



International Actuarial Association  
Association Actuarielle Internationale

## IAA Comment Template

### [Draft Statement of Intent \(SOI\) for ISAP \[8\]](#) IFRS S2 Climate-Related Disclosures

1. Do you agree that an International Standard of Actuarial Practice (ISAP) is needed on IFRS S2 Climate-Related Disclosures?

Yes

No

Please see comments provided at section 4

2. Are any of the proposed topics inappropriate for inclusion in ISAP [8]?

Yes

No

**If yes, please explain why the particular topic should not be included.**

For the reasons stated in section 4, it is the IFoA view that public interest focused non mandatory guidance, thought leadership and research initiatives are the most effective means to support members performing work related to IFRS S2 disclosure requirements for identifying, measuring and disclosing climate related risks and opportunities. This is particularly in recognition of the fact that topics may extend beyond those normally considered to be “typical” actuarial work, thus challenging to define in a fast-changing area of scientific understanding.

**3. What other topics should be included in ISAP [8]?**

Please cover why you wish guidance in this area and if appropriate provide an example to illustrate the issue. Please note that the ISAP is not intended to address unique, country-specific issues. Member associations and local actuarial standard setting organizations could address such issues by providing additional guidance to their members as the ISAP is adopted, or adding such additional guidance within the local adaptation of the ISAP.

The IFoA does not propose any topics for inclusion for the reasons given.

**4. Please use this space for any additional comments not covered above.**

**Do you agree that an ISAP is needed on IFRS S2 – Climate-Related Disclosures?**

The IFoA consulted on this issue in 2021 and [published a consultation feedback document](#) following extensive engagement in April 2022. The IFoA also published a [Risk Alert in April 2022](#) on the same topic and is committed to an extensive engagement and thought leadership programme over what the IFOA considers to be the greatest challenge of our time. We are pleased to share our most recent publications on this important topic [Climate Scenario Modelling](#) plus new [biodiversity statement](#) as part of a range of materials available [in the IFoA’s sustainability hub](#). This resource also includes our [May 2023 response to the FCA’s discussion paper on the topic](#). You may also find the [July 2023 FRC thematic review on climate related metrics and targets](#) useful.

It is the IFoA’s current view that engagement on this fast evolving issue is most effectively achieved by thought leadership and research initiatives such as these. It is not currently persuaded that formal regulatory intervention is the most effective method of positive intervention in what is already a heavily regulated area. In saying this, the IFoA is mindful that IFRS S2 Climate-related Disclosures, which the proposed ISAP is intended to support, imposes obligations on entities. The IFoA takes the view that imposing regulatory obligations on its individual members, to compel those persons to directly influence entity behaviour, may be disproportionate in some circumstances and outside of the sphere of authority for some members.

The IFoA’s Regulatory Board continues to keep the issue under close review.

**5. Please provide the name of the person completing the consultation response, association and email address for further clarifications (if needed).**

<b>Name</b>	<b>Suzie Lyons</b>
<b>Organisation</b>	<b>Institute and Faculty of Actuaries</b>

Comments on draft Statement of Intent to Issue ISAP [8]

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Type of response	<input type="checkbox"/> Personal <input checked="" type="checkbox"/> Organization

**IMPORTANT:**

Please check if the relevant check boxes are ticked appropriately and save the file renamed with the organization's or individual's name (e.g., SOI\_CommentTemplate\_[NAME].Doc).

E-mail the file as an attachment to [SOI.ISAP8.comments@actuaries.org](mailto:SOI.ISAP8.comments@actuaries.org), with "ISAP[8]" in the e-mail header. **Please respond by Wednesday, 23 August 2023.**