Virgin Money UK PLC is the UK’s 6th largest bank and is fully committed to providing climate-related disclosures in our external reporting that demonstrates our overarching climate commitments and provides users of this reporting with sufficient information to be able to gauge where we are on this journey. In this respect, we welcome and look forward to the UK endorsing the International Sustainability Standards Board (ISSB) Standards IFRS S1 and IFRS S2 for use in the UK, and have already started our preparatory work in assessing how we would implement and report under these new ISSB Standards.

Whilst we have not submitted a separate response to the Committee on the consultation document ‘Disclosure of climate-related financial risks’, which seeks to implement an additional Pillar 3 disclosure framework on climate-related risks, we have contributed to and fully endorse the submission from UK Finance who are the collective voice for the UK banking and finance industry.

In particular, we would echo the view that replicating ISSB disclosures in a Pillar 3 context would not be a helpful addition to current Pillar 3 disclosures and that certain disclosures (for example those forward looking forecasts which are by their nature highly uncertain and the requirement to disclose exposures and financed emissions for the 18 sectors defined by TCFD, regardless of materiality) could cause problems for preparers and users alike in how they might be interpreted within a static template.

Finally, we would urge the Committee to re-visit the proposed disclosure requirements to ensure they are fit for purpose and provide disclosures that are ultimately useful additions and interoperable with related climate-related reporting legislation. We believe that jurisdictional flexibility would be the key driver in achieving this.