the UN General Assembly *10. Japan mentioned ‘2050 carbon neutral’ in a policy speech at the October 2020 extraordinary session of the Parliament *11.

All these initiatives and/or commitments show that a vision of ‘Net-zero by 2050’ has been shared globally. The International Energy Agency (IEA) for the first time created a new climate scenario case, ‘Net Zero Emissions by 2050 (NZE2050)’, in its ‘World Energy Outlook 2020’ *12 to supplement the Sustainable Development Scenario (SDS), stating that ‘The vision of a net-zero emissions world is coming into focus’.
Climate-related regulatory developments have progressed in the financial sector

In the financial sector, policy makers, regulators, and supervisors have been tackling climate change proactively. The appendix summarises major regulatory and supervisory developments relating to climate change in 2020 with a focus on the insurance sector, breaking them down into four categories: Global; Europe; North America; and Asia-Pacific (APAC). (Many of these developments are outlined in Deloitte Tohmatsu’s monthly reports ‘International regulatory trends in the insurance sector’.)

(1) Global

One prominent initiative at a global level is the development of a set of recommendations by the Network of Central Banks and Supervisors for Greening the Financial System (NGFS) in May 2020. The NGFS presents five recommendations for supervisors in a guidance paper ‘Guide for Supervisors: Integrating climate-related and environmental risks into prudential supervision’. These high-level recommendations (see Table 1) can be considered as global guiding principles for prudential supervisors.

Table 1. Five recommendations by the NGFS

<table>
<thead>
<tr>
<th>Recommendation</th>
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<tbody>
<tr>
<td>Determine how climate and environmental risks transmit to the economies and financial sectors and identify how these risks are likely to be material for the supervised entities.</td>
</tr>
<tr>
<td>Develop a clear strategy, establish an internal organisation, and allocate adequate resources to address climate and environmental risks.</td>
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<tr>
<td>Identify the exposures of supervised entities that are vulnerable to climate and environmental risks and assess potential losses if these risks materialise.</td>
</tr>
<tr>
<td>Set supervisory expectations to create transparency for financial institutions in relation to the supervisors’ understanding of a prudent approach to climate and environmental risks.</td>
</tr>
<tr>
<td>Ensure adequate management of climate and environmental risks by financial institutions and take mitigating action where appropriate.</td>
</tr>
</tbody>
</table>

In June 2020, the NGFS published a set of climate scenarios that could be used by supervisors, which was followed by a report in September of the same year that summarised practical tools and methodologies utilised by financial institutions in their climate and environmental risk management. These scenarios and practices are expected to help financial institutions enhance their risk management.

The Trustees of the IFRS Foundation have expressed its intention towards developing a global framework for sustainable information disclosures. The IFRS Foundation released a consultative paper on that in September 2020. One of the points for which feedback was sought was the relationship with other standard setters performing similar activities. The IFRS Foundation asked how it could best build upon and work with the existing initiatives in sustainability reporting (including those at regional levels such as Europe) to achieve further global consistency. At around the same time, five organisations that have developed frameworks and standards for sustainable reporting – CDP, CDSB (Climate Disclosure Standards Board), GRI (Global Reporting Initiative), IIRC (International Integrated Reporting Council), and SASB (Sustainability Accounting Standards Board) – issued a joint statement. The statement said that they would work with all stakeholders to establish a comprehensive corporate reporting system that is accepted globally. Stakeholders in the financial sector will likely take a great interest in seeing the extent that disclosure and reporting standards and frameworks, including those recommended by the Task Force on Climate-related Financial Disclosures (TCFD), are harmonised globally as well as across sectors in the future.

Quantification of climate change-related risks and opportunities is one of the areas in which further developments are expected. The TCFD published a consultation paper on decision-useful, forward-looking metrics to be disclosed by financial institutions in October 2020. The paper refers to Warming Potential and Climate VaR as examples of metrics which have been used by multiple financial institutions such as AXA and Aviva to ‘quantify’ climate change-related risks and opportunities. It will be critical for each financial...
institution to identify which metrics could be good or best practices in the financial sector.

Further progress is expected in the insurance sector. In its climate change reports published in July and November 2020, the Financial Stability Board (FSB) has pointed out that (i) the increased frequency and severity of climate events can affect insurers’ resilience and (ii) actions (to be) taken by insurers to reduce their exposures to climate change-related risks can transfer those risks to households and businesses. These issues will need to be discussed carefully when reviewing regulatory and supervisory frameworks.

(2) Europe

One of the most notable developments in Europe is the adoption of the ‘EU Taxonomy Regulation’ by the European Parliament in June 2020. The regulation relates to one of the three objectives set out in the ‘Action Plan: Financing Sustainable Growth’ published by the European Commission (EC) in March 2018, i.e. ‘reorient capital flows towards sustainable investment in order to achieve sustainable and inclusive growth’. The EU Taxonomy was subsequently followed by a draft of the delegated regulation on the development of technical screening criteria for two out of the six environmental objectives (i.e. climate change mitigation and adaptation) published for consultation by the EC in November 2020. Table 2 provides a summary of the key features of the EU Taxonomy Regulation.

<table>
<thead>
<tr>
<th>Objectives</th>
<th>To establish the criteria for determining whether an economic activity qualifies as environmentally sustainable.</th>
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</thead>
<tbody>
<tr>
<td>Scope of application</td>
<td>Measures adopted by EU member states or the EU that set out requirements for financial market participants or issuers in respect of financial products or corporate bonds that are made available as environmentally sustainable.</td>
</tr>
<tr>
<td></td>
<td>Financial market participants that make available financial products.</td>
</tr>
<tr>
<td></td>
<td>Financial institutions which are subject to obligation to publish a non-financial statement.</td>
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</tbody>
</table>

Four criteria for environmentally sustainable economic activities

- Contribute substantially to one or more of the six environmental objectives: (a) climate change mitigation; (b) climate change adaptation; (c) the sustainable use and protection of water and marine resources; (d) the transition to a circular economy; (e) pollution prevention and control; and (f) the protection and restoration of biodiversity and ecosystems.
- Do not significantly harm (DNSH) any of the six environmental objectives.
- Comply with the minimum safeguards (i.e. procedures implemented by a financial institution that is carrying out an economic activity to ensure the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights).
- Comply with technical screening criteria that have been established by the EC.

At a jurisdictional level, the United Kingdom would be one of the front-runners in this space. In July 2020, the UK’s Prudential Regulation Authority (PRA) called on the CEOs of financial institutions to fully embed their approaches to managing climate-related financial risks by the end of 2021. The request highlighted several challenges that financial institutions need to work on, which include the following: (i) There is room for improvement in financial institutions’ understanding of climate-related financial risks; (ii) Risk management processes within financial institutions are at the early stage of development; and (iii) Many financial institutions need to increase their scenario analysis capabilities materially. It emphasised the need to further promote efforts for managing climate change-related risks. In November 2020, the UK published a roadmap towards mandatory TCFD disclosures and an outline of climate-related stress tests to be conducted in 2021.

Switzerland has also been updating its rules on disclosures of climate-related information. The Swiss Financial Market...
Supervisory Authority (FINMA) issued a proposal on the amendment of its disclosure rules in November 2020. The proposed rules require financial institutions to disclose methods for assessing climate-related financial risks, as well as quantitative information on those risks, together with metrics, targets, and methodologies, etc. In France, the Autorité de Contrôle Prudentiel et de Résolution (ACPR) and Autorité des Marchés Financiers (AMF) published the first monitoring and evaluation report on French financial institutions’ coal-related policies in October 2020 based on the findings from surveys conducted by said authorities. The authorities recommend that financial institutions take further actions such as (i) formulating coal-related policies that include an exit date and (ii) justifying the criteria and thresholds used in those policies.

In the banking sector, the European Central Bank (ECB) published its climate-related supervisory plans for 2021 and 2022 in November 2020, together with its finalised guidance on climate and environmental risks. The ECB plans to (i) request banks to conduct a self-assessment in early 2021 in light of the supervisory expectations outlined in the guidance and to draw up action plans, (ii) conduct a full review of banks’ practices in 2022, and (iii) conduct its next stress test in 2022 focusing on climate-related risks. The guidance sets out 13 supervisory expectations for the management of climate and environmental risks by banks, including the following:

- Banks understand the impact of climate and environmental risks on the business environment in the short-, medium-, and long-term so that they can make informed strategic and business decisions.
- Banks take climate and environmental risks into account when developing business strategies, business objectives, and risk management frameworks.
- Banks explicitly incorporate climate and environmental risks into their risk appetite framework. To manage, monitor, and mitigate these risks over a sufficiently long-term horizon, banks incorporate these risks into their existing risk management frameworks and identify and quantify those risks within their process of ensuring capital adequacy.

One landmark development in the insurance sector has been the publication of three consultative documents by the European Insurance and Occupational Pensions Authority (EIOPA). In October 2020, the EIOPA presented a draft set of expectations on the supervision of the integration of climate change risk scenarios by insurers in their ORSA. Insurers will be expected to, for instance, (i) integrate climate change risks in their systems of governance, risk management, and ORSA, (ii) assess short- and long-term climate change risks with the use of scenarios, and (iii) subject the identified material risks to a sufficiently wide range of stress tests or scenario analyses. Moreover, in December 2020, the EIOPA launched public consultation on (i) a methodology for integrating climate change into the Solvency II standard formula and (ii) non-life underwriting and pricing in light of climate change. For the former, one of the main issues is whether and how to integrate climate-related forward-looking elements in the SCR calibration for the natural catastrophe module. For the latter, fundamental issues such as affordability and availability of insurance, deterioration of the protection gap, and greenwashing are discussed in the consultative document.

(3) North America

The pace of climate change-related regulatory and supervisory developments in North America looks a little bit slower compared with that in Europe and the APAC. In the United States, regulators in some states such as New York and California seem to be working actively on climate change. For example, in September 2020, the New York State Department of Financial Services called on all insurers in the state to incorporate consideration of financial risks from climate change into their governance frameworks, risk management processes, and business strategies. The Department also revealed its plan to incorporate reviews of insurers’ approaches and activities in regards to financial risks from climate change in the inspection process that will begin in 2021. In July 2020, the National Association of Insurance Commissioners (NAIC) formed the ‘Climate and Resiliency Task Force’, which may accelerate regulatory and supervisory developments in the US insurance sector.

Canada plans to conduct climate-related stress tests. In November 2020, the Office of the Superintendent of Financial Institutions (OSFI) and the Bank of Canada announced plans for a pilot project to conduct analyses using climate change scenarios, with the aim of deepening understanding of the risks that climate change poses to the financial system from the perspective of a transition to a low-carbon economy. It is predicted that major banks and insurers will participate in the project. Currently, this project does not intend to assess individual institutions’ exposures to climate-related risks. Additionally, the OSFI plans to publish a discussion paper on
building financial resilience to climate-related risks in early 2021.

(4) APAC

APAC initiatives in four jurisdictions (Australia, Hong Kong, Singapore, and New Zealand) can be highlighted. The Australian Prudential Regulation Authority (APRA) identified climate change as one of the focus areas of supervision in 2020 and encouraged all regulated financial institutions to put further efforts into addressing climate change risks. The authority also indicated its intentions to develop a prudential practice guide on climate change and to undertake a vulnerability assessment of financial risks related to climate change. As of February 2020, it was supposed that an assessment framework would be designed first for large banks in 2020, which would be followed by assessments in 2021 and then expanded to other sectors.

In Hong Kong, a cross-sectoral group, ‘Green and Sustainable Finance Cross-Agency Steering Group’, was established in May 2020 by the Hong Kong Monetary Authority (HKMA) and the Securities and Futures Commission (SFC), together with other relevant authorities including the Insurance Authority (IA). In December 2020, the Group announced its green and sustainable finance strategy for Hong Kong and five major action points. The key focus areas that the strategy identified include: (i) strengthening climate-related financial risk management; (ii) promoting the flow of climate-related information to facilitate risk management, capital allocation, and investor protection; and (iii) strengthening capacity building for the financial services industry and raising public awareness.

New Zealand is planning to make climate-related financial disclosures mandatory for companies that meet certain size thresholds, with the aim of (i) promoting market transparency and more accurate pricing signals in the market, (ii) incentivising low-emissions investment, and (iii) creating a level playing field. In December 2020, Singapore finalised its guidelines on environmental risk management for insurers. Supervisory expectations for insurance underwriting expressed in these guidelines include the following: (i) The insurer may consider imposing conditions to require a customer with higher environmental risk to take steps to manage the risk; (ii) The insurer should consider taking actions, such as reflecting the cost of additional risks in the premiums, for customers who do not adequately manage environmental risks; and (iii) Transactions with higher environmental risk should be subject to the insurer’s enhanced due diligence.

This regulatory and supervisory momentum is expected to continue

There is a growing understanding of potential socio-economic impacts of climate and environmental risks and the importance of managing these risks appropriately. As noted above, significant progress was made in 2020 in terms of climate change-related financial regulation and supervision at global, regional, and jurisdictional levels. This trend is expected to continue for the coming years.

Regulation and supervision in terms of climate change in the financial sector can be considered in several aspects, including (i) disclosure (Pillar 3), (ii) risk management and stress testing (Pillar 2), (iii) capital requirement (Pillar 1), and (iv) macroprudential supervision.

Two trends have been observed for disclosures. One of these trends is towards disclosing not only qualitative information but also quantitative information. Another is a shift from voluntary disclosure to mandatory. It is important that financial institutions understand that disclosure is not an end in itself. Financial institutions should not focus solely on the compliance aspect of disclosures. Rather, it is essential for them to form views regarding objectives such as what they

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*In January 2021, OSFI published a discussion paper titled ‘Navigating Uncertainty in Climate Change: Promoting Preparedness and Resilience to Climate-Related Risks’ for consultation.*
would like to achieve through disclosing climate-related information and what they would like to convey by disclosing that information, and to which stakeholders. It is considered essential for regulatory and supervisory authorities to take action to ensure a certain degree of comparability for disclosed information, particularly in cases where disclosure is made mandatory and quantitative information is required in disclosures. To this end, the NGFS, which is comprised of financial regulators and central banks, or similar bodies could lead relevant discussions and initiatives such as developing climate scenarios and methodologies for the quantification of climate and environmental risks and opportunities.

With regard to risk management, it is important for financial institutions to incorporate climate and environmental risks into their overall risk management framework. To that end, the guidance developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the World Business Council for Sustainable Development (WBCSD) in the October 2018 ‘Enterprise Risk Management: Applying enterprise risk management to environmental, social and governance-related risks’ can play an important role. The guidance paper provides ESG-related guidance in five areas: (i) governance and culture, (ii) strategy and objective-setting, (iii) performance, (iv) review and revision, and (v) information, communication, and reporting (see Figure 1). The guidance stresses that a greater focus should be placed on internal oversight, governance, and culture to manage these risks. It states that over the last several decades, particularly in the last 10 years, the prevalence of ESG-related risks has increased considerably and environmental and social issues requiring entities’ consideration have skyrocketed.

Note: Any opinions expressed in this paper are the author’s own, and should not be regarded as the official opinions of the organisation to which the author is affiliated.

In the context of insurance, it is likely to become increasingly important for insurers to take climate and environmental risks into account in insurance underwriting, as indicated in policy papers by authorities such as the EIOPA and the Monetary Authority of Singapore. As for stress testing, it is essential for insurers to enhance stress testing and scenario analysis in their ERM and ORSA. The role that (top-down) stress testing plays in macroprudential supervision will also become more important.

Climate and environmental risks may be taken into account in the Pillar 1 capital requirements. Nevertheless, careful consideration would be required for this, given that practices for quantifying these risks have not yet necessarily been sufficiently established.

It is essential for all financial institutions to take climate and environment-related issues, including climate and environment-related regulation and supervision, as an opportunity to make their business sustainable and therefore to tackle these issues proactively, and not consider them as merely a ‘compliance exercise’. Institutions are expected to make further efforts towards climate change initiatives in the coming years.
### Appendix: Climate-related major regulatory and supervisory developments in 2020

<table>
<thead>
<tr>
<th></th>
<th>Global</th>
<th>Europe</th>
<th>North America</th>
<th>APAC</th>
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<tbody>
<tr>
<td>Jan.</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>■ Australia’s APRA makes climate change one of the focus areas for supervision in 2020 &lt;1&gt;</td>
</tr>
<tr>
<td>Feb.</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>■ APRA urges financial institutions to manage financial risks of climate change &lt;2&gt;</td>
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<tr>
<td>Apr.</td>
<td>-</td>
<td>■ EC launches a public consultation on a renewed sustainable finance strategy &lt;3&gt;</td>
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<tr>
<td>May</td>
<td>■ NGFS publishes its guide for supervisors on integrating climate and environmental risks into prudential supervision &lt;5&gt;</td>
<td>-</td>
<td>-</td>
<td>■ Hong Kong MA and SFC establish the Green and Sustainable Finance Cross-Agency Steering Group &lt;4&gt;</td>
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<tr>
<td>Jun.</td>
<td>■ NGFS publishes its guide on climate scenario analysis for central banks and supervisors &lt;7&gt;</td>
<td>■ EU adopts the Taxonomy Regulation &lt;6&gt;</td>
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<tr>
<td></td>
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<td>■ CFRF publishes its guide to help the financial industry address climate-related financial risks &lt;8&gt;</td>
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<tr>
<td>Jul.</td>
<td>■ FSB releases a fact-finding report on climate-related risks &lt;13&gt;</td>
<td>■ The UK PRA urges financial institutions to manage climate-related financial risks &lt;9&gt;</td>
<td>■ The California DoI launches first-ever database of green insurance products &lt;10&gt;</td>
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<td></td>
<td></td>
<td>■ ESAs respond to EC’s consultation paper on a renewed sustainable finance strategy &lt;11&gt;</td>
<td>■ NAIC forms a task force on climate and resiliency &lt;12&gt;</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>■ The New York DFS announces its opposition to the federal government’s proposed rule on ESG investment &lt;14&gt;</td>
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</table>
| Sept. | ▪ NGFS publishes its work program for 2020-2022 <15>  
▪ NGFS publishes a report on environmental risk analysis by financial institutions <16>  
▪ IFRS Foundation Trustees publish a consultation document on global approaches to sustainability reporting <20>  
| | ▪ ESAs launch a survey on enviromental/ social financial product templates <19>  
| | ▪ The New York DFS calls on insurers to manage climate risks <18>  
| | ▪ New Zealand considers requiring financial institutions to disclose climate-related financial information <17>  
| Oct. | ▪ IAIS releases a draft application paper on climate-related risks and insurance supervision <22>  
▪ TCFD releases its 3rd status report and a consultation paper <23>  
| | ▪ EIOPA launches a public consultation on the supervision over the use of climate change scenarios in ORSA <21>  
| | ▪ The New York DFS urges banks to manage climate-related risks <24>  
| Nov. | ▪ FSB publishes a report on the impact of climate change on the financial system <32>  
| | ▪ AMF and ACPR publish their first report on financial institutions’ coal policies <25>  
▪ The UK Treasury publishes a roadmap for mandatory TCFD disclosures <26>  
▪ Switzerland’s FINMA launches a public consultation on updated rules on climate disclosures <27>  
▪ BoE outlines 2021 stress tests on climate change <28>  
▪ EC launches a public consultation on  
| | ▪ OSFI announces a pilot project on climate risk scenarios <29>  
▪ NAIC issues its climate report <31>  
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<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
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<tbody>
<tr>
<td>Dec.</td>
<td>ECB finalises its guide on climate and environmental risks for banks &lt;33&gt;</td>
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<td></td>
<td>EIOPA launches a public consultation on insurers’ key performance indicators on sustainability for non-financial reporting &lt;34&gt;</td>
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<tr>
<td></td>
<td>EIOPA publishes a discussion paper on a methodology for integrating climate change into a standard formula &lt;35&gt;</td>
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<tr>
<td></td>
<td>EIOPA launches a public consultation on non-life underwriting and pricing in light of climate change &lt;37&gt;</td>
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<tr>
<td></td>
<td>EIOPA releases a report on a sensitivity analysis of climate-change related transition risks &lt;38&gt;</td>
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<tr>
<td></td>
<td>The UK FCA introduces rules to enhance climate-related disclosures &lt;40&gt;</td>
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<tr>
<td></td>
<td>Singapore’s MAS finalises guidelines on environmental risk management for insurers &lt;36&gt;</td>
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<tr>
<td></td>
<td>HK authorities announce plans to support a greener and more sustainable future &lt;39&gt;</td>
</tr>
</tbody>
</table>

Source: Publicly available information listed below^d

^d The numbers within <> in the table correspond to the source numbers on the list below.
1. Australian Prudential Regulation Authority (APRA) ‘APRA sets out policy and supervision priorities for 2020’ (30 January 2020)

2. APRA ‘Letters: Understanding and managing the financial risks of climate change’ (24 February 2020)


4. Hong Kong Monetary Authority (HKMA) ‘Joint statement on the establishment of the Green and Sustainable Finance Cross-Agency Steering Group’ (5 May 2020)


6. EC ‘Sustainable Finance: Commission welcomes the adoption by the European Parliament of the Taxonomy Regulation’ (18 June 2020)

7. NGFS ‘Guide to climate scenario analysis for central banks and supervisors’ (24 June 2020)


10. California Department of Insurance ‘Commissioner Lara launches first-ever database of green insurance products’ (14 July 2020)

11. European Insurance and Occupational Pensions Authority (EIOPA) ‘EIOPA responds to the European Commission’s consultation on a renewed sustainable finance strategy’ (16 July 2020)

12. National Association of Insurance Commissioners (NAIC) ‘NAIC levels up on climate & resiliency’ (17 July 2020)

13. Financial Stability Board (FSB) ‘Stocktake of financial authorities’ experience in including physical and transition climate risks as part of their financial stability monitoring’ (22 July 2020)


15. NGFS ‘NGFS publishes its 2020-2022 work program and announces changes in the governance’ (3 September 2020)

16. NGFS ‘Overview of Environmental Risk Analysis by Financial Institutions’ (10 September 2020)

17. New Zealand Government ‘New Zealand first in the world to require climate risk reporting’ (15 September 2020)

18. New YorkDFS ‘During New York Climate Week, DFS Superintendent Linda A. Lacewell announces actions bolstering DFS’s commitment to addressing climate-related financial risks’ (22 September 2020)

19. EIOPA ‘ESAs launch survey on environmental and/or social financial product templates’ (21 September 2020)

20. Trustees of the IFRS Foundation ‘IFRS Foundation Trustees consult on global approach to sustainability reporting and on possible Foundation role’ (30 September 2020)

21. EIOPA ‘EIOPA consults on the supervision of the use of climate change scenarios in ORSA’ (5 October 2020)


24. New York DFS ‘Superintendent Lacewell announces DFS expands efforts to ensure financial services industry manages financial risks from climate change’ (29 October 2020)

25. Autorité de Contrôle Prudentiel et de Résolution (ACPR) ‘The AMF and the ACPR publish their first report on the
monitoring and evaluation of financial institutions’ coal policies’ (2 November 2020)

26. HM Treasury ‘UK joint regulator and government TCFD Taskforce: Interim Report and Roadmap’ (9 November 2020) and BoE ‘The time to push ahead on tackling climate change – speech by Andrew Bailey’ (9 November 2020)


28. BoE ‘The Bank of England is restarting the Climate Biennial Exploratory Scenario (CBES)’ (13 November 2020)


30. EC ‘Sustainable Finance and Taxonomy: Commission launches public consultation on criteria defining environmentally sustainable activities’ (20 November 2020)

31. NAIC ‘NAIC Assesses, Provides Insight from Insurer Climate Risk Disclosure Survey Data’ (23 November 2020)

32. FSB ‘The implications of climate change for financial stability’ (23 November 2020)

33. European Central Bank (ECB) ‘ECB publishes final guide on climate-related and environmental risks for banks’ (27 November 2020)

34. EIOPA ‘EIOPA consults on insurers’ key performance indicators on sustainability for non-financial reporting’ (30 November 2020)

35. EIOPA ‘EIOPA launches discussion paper on a methodology for integrating climate change in the standard formula’ (2 December 2020)


37. EIOPA ‘Ensuring the availability and affordability of insurance in light of climate change: Discussion paper on non-life underwriting and pricing’ (10 December 2020)

38. EIOPA ‘Sensitivity analysis of climate change related transition risks’ (15 December 2020)

39. HKMA ‘Cross-Agency Steering Group Launches its Strategic Plan to Strengthen Hong Kong’s Financial Ecosystem to Support a Greener and More Sustainable Future’ (17 December 2020)

40. UK Financial Conduct Authority (FCA) ‘FCA introduces rule to enhance climate-related disclosures’ (21 December 2020)
References


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