

An aerial photograph showing a construction site on the right and a dense green forest on the left. A yellow excavator is visible in the lower right corner of the construction area. A large yellow rectangular box is overlaid on the right side of the image, containing text.

Applying IFRS

Accounting for Climate Change

Updated August 2023

The EY logo, consisting of the letters 'EY' in a bold, white, sans-serif font, with a yellow triangle pointing upwards to the right of the 'Y'.

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What you need to know

- ▶ There is an increased focus on the measurement and disclosure of climate-related matters in an entity's financial statements.
- ▶ The determination of the effects of climate change on an entity's financial statements may require significant effort and judgement.
- ▶ Entities are required, at a minimum, to follow the specific disclosure requirements in each IFRS accounting standard. Entities may need to provide additional disclosures in their financial statements in order to meet the standards' disclosure objectives. Hence, in determining the extent of disclosure, entities are required to carefully evaluate what information is required for users to be able to assess the effects of climate change on their financial position, financial performance and cash flows.
- ▶ This publication is intended to support entities in assessing and reporting on the effects of climate change for accounting purposes by providing helpful observations and illustrations.

Overview

The efforts to reduce the society's impact on climate change have never been greater. At the same time, there is unprecedented pressure from stakeholders for entities to communicate clear commitments which is set to continue for the foreseeable future.

Although, there is no single explicit standard on climate-related matters under IFRS, climate risk and other climate-related matters may impact a number of areas of accounting. While the immediate impact on the financial statements may not necessarily be quantitatively significant, there are increasing expectations from stakeholders that entities explain how climate-related matters are considered in preparing their financial statements to the extent they are material¹ from a qualitative perspective. Stakeholders also expect robust disclosures on the most significant assumptions, estimates and judgements made related to climate change.

Investors have highlighted the importance of reducing entities' impact on the environment on their investment-making decisions and their assessment of management's stewardship. In November 2021, through the Glasgow Financial Alliance for Net Zero, over US \$130 trillion of private capital has been committed to accelerating the transition to a zero-emissions economy by 2050.

Climate change is expected to impact businesses in the decades to come. While it is imperative for entities to more explicitly address climate-related risks in their financial statements, considering developments in previous and recent years, accounting practice may evolve gradually over the next few years. As climate-related matters continue to evolve and entities make further commitments and take additional actions to tackle climate change, it is important for them to ensure that their financial statements reflect the most updated assessment of climate-related risks and their impact on the financial statements. Furthermore, entities should ensure consistency between information communicated in the financial statements and the information communicated to stakeholders outside the financial statements, such as in press releases, investor updates and disclosures in other parts of the annual report.

In the International Accounting Standards Board's Third Agenda Consultation, stakeholders expressed a view that there may be inconsistent application of IFRS accounting standards to climate-related risks and insufficient information disclosed about climate-related risks in the financial statements. In response to that feedback, the International Accounting Standards Board (IASB) added a maintenance project on Climate-related Risks in the Financial Statements. As part of the project, the IASB will consider the work of the International Sustainability Standards Board (ISSB) to the extent relevant to financial statements. Together, the Boards intend their work to be complementary and facilitate connectivity in general purpose financial reports.²

¹ In accordance with paragraph 7 of IAS 1 *Presentation of Financial Statements*, information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements.

² <https://www.ifrs.org/projects/work-plan/climate-related-risks-in-the-financial-statements/>

Regulators around the world have increased their focus on the need to report the impact of climate risk on financial statements and consistency between sustainability reporting and/or communication on one hand and the related disclosures in the financial statements on the other. For example, in March 2022, the U.S. Securities and Exchange Commission issued [proposed amendments](#)³ that would require registrants to provide certain climate-related information in their registration statements and annual reports. The proposals are intended to provide consistent, comparable and reliable information to investors about how a registrant has addressed climate-related risks. In October 2022, the UK's Financial Reporting Council published the FRC Lab report [Net Zero Disclosures](#)⁴ to assist reporting teams as they prepare disclosures on net zero and other Greenhouse Gas (GHG) emission reduction commitments. In the [European Common Enforcement Priorities for 2022 Annual Financial Reports](#),⁵ the European Securities and Markets Authority (ESMA) noted that 'consistent treatment of climate-related matters across the annual financial report is a key element to prevent the risk of greenwashing'. In its March 2023⁶, ESMA presented two enforcement decisions taken by national enforcers, members of ESMA, requiring issuers to supplement their disclosures with more specific climate-related information.

The decisions, which related to the impairment tests and sources of estimation uncertainty disclosures, concluded that in case of the financial statements that were subject to the decisions, information provided in the financial statements is not sufficient, particularly in light of climate-related information stated in the non-financial section of its annual financial report. The decisions stress the importance of consistency between financial and non-financial reporting in terms of climate-related assumptions and information.

Although in its [2022 Status Report](#),⁷ the Task Force on Climate-Related Financial Disclosures (TCFD) highlighted the 'encouraging signs of progress in companies disclosing climate-related information', it also noted that 'more urgent progress is needed to improve transparency, especially when considered within the broader global focus on climate change'.

With the release of the ISSB's first two IFRS Sustainability Disclosure Standards in June 2023, along with requirements in Corporate Sustainability Reporting Directive (CSRD) applicable to the European Union, and the forthcoming SEC requirements in the US, the importance on sustainability reporting will only increase. So too will the importance of consistent and connected information in the financial statements.

This publication is intended to support entities in assessing and disclosing the extent to which climate change affects their financial statements prepared in accordance with IFRS. Significant judgement may be required to identify the

³ Securities and Exchange Commission, 21 March 2022, The Enhancement and Standardization of Climate-Related Disclosures for Investors, <https://www.sec.gov/>

⁴ Financial Reporting Council, October 2022, FRC Lab Report: Net zero disclosures, <https://www.frc.org.uk>

⁵ ESMA, 28 October 2022, European common enforcement priorities for 2022 annual financial reports, <https://www.esma.europa.eu>

⁶ ESMA, 29 March 2023, 27th Extract from the EECS's Database of Enforcement, <https://www.esma.europa.eu>

⁷ Task Force on Climate-related Financial Disclosures, October 2022, 2022 Status Report, <https://www.fsb-tcf.org>

accounting considerations that are relevant to the entity's specific facts and circumstances. Any information included in this publication is, therefore, solely intended to provide helpful observations and illustrations and should not be interpreted as an indication that these would apply or be sufficient in all circumstances. Although this publication highlights the need for consistency with climate-related disclosures in other parts of the annual report, it does not address the management commentary (or MD&A) nor other reports outside the IFRS financial statements (for example, any separate sustainability reporting).

Extracts from financial statements presented herein are reproduced for illustrative purposes. They have not been subject to any review as to their compliance with IFRS or any other requirements, such as local capital market rules. Thus, they document practices that entities have developed to date; they are not intended to represent 'best practice'. The extracts presented should be read in conjunction with the rest of the information provided in the financial statements in order to understand their intended purpose.

Although the extracts address entities' sometimes highly specific facts and circumstances, the judgements involved and the requirements in IFRS standards to disclose relevant information apply to all reporting entities. Therefore, we recommend that entities from all sectors consider these examples when reporting on the impact of climate change taking into account their own specific facts and circumstances.

Please see ey.com/IFRS for our most recent IFRS publications. In particular, we refer to our 'Applying IFRS to the Energy Transition' series that seeks to explore the accounting implications of emerging business models and arrangements related to the energy transition. The series currently covers power purchase agreements, carbon capture and storage.

1. Disclosure requirements

1.1 What is the issue?

IAS 1 *Presentation of financial statements* states that the objective of financial statements is to provide information about the financial position, financial performance and cash flows of an entity that is useful to a wide range of users in making economic decisions. In order to support decision-making by the users of financial statements, information should have, at least in part, forward-looking or predictive quality. Information pertaining to climate-related matters will be relevant if investors could reasonably expect that it will have a significant impact on the entity and, therefore, influence their investment decisions. Furthermore, IAS 1 requires an entity to consider whether any material information is missing from its financial statements.

As an overarching principle, IAS 1 requires entities to disclose information, for instance, climate-related matters, that is not specifically required by IFRS standards and not presented elsewhere, but which is relevant to an understanding of the financial statements.⁸ The requirements in IAS 1 are relevant to the entire financial statements.

1.2 What is the impact?

Assumptions and estimates

IAS 1 requires disclosure of information about the assumptions an entity makes about the future that have a significant risk of resulting in a material adjustment within the next financial year.⁹ As such, assumptions in respect of climate-related matters may be required. In some cases, changes in key assumptions related to climate risk may not be expected to result in material adjustments in the short-term, but the chance of material adjustments in the longer term may be significant. In that context, it is important to acknowledge that entities must provide additional disclosures beyond the specific requirements in IFRS standards when those requirements are insufficient to enable users to understand the impact of particular transactions, other events and conditions on an entity's financial position and performance. Thus, disclosures about key assumptions may be required although the risk of material adjustments in the short-term may be considered as low. Furthermore, the fact that investors and other users are requesting more transparency on climate-related matters, may, in itself, suggest that such disclosures are material, although the quantitative impact on financial measures in isolation may be deemed of little significance, as in the case of for instance assets with relatively short useful lives.

Aviva Plc disclosed in its risk management disclosures how it has incorporated its commitment to a low carbon economy in its financial statements.

Disclosure of assumptions in respect of climate-related matters may be required.

⁸ Refer to IAS 1.112(c).

⁹ Refer to IAS 1.125.

Illustration 1-1 – Aviva Plc - 2022 annual report (Financial services sector - insurance, wealth and retirement services)

58 - Risk management

Aviva remains committed to supporting a low carbon economy that will improve the resilience of our economy, society and the financial system in line with the 2015 Paris Agreement target on climate change. In March 2021, we set an ambition to become a Net Zero carbon company by 2040 and we are acting now to mitigate and manage the impact of climate change on our business. We calculate a Climate Value at Risk (VaR) against Intergovernmental Panel on Climate Change (IPCC) scenarios to assess the climate-related risks and opportunities under different emission projections and associated temperature pathways. A range of different financial indicators are used to assess the impact on our investments and insurance liabilities. As part of our actions to mitigate climate risks, Aviva originates assets for their climate credentials. Aviva has defined an Investment in Sustainable assets metric, which is implemented with reference to external frameworks and is set out in our climate reporting policies in the Aviva plc Climate-related Financial Disclosure report 2022.

When entities consider climate-related assumptions, they may need to update their processes. Historically, many of the assumptions that underpin financial reporting have been made using historical experience. However, with the pace of change in climate-related matters, such experience may be less relevant. For instance, entities may need to monitor the plans and commitments announced and initiatives put in place, including but not limited to technological, legal and social developments, by private and public sectors.

BHP Group Limited (BHP) presented the impact of climate change and the transition to a low carbon economy in its 2022 annual financial statements. BHP disclosed two low carbon energy transition scenarios representing management's assumptions regarding the impact of the transition, as well as the items in the financial statements affected by those scenarios.

Illustration 1-2 – BHP Group Limited - 2022 annual report (Extractive sector)

Transition risks

Global transition signposts

In addition to the Group's targets and goals, significant judgements and key estimates are also impacted by the Group's current assessment of the range of economic and climate related conditions that could exist in transitioning to a low carbon economy, considering the current trajectory of society and the global economy as a whole. Signposts do not yet indicate that the appropriate measures are in place to drive decarbonisation at the pace or scale required for the Group to assess achieving the aims of the Paris Agreement as the most likely future outcome. However, as governments, institutions, companies and society increasingly focus on addressing climate change, the potential for a non-linear and/or more rapid transition and the subsequent impact on threats and opportunities increases.

The BHP Climate Transition Action Plan 2021 references the Group's divergent climate scenarios across a range of temperature outcomes. The Group currently uses two of those scenarios, being the Central Energy View and Lower Carbon View¹ as inputs to the Group's operational planning cases. The use of these two scenarios reflects the Group's current estimates of the most likely range of future states for the global economy and associated sub-systems. These operational planning cases inform updates to the Group's supply, demand and price outlooks, capital allocation and portfolio decisions.

Given the complexity of climate modelling, these scenarios are reviewed periodically to reflect new information, with developments in the periods between scenario updates being reflected in updated internal long-term price outlooks.

Investment decisions and asset valuations also incorporate carbon price assumptions for major Group operational, competitor and customer countries. In determining the Group's forecast, factors such as a country's current and announced climate policies and targets and societal factors such as public acceptance and demographics are considered, with the Group forecasting the global range of regional carbon prices to reach between US\$0-175/tCO₂-e in FY2030 and US\$10-250/tCO₂-e in FY2050, and US\$10-175/tCO₂-e in FY2030 and US\$100-250/tCO₂-e in FY2050 in BHP's current major operational and market countries.

The operational planning cases, price outlooks and cost of carbon assumptions, impact certain significant judgements and key estimates, including the determination of the valuation of assets and potential impairment charges (notes 11 'Property, plant and equipment' and 13 'Impairment of non-current assets'), the estimation of the remaining useful economic life of assets for depreciation purposes (note 11 'Property, plant and equipment') and the timing of closure and rehabilitation activities (note 15 'Closure and rehabilitation provisions').

In addition to the operational planning cases, the Group utilises a range of scenarios, including its 1.5°C Paris-aligned scenario², when testing the resilience of its portfolio, forming strategy and making investment decisions. While a 1.5°C Paris-aligned scenario does not currently represent one of the inputs to the Group's operational planning cases, the Group has, during FY2022, systematically integrated the Group's 1.5°C Paris-aligned scenario into the Group's strategy and capital allocation process to test the extent to which its capital allocation is aligned with a rapidly decarbonising global economy. Specifically, the Group applies the Group's 1.5°C Paris-aligned scenario to assess whether future demand for the Group's products under that scenario supports ongoing capital investment. The internal allocation of capital under the Group's Capital Allocation Framework and all major investment decisions now require an assessment of investment viability under the Group's 1.5°C Paris-aligned scenario.

Equinor ASA provided disclosures of commodity price sensitivity aligned with a Paris Agreement scenario in its 2022 annual financial statements.

Illustration 1-3 – Equinor ASA - 2022 annual report (Energy sector)

3 Consequences of initiatives to limit climate changes

Effects on estimation uncertainty

The effects of the initiatives to limit climate changes and the potential impact of the energy transition are relevant to some of the economic assumptions in our estimations of future cash flows. The results of the development of such initiatives, and the degree to which Equinor's operations will be affected by them, are sources of uncertainty. Estimating global energy demand and commodity prices towards 2050 is a challenging task, as this comprises assessing the future development in supply and demand, technology change, taxation, tax on emissions, production limits and other important factors. The assumptions may change over time, which could materialise in different outcomes from the current projected scenarios. This could result in significant changes to accounting estimates, such as economic useful life (affects depreciation period and timing of asset retirement obligations), value-in-use calculations (affects impairment assessments) and measurement of deferred tax assets.

Commodity prices

Equinor's commodity price assumptions applied in value-in-use impairment testing, are set in accordance with requirements in IFRS and based on management's best estimate of the development of relevant current circumstances and the likely future development of such circumstances. This price-set is currently not equal to a price-set required to achieve the goals in the Net Zero Emissions (NZE) by 2050 Scenario, nor a price-set in accordance with the Announced Pledges Scenario as defined by the International Energy Agency (IEA). A future change in the trajectory of how the world acts with regards to implementing actions in accordance with the goals in the Paris agreement could, depending on the detailed characteristics of such a trajectory,

have a negative impact on the valuation of Equinor's property, plant and equipment in total. A calculation of a possible effect of using the assumed commodity prices and CO₂ prices in a 1.5°C compatible NZE by 2050 Scenario as estimated by IEA could result in an impairment of upstream production assets and intangible assets around USD 4 billion before tax, see the sensitivity table below.

Similarly, we have calculated the possible effect of using prices according to the Announced Pledges Scenario, a scenario which is based on all of the climate-related commitments announced by governments around the Globe. Using this scenario, the world is expected to reach a 1.8°C increase in the year 2100, and this could result in an impairment of less than USD 0.5 billion before tax using the same simplified model, see the sensitivity table below.

These illustrative impairment sensitivity calculations are based on a simplified model and limitations described in [note 14](#) Impairments. However, when preparing these illustrative scenario sensitivities, we have linearly interpolated between current prices and the price set disclosed in the table below for both the NZE by 2050 scenario and the Announced pledges scenario. Applying this simplified approach, the illustrative potential impairments are significantly lower than the amount disclosed in [note 14](#) Impairments where an immediate 30% reduction in commodity prices has been applied, also considering a somewhat declining production profile, concentrated before the year 2030 for our producing and sanctioned development projects and the effects of discounting.

It may be necessary to provide sensitivity analyses for a range of scenarios.

The assessment, and more specifically, the quantification, of climate-related risks generally require the application of judgements about highly uncertain future developments, such as future technology developments, political developments and government actions. A valuation may include multiple scenarios covering a wide range of possible outcomes. Therefore, it may be necessary to provide sensitivity analyses for a range of scenarios, as well as disclosures explaining how the entity has incorporated the uncertainties in the estimates relied on in the primary financial statements and in the sensitivities disclosed (as required by IAS 1). It may be that investor communities expect information about the potential future effects of specific future scenarios, such as those relating to limiting the global temperatures increase to 1,5 degrees Celsius as mentioned in the Paris Agreement¹⁰. In that case, an entity may find it relevant to explain whether and how the entity's valuations align with those scenarios and, if they should differ, why the entity believes other scenarios are more realistic. BHP Group Limited made disclosures to this effect in its 2022 annual financial statements.

¹⁰ The Paris Agreement, [UNFCC website](#), accessed on 17 August 2023.

Illustration 1-4 – BHP Group Limited - 2022 annual report (Extractive sector)

Transition risks

Sensitivity to demand for the Group's commodities

The Group acknowledges that there are a range of possible energy transition scenarios, including those that are aligned with the aims of the Paris Agreement, that may indicate different outcomes for individual commodities. The resilience of the Group's portfolio to a 1.5°C Paris-aligned scenario (the Group's 1.5°C Paris-aligned scenario) continues to be considered, including the impact of Paris-aligned commodity price estimates under that scenario on the Group's latest asset plans.

There are inherent limitations with scenario analysis and it is difficult to predict which, if any, of the scenarios might eventuate and none of the scenarios considered constitutes a definitive outcome for the Group.

However, the long-term commodity price estimates under the Group's 1.5°C Paris-aligned scenario reflect the world needing around twice as much steel, copper and potash and four times as much nickel in the next 30 years as in the last 30. In addition, the Group's portfolio is transitioning towards higher quality iron ore and metallurgical coal that enable steelmakers to be more efficient and operate with a lower emissions intensity.

As such, although all potential financial reporting consequences under the Group's 1.5°C Paris-aligned scenario are currently impracticable to fully assess, the long-term commodity price outlooks under this scenario for iron ore, copper, metallurgical coal, nickel and potash are either largely consistent with or favourable to the price outlooks in the Group's current operational planning cases.

Given the positive long-term price outlooks for these commodities, the Group currently considers that a material adverse change is not expected to the valuation, and remaining useful life, of assets and discounting of closure and rehabilitation provisions for assets relating to these commodities under its 1.5°C Paris-aligned scenario.

While energy coal long-term commodity price outlooks under the Group's 1.5°C Paris-aligned scenario are unfavourable when compared to the price outlooks in the Group's current operational planning cases, following impairments recognised in FY2021, the carrying value of assets at the Group's remaining energy coal operations at NSWEC is no longer material.

Further, the Group's closure provision for NSWEC reflects the announcement in FY2022 of the Group's plans to seek approvals to continue mining at NSWEC beyond its current mining consent that expires in 2026 and intention to proceed with a managed process to cease mining at NSWEC by the end of FY2030. While the closure provision remains subject to estimation and assumptions, the timing of closure is no longer considered materially susceptible to the long-term impacts of climate change.

In its 2022 annual financial statements, Heineken N.V. noted that climate change is considered in the entity's estimates and management judgements.

Illustration 1-5 – Heineken N. V. – 2022 annual report (Brewery sector)

3. Significant events in the period and accounting estimates and judgements

(b) Climate change

In preparing the consolidated financial statements, HEINEKEN has considered climate change, including climate change scenarios and the Brew a Better World (BaBW) goals, on the estimates and judgements used in preparing the consolidated financial statements.

The following impacts were assessed in the consolidated financial statements:

- The impact of climate change on the residual values and useful lives of assets were considered in determining the carrying value of non-current assets (refer to note 8.1 and 8.2).
- The impact of climate change was considered in relation to the recognition and measurement of provisions and contingencies (refer to note 9.2 and 9.3).
- The impact of climate change was considered in relation to indications of impairment and the forecast of cash flows used in the impairment assessments of non-current assets including goodwill (refer to note 8.1 and 8.2).

For the year ended 31 December 2022, no material impact on financial reporting judgement and estimates arising from climate change were identified, as a result the valuations of assets or liabilities have not been significantly impacted by climate change risks.

As noted above, in many cases, it will be appropriate to further explain how such factors have impacted the estimations made by the entity, by including details about the assumptions relied on, for instance, the expected closure date of a plant, as well as sensitivity disclosures reflecting what the impact of an earlier closure date would be.

Some consider that the impact of climate risk and potential future developments on the entity, including the sustainability of its current business model, is too uncertain to allow for meaningful representation, through measurement and quantified disclosures, in the financial statements. Generally, where there is a high level of uncertainty, entities should consider disclosing their sensitivity analyses. They can be particularly helpful in conveying relevant information in such cases, as illustrated by the examples discussed above.

Others may be in a position in which management has not yet fully explored the potential impact of climate risk on the entity's financial position and future performance and, as a consequence, climate risk is not incorporated in the relevant valuations and judgements. In such cases, entities should consider disclosing information clarifying their inability to reflect climate risk in the financial statements, along with an explanation of how they consider the financial statements to present fairly the financial position, financial performance and cash flows of the entity, if the potential impact of climate risk on the entity might be material.

Judgements

IFRS requires disclosure of the management's accounting policy judgements that is separate from estimates that have the most significant effect on the amounts recognised in the financial statements. Climate-related matters may impact the judgement made when deciding the appropriate accounting policies, and thus may, in some cases, trigger judgement disclosures. For instance, as discussed in Section 3, judgement may be applied when assessing whether cash

Information regarding climate-related matters should be considered in conjunction with other uncertainties when assessing going concern.

flows expected to arise in an entity's attempt to achieve certain sustainability targets in the future are to be considered asset maintenance or enhancements when determining value in use in an impairment assessment. Similarly, significant judgement may be required when determining whether an entity has a constructive obligation to clean a site or remove waste, as discussed in Section 4.

In its 2022 annual financial statements, Mercedes-Benz Group provided disclosures explaining the judgements made when assessing how climate-related aspects impact recognition and measurement of certain groups of assets and liabilities.

Illustration 1-6 – Mercedes-Benz Group - 2022 annual report (Automotive sector)

1 Accounting policies

Consideration of sustainability related aspects in connection with the recognition and measurement of assets and liabilities

With "Ambition 2039" the Mercedes-Benz Group has set itself the target of a CO₂-neutrality for the new vehicle fleet by 2039 in its business strategy. With the strategic step to "Electric only", the Mercedes-Benz Group is accelerating its transformation into an all-electric and software-driven future. Recognition and measurement of the Group's assets and liabilities take into account climate-related risks and developments associated with the transformation, which also include the climate targets set in the Paris Climate Agreement.

Accounting estimates and management judgments in connection with sustainability-related aspects are taken into consideration in particular in the accounting of assets and liabilities described below:

The determination and review of the useful lives of the capitalized development costs are based on the expected product life cycle. Changes in the originally envisaged product life cycles can result from the transformation to all-electric vehicles. Due to the resolutions regarding the accelerated transformation new developments in the area of conventional powertrains are reduced and already capitalized development expenditure will partly be used for longer. For this reason the useful lives of specific development expenditures have been extended with effect from 1 January 2022, which resulted in a positive effect on EBIT in the amount of €0.2 billion for 2022. An effect in the same amount is expected for 2023.

In the same way, the useful lives of property, plant and equipment assets are regularly reviewed in the light of the transformation to all-electric vehicles. This did not require any material adjustments of the useful lives up to the reporting date as the production facilities of the Group are basically flexible in use.

Illustration 1-6 – Mercedes-Benz Group - 2022 annual report (Automotive sector)

In the context of controlling and further developing the production network, efforts are also being made to compensate for potential effects of the transformation at affected sites. No significant obligations to dismantle or remove production facilities and plants that would give rise to a provision existed on the reporting date.

The residual value of leased vehicles that are classified as operating leases is determined by the value that could be achieved for an asset that possesses the expected conditions of the leased asset at the end of the leasing period on the reporting date. Only developments that can be observed up to the reporting date are considered. Due to the transformation to all-electric vehicles, changes to the residual value of both conventionally powered and all-electric vehicles due to changing customer behaviour, new regulatory requirements and further technological development can result over time. The development of the residual values did not give rise to any indications that the transformation had a negative effect on the residual values during the financial year.

The expected proceeds from the disposal of vehicles pledged as collateral were taken into account in the determination of expected credit losses for receivables from financial services. The expected proceeds from the disposal were based on an estimate of the market value at the expected time of a possible default. There were no indications of a reduction of these estimated market values that could be traced to effects of climate change or of changing customer behaviour as of the reporting date.

As of the reporting date, there were no material provisions for payments to authorities that could result from exceeding local regulations regarding vehicle emission limits.

The impairment test on the level of the cash-generating units is based on the corporate planning of the Mercedes-Benz Group. The "Electric only" strategy of the Group taken account of herein provides for a step by step substitution of vehicles with combustion engines by electric vehicles. For the purposes of the impairment test, further sales risks and risks regarding the availability and the future price of components and raw materials were also taken into account. Additional corporate planning parameters in connection with the transformation affect the investment requirements and the currently higher variable costs of all-electric vehicles in comparison with vehicles with conventional powertrains. The simultaneous development, model refinement and production of electric and conventionally powered vehicles results in a higher investment requirement, particularly in the detail planning period until 2027, in comparison with focussing on conventionally powered vehicles. No growth was assumed in the derivation of the terminal value, due in part to the not yet completely predictable effects of the competitive situation and customer behaviour in the course of the transition to electric mobility. The impairment test carried out taking account of the transformation effects described did not result in any impairment requirement for the cash-generating units.

Going Concern

IAS 1 explains "going concern" by stating that financial statements are prepared on a going concern basis "unless management either intends to liquidate the entity or to cease trading, or has no realistic alternative but to do so".¹¹ In assessing whether the going concern basis of preparation is appropriate, information regarding climate-related matters should be considered in conjunction with other uncertainties.

Climate-related matters may affect an entity's going concern assessment, with assumptions regarding the nature of future business activities and restrictions on bank financing likely to be factored into the assessment. Additionally, entities will need to consider external factors such as issues regarding water, energy, land use and waste management that are crucial to the continued operation of the business.

In making their going concern assessments, many entities only consider the next 12 months and conclude that the going concern uncertainties are not significant. However, according to IAS 1, an entity needs to look at a period of at least 12 months from the end of the reporting period when assessing whether to prepare financial statements on a going concern basis. In other words, considering going concern for only 12 months, if known uncertainties impact the assessment over a longer term, is not consistent with the requirements in IAS 1.

¹¹ Paragraph 25 of IAS 1

Although an entity may conclude that the going concern basis is still appropriate, IAS 1 requires disclosure of material uncertainties, if any, that would cast significant doubt upon an entity's ability to continue as a going concern. Climate-related matters could create material uncertainties related to events or conditions that cast significant doubt upon an entity's ability to continue as a going concern. In such a case, although going concern may be assumed, additional disclosures explaining the uncertainties associated with the assumption would be required.

In its 2022 annual financial statements with a 31 December 2022 reporting date, Rolls Royce Holdings Plc stated that, based on a comprehensive going concern review over an eighteen-month period to August 2024, "The future impact of climate change on the Group has been considered through climate scenarios. The climate scenarios modelled do not have a material impact on the cash flow forecasts over the 18-month period to August 2024."

Illustration 1-7 – Rolls Royce Holdings Plc - 2022 annual report (Civil aerospace and defence sectors)

1 Accounting policies

Climate change

Climate change

In preparing the Consolidated Financial Statements the Directors have considered the potential impact of climate change, particularly in the context of the disclosures included in the Strategic Report and Climate Review this year and the stated decarbonisation strategy. Based on the Taskforce for Climate-related Financial Disclosures (TCFD) recommendations, the Group assesses the potential impact of climate-related risks which cover both transition risks and physical risks. The eight key risks and the opportunities considered in the climate scenarios prepared include extensive policy, legal, technological, and market changes and physical risks which could include direct damage to assets and supply chain disruption. Two of the assessed key transition risks have been identified as potentially having a high impact on the Group. These relate to the risk that regulatory changes could materially impact demand for our products and that addressing climate change will require shifting investment focus towards more sustainable products and solutions. Both of these risks are being actively addressed through the Group's decarbonisation strategy and the financial implications, as reflected in the quantified climate scenarios, have been considered when preparing the financial statements.

The Group has set its decarbonisation strategy and identified longer-term considerations in response to the climate challenge and is engaging proactively with external stakeholders to advocate for the conditions that society needs to achieve its net zero target. The Group's main short- and longer-term priorities include:

- achieving net zero greenhouse gas (GHG) emissions by 2030 from all energy purchased and consumed in the Group's offices, manufacturing and production activities (with the exception of product testing and development). This will be met through continued investment in onsite renewable energy installations; the procurement of renewable energy; and continued investment in energy efficiency improvements to reduce the Group's overall energy demands and operating costs. An estimate of the investment required to meet these scope 1 and 2 emission improvements is included in the forecasts that support these Consolidated Financial Statements;
- the scale up of sustainable fuels that will play a crucial role in reaching net zero carbon. To accelerate this, the Group are working to demonstrate that all the commercial aero engines produced, and the most popular reciprocating engines, representing 80% of the product portfolio, are compatible with sustainable fuels by the end of 2023 and working with our armed forces customers to achieve the same goals for the Rolls-Royce engines they use; and
- developing breakthrough new technologies, including investment in hybrid-electric solutions in Power Systems, continued development of the more efficient UltraFan aero engine, testing of sustainable aviation fuels, small modular reactors (SMRs) and hybrid and fully electric propulsion. New products will be compatible with net zero operation by 2030 and all products will be compatible with net zero operation by 2050. In the year, R&D costs of £(108)m (2021: £(68)m) within New Markets included design development to ready the SMRs to progress through the UK generic design assessment (GDA) process and investment in electrical propulsion technology. Future investment required to deliver these technologies is included in the forecasts that support the Consolidated Financial Statements.

The climate change scenarios previously prepared to assess the viability of our business strategy, decarbonisation plans and approach to managing climate-related risk have continued to develop over the last year as set out in our Climate Review. There remains inherent uncertainty over the assumptions used within these and how they will impact the Group's business operations, cash flows and profit projections. The Directors assess the assumptions on a regular basis to ensure that they are consistent with the risk management activities and the commitments made to investors and other stakeholders.

Assumptions used within the Consolidated Financial Statements in relation to areas such as revenue recognition for long-term contracts, impairment reviews of non-current assets and the carrying amount of deferred tax assets consider the findings from the climate scenarios prepared. Key variables include carbon pricing based on the International Energy Agency (IEA) Net Zero scenario, which assumes an increase from \$46 per tonne of carbon in 2022 to \$250 per tonne in 2050, and commodity price, temperature rise and GDP information from the Oxford Economics Global Climate Service Net Zero scenario aligned to IPCC SSP1-19.

Although in many cases, climate risk may not add significant going concern uncertainty in the shorter term, it cannot be disregarded for the purpose of assessing an entity's ability to continue as a going concern. If, based on an analysis of the sustainability of an entity's business over the longer term, there is significant going concern uncertainty regarding that entity's ability to continue over that longer term, disclosures addressing those uncertainties should be considered.

Consistency and transparency

Consistency between disclosures made by an entity outside the financial statements, such as in the management report, a sustainability report, etc., and the disclosures provided in the financial statements is a key feature of relevant reporting that has been gaining increased attention. For instance, in March 2023, ESMA published two decisions in which European enforcers had concluded that entities had not provided sufficient disclosure about climate-related matters in their 2021 financial statements. The decisions cited disclosures made by the same entities outside the financial statements.¹²

Effective communication about climate risk also involves structuring relevant disclosures within the financial statements. One of the approaches to transparent discussion of climate-related risks is to provide an overall disclosure of climate-related matters in the notes to the financial statements, together with a summary of key estimates and critical judgements, and cross-references to other notes to the financial statements elaborating and quantifying the impacts of climate-related matters. Other approaches to providing climate related risks disclosures may also work. Regardless of the approach taken, it is important that entities carefully assess how to best ensure that users can navigate the financial statements in an effective way to allow for a good understanding of the entity-specific financial impact of climate-related matters.

How we see it

Climate risk is becoming a major source of estimation uncertainty and could add complexity in the application of IFRS accounting standards. Furthermore, entities should consider uncertainties associated with future climate-related developments when assessing an entity's ability to continue as a going concern.

Entities should, therefore, ensure that relevant disclosure of assumptions and estimates are made, and those disclosures should be entity-specific, taking care to avoid generic, boilerplate-type language. Entity-specific disclosures include quantifiable information about assumptions, as well as explanations of deviations from known market expectations regarding the same assumptions. Furthermore, sensitivity disclosures, quantified if relevant, to illustrate the uncertainty embedded into the estimates relied on by entities, should also be made. It is also important that entities ensure consistency in both the disclosures about climate related matters outside the financial statements (e.g., in separate sustainability reports or management commentaries) and how they incorporate climate risk in the financial information (e.g., in measurements and disclosures in the financial statements).

When assessing the uncertainty associated with an entity's ability to continue as a going concern, climate risk impacts beyond those expected to materialise in the short term, should be considered.

¹² ESMA, 29 March 2023, 27th Extract from the EECS's Database of Enforcement, <https://www.esma.europa.eu>

2. Property, plant and equipment

2.1 What is the issue?

IAS 16 *Property, Plant and Equipment* requires an item of property, plant and equipment (PP&E) to be recognised if it is probable that future economic benefits associated with the item will flow to the entity and its cost can be measured reliably.

An item of PP&E should be depreciated over its useful economic life in a manner that reflects the pattern in which the asset's future economic benefits are expected to be consumed by the entity. IAS 16 requires the useful life and residual value of an asset to be estimated on a realistic basis and reviewed at least at the end of each financial year.

An entity may be required by legislation to incur certain expenditures, for example, safety or environmental protection equipment, that do not directly increase the future economic benefits expected to flow from the asset. IAS 16 explains that these expenditures may qualify for recognition as cost of an asset if they allow an entity to derive future economic benefits from related assets in excess of those that would flow if such expenditure had not been made.

We refer to Section 3 below for a discussion on impairment requirements in relation to PP&E.

2.2 What is the impact?

Climate change, the legislation enacted to address it, and growing societal pressure have the potential to significantly affect the value of an item of PP&E, its economic life and its residual value. For example, some technologies will be phased out by legislation, renewable technologies are becoming cost competitive as a result of strong learning curve effects and research and development investments, and some assets are prone to damage from extreme weather events.

In particular, entities should consider the following in assessing the impact of climate on its PP&E.

- ▶ *Useful life* - Climate change, including associated legislation, may affect how and for how long items of PP&E are used. IAS 16 requires entities to review the useful life of an asset at least at the end of each year-end. Entities will need to consider climate-related factors annually when determining the expected useful life of their assets and, therefore, the period over which such assets are depreciated. An entity would need to assess whether it expects, for example, the early closure of fossil-fuel producing assets (e.g., coal producing assets) or continued use of carbon-emitting assets (e.g., high emission ships). Similarly, an entity would need to consider if its PP&E assets could be indirectly affected if, for example, it is used to provide services to customers in high emission industries.

Climate-related matters may affect the value of an item of PP&E, its economic life and its residual value.

Illustration 2-1 – National Grid - 2022 annual report (Utility sector)

Notes to the consolidated financial statements

13. Property, plant and equipment

The role that our US gas networks play in the pathway to achieving the greenhouse gas emissions reductions targets set in the jurisdictions in which we operate is currently uncertain. In the year, policymakers in New York and Massachusetts have indicated an increase in electrification and a strategic downsizing of gas networks in their formal plans to meet their respective decarbonisation targets. As a result, there is a risk that the UELs of certain elements of our gas networks may be shortened in line with future legislation.

We believe the gas assets which we own and operate today will continue to have a crucial role in maintaining security, reliability and affordability of energy beyond 2050, although the scale and purpose for which the networks will be used is dependent on technological, legal and regulatory developments.

In the US, our gas distribution asset lives are assessed as part of detailed depreciation studies completed as part of each separate rate proceeding. Depreciation studies consider the physical condition of assets and the expected operational life of an asset. We believe these assessments are our best estimate of the UEL of our gas network assets in the US.

The weighted average remaining UEL for our US gas distribution fixed asset base is circa 52 years; however, a sizeable proportion of our assets are assumed to have UELs which extend beyond 2080. We continue to believe the lives identified by rate proceedings are the best estimate of the assets' UELs, although we continue to keep this assumption under review as we gain more certainty about policy-driven legislation. We continue to actively engage and support our regulators to enable the clean energy transition in a safe, reliable and affordable way.

Asset depreciation lives feed directly into our US regulatory recovery mechanisms, such that any shortening of asset lives and regulatory recovery periods as agreed with regulators should be recoverable through future rates, subject to agreement, over future periods, as part of wider considerations around ensuring the continuing affordability of gas in our service territories.

Given the uncertainty described relating to the UELs of our gas assets, below we provide a sensitivity to the depreciation charge for our New York and New England segments were a shorter UEL presumed. It should be noted that all net zero pathways suggest some role of gas in heating buildings beyond 2050, so our sensitivity analysis for 2050 illustrates an unlikely worst-case scenario:

	Increase in depreciation expense for the year ended 31 March 2023		Increase in depreciation expense for the year ended 31 March 2022	
	New York £m	New England £m	New York £m	New England £m
UELs limited to 2050	185	54	140	40
UELs limited to 2060	90	21	67	16
UELs limited to 2070	42	3	31	1

Note that this sensitivity calculation excludes any assumptions regarding the residual value for our asset base and the effect that shortening asset depreciation lives would be expected to have on our regulatory recovery mechanisms. In the event that any of the US gas distribution assets are stranded, the Group would expect to recover the associated costs. While recovery is not guaranteed and is determined by regulators in the US, there are precedents for stranded asset cost recovery for US utility companies.

Illustration 2-2 – A.P. Moller-Maersk - 2022 annual report (Logistics sector)

3.2 - Property, plant and equipment

⚠ Significant accounting estimates

Useful life and residual values

Useful lives are estimated based on experience. When there is an indication of a change in an asset's useful life, management revises the estimates for individual assets or groups of assets with similar characteristics due to factors such as quality of maintenance and repair, technical development, or environmental requirements. Management has also considered the impact of decarbonisation and climate-related risks on useful lives of existing assets. Such risks include new climate-related legislation restricting the use of certain assets, new technology demanded by climate-related

legislation, and the increase in restoration costs for terminal sites due to new and/or more comprehensive policies.

Residual values of vessels are difficult to estimate given their long useful lives, the uncertainty of future economic conditions, and the uncertainty of future steel prices, which is considered the main determinant of the residual value. Generally, the residual values of vessels are initially estimated at 10% of the purchase price excluding dry-docking costs. The long-term view is prioritised in order to disregard to the extent possible, temporary market fluctuations which may be significant.

- **Business models** - Climate-related ambitions will result in the development of new business models and projects with the aim of reducing carbon emissions. For example, carbon capture and storage may use a depleted oil or natural gas reservoir and utilise existing infrastructure that is partially or fully depreciated (e.g., pipelines or offshore facilities linked to producing or decommissioned oil and gas fields). In such a scenario, as the degree of certainty surrounding the future use of such assets increases, an entity should assess whether it needs to change the method and/or period over which existing facilities are depreciated. That is, the useful life of existing infrastructure could be extended by a clean energy project.

- ▶ **Decommissioning** - If the useful life of an item of PP&E is shorter than previously expected, this would result in earlier decommissioning and would increase both the decommissioning provision and the decommissioning component of the asset as a result of the discounting effect. In addition, it should be noted that IFRIC 1 *Changes in Existing Decommissioning, Restoration and Similar Liabilities* creates profit and loss volatility in the case of end-of-life assets, which have a carrying amount that is small compared to the potential movements in the decommissioning liability.
- ▶ **Residual value** - The residual value of an item of PP&E should also be reviewed at least at each year-end. While residual values of PP&E assets are generally fairly predictable, this is not necessarily the case if there are relatively few buyers of second-hand PP&E assets that use technologies that are being phased out before a legal deadline. In the illustration below, easyJet Plc described in its 2022 annual financial statements how the residual values of its fleet are affected by climate change.

Illustration 2-3 – easyJet Plc - 2022 annual report (Airline sector)

1A. Significant accounting policies

Property, plant and equipment

Property, plant and equipment (PPE) is stated at cost less accumulated depreciation. Depreciation is calculated to write off the cost, less estimated residual value, of assets, on a straight-line basis over their expected useful lives. Expected useful lives (UELs) and residual values are reviewed annually.

	Expected useful life
Aircraft*	18-23 years**
Aircraft spares***	18 years
Aircraft – prepaid maintenance	7-10 years
Leasehold improvements	5-10 years or the length of lease if shorter
Freehold land	Not depreciated
Fixtures, fittings and equipment****	3 years or length of lease of property where equipment is used if shorter
Computer hardware****	3-5 years

* Aircraft held as right of use assets are depreciated over the lease term; see leases section. Contractual capital maintenance associated with leased aircraft is charged as depreciation to the income statement as the usage that defines the maintenance event occurs.

** easyJet operate a fleet of Airbus CEO and NEO aircraft. The newer NEO aircraft have a UEL of 23 years. Aligning to the longer-term plan for CEO aircraft, and the intention to replace these over time with the more fuel efficient NEO aircraft as part of easyJet's net zero commitment, CEO aircraft have a shorter UEL of 18 years. This change to 18 years was applied prospectively from 1 July 2021.

***In the year, the expected useful economic life estimate for aircraft spares was revised from 14 years to 18 years in line with expected usage and the useful economic life estimate of the majority of easyJet's owned aircraft. This change was applied prospectively from 1 October 2021 and had an immaterial impact.

****Other assets within note 11.

Residual values are reviewed annually against prevailing market rates for equivalently aged assets at the end of the reporting period, and depreciation rates are adjusted accordingly on a prospective basis. The carrying value of PPE assets is part of the Airline CGU and is therefore reviewed for impairment at least annually or when there is any indication of impairment within the CGU. For aircraft, easyJet is dependent on Airbus as its sole supplier. This gives rise to an increased valuation risk, which crystallises when aircraft exit the fleet, where easyJet is reliant on the future demand for second-hand aircraft and specifically Airbus aircraft. Future developments, such as the impact of climate change on the technological, market, economic or legal environment, are considered when assessing residual values and useful economic lives.

- ▶ **Development costs** - An entity may incur expenditure on the development of infrastructure relating to new technologies (i.e., hydrogen processing or carbon capture and storage (CCS) facilities). Such development costs are recognised as an item of PP&E if (and only if) it is probable that future economic benefits associated with the item will flow to the entity and the cost of the item can be measured reliably. The entity will need to consider at which point there is sufficient and reliable information to meet the PP&E recognition criteria. This is key as there will be more uncertainty about the total project costs of assets relating to new technologies compared to existing technologies. Therefore, there is greater potential for significant time and cost overruns.
- ▶ **Overhauls or redesigns** - In certain instances, major overhauls or redesigns may be required to convert or repurpose an existing asset (e.g., specialty ships used in the offshore oilfield services industry might be repurposed to service offshore wind farms). To the extent that such activities result in the replacement of asset parts, entities will need to apply the 'major inspection and overhaul' principles of IAS 16 in determining the appropriate treatment

Entities will need to ensure that sufficient and appropriate disclosure allows users to understand how PP&E is affected by the risks from, and exposures to, climate change.

of additional expenditure as well as the carrying value of pre-existing PP&E. As a result, entities may need to reconsider the useful lives of certain parts that are expected to be replaced earlier than previously expected.

- **Disclosures** - As noted above, climate-related matters have the potential to create significant uncertainty around the carrying value and accounting for items of PP&E. Entities will need to ensure that sufficient and appropriate disclosure allows users to understand those risks and exposures. Meaningful disclosures would address the uncertainties regarding useful life, residual value and decommissioning of PP&E, as well as any changes in those assumptions during the reporting period. In addition, entities may wish to consider whether or not the classes of PP&E presented in the financial statements are still appropriate. For example, an entity may conclude that it is no longer useful to combine the carrying amount of power stations regardless of underlying technology and carbon intensity. We refer to Section 1 for a discussion on disclosure requirements. In the illustration below, Electricité de France SA provided details in its 2022 annual financial statements about its sustainable investment programme and how its initiatives will help achieve its commitments on energy transition.

Illustration 2-4 – Electricité de France SA - 2022 annual report (Energy sector)

20.4 CARBON-FREE INVESTMENTS

In 2022 the Group continued its programme of gross operating investments, which amounted to €19.2 billion and included €18.3 billion of gross investments in intangible assets and property, plant and equipment (see notes 4 and 10.7) and €0.9 billion of gross financial investments.

In 2022, nearly 94% of the Group's investments were in line with its net-zero trajectory (94% in 2021), with 50% of investments concerning the nuclear sector (50% in 2021). 66% of the Group's investments were aligned with the current European Taxonomy at 31 December 2022 (compared to 44% in the published figures for 2021 and 63% in proforma figures for 2021 including the effects of the complementary delegated act on nuclear and gas activities). This notably covered investments in nuclear activities in France, networks, renewable energy generation facilities (solar power, wind power), hydropower facilities and certain energy services (see section 3.8.4 of the 2022 Universal Registration Document, "Details on the taxonomy").

EDF promotes innovation to contribute to achievement of the net zero objective, by investing in startups and venture capital funds dedicated to innovation (the EDF Pulse Ventures programme), and by developing intrapreneurial projects (the EDF Pulse Incubation programme). The Group has formed several subsidiaries for these purposes, such as Hynamics, a company that produces and sells low-carbon hydrogen produced by water electrolysis to meet the needs of the heavy-duty transport industry.

The Group's *raison d'être* is also expressed in the management policy for its portfolio of dedicated assets held to finance long-term nuclear expenses in France (realisable value of €33.9 billion at 31 December 2022), and its responsible investor's charter introduced in 2020, which has three focal points (compliance with the United Nations' Principles for Responsible Investment; respect of the major international agreements on human rights; and annual reporting on responsible investments). This charter is applicable both to assets managed directly and assets managed by specialist companies under delegated management arrangements.

In 2022, a review was conducted of these delegated management companies' compliance with the United Nations' Principles for Responsible Investment and the major international agreements, and for climate risks, a carbon emission assessment was established for listed and unlisted assets. The climate scenarios incorporated into risk/return studies of dedicated assets were analysed in accordance with the recommendations of the NGFS (Network for Greening the Financial System), to assess the risk of nuclear provisions being underfunded in the event of a climate stress scenario that could affect the value of dedicated assets, depending on different time horizons.

For unlisted assets, EDF is committed to integrating environmental, social and governance (ESG) considerations as effectively as possible into its decisions for investments and management of investments, notably by requiring the companies in its portfolio to carry out a carbon review and monitor their environmental footprint.

How we see it

Climate-related matters have the potential to significantly impact the useful life, residual value and decommissioning of PP&E. Climate change, and the associated legislation to promote sustainability, increase the risk that items of PP&E become 'stranded assets' whose carrying value can no longer be recovered within the entity's existing business model.

Given the uncertainties around the impact of climate change, disclosures should be included to allow the users of the financial statements to understand and evaluate the judgements applied by management in recognising and measuring items of PP&E.

3. Impairment of assets

3.1 What is the issue?

IAS 36 *Impairment of Assets* requires an entity to assess at the end of each reporting period (either year-end or interim reporting date), whether there are any impairment indicators for an entity's assets. If there are, the standard requires an entity to perform an impairment assessment. For goodwill, intangible assets with indefinite useful lives and intangible assets not yet available for use, IAS 36 requires an annual impairment test and also when indicators of impairment exist. Impairment indicators include significant changes in the technological, market, economic or legal environment that have an adverse effect on the entity, evidence of an asset's obsolescence and observable indications that the asset's value has declined. Increased awareness of the consequences of environmental change is triggering regulatory action, which is affecting stakeholder perspectives. In turn, this is impacting market prices for commodities and is driving entities to change the way they operate. An entity would need to consider whether such events and circumstances indicate impairment.

Entities often provide information on climate-related risks outside the financial statements (e.g., in the directors' report or the sustainability report). When determining the existence of any impairment indicators, entities should take into consideration all relevant sources of information available, and include such sources, to help ensure that consistent conclusions are drawn.

If one or more impairment indicators have been identified, the recoverable amount of an asset or cash-generating unit (CGU) has to be determined and compared with its carrying amount. In determining the recoverable amount an entity would need to consider both the direct and indirect impacts of environmental change.

Finally, IAS 36 requires an entity to disclose sufficient information for a user to understand how an asset or CGU was tested for impairment, such as key estimates and judgements, and the events and circumstances that led to the recognition of any impairment loss.

3.2 What is the impact?

Indication of impairment

Government actions to manage environmental change, such as committing to reach net-zero emissions by 2050 in line with the Paris Agreement or locally-set emissions targets, could indicate:

- ▶ There is a decline in the value of an entity's asset significantly exceeding what would be expected from the passage of time or normal use due to penalties for the use of assets exceeding certain emission targets. Additionally, it could indicate the asset would be abandoned earlier than previously anticipated.
- ▶ There is a significant adverse change to the market, economic or legal environment in which the entity operates. For example, a legal requirement to surrender carbon credits based on CO₂ emissions could mean certain activities become less profitable or even loss making in their current form. Alternatively, the introduction of a regulation to restrict certain production methods could mean an investment is required or production needs to be abandoned or required inputs need to be replaced with new ones, which may not exist yet.

- ▶ There is significant adverse change to the technology employed by the entity, requiring significant investments in technology to adapt to the changes in the market.

Furthermore, stakeholders, such as investors, insurers, suppliers, lenders and customers are becoming more environmentally aware when making investment or purchasing decisions. They also factor in the exposure to certain industries. These developments could result in the presence of the following impairment indicators:

- ▶ The economic performance of an asset or CGU is likely to be worse than previously expected due to changes in customer preferences (e.g., competitors introducing more sustainable goods or services)
- ▶ Increase in general costs, for example when suppliers pass on higher costs, suppliers stop producing parts for certain assets, as well as increased maintenance costs due to physical impact of extreme weather events that may negatively impact the asset's or CGU's expected economic performance
- ▶ There is an increase in market interest rates or other market rates of return which are likely to affect the discount rate used in calculating an asset's or CGU's value in use. This, in turn, could decrease the asset's or CGU's recoverable amount materially. For example, an entity operating in an industry with high carbon emissions or high risk of flooding may face higher interest rates, or investors would require a higher rate of return to compensate for the increased risk they are exposed to from investing in such an entity. Whereas an entity operating in a 'green' industry may face lower interest rates, positively impacting their discount rate. A higher discount rate which reflects a higher risk specific to the asset or CGU would reduce the present value of the future cash flows and result in a lower value in use and vice versa.
- ▶ The carrying amount of the entity's net assets exceeds its market capitalisation. When investors are moving away from industries with high emissions, an entity's share price is likely to be negatively impacted, which could result in its market capitalisation dropping below the carrying amount of its net assets.
- ▶ There is an increase in insurance costs as insurers manage their risk exposure to environmental change by, for example, factoring in the increased probabilities associated with the physical impact of extreme weather events.

Finally, an entity's commitment to reduce its carbon footprint or more generally its impact on the environment, could indicate:

- ▶ Evidence of obsolescence of an asset. For example, an entity could look to abandon assets not compatible with their decarbonisation strategy.
- ▶ Significant changes in the extent, or manner, in which an asset is used or is expected to be used, have taken place in the period or soon after, that will have an adverse effect on it. For example, an entity could look at reducing certain activities to reduce its carbon footprint, its use of fossil fuels, or it could phase out assets with high energy consumption.
- ▶ The asset's or CGU's operating costs can be negatively affected by the required offsetting of its CO₂ emissions or investments to reduce energy and or water consumption.

ArcelorMittal SA described in its 2022 financial statements how it had considered the impact of climate change as part of its impairment assessment.

Illustration 3-1 – ArcelorMittal SA - 2022 annual report (Steel manufacturing and extractive sectors)

5.3 Impairment of intangible assets, including goodwill, and tangible assets

The Company considered its exposure to certain climate-related risks which could affect its estimates of future cash flow projections applied for the determination of the recoverable amount of its GCGUs and CGUs. With the switch to electric vehicles and the move to wind and solar power generation, the Company sees additional opportunities as customers deepen their understanding of embedded and lifecycle emissions of the materials where steel compares favorably. ArcelorMittal's most substantial climate-related policy risk is the EU Emissions Trading scheme ("ETS"), which applies to all its European plants. The risk concerns the Company's primary steelmaking plants which are exposed to this regulation and yet unprotected against competition from imported steel. The Company is committed to the objectives of the Paris agreement and announced its ambition to reduce carbon emissions by 35% in Europe and 25% group-wide by 2030 and achieve group-wide carbon neutrality by 2050. These announced goals will require significant long-term investments which require global level playing field, access to abundant and affordable clean energy, facilitating necessary energy infrastructure, access to sustainable finance for low-emissions steelmaking and accelerated transition to a circular economy. In addition, the Company considered the legal obligation of carbon neutrality by 2050 effective within the EU and in Canada following adoption of the Climate Law and the Net Zero Emission Accountability Act, respectively. Accordingly, with respect to its flat steel operations in the EU and in Canada, ArcelorMittal concluded that future decarbonization capital expenditures, which correspond essentially to the construction of DRI-EAF facilities, are necessary to maintain the level of economic benefits expected to arise from the assets in their current condition and should therefore be included in the Company's assumptions for future cash flows of the recoverable amount of the respective GCGUs and CGUs. At the same time, the Company is engaged in developing in the near to medium term a range of innovative low-emission technologies for the transition to decarbonized steel including the Smart Carbon route and the Hydrogen-DRI route and required investments are considered either in the

Illustration 3-1 – ArcelorMittal SA - 2022 annual report (Steel manufacturing and extractive sectors)

Company's future cash flow projections or in the context of joint ventures, as an element of the Company's best estimate of capital expenditures which are committed and/or being implemented. The Company acknowledged that CGUs and GCGUs applying the blast furnace basic oxygen furnace "BF-BOF" route in other jurisdictions than the EU and Canada will apply decarbonization at a different pace. They may also not yet be subject to a legal obligation of carbon neutrality, as a result of which future decarbonization capital expenditures may not be included in their value in use calculations. Accordingly, the Company increased risk premiums included in their discount rates until they are able to accelerate their decarbonization strategy to meet the 2050 carbon neutrality objective and a legal obligation arises in the relevant jurisdiction. Additionally, the Company's assumptions for future cash flows include an estimate for costs that the Company expects to incur to acquire emission allowances, which primarily impacts the flat steel operations in the EU and in Canada. The assumption for carbon emission cost is based on historical experience, implementation of decarbonization strategies to mitigate or otherwise offset such future costs and information available of future regulatory or operational changes. Due to economic developments, uncertainties over the pace of transition to low-emission technologies, political and environmental actions that will be taken to meet the carbon reduction goals, regulatory changes and emissions activity arising from climate-related matters, the Company's assumptions used in the recoverable amount calculations, such as capital expenditure, carbon emission costs and other assumptions are inherently uncertain and may ultimately differ from actual amounts.

Similarly, Rothschild & Co provides information on how it incorporates the climate risk in its impairment tests in its 2022 annual report.

Illustration 3-2 – Rothschild & Co - 2022 annual report (Financial services sector - advisory, wealth and asset management)

7.5.3.1 Consideration of climate risk when testing for impairments of intangible assets and goodwill

When valuing its intangibles and CGUs, the Group mostly uses inputs such as discount rates, royalty rates and growth rates in perpetuity that are market-observed, and that therefore reflect current expectations of climate impacts. As discussed above, while the forecast cash flows take account of our net-zero pledge, in other ways the impact of climate risk is not considered financially significant to the Group, given our careful management of the risks.

Unilever Plc, in its 2022 financial statements below, disclosed that the impact of climate change on the growth rates and projected cash flows was considered as part of its goodwill impairment testing:

Illustration 3-3 – Unilever Plc - 2022 annual report (Consumer goods sector)

Notes to the Consolidated Financial Statements Unilever Group

9. Goodwill and intangible assets

Key assumptions

Projected cash flows include specific estimates for a period of five years. The growth rates and operating margins used to estimate cash flows for the five years are based on past performance and on the Group's three-year strategic plan, de-risked to ensure reasonability and extended to years four and five. The Group's three-year strategic plan factors in initiatives we are undertaking to reduce carbon emissions in line with our CTAP and impacts of climate change on our operational costs. The growth rates used in this exercise for CGUs and significant CGUs are set out below:

Active markets and identifying CGUs

IAS 36 stresses the significance of an active market for the output of an asset or group of assets in identifying an CGU. An active market is a market in which transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis. If there is an active market for the output produced by an asset or group of assets, the assets concerned are identified as a cash-generating unit, even if some or all of the output is used internally.

In the context of an entity's transition to a low carbon economy, an entity makes significant investments in energy generating assets (for example, solar panels or a windfarm) for internal use only, and the investment decision may be focused on internal cost savings (i.e., substituting the electricity bought from the market). However, where an active market exists for electricity, the entity needs to assess its ability to access the active market to sell its electricity in

determining whether the (group of) assets (for example the solar panels or windfarm) should be identified as a separate CGU (i.e., not included in the operational CGU that intends to consume most of the energy produced).

Determining the recoverable amount

IAS 36 defines the recoverable amount as the higher of fair value less costs of disposal and value in use. When the recoverable amount is based on value in use and therefore requires an estimation of future cash flows, IAS 36 requires that the entity's cash flow projections are based on reasonable and supportable assumptions that represent management's best estimate of the range of economic conditions that will exist over the remaining useful life of the asset. When doing so, an entity would need to take into account various elements and aspects of risk, which may be dealt with either as adjustments to the discount rate or to the cash flows. These elements include expectations about possible variations in the amount or timing, and other factors market participants would reflect in pricing the future cash flows the entity expects to derive from the asset, as well as the price for bearing the uncertainty inherent in the asset/CGU. With the general uncertainty about the impact of climate change and limited availability of historical information to assess assumptions against, significant challenges are expected when preparing the forecast or budgets for future cash flows.

Variations in amount or timing of cash flows

Factoring in environmental change, means the need to address significant uncertainties about the future impact, which is beyond an entity's control, and requires incorporating data which may not have been incorporated in the past. Therefore, entities cannot ignore external evidence and should consider the statement in IAS 36¹³ that greater weight is given to external evidence. The best information available to the entity should be used, and the entities' own data should be adjusted if "reasonably available information indicates that other market participants would use different data or there is something particular to the entity that is not available to other market participants such as an entity-specific synergy". For example, entities could use projected energy prices, commodity prices or carbon prices (we refer to the example in Illustration 3-2 below). Incorporating projected prices is complex and requires significant judgement of, among others, the relevant timeframe and the climate change scenario used. Forecasts for commodity prices could, for instance, be obtained from commodity brokers or some banks. Whereas the spot carbon price of the relevant markets could be a starting point for carbon pricing. Alternatively, entities can start with the downscaled scenarios for carbon pricing provided by the Network for Greening the Financial System (NGFS), International Energy Agency (IEA), and the World Economic Outlook (WEO). Judgement will be required to determine the appropriate source for the jurisdictions in which the entity operates.

When the inputs for the cash flow forecast have been determined, the next consideration is the extent to which an entity is able to pass these costs on to

Entities should consider the statement in IAS 36 that greater weight is given to external evidence when factoring in environmental change.

¹³ See IAS 36. 33(a) regarding the measurement of value in use. Also, see section 5 of this publication for the determination of fair value in relation to the measurement of fair value less costs of disposal.

customers, which depends on the specific contract and the price elasticity in the market.

Beach Energy Limited disclose in its 2022 financial statements below how it considered the impact of climate change and factored carbon pricing into their impairment assessment.

Illustration 3-4 – Beach Energy Limited - 2022 annual report (Energy sector)

Impairment and impairment reversal indicator modelling

In determining whether there is an indicator of impairment, in the absence of quoted market prices, estimates are made regarding the present value of future cash flows for each CGU. These estimates require significant management judgement and are subject to risk and uncertainty, and hence changes in economic conditions can also affect the assumptions used and the rates used to discount future cash flow estimates. Current climate change legislation is also factored into the calculation and future uncertainty around climate change risks continue to be monitored. These risks may include a proportion of a CGU's reserves becoming incapable of extraction in an economically viable fashion; demand for the Group's products decreasing, due to policy, regulatory (including carbon pricing mechanisms), legal, technological, market or societal responses to climate change and physical impacts related to acute risks resulting from increased severity of extreme weather events, and those related to chronic risks resulting from longer-term changes in climate patterns. In most cases, the present value of future cash flows is most sensitive to the assumptions outlined below. An evaluation of climate risk is reflected in Beach's assumptions on carbon cost pricing, including carbon pricing slope of \$34/tCO₂e increasing to A\$61/tCO₂e by 2030 then increasing to A\$70/tCO₂e by 2040 (real) and incorporating the benefits of CCS and the delivery of other committed projects which is applicable to Australian emissions that exceed facility-specific baselines in accordance with Australian regulations. Beach continues to monitor the uncertainty around climate change risks and will revise carbon pricing assumptions accordingly. The present value of future cash flows for each CGU were estimated using the assumptions below with reference to external market forecasts at least bi-annually. The assumptions applied have regard to contracted prices and observable market data including forward values and external market analyst's forecasts.

It is key to understand whether the investment is required to continue operating the assets and, therefore, would be akin to maintenance.

Inclusion of future investments

Another aspect to consider is how investments in fixed assets need to be considered in a cash flow forecast used to determine the recoverable amount of an asset or CGU. When assessing fair value less costs of disposal, these investments should be reflected, if a market participant would make such investments. However, when assessing the CGU's value in use, the guidance in IAS 36 is more prescriptive. Future cash flows are estimated for the asset in its current condition and do not include estimated future cash inflows or outflows that are expected to arise from future restructuring to which an entity is not yet committed or that improve the asset's performance. This raises the question to what extent such cash flows should be included where an entity is trying either to achieve certain sustainability targets or to cut their CO₂ emissions, which would require capital investments. It is key to understand whether the investment is required to continue operating the assets and therefore would be akin to maintenance. In contrast, if such capital investments, in effect, would

represent improvements or enhancements to the asset, they should only be included when the entity is committed to, or has substantively commenced, the investment.

Use of multiple scenarios

Significant uncertainty and judgement also arise when considering how different scenarios of environmental change may materialise, for instance, the speed of decarbonisation and the extent to which the average global temperature is increasing. Where significant uncertainty and judgement exists, an expected cash flow approach, based on probability-weighted scenarios, may be more appropriate than a single best estimate for determining value in use (see the example in Illustration 3-4 below). In practice, this could mean probability weighting scenarios (i.e., worst case, base case and best case), as well as factoring in different pricing curves. Even where a probability-weighted scenario approach is used, an entity would still need to consider adjusting the discount rate for the general uncertainties and risks not reflected in the cash flows. Scenario analyses will be particularly relevant for highly impacted industries, such as extractives and manufacturing industries. Industries impacted to a lesser extent, could instead consider incorporating the exposure from environmental change through the discount rate and perform sensitivity analysis. For a discussion of fair value, see section 5 of this publication.

Tesco Plc described how it probability weighted its cash flow forecasts and considered climate change scenarios in its 2023 annual financial statements:

Illustration 3-5 – Tesco Plc - 2023 annual report (Retail sector)

Note 14 Impairment of non-current assets

Value in use

Retail

The Group applies an expected cash flow approach by probability-weighting different cash flow scenarios. The greatest probability weighting is applied to the cash flows derived from the three-year internal forecasts. Additional scenarios take account of the risks presented by a macroeconomic downturn, higher levels of operating costs and climate change, consistent with the viability statement scenarios (see the Longer term viability statement in the Strategic report) as well as an upside scenario. The viability statement scenarios reflect 'severe but plausible' risks which are adjusted for impairment testing in order to reflect management's best estimate of future economic conditions, including any reasonably possible upside to the three-year internal forecasts.

In addition to the climate change scenario included within the probability-weighted cash flows, the Group incorporates other climate change related assumptions into the impairment modelling, including, but not limited to, investments in technology to aid the Group's net zero commitments, the costs associated with replacing assets with more environmentally-friendly alternatives, and assumptions over the cash flow profile of the Group's fuel business.

Where significant uncertainty and judgement exists, an expected cash flow approach, based on probability-weighted scenarios, may be more appropriate.

In contrast to Tesco Plc, Eni SpA did not apply multiple climate risk-related scenarios to determine its future expected cash flows, but rather described how the discount rate of future expected cash flows included a market risk premium estimated by management to reflect the risks of the energy transition in its 2022 annual financial statements.

Illustration 3-6 – Eni SpA - 2022 annual report (Energy sector)

15 Reversals (Impairments) of tangible and intangible assets and right-of-use assets. Sensitivity of outcomes to alternative scenarios.

The discount rate of the future cash flows of the CGUs was estimated as the weighted average cost of equity (Ke) and net borrowings, based on the Capital Asset Pricing Model methodology. Specifically, the cost of equity considers both a premium for the non-diversifiable market risk measured on the basis of the long-term returns of the S&P500, and an additional premium that considers exposure to operational risks of the countries of activity and the risks of the energy transition. For 2022, a Group cost of capital ("WACC") of approximately 7% was estimated unchanged compared to 2021 due to a lower cost of equity as a consequence of the reduction in the company's financial risk as a result of the deleveraging process carried out, which offset the increased yields on risk-free assets. The Group WACC is adjusted to account for the specific operational risks of each geography against the average portfolio, where Oil & Gas activities are conducted, by adding a corrective factor (WACC adjusted on a country-by-country basis).

Due to climate change, some entities may experience significant difficulties in preparing future cash flow projections beyond the next few years.

Period of reliable cash flow projections

As a result of the significant uncertainty outside an entity's control, the period for which reliable cash flow projections are available and the impact of climate change on the growth rate applied to the last year of cash flow forecast needs careful consideration. While IAS 36 states that cash flow projections for value in use must cover a maximum period of five years, it allows for a longer period if it can be justified. Due to climate change, some entities may experience significant difficulties in preparing future cash flow projections beyond the next few years. Basing the extrapolation of longer-term cash flows on the short-term cash flow forecasts may also raise challenging questions. Other entities could be required to forecast longer before calculating a terminal value, and some may even find that the cash flow projections should be made for the full remaining estimated useful life of the asset or CGU.

Entities significantly exposed to climate change risk will have to assess the impact on the growth rate applied and might even need to consider negative growth rates.

Terminal value

Value in use for many long-term assets will mainly be driven by the terminal value and, therefore, by the level of cash flows in the final year of cash flow projections and the growth rate applied to it. As such, it is important to ensure that the final year of the cash flow forecast represents a sustainable level, also reflecting climate-related aspects. If it does not, adjustments to reflect future expenditure to address the impact of climate change may be required (see the above discussion on the inclusion of future investments). It is important to ensure that the growth rate applied is appropriate and that it considers the impact of climate-related matters. IAS 36 requires the application of a steady or declining growth rate, unless an increasing rate can be justified. Entities significantly exposed to climate change risk will have to assess the impact on the growth rate applied and might even need to consider negative growth rates. Furthermore, the terminal value may become particularly challenging when different growth rates need to be considered depending on the time passed.

In the illustration below, Enel SpA disclosed in its 2022 annual financial statements how it took account for the impacts of climate change in the long term in the impairment test, and, in particular, the impact it has on the terminal value and the growth rate assumed.

Illustration 3-7 – Enel SpA - 2022 annual report (Energy sector)

24. Goodwill – €13,742 million

Note also that the Group has used sensitivity analyses to take account of the impacts of climate change in the long term. More specifically:

- we consider a long-term growth rate in the estimation of the terminal value that is in line with the change in electricity demand over the 2026-2050 period, based on the specific features of the businesses concerned, adopting certain assumptions concerning the increase in temperature due to climate change and trends connected with the energy transition;
- we consider changes in the hydroelectric, wind and photovoltaic generation levels of our portfolio assets, associated with each projection of underlying climate and weather variables (for example, temperature, irradiance, wind speed and precipitation);
- we assume that the Group will incur the costs provisioned for decommissioning fossil fuel generation plants in line with the goal of zero direct (Scope 1) and indirect emissions from retail activities (Scope 3).

BP Plc disclosed in its 2022 annual financial statements how it had revised its pricing assumptions, and how these pricing assumptions compare to external pricing forecasts.

Illustration 3-8 – BP Plc - 2022 annual report (Energy sector)

Judgements and estimates made in assessing the impact of climate change and the transition to a lower carbon economy
Climate change and the transition to a lower carbon economy were considered in preparing the consolidated financial statements. These may have significant impacts on the currently reported amounts of the group's assets and liabilities discussed below and on similar assets and liabilities that may be recognized in the future. The group's assumptions for investment appraisal (see page 28) form part of an investment decision-making framework for

Impairment of property, plant and equipment and goodwill

The energy transition is likely to impact the future prices of commodities such as oil and natural gas which in turn may affect the recoverable amount of property, plant and equipment and goodwill in the oil and gas industry. Management's best estimate of oil and natural gas price assumptions for value-in-use impairment testing were revised during 2022. Prices are disclosed in real 2021 terms. The Brent oil assumption from 2024 up to 2030 was increased to \$70 per barrel to reflect near-term supply constraints before steadily declining to \$45 per barrel by 2050 continuing to reflect the assumption that as the energy system decarbonizes, falling oil demand will cause oil prices to decline. The price assumptions for Henry Hub gas up to 2035 and up to 2050 were increased to \$4.00 per mMBtu and \$3.50 per mMBtu respectively, reflecting increased demand for US gas production to offset reduced Russian gas flows. The revised assumptions sit within the range of external scenarios considered by management and are in line with a range of transition paths consistent with the temperature goal of the Paris climate change agreement, of holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels.

Shell Plc, in its 2022 annual financial statements, referred to a number of external climate change scenarios and disclosed the sensitivity of carrying amounts to prices under the assumption that all other factors in the models used to calculate recoverability of carrying amounts remain unchanged.

Illustration 3-9 – Shell Plc - 2022 annual report (Energy sector)

Price sensitivities using climate price lines

Sensitivity to changes in commodity prices has been tested as follows:

Priceline 1 – Average prices from three [A] 1.5-2 degrees Celsius external climate change scenarios: in view of the broad range of price outlooks across the various scenarios, the average of three external price outlooks was taken.

[A] The IEA SDS scenario applied in 2021 is no longer published and has therefore been taken out for 2022.

- **IHS Markit/ACCS 2022** – under this scenario oil prices (real terms 2022 [RT22]) gradually decrease towards \$36.5 per barrel (/b) in 2039, recovering to \$94.3/b in 2050. Gas prices [RT22] decrease from \$3.7 per million British thermal units (/MMBtu) in 2023 towards 2024 to slightly below \$3/MMBtu for Henry Hub, remaining around that level until 2050. For Europe, prices decrease from \$35/MMBtu in 2023 towards around \$4/MMBtu in 2029, remaining around that level until 2040 and then gradually increasing to a level around \$5/MMBtu in 2050. For Asia, prices decrease towards around \$5/MMBtu in 2029, again gradually increasing from 2045 to a level around \$6/MMBtu in 2050.
- **Woodmac WM AET-1.5 degree** – under this scenario oil prices [RT22] gradually decrease towards \$27/b in 2050. Gas prices [RT22] decrease from around \$5/MMBtu in 2023 to \$3/MMBtu in 2024, gradually increasing to some \$4/MMBtu in 2045 and again decreasing to some \$3/MMBtu in 2050 for Henry Hub. For Asia and Europe, gas prices [RT22] decrease from around \$30/MMBtu in 2023 to some \$6/MMBtu and \$5/MMBtu respectively in 2031, gradually increasing again to some \$10/MMBtu and some \$8/MMBtu respectively around 2040 and subsequently decreasing to \$6/MMBtu and some \$5/MMBtu respectively in 2050.
- **IEA NZESO** – under this scenario oil prices [RT22] gradually decrease towards some \$25/b in 2050. Gas prices [RT22] decrease from some \$3.5/MMBtu in 2023 to around \$2/MMBtu for Henry Hub in 2030, remaining slightly below that level until 2050. For Asia and Europe, gas prices [RT22] decrease from some \$10/MMBtu and \$9/MMBtu respectively in 2023 to some \$6/MMBtu and \$5/MMBtu respectively around 2030, with a decrease towards some \$5/MMBtu and \$4/MMBtu respectively in 2050.

This average priceline provides an external view of the development of commodity prices under 1.5-2 degrees Celsius external climate change scenarios over the whole period under review.

Applying this priceline to Integrated Gas assets of \$75 billion (2021: \$65 billion [A]) and Upstream assets of \$88 billion (2021: \$89 billion [A]) as at December 31, 2022, shows recoverable amounts that are \$4-6 billion (2021: \$13-16 billion) and \$1-2 billion (2021: \$14-17 billion) lower, respectively, than the carrying amounts as at December 31, 2022.

Entities should disclose how climate change and climate-related goals have been translated into assumptions and how they are reflected in the impairment test.

Disclosures

Where entities use significant assumptions and judgements to reflect the climate risk in their impairment test, this should be reflected in the disclosures. It is important to disclose how climate change and climate-related goals have been translated into assumptions and are reflected in the impairment test, or alternatively, why these have not been considered. For example, entities committed to meet the Paris Agreement target of net zero emissions by 2050 may consider disclosing how this is translated into assumptions on pricing commodities, levies, forced decommissioning of assets, divestments of businesses, etc. This would help users understand the interaction between what the entity discloses in their financial statements and other sections of the annual report, such as the sustainability report or press releases. We refer to Section 1 for further discussion on disclosures.

The effects of published ambitions in terms of climate change on financial reporting were addressed by Coles Group Limited in its 2022 annual financial statements, where the entity stated that it did not identify any material financial reporting impact as a result of climate risks.

Illustration 3-10 – Coles Group Limited - 2022 annual report (Retail sector)

4.1 Impairment of non-financial assets

Forecast future cash flows

Forecast future cash flows are based on the Group's latest Board approved internal five-year forecasts and reflect management's best estimate of income, expenses, capital expenditure and cash flows for each asset or CGU. Internal forecasts have considered the ongoing impacts of the COVID-19 pandemic on income and expenses. Changes in selling prices and direct costs are based on past experience and management's expectation of future changes in the markets in which the Group operates.

In addition, consideration has been given to the potential financial impacts of climate change related risks on the carrying value of goodwill through a qualitative review of the Group's climate change risk assessment. This review did not identify any material financial reporting impacts.

When calculating the FVLCOF of an asset or CGU, future forecast cash flows also incorporate reasonably available market participant assumptions such as enhancement capital expenditure.

A sensitivity analysis can be useful to explain the impact of a reasonably possible change in the inputs used on the headroom, or the change in assumptions required to cause an impairment. Entities are required to provide a sensitivity analysis for each cash-generating unit or group of units for which the carrying amount of goodwill or intangible assets with indefinite useful lives allocated to that unit or group of units is significant. This disclosure is made if a reasonably possible change in a key assumption used to determine the CGU's recoverable amount would cause its carrying amount to exceed its recoverable amount.

How we see it

- ▶ The extent to which certain assets, processes or activities will be impacted by climate-related business requirements and how climate-related risks and opportunities will affect an entity's forward-looking information, such as cash flow projections in the prognosis period, may require significant judgement.
- ▶ Entities should consider what information users rely on in assessing the entity's exposure to climate-related risks.

4. Provisions

4.1 What is the issue?

IAS 37 *Provisions, Contingent Liabilities and Contingent Assets* requires a provision to be recognised when an entity has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the obligation. At the same time, IAS 37 does not allow an entity to recognise a provision for future operating losses.

Except in the case of an onerous contract, the amount required to be recognised as a provision is the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. In the case of an onerous contract, the amount required to be recognised as a provision is not based on an estimate of an expected outcome. Instead, the provision reflects the lower of the costs of fulfilling the contract and any compensation or penalties from a failure to fulfil it (regardless of what the entity expects to do).

If any of the conditions for recognition are not met, no provision is recognised and an entity may instead have a contingent liability. Contingent liabilities are not recognised, but explanatory disclosures are required, unless the possibility of an outflow in settlement is remote.

IAS 37 requires disclosures to enable users to understand the nature, timing and amount of provisions and contingent liabilities. For both provisions and contingent liabilities, this includes an indication of the uncertainties relating to the amount or timing of any outflow.

In April 2023, the IASB added a maintenance project to its agenda intended to provide targeted improvements to the recognition requirements in IAS 37. Any resulting amendments are expected to replace IFRIC 21 *Levies*. The IASB has also indicated an intention to add examples to IAS 37 to illustrate the application of the requirements in the context of climate-related matters (e.g., net zero commitments). At the time of writing, the IASB was discussing possible amendments and was expected to decide the project direction in the fourth quarter of 2023.¹⁴

4.2 What is the impact?

As entities take action to address the consequences of climate change, these actions may result in the recognition of new liabilities or, where the criteria for recognition are not met, new contingent liabilities may have to be disclosed.

In particular, entities should consider the following in assessing the impact of climate on provisions and contingent liabilities.

New laws or regulations

Legislation introduced in response to climate change may give rise to new obligations that did not exist previously. For example, new requirements could be introduced for the recycling or removal of products, such as the first EU

Actions to address the consequences of climate change may result in the recognition of new liabilities or the disclosure of new contingent liabilities.

¹⁴ <https://www.ifrs.org/projects/work-plan/provisions>.

Directive on 'Waste Electrical and Electronic Equipment in 2003.¹⁵ Where a new law is proposed but not yet enacted, an obligation arises only when the legislation is virtually certain to be enacted as drafted.¹⁶ In many jurisdictions, this will not be until the law is enacted.

Legal requirements to incur expenditure in order to operate in a particular way in the future will not, in themselves, justify the recognition of a provision if there is no present obligation to incur the future expenditure, as illustrated in Example 1 below.

Example 1: Legal requirement to incur future expenditure

Under legislation passed in 2022, an entity is required to replace gas heating systems in all owned properties with hydrogen or other low-carbon alternatives by 30 June 2026. The company does not start to replace its heating systems until 2027.

At the end of the 2023, 2024 and 2025 reporting periods, no event has taken place to create an obligation. Only when the heating systems are replaced or the legislation takes effect, will there be a present obligation as a result of a past event.

Non-compliance with the legislation by the due date (that is, 30 June 2026) does not mean that there is an obligating event to justify provision for the cost of replacing heating systems required under the legislation. However, a provision would be recognised for the best estimate of any fines and penalties if it is determined to be more likely than not that such fines and penalties will be imposed.

In addition, new levies may be introduced by governments to encourage or discourage specified activities, for example, an environmental tax charged on the energy that businesses use. Applying the guidance in IFRIC 21, the activity that creates the obligation under the relevant legislation to pay the levy is the obligating event for the purposes of the recognition of a provision, in this case the consumption of energy.

Constructive obligations

An entity may make a public commitment to behave in a certain way or undertake certain activities in response to climate change. Such an entity must assess whether they have created a constructive obligation that requires recognition of a provision. Under IAS 37, only those obligations arising from past events that exist independently of an entity's future actions can be recognised as a provision.

Entities worldwide have been declaring their commitment to be net-zero for GHG emissions in the future. Disclosed net-zero commitments might simply establish the premise of GHG emissions reductions without any details provided on the route to reach any goals. Others might provide details of short- or

Entities should assess whether public commitments created a constructive obligation.

¹⁵ IFRIC 6 *Liabilities arising from Participating in a Specific Market - Waste Electrical and Electronic Equipment* was developed to provide guidance on identifying the obligating event for recognition of a provision in accordance with paragraph 14(a) of IAS 37. However, it was the existing guidance in IAS 37 that required recognition of a provision where there is a past obligating event, and a probable outflow of resources that could be reliably measured.

¹⁶ Refer to IAS 37.50.

medium-term plans. Even entities make similar statements, the impact on financial statements can vary significantly.

While such a statement indicates to the public that an entity has accepted responsibility for reducing or removing GHG emissions, it does not automatically mean that a provision should be recognised. Rather, the financial reporting consequences and the applicable requirements in IFRS will depend on the planned actions. For example, an entity that plans to replace certain assets with low-emitting ones will need to consider whether, or when, it has a capital commitment under IAS 16. Retiring existing assets could affect both impairment assessments and reassessments of useful life. In some cases, while called a 'commitment', the planned actions might be subject to change without penalty or contingent on future events; they might also be covered by other liabilities, such as decommissioning provisions.

Since an entity's specific plans are key to appropriately accounting for net-zero commitments, entities should consider including appropriate explanatory disclosures to assist users of financial statements to understand the impact. Furthermore, entities should be careful to ensure that clear language is used in describing their aspirations, targets and intended actions in response to the climate change challenge. For example, a reader may have difficulty understanding the extent to which the entity can realistically withdraw from a course of action described in its transition plan.

Decommissioning and asset retirement obligations

Provisions may not have previously been recognised for the decommissioning costs of assets such as coal, or oil and gas plants, because they were considered to have indefinite useful lives. Climate change, and the resulting associated legislation, may require this judgement to be reconsidered and new decommissioning provisions recognised, or new contingent liabilities disclosed, as Shell Plc disclosed in its 2022 annual financial statements.

Climate change, and the resulting associated legislation, may require past judgements to be reconsidered.

Illustration 4-1 – Shell Plc - 2022 annual report (Energy sector)

31. Legal proceedings and other contingencies

Decommissioning and restoration of manufacturing facilities

Prior to 2020, in line with industry practice, Shell's policy had been not to recognise decommissioning and restoration provisions associated with manufacturing facilities in Oil Products and Chemicals. This was on the basis that these assets were considered to have indefinite lives and, therefore, that it was considered remote that an outflow of economic benefits would be required.

In 2020, the changed macroeconomic fundamentals were considered, together with Shell's plans to rationalise the Group's manufacturing portfolio. It was also reconsidered whether it remained appropriate not to recognise decommissioning and restoration provisions for manufacturing facilities.

It was concluded that the assumption of indefinite lives for manufacturing facilities was no longer appropriate, and the need for either recognition of decommissioning and restoration provisions or contingent liability disclosure was reviewed. In 2020, provisions had been recognised for certain shorter-lived manufacturing facilities, but for the remaining longer-lived facilities, where decommissioning would generally be more than 50 years away, it was concluded that, while there is a present obligation that has arisen from past events, the amount of the obligation cannot be measured with sufficient reliability. This conclusion was reached on the basis that the settlement dates are indeterminate; and that other estimates, such as extremely long-term discount rates for which there is no observable measure, are not reliable. Consequently, a decommissioning and restoration obligation exists that cannot be recognised or quantified and that is disclosed as a contingent liability.

As well as creating new decommissioning obligations for entities, climate change or related legislation could also result in earlier decommissioning. This would result in an increase to a previously recognised provision, as a result of the impact of discounting. The decommissioning component of the related PP&E asset would also increase as a result of the requirements of IFRIC 1. Changes in the estimated cost of decommissioning activities as a result of climate-related

matters may also impact the measurement of existing decommissioning and asset retirement obligations as BP Plc and Rio Tinto Plc discussed in their 2022 annual financial statements.

Illustration 4-2 – BP Plc - 2022 annual report (Energy sector)

1. Significant accounting policies, judgements, estimates and assumptions – continued

Provisions: decommissioning

The energy transition may bring forward the decommissioning of oil and gas industry assets thereby increasing the present value of associated decommissioning provisions. The majority of bp's existing upstream oil and gas properties are expected to start decommissioning within the next two decades. The group's expectation to reduce its upstream hydrocarbon production by around 25% by 2030 from its 2019 baseline (see page 11) is expected to be achieved through future active management, including divestments, and high-grading of the portfolio. Any resulting increases or decreases to the weighted average timing of decommissioning will be driven by the profile of assets held in the revised portfolio. Currently, the expected timing of decommissioning expenditures for the upstream oil and gas assets in the group's portfolio has not materially been brought forward. Management does not expect a reasonably possible change of two years in the expected timing of all decommissioning to have a material effect on the upstream decommissioning provisions, assuming cash flows remain unchanged.

Decommissioning cost estimates are based on the known regulatory and external environment. These cost estimates may change in the future, including as a result of the transition to a lower carbon economy. For refineries, decommissioning provisions are generally not recognized as the associated obligations have indeterminate settlement dates, typically driven by the cessation of manufacturing. Management will continue to review facts and circumstances to assess if decommissioning provisions need to be recognized. Decommissioning provisions relating to refineries at 31 December 2022 are not material. See significant judgements and estimates: provisions for further information.

Illustration 4-3 – Rio Tinto Plc - 2022 annual report (Extractive sector)

14 Close-down and restoration provisions

Impact of climate change on our business – Close-down, restoration and environmental cost

The underlying costs for closure have been estimated with varying degrees of precision based on a function of the age of the underlying asset and proximity to closure. For assets within ten years of closure, closure plans and cost estimates are supported by detailed studies which are refined as the closure date approaches. These closure studies consider climate change and plan for resilience to expected climate conditions with a particular focus on precipitation rates. For new developments, consideration of climate change and ultimate closure conditions are an important part of the approval process. For longer-lived assets, closure provisions are typically based on conceptual level studies that are refreshed at least every five years; these are evolving to incorporate greater consideration of forecast climate conditions at closure.

Closure cost composition as at 31 December	2022 US\$m	2021 US\$m
Decommissioning, decontamination and demolition	3,386	3,343
Closure and rehabilitation earthworks ^(a)	4,760	4,125
Long-term water management costs ^(b)	1,092	967
Post closure monitoring and maintenance	1,846	1,676
Indirect costs, owners' costs and contingency ^(c)	4,675	4,431
Total	15,759	14,542

(a) A key component of earthworks rehabilitation involves re-landscaping the area disturbed by mining activities utilising largely diesel powered heavy mobile equipment. In developing low-carbon solutions for our mobile fleet, this may include electrification of the vehicles during the mine life. The forecast cash flows for the heavy mobile equipment in the closure cost estimate are based on existing fuel sources. The cost incurred during closure could reduce if these activities are powered by renewable energy.

(b) Long-term water management relates to the post-closure treatment of water due to acid rock drainage and other environmental commitments and is an area of research and development focus for our Closure team. The cost of this water processing can continue for many years after the bulk earthworks and demolition activities have completed and are therefore exposed to long-term climate change. This could materially affect rates of precipitation and therefore change the volume of water requiring processing. It is not currently possible to forecast accurately the impact this could have on the closure provision as some of our locations could experience drier conditions whereas others could experience greater rainfall. A further consideration relates to the alternative commercial use for the processed water, which could support ultimate transfer of these costs to a third party.

(c) Indirect costs, owners' costs and contingency include adjustments to the underlying cash flows to align the closure provision with a central-case estimate. This excludes allowances for quantitative estimation uncertainties, which are allocated to the underlying cost driver and presented within the respective cost categories above.

Climate change and related legislative changes could mean that certain operations are no longer feasible.

Onerous contracts

Increased costs related to the use of new environmentally friendly materials or processes could mean that contracts previously expected to be profitable are now expected to be loss making. If determined to be onerous, a provision may be required for the least net cost of exiting from the contract, which is the lower of the cost of fulfilling it and any compensation or penalties arising from failure to fulfil it. However, if there are no fines or compensation payable on exiting the contract, no provision would be allowed, even if the entity chooses to honour the contract.

Business model

Climate change and related legislative changes could mean that certain areas of current operations of an entity are no longer feasible in their current form, for example, operations related to drilling for oil, or building diesel engines. This may mean that contracted projects, or capital commitments are abandoned resulting in possible onerous contracts, or in more extreme cases, restructuring or closure of individual divisions or businesses. Entities will need to assess whether, and when, business model changes require the recognition of related restructuring provisions.

Legal claims

In most situations, assessing the need to provide for legal claims is one of the most difficult tasks in the field of provisioning. This is due mainly to the inherent uncertainty in the judicial process itself, which may be very long and drawn out. Whether an entity should make provision for the costs of settling a case or to meet any award given by a court will depend on a reasoned assessment of the particular circumstances, based on appropriate legal advice. Entities may expect lawsuits linked to climate-related matters to become more common in the future and the outcome more uncertain, as is discussed in the below disclosure made by Shell Plc in its 2022 annual financial statements.

Illustration 4-4 –Shell Plc - 2022 annual report (Energy sector)

31. Legal proceedings and other contingencies

Climate change litigation

In the USA, 22 lawsuits filed by several municipalities and/or states against oil and gas companies, one industry group, and Shell plc are pending as of December 31, 2022. The plaintiffs seek damages for a variety of claims including harm to their public and private infrastructure from rising sea levels and other alleged impacts of climate change caused by the defendants' fossil fuel products. In the Netherlands, in a case against Shell brought by a group of environmental non-governmental organisations (eNGOs) and individual claimants, the Court found that while Shell is not currently acting unlawfully, Shell must reduce the aggregate annual volume of CO₂ emissions of Shell Group operations and energy-carrying products sold across Scopes 1, 2 and 3 by 45% (net) by the end of 2030 relative to its 2019 emissions levels (the "Dutch Court Order"). For Scopes 2 and 3, this is a significant best-efforts obligation. Shell has appealed that ruling. Management believes the outcome of these matters should be resolved in a manner favourable to Shell, but there remains a high degree of uncertainty regarding the ultimate outcome of these lawsuits, as well as their potential effect on future operations, earnings, cash flows and Shell's financial condition.

In the UK, the environmental law group ClientEarth sent a pre-action letter in March 2022 threatening to commence, purportedly on behalf of Shell plc, a legal claim in the UK courts against Shell plc's Board of Directors (known as a "derivative action") regarding the way in which the Directors have allegedly handled "climate change related risk". On February 8, 2023, ClientEarth filed the claim with the English High Court against Shell plc and the current Board of Directors. The claim does not seek monetary relief but asks the Court to order the Directors to: (i) adopt and implement a different strategy to manage climate risk in compliance with their statutory duties; and (ii) comply immediately with the Dutch Court Order. The High Court must grant permission for ClientEarth to proceed with this claim.

New legislation related to climate change may also mean that outflows for existing legal claims become probable rather than possible, resulting in the need to recognise a provision rather than disclose a contingent liability.

Where relevant, entities should disclose how climate transition has been taken into account when accounting for provisions.

Disclosure

The timing and impact of the effects of climate change is uncertain. Entities will need to ensure that sufficient and appropriate disclosure allows users to understand those uncertainties and the assumptions and judgements made in recognising and measuring provisions. Where relevant, entities should disclose how climate transition has been taken into account in the measurement of a provision or disclosure of a contingent liability, disclosure of the values assigned to key assumptions (such as the timing of decommissioning outflows), any material changes to key assumptions in the reporting period, the reason for the changes, and sensitivities of material decommissioning provisions to changes in cost or timing assumptions. Refer to Section 1 for further discussion on disclosures.

How we see it

Climate-related matters have the potential to have a significant impact on the recognition and measurement of provisions, and the need for disclosure of contingent liabilities. However, under IAS 37, only those obligations arising from past events that exist independently of an entity's future actions shall be recognised as a provision.

Given the significant uncertainties involved in assessing the extent and impact of climate change, entities should ensure that sufficient disclosures are provided to allow users of financial statements to understand those uncertainties, how climate transition has been taken into account in the measurement of a provision or disclosure of a contingent liability, and the assumptions and judgements made by management in recognising and measuring provisions.

5. Fair value measurement

5.1 What is the issue?

IFRS 13 *Fair Value Measurement* defines fair value as an exit price and requires an entity to use the assumptions that market participants would use when pricing the asset or liability. Fair value is not the value specific to the reporting entity and it is not the specific value to one market participant whose risk assessment or specific synergies may differ from other market participants.

Since fair value focuses on what market participants in the principal (or most advantageous) market would consider when pricing the asset or liability, care is needed in determining whether, and to what extent, climate change might affect the assumptions used to measure fair value. This may include, for example, how market participants believe climate-related risks would affect the price of the asset or liability; the effect of restrictions imposed on assets in response to climate change (if it is a characteristic of the asset); and the highest and best use of a non-financial asset, which must be physically possible, legally permissible and financially feasible, and is presumed to be the entity's current use. Sustainability reporting disclosures might provide more information about an asset or liability and, therefore, affect what market participants would be willing to pay. However, determining the impact of that information on market participant assumptions, inputs and sensitivities, is likely to require significant judgement.

IFRS 13 requires an entity to prioritise the use of observable inputs over unobservable ones. This may be more challenging if risks are not yet priced in a market and would affect the categorisation of the fair value measurement (as a whole) within the fair value hierarchy. Among other disclosure requirements, IFRS 13 requires entities to provide a narrative description of the sensitivity of recurring Level 3 fair value measurements to changes in the unobservable inputs used, if changing those inputs would significantly affect the fair value measurement. For financial instruments, further quantitative information is required about the effects of reasonably possible alternative assumptions.

5.2 What is the impact?

Measurement

Entities should ensure that the relevant fair value measurements appropriately consider the relevant climate-related risk factors. Climate change can have a tangible effect on an entity's assets and liabilities now or in the future (e.g., rising water levels, changing weather patterns, increased pollution levels). A government or entity's response to climate change may be known (e.g., changes to legislation or regulation, commitments to agreed targets or spending to mitigate effects of pollution) or only anticipated (e.g., potential changes in business models, changing behaviours of consumers, competitors, suppliers, lenders and investors). All of these could potentially affect the fair value of an asset or liability, whether the risk or opportunity is real or perceived.

IFRS 13 requires fair value to be measured consistent with the unit of account for the asset or liability being measured. Therefore, entities need to understand to which assets and/or liabilities climate-related factors are attributable, and ensure they do not double count or omit relevant factors. For example, anticipated increases in costs due to climate-related developments may affect

Entities should ensure that the fair value measurements appropriately consider relevant climate-related risk factors.

the value of an item of property, plant or equipment held by a mining company and also a related rehabilitation provision. However, when measuring the fair value of an item of property, plant or equipment, the entity would need to consider only those inputs that market participants would consider relevant when pricing the asset.

If market participants would consider adjustments for the inherent risk of the asset or liability or for the risk in the valuation technique used to measure fair value (e.g., the valuation technique did not explicitly consider climate-related matters), then such risk adjustments should be considered in the fair value assumptions. However, despite the increased focus on climate-related factors, incorporating such factors into a fair value measurement may be particularly challenging and inputs might not be observable at this stage. In some cases, there might be no standard framework to measure, validate and monitor related programmes. In others, changes may be agreed in principle, but the timing may be unknown or subject to change. Even if the risk can be quantified and timing estimated, the market(s) and market participants might not yet know how to adjust for it in the price of the asset or liability. As a result, entities need to consider whether, and how, they can factor relevant climate-related risks into a fair value measurement.

The ability of market participants to reliably price climate risk and incorporate climate change variables into valuations is expected to gradually improve. This may be similar to the gradual process that market participants took when switching to overnight index swap (OIS) discounting from London interbank offering rate (LIBOR) discounting for collateralised derivatives. There was a period of time during which only some market participants switched to using OIS discounting and others continued using LIBOR discounting. During the transition period, entities may be required to exercise significant judgement to determine the appropriate market participant assumptions.

When considering whether adjustments should be made in a fair value measurement, the following questions could be relevant:

- ▶ Are market participants likely to incorporate climate change variables into the fair value measurement?

An entity may consider the effect of climate change variables in its use, and value, of an asset, but if other market participants do not incorporate these variables in transactions, then it would be inappropriate to include them as inputs in an IFRS 13 fair value measurement.

- ▶ When using a proxy as part of the market approach, are climate change variables considered in the choice of the appropriate proxy?

It is important that the chosen proxy displays similar exposure to climate risk factors as the item being valued. For example, when valuing an investment in an oil company, the equity valuation of an oil company that has invested heavily in developing a renewable energy product offering is likely to be impacted differently by climate risk factors than the equity valuation of a similar oil company that does not have a transition plan to develop its product offering. If using a proxy with different climate risk factors, an adjustment may be necessary.

- ▶ When using a proxy in measuring the credit valuation adjustments (CVA) against less liquid uncollateralised derivative counterparties, are climate change variables considered when choosing the appropriate proxy?

If there is no observable counterparty-specific credit spread and a proxy is used, the CVA measurement might need to be adjusted when that counterparty is materially exposed to climate risks (provided the adjustment is consistent with those that market participants would make).

- ▶ Have any restrictions on the assets been considered?

If the restrictions are a characteristic of the asset being measured (as opposed to a characteristic of the entity itself), then the restrictions should be factored into the fair value measurement. For example, if a portion of a forest is restricted from harvest as part of a carbon capture scheme, this restriction would be considered since it does represent a characteristic of the asset being measured.

When using the income approach (e.g., a discounted cash flow technique), the following questions could be relevant:

- ▶ Does the technique incorporate the impact of climate risk factors and, if so, to what extent?

Entities need to check whether the projected cash flows and/or the discount rate factor in the existence of climate risk factors and are internally consistent. For example, for the equity valuation of an automotive company producing internal combustion engines (ICEs), it may not be appropriate to assume indefinite sales growth from ICEs in their cash flow projections given the regulatory risks that threaten the longevity of ICEs.

- ▶ Have any climate change risk factors been double counted?

Double counting the risk in both the cash flow projection and discount rate should be avoided. Conversely, to the extent the risks are not adequately captured in the cash flows, then an adjustment to the discount factor may be warranted (provided the adjustment is consistent with adjustments that market participants would make).

For non-financial assets, the following questions could be relevant:

- ▶ Have developments in response to climate risk changed the entity's current use of the asset?
- ▶ Are there any indications that market participants have changed the use of similar assets?
- ▶ Is the asset positively or negatively affected by current and/or anticipated changes in the climate (e.g., rising water levels, changing weather patterns)?
- ▶ If the current use differs from its highest and best use, why?

For stranded assets, for example, an entity may believe the value from their perspective is low (perhaps because it is not part of their future plans given their selected climate change transition business plans), IFRS 13 would consider the highest and best use from a market participant's perspective, which may result in a fair value measurement that is higher than when assuming the entity's current use.

Disclosure

Regardless of whether an entity can adjust for relevant risks in measuring fair value, disclosure of those risks and their potential effect will be important. In particular, users of financial statements will need to understand whether, and how, the relevant climate-related factors have been incorporated within the methodologies and inputs.

In instances where climate risk factors have a material impact on the fair value measurements, additional disclosures would be required, particularly for those categorised within Level 3 of the fair value hierarchy. This includes any changes in the valuation processes, and sensitivity to changes in unobservable inputs and the interrelationship of those inputs. Entities may need to consider whether additional information is needed to meet the disclosure objective in IFRS 13.

Should entities wish to convey more information (e.g., the entity's incorporation of climate-related factors for its own purposes, rather than financial reporting), entities need to consider whether disclosure within the financial statements is appropriate or it is better presented in the management's discussion and analysis (MD&A).

Illustration 5-1 below contains an example of disclosures that could be included in the financial statements. It represents an extract from the Mondi Plc 2022 annual financial statements, and shows, for a Level 3 fair value measurement, a description of the impacts of climate change on the relevant inputs into the fair value measurement. It highlights how climate-related factors (e.g., water scarcity, fire risks) affect the inputs that are considered by market participants and used in the fair value measurement.

Illustration 5-1 – Mondi Plc – 2022 annual report (Containers and packaging sector)

14 Forestry assets

The fair value of forestry assets is a level 3 measure in terms of the fair value measurement hierarchy, consistent with prior years.

The following assumptions have a significant impact on the valuation of the Group's forestry assets:

- The net selling price, which is defined as the selling price less the costs of transport, harvesting, extraction and loading. The net selling price is based on third-party transactions and is influenced by the species, maturity profile and location of timber. In 2022, the net selling price used ranged from the South African rand equivalent of €14 per tonne to €47 per tonne (2021: €14 per tonne to €44 per tonne), with a weighted average of €33 per tonne (2021: €24 per tonne).
- The conversion factor, which is used to convert hectares of land under afforestation to tonnes of standing timber, is dependent on the species, the maturity profile of the timber, the geographic location and a variety of other environmental factors, such as the anticipated impact of climate change on water scarcity and fire risks. In 2022, the conversion factors ranged from 7.9 to 23.9 (2021: 8.3 to 24.1).
- The risk premium on immature timber of 12.5% (2021: 12.9%) is based on an assessment of the risks associated with forestry assets in South Africa and is applied for the years the immature timber has left to reach maturity. A risk premium on mature timber of 4.0% (2021: 4.0%) was applied. The risk premium applied to immature and mature timber include factors for the anticipated impact of climate change on water scarcity and fire risks. An increase in the severity and frequency of extreme weather events, such as higher temperatures, changes in rainfall patterns and drought conditions, may result in higher timber losses in future years caused by stronger winds, erosion, fires, pests and diseases.

Segro Plc described in its 2022 annual report how sustainability and environmental matters are considered in the valuation of real estate.

Illustration 5-2 – Segro Plc - 2022 annual report (Real estate sector)

26. Property Valuation Techniques, Sustainability and Climate Change Considerations and Related Quantitative Information

Sustainability valuation considerations

The Group's valuers, CBRE, note in their valuation report that the impact of sustainability factors on valuations have been considered. In a valuation context, 'sustainability' encompasses a wide range of physical, social, environmental, and economic factors that can affect value of an asset, even if not explicitly recognised. The range of issues includes key environmental risks, such as flooding, energy efficiency and climate, as well as matters of design, legislation and management considerations – and current and historic land use.

Climate risk legislation

The UK Government and the EU is currently producing legislation on the transition to net-zero which is likely to include an update to the Minimum Energy Efficiency Standards and also the intention to introduce an operational rating. Whilst the nature of the legislation is not yet clear it could have a potential impact to future asset value.

The introduction of mandatory climate related disclosures in the UK and EU (including 'Task Force on Climate related Financial Disclosures' (TCFD) in the UK and 'Sustainable Finance Disclosure Regulations' (SFDR) and 'Corporate Sustainability Reporting Directive' (CSRD) in the EU), including the assessment of physical and transition climate risks, may potentially have an impact on how the market views such risks and incorporates them into the sale and letting of assets.

Sustainability and climate risk legislation has an impact on the value of an asset, even if not explicitly recognised. Valuers reflect markets, they do not lead them. Where the valuers recognise the value impacts of sustainability and legislation, they are reflecting their understanding of how market participants include sustainability and legislation requirements in their bids and the impact on market valuations.

How we see it

Entities should ensure that any climate change variables incorporated in a fair value measurement are those that market participants would consider when pricing the asset or liability to ensure it is an IFRS 13 fair value measurement. While more information about climate-related risks, including information disclosed outside the financial statements, is being made available, reliably pricing climate-related risk and incorporating climate change variables into valuations is expected to gradually improve.

Significant judgement may be needed when considering climate-related factors in fair value measurements, which may lead to greater estimation uncertainty. As a result, entities will need to provide sufficient transparency in their disclosures about the impact of climate-related risks on fair value measurements.

6. Financial instruments

6.1 What is the issue?

IFRS 9 *Financial instruments* requires entities to recognise expected credit losses (ECL) on financial assets measured at amortised cost and on debt assets measured at fair value through other comprehensive income (FVOCI), as well as on certain financial guarantees and loan commitments. Climate change may affect an entity's assessment of expected credit losses on these instruments, potentially leading to higher allowances for expected credit losses. The longer the term of the exposures and the greater the extent to which the counterparty is likely to be affected by climate change, the greater this effect is likely to be.

IFRS 9 also requires entities to classify and measure financial assets based on the business model in which they are held and their contractual terms. Sustainability-linked loans are becoming increasingly prevalent. The contingent rate adjustments inherent in these loans may introduce additional variability to the cash flows of the loan that is inconsistent with a basic lending arrangement, which would then result in failure of the solely payment of principal and interest (SPPI) test. This would result in the asset being classified as at fair value through profit or loss.

6.2 What is the impact?

Expected credit losses

IFRS 9 requires use of forward-looking information to recognise expected credit losses. There is a variety of increasingly possible adverse future climate risk economic scenarios that could impact the probability of borrowers defaulting and the extent of losses that lenders may incur in the event of default. Climate-related risks are broadly categorised into physical and transition risks. Physical risks include the risk of loss due to specific weather events (such as storms or wildfires) and due to longer-term changes in weather trends (such as rising sea levels). Transition risks relate to the risk of financial loss due to the economic transition toward a more sustainable economy.

Physical risks can impact the creditworthiness of borrowers due to business interruption, impacts on economic strength, asset values and unemployment. Transition risks could also result in a rapid deterioration of credit quality in sectors and/or countries affected, particularly if policy changes are radical or quickly implemented, and these factors should be considered in a borrower's ability to repay and service debt.

From a credit risk perspective, physical and transition risks related to climate change could potentially impact:

- ▶ Probability of Default (PD). PD affects staging of exposures and the measurement of ECL allowances. Historical correlations that predict defaults may no longer be relevant. Methods for risk rating customers may, therefore, need to be updated as new financial and non-financial metrics capturing the impacts of climate change are made available. The impact of regulatory actions should also be considered.
- ▶ Loss Given Default (LGD). LGD affects the ultimate measurement of the ECL allowance. Physical and transition risks may affect collateral values, for example, on mortgage loans, and lead to entities employing different collection strategies for distressed debt.

A variety of adverse future climate risk economic scenarios could impact the probability of borrowers defaulting.

- ▶ Model adjustments. Entities may make use of judgemental in-model or post-model adjustments to incorporate climate risk into their ECL allowances, particularly in the short term due to data and model limitations. Enhanced governance processes will be required to support these judgements.
- ▶ Forward-looking information. Entities may need to incorporate climate risk factors into their macroeconomic scenarios. The impact of climate risk on these scenarios is likely to be greater, the longer the duration of the underlying exposures and the greater an entity's exposure is to vulnerable sectors or geographies.
- ▶ Concentration risk. Climate risk is likely to increase risk exposures in vulnerable sectors or geographies. Sectors like agriculture and insurance may be particularly vulnerable to physical risks. Mining and oil and gas may be particularly exposed to transition risk. Some geographies such as those at low altitude or exposed to drought or flooding may be particularly exposed to physical risks. Changes in risk concentrations may affect the modelling of ECL allowances and the disclosure of credit risk concentrations.

Entities, particularly those with large credit risk exposures like banks, are in various stages of integrating climate risks into their risk frameworks, and there exist several challenges in this regard:

- ▶ Climate-related risks are uncertain, non-linear and pervasive.
- ▶ There are multiple projections and scenarios available to estimate the size and impact of climate risk, but limited projections for economic and financial effects.
- ▶ Data and projections available are not always comparable, given divergence in taxonomies and standards globally.
- ▶ Entities need to collect new types of data on their customers and put in place new processes and governance.
- ▶ Identifying the right metrics to measure climate risk exposure can be challenging.
- ▶ Clarity or consensus on incorporating climate scenario analysis and into risk assessments is still emerging.

Illustration 6-1 shows how National Australia Bank Limited considered its exposure to climate risks as part of its credit risk assessment in its 2022 annual financial statements. In this example, the exposure to ESG risks has been captured as part of a forward-looking adjustment.

Illustration 6-1 – National Australia Bank Limited- 2022 annual report (Financial services sector - banking)

NOTE 19 FINANCIAL RISK MANAGEMENT

Credit risk section

ESG risks

The Group is exposed to ESG and other emerging risks. The following items are examples of how these risks may impact the Group:

- Increases in the frequency and severity of climatic events could impact customers' ability to service their loans or the value of the collateral held to secure the loans.
- Action taken by governments, regulators and society more generally, to transition to a low-carbon economy, could impact the ability of some customers to generate long-term returns in a sustainable way or lead to certain assets being stranded in the future.
- Failure to comply with environmental and social legislation (emerging and current) may impact customers' ability to generate sustainable returns and service their loans.
- If in future customers don't hold appropriate levels of insurance for physical assets against certain risks, this may impact the value the Group can recover in the event of certain natural disasters.

The Group considers these risks as part of the credit risk assessment and due diligence process before a customer is granted credit and for new product development. The Group also manages its total credit portfolio within established risk appetite and limits, particularly for specific industries or regions that are more exposed to these types of risks. As at 30 September 2022, the

Group holds FLAs in its credit impairment provisions reflecting the potential impact of emerging ESG risks. This includes \$14 million (2021: \$nil) for the potential impact of the Lismore floods.

Illustration 6-2 shows how ABN AMRO Bank N.V accounted for the potential transition risk by including a management overlay in the ECL calculation.

Illustration 6-2 – ABN AMRO Bank N.V. - Integrated Annual Report 2022 (Financial services sector - banking)

Credit risk overview section

During 2022, management overlays decreased to a total of EUR 328 million (31 December 2021: EUR 424 million). Of this decrease, EUR -43 million was due to reclassification of overlays to input data and in-model adjustments and did not have P&L impact. The remaining management overlays were mainly recorded for risks in the corporate loans portfolios and comprised the following:

- ▶ A new management overlay was applied for potential effects of the war in Ukraine that are not fully captured by the latest projections in our macroeconomic scenarios and existing IFRS 9 models. An initial overlay for second-order impact on potentially vulnerable clients was cancelled after individual clients were reviewed and, where appropriate, reclassified. As the uncertainty in the macroeconomic outlook as a whole continues to be high, the initial overlay was replaced by an overlay on impairments for third-order effects, amounting to EUR 123 million at year-end 2022.
- ▶ A new management overlay of EUR 34 million was formed for the potential impact that the government's measures to reduce nitrogen emissions may have on clients in livestock farming businesses in the Netherlands.
- ▶ The existing overlays, which cover anticipated additional risk costs relating to the wind-down of portfolios, decreased in line with the reducing exposure to these portfolios.

In its 2022 Annual report, UBS Group disclosed the impact of sustainability and climate risk on the measurement of ECL. As shown in Illustration 6-3, while the impact was not material, the reasons for this outcome were disclosed.

Illustration 6-3 – UBS Group AG - 2022 annual report (Financial services sector – banking and wealth management)

Note 19 Expected credit loss measurement

Sustainability and climate risk

Sustainability and climate risk (SCR) may negatively affect clients or portfolios due to direct or indirect transition costs, or exposure to physical risks in locations likely to be impacted by climate change. Such effects could lead to a deterioration in credit worthiness, which in turn would have an impact on ECLs.

While some indicators that are more influenced by climate change (e.g., energy prices) are factored into the current PD models where they have demonstrated statistical relevance, UBS currently does not use a specific SCR scenario in addition to the four general economic scenarios applied to derive the weighted-average ECL. The rationale for the approach at this point in time is the significance of model risks and challenges in calibration and probability weight assessment given the paucity of data.

Instead, UBS focuses on the process of vetting clients and business transactions and takes individual actions, where transition risk is deemed to be a significant driver of a counterparty's credit worthiness. This review process may lead to a downward revision of the counterparty's credit rating, or the adoption of risk mitigating actions, and hence affect the individual contribution to ECLs.

At the portfolio level, UBS has started to use stress loss assumptions to assess the extent to which SCR may affect the quality of the loans extended to small and medium-sized entities and large corporate clients. Initial tests were based on a set of assumptions presented by external parties (such as the Bank of England). Such analysis undertaken during 2022 concluded that the counterparties are not expected to be significantly impacted by physical or transition risks, mainly as there are no material risk concentrations in high-risk sectors. The analysis of the corporate loan book has also shown that any potential significant impacts from transition costs or physical risks would materialize over a time horizon that exceeds in most cases the contractual lifetime of the underlying assets. Based on current information on regulatory developments, this would also apply to the portfolio of private clients' mortgages and real estate financing, given the long lead times for investments in upgrading the housing stock.

As a result of the aforementioned factors, it was assessed that the magnitude of any impact of SCR on the weighted-average ECL would not be material as of 31 December 2022. Therefore, no specific post-model adjustment was made in this regard.

- › Refer to "Sustainability and climate risk" in the "Risk management and control" section of this report
- › Refer to "Our focus on sustainability and climate" in the "Our strategy, business model and environment" section of this report
- › Refer to "UBS AG consolidated supplemental disclosures required under SEC regulations" for the maturity profile of UBS core loan book

It is important to note that the factors outlined here should be considered by any entity that holds financial assets that are in the scope of the IFRS 9 impairment requirements - this includes financial institutions, as well as corporates. For example, Illustration 6-4 discloses how Rolls-Royce considered the impact of potentially vulnerable sectors when estimating ECL.

Illustration 6-4 – Rolls-Royce Holdings PLC - Annual Report 2022 (Civil aerospace and defence sectors)

1 Accounting policies

Useful lives of assets – The useful lives of property, plant and equipment and right-of-use assets could be reduced by climate-related matters, for example, as a result of physical risks, obsolescence or legal restrictions. The change in useful lives would have a direct impact on the amount of depreciation or amortisation recognised each year from the date of reassessment. The Directors' review of useful lives has taken into consideration the impacts of the Group's decarbonisation strategy and has not had a material impact on the results for the year. The Directors have also considered the remaining useful economic lives of material intangible assets, including the £1,826m and £250m capitalised development spend associated with the Trent and business aviation programmes disclosed in note 9. Given the measures the Group is taking, including the testing of engines for sustainable aviation fuels (SAF) compatibility and that all the commercial aero-engines and the most popular reciprocating engines that are currently produced will be compatible with sustainable fuels by the end of 2023, the Directors judge that no adjustment is required to the useful economic lives.

Inventory valuation – Climate-related matters may affect the value of inventories as a result of a decline in selling prices or could become obsolete due to a reduction in demand. After consideration of the typical stock-turns of the inventory in relation to the rate of change in the market the Directors consider that inventory is appropriately valued.

Recoverability of trade receivables and contract assets – The impact of climate-related matters could have an impact on the Group's customers in the future, especially those customers in the Civil Aerospace business. No material climate-related issues have arisen during the year that have impacted the assessment of the recoverability of receivables. The Group's expected credit loss (ECL) provision uses credit ratings which inherently will include the market's assessment of the climate change impact on credit risk of the counter parties. Given the maturity time of trade receivables and the majority of contract assets, climate change is unlikely to cause a material increase on counter party credit risk in that time.

How we see it

The impact of climate risk on an entity's ECL calculations is likely to be greater the longer the duration of the underlying exposures and the greater the entity's exposure to vulnerable sectors or geographies. Given the judgemental nature of incorporating climate risks into ECL calculations, it is important that entities establish strong governance processes to support material judgements that they make in this regard, and that there are enhanced disclosures made about the risks and the impact significant judgements and estimation uncertainty.

Careful analysis of the terms of sustainability-linked loans is required to assess whether they meet the SPPI test.

Sustainability-linked (ESG-linked) loans

Sustainability-linked (ESG-linked) loans are structured such that their interest rates vary based on whether the borrower achieves pre-determined targets defined in the loan agreement. For example, the terms may include a reduction or increase in the interest rate if the borrower does, or does not, attain a certain rating on a type of green-building rating system for an agreed number of the borrower's manufacturing buildings. These contingent rate adjustments introduce variability to the cash flows of the loan which is linked to the underlying performance of the borrower. This may not be consistent with a basic lending arrangement.

In a basic lending arrangement, consideration for the time value of money and credit risk are typically the most significant elements of interest, however in practice there could be other elements included. Contractual terms that introduce exposure to risks, or volatility in the contractual cash flows, that are unrelated to a basic lending arrangement, (e.g., exposure to changes in equity prices or commodity prices), do not give rise to contractual cash flows that are SPPI.

How we see it

There is no bright line to determine whether sustainability-linked features cause an instrument to fail the SPPI test and therefore analysis of the terms of these loans is required. It is important to consider whether they provide commensurate compensation for basic lending risks, such as credit risk, or whether they introduce compensation for new risks that are inconsistent with basic lending arrangements. Some features may be *de minimis* or non-genuine, and judgement will be needed based on the facts and circumstances.

Illustration 6-5 from NatWest Group Plc's 2022 annual financial statements gives an example of the judgements and considerations made when classifying sustainability-linked loans.

Illustration 6-5 – NatWest Group Plc - 2022 annual report (Financial services sector - banking)

10 Financial instruments – classification

Financial instruments are contracts that give rise to a financial asset of one entity and a corresponding financial liability or equity instrument of a counterparty entity, such as: cash; derivatives; loans; deposits; and settlement balances. This note presents financial instruments classified in accordance with IFRS 9 – Financial Instruments.

Judgment: classification of financial assets

Classification of financial assets between amortised cost and fair value through other comprehensive income requires a degree of judgment in respect of business models and contractual cashflows.

- The business model criteria is assessed at a portfolio level to determine whether assets are classified as held to collect or held to collect and sell. Information that is considered in determining the applicable business model includes the portfolio's policies and objectives, how the performance and risks of the portfolio are managed, evaluated and reported to management; and the frequency, volume and timing of sales in prior periods, sales expectation for future periods, and the reasons for sales.
- The contractual cash flow characteristics of financial assets are assessed with reference to whether the cash flows represent solely payments of principal and interest. A level of judgment is made in assessing terms that could change the contractual cash flows so that it would not meet the condition for solely payments of principal and interest, including contingent and leverage features, non-recourse arrangements and features that could modify the time value of money.

We originate loans that include features that change the contractual cash flows based on the borrower meeting certain contractually specified environmental, social and governance (ESG) targets. These are known as ESG-linked (or sustainability-linked) loans. As part of the terms of these loans, the contractual interest rate is reduced or increased if the borrower meets (fails to meet) specific targets linked to the activity of the borrower for example reducing carbon emissions, increase the level of diversity at Board level, sustainable supply chain, etc. ESG features are first assessed to ascertain whether the adjustment to the contractual cash flows results in a de minimis exposure to risks or volatility in those contractual cash flows. If this is the case the classification of the loan is not affected. If the effect of the ESG feature is assessed as being more than de minimis, we apply judgement to ensure that the ESG features do not generate compensation for risks that are not in line with a basic lending arrangement. This includes amongst other aspects a review of the consistency of the ESG targets with the asset or activity of the borrower, consideration of the targets within our risk appetite etc. Some of these loans are an integral part of our climate and sustainable funding and financing target disclosed on page 25.

For accounting policy information see Accounting policies notes 3.8, 3.9, 3.10 and 3.12.

EY existing guidance¹⁷

Compensation for credit risk

Instruments are more likely to meet the SPPI requirements if the attainment (or non-attainment) of the sustainability target is likely to result in the improvement (or the deterioration) of the borrower's credit risk during the life of the loan such that the change in interest rate is commensurate with the change in credit risk of the borrower. This is because IFRS 9 acknowledges that clauses which allow changes to the contractual cash flows may not fail the SPPI test if there is a relationship between the changes and an increase in credit risk.

An entity may be able to prove the relationship if the entity can demonstrate that it takes the sustainability metric into account when pricing and monitoring the credit risk on the loan. This could be the case if there is a link between the feature and the value of the collateral pledged against the loan (see example 2 below), or if there is a link between the feature and the probability of default on the loan (see example 3 below). If the link to credit risk is too indirect (see example 4 below), the feature will have to be further assessed (see sections on de-minimis and compensation for other basic lending risks below).

If there is a link between the feature and the loan's credit risk, the lender should also establish whether the magnitude of the change in the contractual cash flows due to the feature is commensurate with the anticipated change in credit risk. If the feature gives rise to leveraged exposure to credit risk, the loan is

¹⁷ For more information, see [International GAAP® 2023, Chapter 43](#), at section 5.4.7

likely to fail the SPPI test. The exception to this is where the feature gives rise to non-commensurate changes in interest rates, not to introduce leverage to the contract, but to introduce a punitive interest rate to act as a disincentive against the borrower allowing its credit risk to deteriorate.

The following examples demonstrate these considerations:

Example 1: Sustainability-linked loans

A bank grants a loan to fund the acquisition of a new fleet of vessels. The loan is collateralised by that fleet. In addition, the loan contains a sustainability feature that reduces or increases the interest rate based on the borrower's performance against a commonly used metric in the industry for carbon emissions. The metric is based on the carbon emissions of the entity's fleet after factoring in the distance travelled by the fleet and the ships' size.

In this scenario, there may be a link between the emissions targets and the value of the collateral (the fleet). The bank would need to consider:

- ▶ Whether the value of the fleet is linked to the attainment of the carbon emission targets:
 - ▶ This might be the case, as, all things being equal, a better maintained and therefore more efficient fleet should attract a higher resale value than a less efficient fleet.
 - ▶ However, better efficiency may not necessarily indicate that the fleet is in a better condition. Efficiency will depend on other factors such as the ships' payloads, the skill of the crew in operating them, time spent waiting to dock at busy ports and weather conditions.
 - ▶ Judgement would need to be exercised in determining the strength of the link based on the facts and circumstances.
- ▶ Whether the change in value of the fleet would affect the entity's assessment of the credit risk on the loan:
 - ▶ In this scenario, the fleet has been pledged as collateral on the loan. A more valuable fleet could, therefore, reduce the loss given default on the loan and decrease the entity's assessment of the loans' credit risk.
 - ▶ However, if the loan is not collateralised, or if the metric considers the performance of additional ships that have not been pledged as collateral against the loan, the link with credit risk may be harder to demonstrate.
- ▶ Whether the change in the interest rate in response to the attainment of the emissions target can be considered appropriate compensation for the associated change in credit risk.

Example 2: Sustainability-linked loans

A ten-year loan is granted to a power generating entity to finance an overhaul of a coal-fired power plant. Operating this power plant is the entity's sole business. New local legislation will prohibit the power plant from continuing to operate if a specified CO₂ emissions target is not met on, or after, a date in three years' time. Therefore, the bank has included a series of annual targets in the loan terms, building up to the final deadline. If the power plant does not meet these contractual emissions targets, the interest rate on the loan increases.

It is likely that the lender will be able to demonstrate a link between the sustainability feature and the loan's credit risk. If the final emissions target is not met, the plant will not be able to operate. As this is the borrower's sole business, it would be unlikely that it will be able to repay the loan if that were to happen. The contractual emissions targets are designed to incentivise the borrower to incrementally work towards meeting the overall legislative target. The closer the borrower gets to the legislative deadline and the further it is from achieving it, the higher its credit risk becomes. The contractual features increase the interest rate in response to this increase in credit risk. Therefore, there is a clear link between the contractual targets and the credit risk on the loan.

The lender would also need to establish whether the magnitude of the change in the interest rate is commensurate with the change in credit risk. If the change is not commensurate, it should consider whether the feature is designed as a punitive feature to disincentivise against the borrower allowing its credit risk to increase by making slow progress towards the important legislative deadline.

In practice, this link to credit risk may not be so clear. For example, the link may be blurred when the entity's credit risk is a function of multiple comingled businesses, but the loan and the sustainability-feature relate to a single business, or portion thereof, or when the cost of attaining the sustainability target is high and could outweigh the benefits.

Example 3: Sustainability-linked loans

A short-term loan is granted to a food retailer. The interest rate on the loan varies depending on the performance of the retailer against a sustainability scorecard. The scorecard includes three targets based on:

- a) The reduction in the retailer's CO₂ emissions
 - b) The percentage of new hires that are female
- And
- c) The number of training hours in sustainable food production provided to previously underprivileged people

The retailer's performance against each target is weighted and used to determine an overall score. The interest rate will be reduced if the retailer achieves a score above a predetermined level.

In this illustration, achievement of the sustainability target benefits the entity in a broader, intangible manner. For example, the retailer could achieve the training target by providing training as a corporate social initiative to people who are not employed by the retailer and have no contractual or financial relationship with the retailer. While this may improve its reputation, and possibly improve its business performance and credit risk in the long term, such a link is indirect and, most likely, weak. Additionally, the loan is a short-term loan and, as such, it will be difficult to demonstrate a link between the feature and the loan's credit risk.

De minimis or non-genuine sustainability features

Lenders or holders should also consider whether the sustainability feature is *de minimis* or non-genuine. An entity should be able to conclude, without a detailed quantitative analysis, whether a feature is *de minimis*. As an operational simplification, an entity may decide to introduce a quantitative threshold below which features would be considered '*de minimis*' without a detailed analysis. Judgement should be exercised in determining what the appropriate threshold is.

Other considerations

When analysing sustainability features that are not *de minimis* and which introduce cash flows that are not commensurate with the change in the credit risk on the loan, we believe that the following considerations may clarify whether the sustainability feature introduces compensation for a new risk that is inconsistent with a basic lending arrangement:

- ▶ The record of contract negotiations between the borrower and the lender
- ▶ The nature of the sustainability feature
- ▶ The lender's pricing decisions
- ▶ The extent to which the counterparties monitor and manage the resulting sustainability risk
- ▶ The level and frequency of data on the sustainability feature that the borrower is required to report to the lender

Post Implementation Review (PIR) of IFRS 9

The accounting treatment for financial assets with ESG-linked features, such as where the interest rate varies depending on the achievement of ESG goals, was identified as a high priority as part of the Post Implementation Review (PIR) of IFRS 9. As part of the discussions, a key question in analysing these loans is what the entity (the holder) is being compensated for, and the nature of the contingent event.¹⁸

Proposed amendments

The culmination of the IASB's discussions on the topic, on 21 March 2023, saw the publication of the Exposure Draft (ED) *Amendments to the Classification and Measurement of Financial Instruments*.¹⁹ The ED proposes amendments to address the assessment of the contractual cash flow characteristics of financial assets, including those with ESG-linked features.

The IASB proposes two broad amendments. The first would help to identify whether the compensation the lender receives is consistent with a basic lending arrangement by requiring consideration of:

- ▶ What the lender is compensated for
- ▶ Whether the compensation covers risks or market factors not typically considered consistent with a basic lending arrangement
- ▶ If a change in contractual cash flows is inconsistent with a basic lending arrangement, including the direction and magnitude of any change

The second amendment proposes to expand the guidance for how contractual terms that change the timing or amount of contractual cash flows over the life of the financial asset should be assessed by considering:

- ▶ Whether the contractually specified change would meet the SPPI requirement irrespective of the probability of the contingent event occurring
- ▶ To be consistent with a basic lending arrangement, the occurrence or non-occurrence of the contingent event must be specific to the debtor
- ▶ The resulting contractual cash flows must represent neither an investment in the debtor nor an exposure to the performance of specified assets

¹⁸ More detail on the deliberations of the IASB on these matters: [IFRS 9 Post Implementation Review – progress to date](#)

¹⁹ IASB, *Amendments to the Classification and Measurement of Financial Instruments*: Proposed amendments to IFRS 9 and IFRS 7, March 2023, www.ifrs.org

The ED also proposes adding two examples to support the consistent application of the SPPI condition, as indicated below:

Instrument	Analysis
<p>Instrument EA</p> <p>Instrument EA is a loan with an interest rate that is periodically adjusted by a specified number of basis points if the debtor achieves a contractually specified reduction in greenhouse gas emissions during the preceding reporting period.</p>	<p>The contractual cash flows are solely payments of principal and interest on the principal amount outstanding.</p> <p>The occurrence of the contingent event (achieving a contractually specified reduction in greenhouse gas emissions) is specific to the debtor. The contractual cash flows arising from the occurrence (or non-occurrence) of the contingent event are, in all circumstances, solely payments of principal and interest on the principal amount outstanding.</p> <p>The contractual cash flows represent neither an investment in the debtor nor an exposure to the performance of specified assets.</p>
<p>Instrument I</p> <p>Instrument I is a loan with an interest rate that is periodically adjusted when a market-determined carbon price index reaches a contractually defined threshold.</p>	<p>The contractual cash flows are not solely payments of principal and interest on the principal amount outstanding.</p> <p>The contractual cash flows change in response to a market factor (the carbon price index), which is not a basic lending risk or cost and is, therefore, inconsistent with a basic lending arrangement.'</p>

Finally, the ED proposes new disclosures to allow users to better understand the effects of terms that could change the timing or amount of contractual cash flows. They apply to financial instruments with ESG-linked features discussed above, and to all other financial assets at amortised cost, or FVOCI and financial liabilities at amortised cost, with contingent features. In particular, the disclosures require:

- ▶ A qualitative description of the nature of the contingent event
- ▶ Quantitative information about the range of changes to contractual cash flows that could result from the contractual terms
- ▶ The gross carrying amount of financial assets and the amortised cost of financial liabilities subject to those contractual terms

Under the ED, prior periods would not need to be restated, with any adjustments required made to opening retained earnings. The comment period for the ED closed on 19 July 2023, and as the ED is subject to the IASB's due process, the proposals outlined above are subject to change.

How we see it

The ED provides much needed guidance on the treatment of ESG-linked features. The approach taken in the ED is consistent with our interpretation of existing requirements. Obtaining the quantitative and qualitative data needed for the disclosure of financial instruments with contingent features may require significant effort.

Entities should consider the extent to which IFRS 7 requires disclosures in relation to climate risks.

Disclosures

IFRS 7 *Financial Instruments: Disclosures* requires entities to provide disclosures in their financial statements that enable users to evaluate the significance of financial instruments for the entity's financial position during the period and at the end of the reporting period.

Entities should consider to which extent they are exposed to climate risks as a result of their involvement in financial instruments. IFRS 7 requires qualitative and quantitative disclosures unless the information resulting from that disclosure is not material.

7. Carbon credits and renewable energy certificates

7.1 What is the issue?

The specific features of carbon credits, including whether they are traded in compliance or voluntary markets, are key to determining the appropriate accounting.

The ambitious goals of GHG emission reductions as set by the 2015 Paris Agreement, or imposed by the local jurisdictions, has increased the pressure on entities to find ways to reduce their carbon footprint. For some entities, neutralising or offsetting their carbon footprint includes the use of carbon credits and/or renewable energy certificates that can help accelerate investment in carbon reducing solutions as well as turning emission reduction and removal projects into tradeable assets. Projects that generate carbon credits are generally categorised into those that reduce emissions (e.g., generation of energy from renewable sources) and those that remove emissions (e.g., regenerative farming projects, carbon capture and storage).

Carbon markets are broadly split into two types of markets: compliance markets and voluntary markets. Hybrid markets are also possible and can include governments strongly encouraging the use of voluntary markets, or governments accepting voluntary carbon credits in lieu of cash payments to settle emissions obligations. Appropriately accounting for carbon credits depends on the specific features (e.g., whether they can be traded) and the role the entity plays in those markets (e.g., project developer, broker/dealer, emitter).

Currently, there are no explicit requirements that address the accounting for mandatory emissions trading schemes (including mandatory carbon credits) or for voluntary carbon credits. The IASB has a project in its pipeline for pollutant pricing mechanisms in which it notes the diversity in how such mechanisms (which include emissions trading schemes) are accounted for and that some of the issues identified relate to possible gaps and inconsistencies in IFRS accounting standards. At the time of writing, this was not an active research project.²⁰

While there are no explicit requirements, several standards provide relevant guidance that entities need to consider.

- ▶ The award of carbon credits or renewable energy certificates in compliance markets represents generally a government grant. IAS 20 *Accounting for Government Grants and Disclosure of Government Assistance* permits the award of initial recognition of such non-monetary grants either fair value or a nominal amount, depending on the entity's chosen policy.
- ▶ Whether received from a grant or purchased, if credits or certificates are recognised, IAS 2 *Inventories* or IAS 38 *Intangible Assets* might apply, depending on whether the credits are held for sale in the ordinary course of business or to settle an emissions liability in the ordinary course of business.
 - ▶ If IAS 2 applies, they will be held at the lower of cost and net realisable value. However, broker-dealers applying IAS 2 have the choice to either measure inventories at fair value less costs to sell or at the lower of cost and net realisable value.

²⁰ <https://www.ifrs.org/projects/pipeline-projects>, accessed 27 July 2023.

- ▶ If IAS 38 is applied, an entity applies the cost model unless the credits or certificates are traded in an active market, in which case, the revaluation model can be applied. Emission rights that are accounted for as intangible assets are unlikely to be amortised as their depreciable amount is usually nil. Their expected residual value at inception will be equal to their fair value. Thereafter, although their residual value is equal to their market value, there is no consumption of economic benefit while the emission right is held. The economic benefits are realised instead by surrendering the rights to settle obligations under the scheme for emissions made, or by selling rights to another party. It is necessary to perform an IAS 36 impairment test whenever there is an indication of impairment.
- ▶ Whether IAS 2 or IAS 38 applies is also important in the accounting for any sale of carbon credits as IAS 38 has specific requirements on how to account for disposals of intangible assets, while entities that hold them as inventories will typically apply IFRS 15 *Revenue from Contracts with Customers* or, for broker-dealers, IFRS 9 may apply, depending on the specific contractual arrangement.
- ▶ For broker-dealers that trade derivatives based on the emission rights, then such contracts fall within the scope of IFRS 9 and are accounted for at fair value through profit or loss, unless they hedge the fair value of the emission rights granted to the entity or qualify for the 'own use exemption'.

7.2 What is the impact?

Compliance markets

Compliance markets may not exist in all jurisdictions, but where they do, participation is mandatory for certain entities. These markets are typically run by governments or their agencies.

In such markets, the carbon credits can (or must) be used to settle obligations to pay for GHG emissions. Therefore, while the pricing of carbon credit will depend on supply and demand, the amount an entity needs to pay to settle an emissions liability with the government is also a relevant factor. The most common type of mandatory scheme involves a cap-and-trade model whereby participants are allocated emission rights or allowances equal to a cap (i.e., a maximum level of allowable emissions) and are permitted to trade those allowances (e.g., the European Union's emissions trading scheme (EU ETS)).

Renewable energy certificates are similar. Typically, producers of electricity are granted certificates by the government based on the power output (kWh) derived from renewable sources. Entities distributing electricity (produced from both renewable and traditional sources) are required to hand over to the government a number of certificates based on the total kWh of electricity sold to consumers during the year or pay a penalty to the extent that an insufficient number of certificates is rendered. Producers can sell their certificates to distributors, using the income to subsidise, in effect, the higher cost of generation from renewable sources. The pricing of green certificates depends on many variables, but primarily on the required number of certificates that have to be delivered relative to the amount of power that is produced from

Since there are no explicit requirements under IFRS for mandatory emissions trading schemes, entities need to develop their own policy in accordance with IAS 8.

renewable sources, and the level of penalty payable if the required number of certificates is not remitted.

Mandatory carbon credits

The accounting for carbon credits in compliance markets (mandatory carbon credits) needs to be considered together with the related liability for GHG emissions. Since there are no explicit requirements under IFRS, entities need to develop their own accounting policy in accordance with IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors*. In practice, three approaches have gained acceptance:

- ▶ The IFRIC 3 *Emission Rights* approach, which despite having been withdrawn, is considered to be an appropriate interpretation of existing IFRS. This approach leads to the recognition of: an asset for the credits or allowances; a government grant; and the liability in respect of emissions. However, this approach can result in accounting mismatches because the liability for the obligation to deliver allowances is measured at the current market price.
- ▶ The net liability approach, under which credits or allowances received by way of a government grant are recorded at a nominal amount and purchased credits are initially recognised at cost. Generally, a liability is recognised when emissions exceed credits or allowances held.
- ▶ The government grant approach leads to the recognition of: an asset for the credits or allowances; a government grant; and the liability in respect of emissions. Therefore, it is similar to the IFRIC 3 approach, except that the liability is measured by reference to the carrying value of the credits or allowances to the extent they will be used to settle the liability.

Renewable energy certificates in compliance markets

An entity's role in the market is key to the accounting treatment:

- ▶ *Producers* - If an entity is a producer that uses renewable energy sources, the award of renewable energy certificates is treated as a government grant by a producer. Thereafter, the entity will apply IAS 2 or IAS 38, depending on whether they will be sold or used.
- ▶ *Distributors* - an important consideration is whether the distributor is also a producer.

When the distributor is also a producer of renewable energy, it has the option to use certificates granted to it or to sell them on the market and pay a penalty if it has insufficient certificates to remit to the government. If so, the permissible accounting treatments of green certificates are, in principle, the same as those for mandatory carbon credits discussed above.

When the distributor is not also a producer, it needs to recognise a liability representing the obligation to remit the certificates to the government as sales of energy are made to customers. If the entity purchases the certificates in the market, it can account for them either by applying IAS 38 or IAS 2, unless the certificates are held for sale (then IAS 2 applies only).

Broker-dealers

If a broker-dealer holds credits or certificates for own use and also has a trading department trading in credits or certificates, it must split the books between emission rights held for own use and those held for trading. Credits or certificates held by broker-dealers for trading are within the scope of IAS 2. In most instances, broker-dealers measure such inventories at fair value less costs to sell (FVLCS) with changes in FVLCS recognised in profit or loss. However, this is a choice, and broker-dealers can choose to measure those inventories at the lower of cost and net realisable value instead. If certificates are held for own use, brokers-dealers account for them as intangible assets or inventory, as appropriate, and the considerations above are relevant.

As noted above in section 7.1, in terms of sales transaction, broker-dealers will generally apply IFRS 15, but IFRS 9 may also be applicable, depending on the specific contractual arrangements.

Voluntary markets

The features of voluntary carbon credits make each one unique.

Voluntary markets function outside the compliance markets. Carbon credits are verified by independent verifiers (e.g., Gold Standard, Verra), each with their own models and verification requirements, and credits in these markets are not intended to be used for compliance purposes. Entities are not required by law or regulation to use these markets, but do so voluntarily, for example, to be able to state to their clients that they are carbon neutral.

Some entities' involvement in voluntary carbon markets may still be limited. However, entities that chose to participate in these markets need to understand the features of any credits and consider the appropriate accounting treatment.

Pricing in such markets is dependent on the specific features of the credits, such as: who verified the credit; the type of reduction or removal project that generated the credit; when and where the emissions were reduced or removed; whether they are tradeable (i.e., can they be sold) and, if so, whether any restrictions apply to either the buyer or seller.

Therefore, while voluntary carbon credits from the same types of projects might be similar, they are not fungible. This is an important consideration if measuring fair value. For example, if inputs to fair value measurement are used from the sale of similar voluntary carbon credits, it is likely adjustments to the selling prices of those similar products will be needed to ensure the fair value is appropriate. Furthermore, voluntary carbon markets are still developing and, as such, many inputs are still unobservable. See section 5 above for further discussion about fair value measurement.

Ex-post credits

Ex-post credits are carbon credits issued after the emissions reduction or removal has taken place. These credits should be certified by a recognised standards body.

The accounting considerations for ex-post credits differ depending on whether an entity is a project developer (i.e., the one generating the carbon credit) or a buyer of a credit, a seller or a user of the credits.

A key question is whether an entity, particularly project developers, can recognise voluntary carbon credits as assets. Whether there is an asset will depend on whether it will generate future economic benefits for the entity. In compliance markets, mandatory carbon credits can be used to reduce or settle an emissions liability with the government (or its agency). That is unlikely in a voluntary market, so the ability to sell credits (regardless of an entity's intention) is an important factor for entities determining whether they can recognise a voluntary carbon credit as an asset.

As with mandatory carbon credits, voluntary carbon credits might be inventory or intangible assets for the entity, depending on whether the credits are held for sale in the ordinary course of business, or the entity intends to use the credit itself. That is, either IAS 2 or IAS 38 might apply.

How an entity obtains the credit will be important in determining when to recognise an asset and at what value:

► *Project developers*

Determining when to recognise voluntary carbon credits is likely to require judgement for project developers. Generally, they will be able to recognise voluntary carbon credits when they have been verified. However, if the cost method is used (see below), they may be able to commence capitalisation earlier of costs related to the generation of carbon credits. Factors to consider in determining the timing of recognition include:

- The quality of the verification project - if the verification process is simple or administrative, it might be easier to determine an asset exists. However, the cost to verify the voluntary carbon credits may be minimal as there may not be many activities required before obtaining verification. If the verification process is robust, an entity might not know the feasibility until later in the project
- How well established projects or approaches are at reducing or removing carbon - newer approaches might be more challenging to verify in the early stages

The above factors will also affect the initial measurement of the voluntary carbon credits. Depending on which standard applies, entities will need to apply the cost requirements in IAS 2 or in IAS 38, with capitalisation ceasing at the point of verification. However, if the generating assets are subject to biological transformation (e.g., trees),²¹ we believe entities can choose instead, as a policy choice, to analogise to the requirements in IAS 41 *Agriculture* for agricultural produce at the point of harvest. This analogy would apply only to initial measurement, which would be FVLCS at the point of verification, and that value would then be cost for purposes of apply IAS 2 or IAS 38 thereafter.

IAS 2 requires an entity to include all costs of conversion and costs to bring the inventories to final condition. Similarly, IAS 38 requires that the cost of internally generated intangible assets comprises all of the directly

²¹ "Biological transformation comprises the processes of growth, degeneration, production, and procreation that cause qualitative or quantitative changes in a biological asset", IAS 41.5.

attributable costs necessary to create, produce and prepare asset to be capable of operating in the manner intended by management and provide the examples of such costs. Judgement will be needed to determine the appropriate costs to include.

If voluntary carbon credits are a by-product of a production process (for example credits generated at the same time of production of green energy), judgement will also be needed to appropriately allocate costs between main product(s) and the voluntary carbon credits (by-products).

► *Buyers of voluntary carbon credits*

Buyers will generally recognise voluntary carbon credits upon purchase, applying the cost requirements for initial recognition in IAS 2 or IAS 38, as appropriate (see below for considerations for broker-dealers).

In some cases, an entity might obtain voluntary carbon credits in exchange for the provision of goods or services. Standards such as IFRS 15, IFRS 16 or IFRS 9 might be relevant, depending on the specific contractual arrangement. Assume, for example, the entity obtained the credits in exchange for providing a service and that the contract is in the scope of IFRS 15. In that situation, the credits represent non-cash consideration, and need to be measured a fair value and recognised when the entity obtains control of them in accordance with IFRS 15.

What an entity does with the credit will be important in determining when to derecognise the asset and what to recognise:

► *Sales of voluntary carbon credits*

If an entity applies IAS 2 to the credits, it will generally apply IFRS 15 to account for the sales of such credits and recognise the revenue, unless IFRS 9 applies (see below for considerations for broker-dealers). If an entity applies IAS 38 to its voluntary carbon credits, that standard has its own disposal requirements, which require recognition of a gain or loss on disposal (i.e., a net amount).

Regardless of the standard that applies, entities need to carefully analyse transactions to sell voluntary carbon credits:

- ▶ Will control of the voluntary carbon credit be transferred?
- ▶ Is any other party involved in the transaction (e.g., agent, broker)?
- ▶ Is the entity retiring a credit on behalf of a customer?
- ▶ Is the entity promising to offset emissions as part of creating a good or providing a service? If so, entities need to carefully analyse whether that is a promise to the customer (i.e., actually transferring a good or service to the customer) or an additional cost of doing business. For example, consider an airline that commits to offsetting all emissions from flights. If a customer pays extra to offset emissions, does that transfer control of something to the customer or is the airline receiving

more consideration to cover the higher cost of doing business? See below for further discussion under 'users of voluntary carbon credits'.

This analysis will assist in determining substance of the transaction, and help to determine the appropriate timing of derecognition, and recognition in profit or loss.

► *Using voluntary carbon credits*

Typically, references to 'using' voluntary carbon credits refer to reducing a notional register of emissions (i.e., outside the financial statements). Voluntary carbon credits should be derecognised when they are used, which will generally coincide with officially retiring the credit. In some instances, this will result in immediate recognition of an expense. In most instances, derecognition of carbon credits will lead to recognition of marketing costs.

If voluntary credits will be used to reduce the notional register of emissions, this might occur immediately after verification or purchase. In such a situation, entities can, therefore, make a policy choice either to: recognise an asset and immediately derecognise it; or recognise it as a marketing cost immediately (and not recognise an asset). Either approach would result in the same impact on profit or loss. However, the disclosures would differ (e.g., classification in the statement of cash flows, note disclosures, etc.). Entities should state their policy and provide adequate disclosure in the notes, so that users of financial statement understand the impact on financial statements.

References to the use of voluntary carbon credits might also be intended to describe the use of credits to offset emissions as part of the creation of goods or services. As discussed above, in '*Sales of voluntary carbon credits*', entities need to carefully analyse whether this will transfer a good or service to a customer or is simply an additional cost of doing business. This is important to understand whether the related costs are part of cost of sales or costs to fulfil a performance obligation, or they are marketing costs.

If entities are able to use voluntary carbon credits to (partially) settle a liability with a third party or government, they should be derecognised when the credit is transferred and the liability can be (partially) derecognised.

Broker-dealers

Consistent with considerations in a compliance market (as discussed above):

- Properly distinguishing certificates held for own use from certificates held for trading is important
- Voluntary carbon credits held by broker-dealers for trading are within the scope of IAS 2 and broker-dealers have a choice to measure such inventories at FVLCS, with changes in FVLCS recognised in profit or loss

Measuring fair value for voluntary carbon credits may be more challenging than for credits or certificates in compliance markets. As discussed above, voluntary carbon credits are not fungible, and many valuation inputs are still unobservable. In light of this, some broker-dealers might choose to measure their voluntary carbon credits at the lower of cost and net realisable value instead of at FVLCS.

Entities need to disclose sufficient information to help users understand the features of any credits or certificates and the impact on their financial statements.

Disclosures

While there is no one standard that applies to carbon credits or renewable energy certificates, as noted above, there are several standards that apply. Therefore, entities will need to ensure sufficient information is disclosed in accordance with standards such as IAS 2, IAS 20, IAS 38, IFRS 15 or IFRS 9. For mandatory emissions trading schemes, entities will also need to provide sufficient information about their accounting policy developed in accordance with requirements in IAS 8. The classification of carbon credits or renewable energy certificates as either intangible assets or inventory would impact the classification in the statement of cash flows as they would be presented under investing or operating activities respectively.

Regardless of the standards that apply, the different markets, credits and certificates, mean that users of financial statements will need additional information to understand the related risks and opportunities. At a minimum, it will be helpful for entities to disclose whether they are subject to any mandatory emissions trading schemes and, if so, which ones.

It will be important for entities to provide adequate disclosure about carbon credits and renewable energy certificates, including their accounting policies, and information about the carbon credits or certificates (including whether in compliance or voluntary markets, ex-ante or ex-post, etc.), the emissions liability, and the effect on profit or loss. Entities might also need to distinguish between assets and liabilities arising from compliance markets and assets arising in voluntary markets.

How we see it

With the need to reduce emissions, it is likely that the use of carbon credit and renewable energy certificates will continue to be used by governments and voluntary carbon markets will continue to grow. New types of projects to reduce or remove emissions will also emerge, and entities will seek new ways to monetise those projects.

Until the IASB provides explicit requirements, entities will need to carefully assess the features of mandatory schemes and credits in voluntary markets before determining the appropriate accounting. Adequate disclosure will be key to ensuring users of financial statements understand the effect on financial statements as well as the risks and opportunities that entities will face.

Appendix 1: Other climate-related accounting considerations

Below we set out other potential climate-related accounting considerations that could have an impact on entities. As practice develops and as more information becomes available, we will update the publication and address some of these issues separately.

Standard	Potential accounting considerations
IAS 2 Inventories	<p>Have inventories become less profitable (due to carbon offsetting charges, additional import duties, product conversion/redesign costs) or obsolete (due to changes in customer demand or regulatory restrictions)?</p> <p>Should levies on emissions during production be included in the cost of the produced inventories?</p>
IAS 10 Events after the Reporting Date	Do specific regulatory or market developments that occur after the reporting date represent non-adjusting events?
IAS 12 Income taxes	<p>Is the manner of recovery of assets expected to change as a result of climate legislation or changes in tax legislation?</p> <p>If climate legislation (e.g., resulting in higher costs of doing business) and corresponding tax legislation (e.g., limiting deductibility of certain expenses) affects the viability of the business model of the entity, will the entity be able to recover its deferred tax assets?</p>
IAS 19 Employee Benefits	Do any of the entity's employee benefits depend on the achievement of specific climate-related targets?
IAS 20 Accounting for Government Grants and Disclosure of Government Assistance	<p>Have government incentives or assistance been introduced or revised in response to specific climate-related initiatives?</p> <p>Are conditions attached to any government grants linked to climate-related targets or initiatives? Have circumstances changed that would affect the entity's ability to meet those conditions or could require repayment of a grant?</p>
IAS 41 Agriculture	<p>Have there been any events related to climatic, disease and other natural risks that have given rise to a material item of income or expense for which the nature and amount needs to be disclosed in the financial statements?</p> <p>Have entities that hold, or are planting, trees as carbon sinks or to produce carbon offsets considered which standard applies to those assets?²²</p>
IFRS 2 Share-based Payments	Do any of the entity's share-based payment plans depend on the achievement of specific climate-related targets?
IFRS 8 Segment Reporting	<p>Is the information presented in the segment reporting consistent with the information disclosed in other parts of annual report/other communication to investors (e.g., when information for commodity / non-commodity businesses are reviewed by CODM)?</p> <p>Does the entity adjust the IFRS information for internal management reporting purposes to fully reflect any climate-related impact of its activities?</p>

²² Refer to our publication [IFRS Developments, Issue 199: Accounting for trees held to generate carbon offsets for use or sale](#) for further details.

Standard	Potential accounting considerations
IFRS 10 Consolidated Financial Statements	Do new climate-related regulatory developments result in the loss of control over a particular business or activity (for example, due to the inability to continue to operate certain activities or influence the key decisions)?
IFRS 15 Revenue from Contracts with Customers	<p>Is the entity facing increased uncertainties related to revenues recognised over time due to climate-related developments?</p> <p>Are climate-related developments affecting the extent to which variable consideration is expected to be entitled by the entity (including its assessment of the constraint on variable consideration)? Are customers charged an optional or required fee to offset emissions with their purchase? If so, has the entity assessed the impact on its accounting (e.g., whether there is a promised good or service, whether it is agent or principal)?</p> <p>Have any climate-related developments led to modifications of contracts with customers (e.g., switching to goods or services with a smaller carbon footprint)?</p> <p>Have any climate-related developments affected anticipated revenue contracts (e.g., renewals), such that recognised contract cost assets need to be assessed for impairment or the amortisation period revised?</p>
IFRS 16 Leases	<p>Have there been changes (e.g., changes in business models or restructuring plans) that require a reassessment of the lease term and lease liability?</p> <p>Are lease agreements modified due to climate-related changes in the market or legal environment (e.g., the inability to operate certain asset or activities)?</p> <p>Have leases been identified in new contracts or arrangements entered into in response to climate-related risks and opportunities?</p>
IFRS 17 Insurance Contracts	<p>Entities that issue insurance contracts in the scope of IFRS 17 will need to increase their focus on identifying, modelling, and managing climate-related risks and estimation uncertainty. This will apply both to insurance contract liabilities under IFRS 17 and to the significant financial instrument assets held by many insurers to back those liabilities.</p> <p>Key considerations related to IFRS 17 include:</p> <p>Do the entity's risk assumptions used within the IFRS 17 measurement models appropriately reflect climate-related developments (e.g., increased frequency or magnitude of insured events such as business interruption, property damage or death)?</p> <p>Could climate-related risks affect the grouping of contracts under IFRS 17?</p> <p>Does the entity provide adequate disclosure over significant judgments and changes in judgment related to climate-change in applying IFRS 17?</p> <p>Does the entity provide the relevant disclosures of:</p> <ul style="list-style-type: none"> ▶ Climate-related risk concentrations arising from contracts within the scope of IFRS 17, including a description of how the entity determines the concentrations and a description of shared characteristics that identify each concentration (for example, the type of insured event, industry, or geographical area)?

Standard	Potential accounting considerations
	<p data-bbox="756 241 1453 342">▶ Its exposure to changes in risk variables through sensitivities, include a description of the methods and assumptions used in preparing the sensitivity analysis?</p> <p data-bbox="756 353 1430 477">Does the entity adequately disclose its related risk management procedures for users to understand the effects, and is this disclosure consistent other disclosures provided in the financial statements or elsewhere?</p> <p data-bbox="756 488 1458 589">Where relevant, does the entity disclose information about the effect of any climate-related regulatory frameworks in the areas in which it operates?</p>

Appendix 2: Summary of important changes to this publication

The key changes to this publication since the November 2022 edition include updates to the illustrations where possible and adding new illustrations. Additional discussion has been added throughout on consistency considerations between sustainability reporting outside the financial statements and financial reporting within the financial statement.

The other changes made to this August 2023 update are summarised below.

4. Provisions

A paragraph has been added on the IASB's project on provisions. In addition, the discussion in the section on constructive obligations in relation to public commitments made by entities has been expanded.

6. Financial instruments

Updates were made to the section on compensation for other basic lending risks to reflect the standard-setting developments at the IASB.

7. Carbon credits

New section added to discuss considerations for carbon credits in both compliance (i.e., mandatory) and voluntary markets.

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