

# Response to Consultation Paper on Sustainability Reporting

31-Dec-2020

Dear Sir/Madam

I have noticed your consultation on the above subject. I am concerned about this issue because achieving a sustainable economy as part of a sustainable society and global ecosystem is the greatest challenge facing humanity over the next few decades.

I have real concern about your proposal. I think that:

- Sustainability reports should be for the benefit of all stakeholders of a company and not just those in the financial community, who seem to be your main concern;
- Sustainability reporting should be built into mainstream financial reporting, and not be treated as a separate issue, as you propose. It will forever remain peripheral, and at risk of being treated as 'greenwash' if your proposal for a separate Sustainability Standards Board is adopted;
- Companies should now be required to disclose their likely costs of becoming net zero carbon compliant, and to account for these costs as they make the transition to achieving that goal over the years to come. These costs must be on the balance sheet now and in the profit and loss account as they are expended. How else are we to know who is really walking the talk on this issue? As someone with a stake in the world I really need to know this.

You have the option to make this issue the biggest issue in accounting for decades to come, which is what it should be given the urgency of climate change. Instead your proposal sweeps it to one side and treats it as peripheral. This will no longer do. I urge you to rethink, and to propose integrated financial and sustainability reporting as the way forward for accounting standards.

Regards

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