

## Comments on ISSB Exposure Draft: Amendments to Greenhouse Gas Emissions Disclosures - Proposed amendments to IFRS S2

Items		Concerns / Recommendations / Your Comments ( please provide detailed rationale and suggested alternatives where appropriate )
1.	Question 1—Measurement and disclosure of Scope 3 Category 15 greenhouse gas emissions	<p>The banks welcome guidance on derivative financial instruments and agree with the proposed guidance. Some banks follow this approach in their own financed emissions reporting.</p> <p>The decision to limit reporting around facilitated emissions may result in less pressure to set sector specific targets outside of Oil and Gas.</p>
2.	Question 2—Use of the Global Industry Classification Standard in applying specific requirements related to financed emissions	The banks welcome this change allowing flexibility around the classification system used. Some banks currently apply the ISIC classification system, hence flexibility in this approach will reduce their reporting burden.
3.	Question 3—Jurisdictional relief from using the GHG Protocol Corporate Standard	The banks welcome the proposal. The decision to allow flexibility regarding the standard is beneficial, particularly if there are jurisdictional requirements to comply with another standard.
4.	Question 4—Applicability of jurisdictional relief for global warming potential values	Not all banks may be impacted. Some banks do not currently use the GWP factors directly in any of the calculations they perform, given that all their emission factors are typically expressed in GHG equivalents where other gas types are material.