Infrastructure
Sustainability
Council

Expert interview:

What new ESG reporting requirements mean for the Infrastructure Sector

Contributors

Ricky Bridge

I'm the Group Executive General Manager for Sustainability and Environment at Downer. I've been with Downer for over 15 years, and I've worked in the industry now for about 25 years, starting out more in environmental management roles which has then morphed more into sustainability and corporate sustainability and reporting roles to now, where I have oversight over both environment and sustainability at Downer.

Ken Lunty

I work for Arcadis, a multinational design and engineering and advisory firm where I am Technical Director and National Lead for Sustainability. We've worked on some of the mega infrastructure projects and built environment projects around Australia. Most of my background has been in the built environment sector, both working on project-based sustainability, but also organisational based sustainability as well. For me, the most interesting thing about my job is constantly trying to think about the next thing that's required to create a sustainable future.

Ben Hale

I'm the Sustainability Lead for Gamuda Australia. Similar to Ken, I work predominantly in the built environment, mostly around infrastructure at the moment. Although Gamuda's, and therefore my work, is starting to spread out into industries such as renewables and electricity transmission. I've been in the sustainability industry for nearly a decade and a half, predominantly on the contractor side, but I've spent quite a bit of time in consultancy as well.

Isabella Levi

I'm a Principal - Financial Services, Climate & Sustainability at Oliver Wyman, a strategy consulting firm. I work in our financial services practice and lead much of our work in Australia on climate and sustainability. My work more recently has been focused on helping financial institutions in their response to climate change, both from a climate strategy perspective, climate risk management, and also how they approach the transition. We also recently worked with the team at ISC, on a pro bono piece of work to look at how the ISC and its rating scheme could be applied in a financial services context.

Interviewer

Monique Isenheim

Monique is the Head of Market Development at the Infrastructure Sustainability Council. Monique can be reached at Monique.isenheim@iscouncil.org

What are the existing and emerging ESG reporting requirements that the infrastructure sector needs to be aware of? What do these requirements look like right now, especially in the Australian and New Zealand context?

Isabella Levi: ESG related risks, including climate change, biodiversity impact and human rights issues have long been recognised by the public, investors, governments, and infrastructure owners and managers as a critical risk to both economic and business interests, that needs effective management. Environmental impact assessment and reporting on sustainability is nothing new in the infrastructure space.

There are 3 major recent trends that are forcing a sharper global focus on ESG, which will have a flow-on effect to how infrastructure firms start to think about the need for ESG related improvements in their reporting and sustainability standards. I think the 1st is sustainability reporting standards are moving from voluntary to mandatory disclosures, bringing with it greater scope and granularity that's now required to be disclosed annually and publicly.

The 2nd is an increased and heightened focus of investors and financiers on effective ESG management, largely because investors are also similarly now required to report on, or will be shortly required to report on, their own investments which includes ESG components in their overall disclosures.

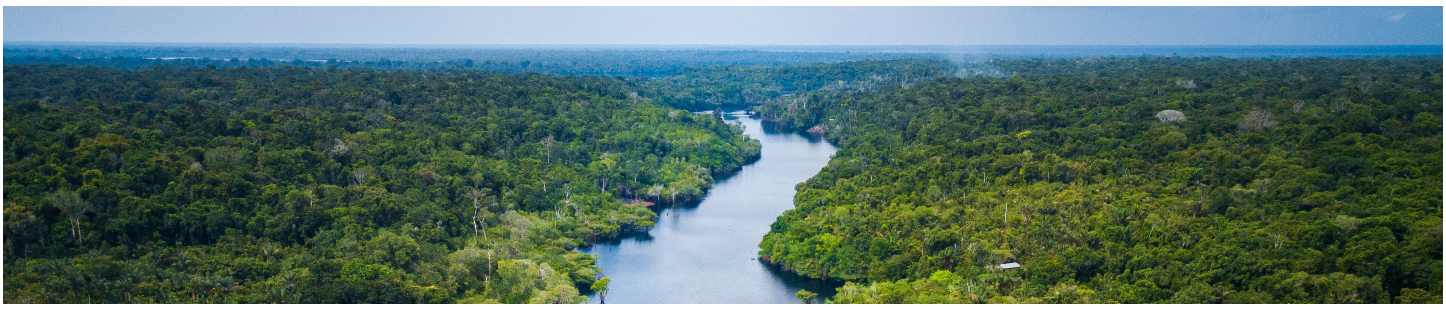
And then the 3rd is at least in the Australian context, a major focus on greenwashing risk, which is now a top priority for both the ACCC and ASIC.

In the last 5 years there's been a pretty rapid acceleration in global ESG related regulation. Speaking specifically on climate change, the Taskforce for Climate-related Financial Disclosures, the TCFD, was formed in response to the failings of the Paris Agreement. On the back of that we have seen other voluntary disclosure regimes emerge globally to tackle climate. Those include the likes of the CDP, the Greenhouse Gas Protocols, the Science-based Targets Initiative as examples. The purpose of these reporting regimes is largely to improve the granularity and transparency of metrics on risks and opportunities. Equally they require organisations to conduct materiality assessments and develop strategies and plans to minimise their impact in relation to climate change.

In terms of what this looks like in the Australian landscape, the major change in the world of climate reporting here has been this move from the voluntary to mandatory climate disclosures. The Australian Accounting Standards Board, the AASB, has recently followed the international version, the ISSB, in announcing its Australian Sustainability Reporting Standards (ASRS) and that largely picks up on the TCFD components and then puts it in an Australian context. That's likely to become mandatory from January 2025, so very shortly.

In New Zealand we're seeing the Reserve Bank put forward a similar submission following the TCFD recommendations which is likely to make annual reporting mandatory there, too.

For many companies these requirements will require a much greater level of detail on emissions measurement. They'll also require scenario analysis and identification of physical and transition risks, and that will require disclosure of a climate transition plan. It will require associated metrics and targets. This level of transparency means that companies will now be held to account in ensuring that their reporting metrics are tracking



in line with their defined strategy, and that they have resiliency plans and transition plans.

In my area of expertise, in the financial services community, we're starting to see financial services companies developing their own frameworks to look at assessing the validity of companies, transition and resiliency plans which ultimately much further down the track may mean limited access to capital and insurance for companies that aren't demonstrating meaningful action on climate.

> *"It is quite a big change moving from voluntary to mandatory reporting. Not for all organisations, and I think actually, infrastructure is probably one of the best setup sectors, because there has been a long-standing history of reporting and understanding sustainability related components."*

Isabella Levi

Principal - Financial Services, Climate and Sustainability, Oliver Wyman

How does TNFD come into this?

Isabella Levi: The TNFD, similar to the TCFD, is going to follow a very similar approach. The TNFD is a set of voluntary guidance on nature related reporting. It follows roughly the same 4 categories that the TCFD does. It looks at reporting on governance strategy, risk and impact measurement and metrics and targets. I imagine that the TNFD will follow a very similar process to the TCFD. In April this year, the ISSB announced that it was looking into nature related issues drawing on the recommendations from the TNFD. That's the 1st step to start setting in motion the process for national regulatory bodies, including the Australian Accounting Standards Board, to incorporate their own version of the TNFD in Australian legislation. So a bit hard to tell at this stage, but I think, this is likely to be accelerated for nature, because it will follow a very similar process to the TCFD. I imagine there will start to be changes at least being looked to be made in the Australian context in the next 18 to 24 months.

There's obviously a bit of a focus here on nature, in Australia as well. We've got the Nature Positive Summit here in Sydney in October, and no doubt that will start to force a greater focus on nature, positive solutions and nature related, reporting therein after.

In the infrastructure sector, what's the importance of staying ahead with these ESG requirements?

Ricky Bridge: Staying ahead is extremely important, for the organisation as a whole. But, more importantly, our stakeholders, and that's both our current investors as well as future investors or investors that aren't on the books, but ones we're wanting to attract.

Having strong ESG credentials, and having very transparent, reliable, accurate and credible disclosures all goes towards attracting those investors and those stakeholders, as well as keeping the current investors updated. I think it now flows more into our customers, too. Probably 90% of our customers are government or government related. They've all set GHG emission reduction targets. They've all got commitments. They've all got ambitions. They're certainly looking more at organisations and wanting to partner with organisations that have shared values. And then from an attraction and retention perspective, we're seeing that's becoming a really strong lever when it comes to attracting talent and retaining talent at Downer. I'm sure all the organisations are seeing the same thing, people are wanting to work for an organisation that has got similar values to their own, that is contributing positively and is purpose driven, enabling our purpose, which is enabling communities to thrive. So for all those reasons, as I'd say, that's why it's important for us.

Ken Lunty: I can add to Rickys comments in terms of applying those frameworks onto projects from a design and consultancy point of view. We don't focus too much on providing legal or reporting advice, we leave that to the relevant experts. But for us it's about how do we come up with design and engineering solutions that enable our clients to meet the decarbonization targets that they're setting for themselves, based on the reporting. Isabella described it perfectly when she said that the transition from voluntary to compliance is creating a huge shift. We're starting to see some companies pulling back from targets, revisiting targets and moving away from the purchase of offsets as a key strategy. They are working toward other solutions because of the transparency shareholders are expecting and the risk of greenwashing without that transparency. Shareholders are much more informed and understand that offsets are a last resort and that there are significant challenges around transparency and reputational risk around offsetting as a strategy. So an engineering, or design related solution to reduce or avoid emissions or any other nature or community based impact, is where we want to continue to focus. I believe this is the sweet spot for an advisory firm like Arcadis.

One of the best things that has come out of these frameworks is consistency. We talked about the transparency and accuracy, but consistency is really the basis behind all of this. We often see variability in environmental impact assessments and other compliance reporting because the frameworks aren't as clear and structured as TCFD or TNFD. So having that consistency is quite powerful in terms of what organisations are communicating and implementing in terms of strategy. So you're starting to see a lot more consistency across greenhouse gas reporting and climate change related risk management strategies. Hopefully, we see the same trend happening with nature-based impact reporting. I've been on projects where a built asset such as disused electricity pylon has a higher quantifiable value than a tree just because someone owns the pylon. Hopefully, with frameworks like TNFD, natural capital such as that tree will have a consistent way of being valued, depending on where it is, the value it provides to the environment and the community and so on. When we have this, there will better consistency in understanding the value of removing that tree or offsetting that tree somewhere else. So for me, I think the consistency in terms of managing impacts at an organisational level is going to be a huge change in the next decade. This will separate the greenwashers from the actual change makers.

Ben Hale: I think the summary from Ricky and Ken is bang on. Gamuda is an international company, and we work in predominantly in Malaysia and Australia, and due to that, we do get a bit of exposure to some of the other versions of the reporting standards. When you look at the Malaysian version compared to the Australian, to a certain degree we have it easy here, because the ISSB versus the Australian version has been a little bit watered down, be that positive or negative. That's a value judgment that I won't make, but in Australia the requirement is predominantly around climate related issues, climate risks, and GHG emissions. Whereas in the wider context, in the ISSB context, it's not just climate related. It's wider sustainability; it's a much broader remit and flows more into the GRI reporting standards. The big ticket item for me in terms of the reporting is that in Australia, the 15 categories of Scope 3 under the GHG protocol are considered as what companies can report on next year. Whereas in in Malaysia the 15 categories are the categories upon which must be reported. So, while I think everything that Ken and Ricky have said is absolutely true, there's just a little bit more stringency in the international scene that will come into Australia. But it'll be a year delayed.

With these new requirements, where do you see the role of the board, and the executive management?

Ben Hale: Again, we're in a slightly enviable position, but I think Ricky's in a similar position. We have a very supportive senior leadership team and board in terms of what they're required to do. In Gamuda's case, our board is somewhat disconnected from the actual, day-to-day mechanics of sustainability reporting. And they're much more focused on the outcomes that are being searched for in turn. By that, I mean getting people like Ken and Arcadis to come in at the right times and make sure that we're hitting our targets and making sure that our design and our design houses have the capabilities that we, as practitioners, need them to have. Also, then, making sure that any of the contracts that we sign have sufficient targets embedded to align with both our own and our clients'. So in terms of what they need to do day-to-day, they're quite disconnected, but on a general scene, they're the ones driving the overall achievement pathway that we're looking to get across the line.

"For us, it's about: How do we come up with design and engineering solutions that enable our clients to meet the decarbonization targets that they're setting for themselves, based on the reporting."

Ken Lunty

Technical Director and National Lead for Sustainability, Arcadis

Ken Lunty: In my experience, boards can be disconnected from new and emerging expectations and responsibilities. A board's fiduciary and financial responsibility is priority and it takes courage to consider uncertainty and change within an organization. Engaged, healthy and diverse boards will consider emerging issues such as sustainability and integrate them into the direction and the culture of the company. Sometimes it can be challenging for boards to play to their roles in understanding and implementing changes that come with evolving market trends and legislation. This is where they need a strong executive team to implement the decisions they make. Having sat on the board of a smaller organisation, it is very challenging to have that separation between what you do in the business (as and executive), and what you do for the business (as a board member). The most effective boards are the ones that can disconnect from the day-to-day operations and focus on the long-term holistic sustainability of the business through robust strategy. With TCFD, I've been working closely with the Directors of the Australian business here to make them aware of the reputational risks of not being across some of these changes in mandatory reporting. However, I found the easiest way to get to them was through our general counsel. So I can take the sustainability route as hard as I want to, but when I have the general counsel onside explaining the compliance risks of a sustainability issue, the message gets heard very quickly. So again, it is about the senior executive team working closely with the board to facilitate a positive shift in the direction of the business. The board and senior management, that's where the culture starts. If everything's bottom up, you might get some movement, but it's a long, hard road. So to me, board and senior management engagement and commitment is paramount.

Ricky Bridge: Look, I think the two need to work hand in hand. I think it's very clear, your Board has oversight and provides governance. Their role is around governance and not necessarily in the doing. Management's role is to have the frameworks, the mechanisms to do all the work, to satisfy the Board, that adequate governance and processes and systems are in place in order to meet the requirements and to provide the right level of information to the board for them to make decisions in terms of the organisation, the strategy, how it's going to mitigate the risks and position itself. As a board member, your role becomes very important in terms of how you show your diligence and therefore how you interrogate, and the questions you ask, and the discussions that you have, and how those discussions are then captured and how that is then minuted. They're all important parts, in corporate governance that a lot of attention needs to be taken to, especially under the new requirements to make sure that the Board is fulfilling its role, as well as making sure that they're adequately upskilling themselves through information provided to them by management, but also what they're doing external to the organisation that also helps inform their understanding of the subject matter and their ability, therefore, to effectively govern the topic.

Isabella Levi: For boards, there are some big decisions here that the boards need to make. Lots of organisations are being asked or are asking their boards to look at targets and to look at specific metrics which have big implications, both from a reputational standpoint, from a greenwashing risk perspective, and also in terms of organisational strategy. This is a complicated subject matter for boards to upskill themselves on as well. As much as the governance element is key, it is also going to need all companies to upskill their boards sufficiently to be able to make informed choices on all of these capacities.

Ken also raised a really good point around general counsel as a key way of looking at some of the impacts of the sustainability reporting disclosures. There is a big reputational risk element to the disclosures. It is quite a big change moving from voluntary to mandatory reporting. Not for all organisations, and I think actually, infrastructure is probably one of the best setup sectors, because there has been a long standing history of reporting and understanding sustainability related components. I think that's a fortunate position for infrastructure but there is a reputational risk here with the amount of transparency that is going to be required to be disclosed, also in the context of also a heightened risk for greenwashing litigation in the Australian context.

Question: Where should the ESG reporting requirements sit within an organisation ?

Ken Lunty: That's an interesting question. If I think about climate related reporting, or nature related reporting, they are based on financial reporting frameworks. So when we think about who's doing the financial reporting for an organisation, it's done by a financial professional with input from various teams. This is then audited by a suitably qualified professional from an external entity. To get to that point for climate reporting may be a journey for many businesses. They may start by outsourcing the reporting to a consultant, but ultimately, if you're doing that you need to make sure you invest in learning off that experience. If the company is not committed to reporting and understanding the implications and information that comes out of the reporting then it becomes challenging to understand how to react from what your reporting is telling you. I think the ultimate goal is to have an internal team that has responsibility for the overall business strategy and can communicate to senior management and the board on how the reporting will affect future business risks and opportunities. Then have that reporting externally audited so that you can prevent any transparency or greenwashing issues.

Ricky Bridge: I think it's a combination. Reflecting on our discussion and the evolving landscape of sustainability reporting, it's clear that we're transitioning from voluntary to mandatory reporting. However, another significant shift is emerging. In the past, sustainability reports were often viewed as marketing tools, sometimes filled with hyperbole and unverified claims. Now, reporting requirements are increasingly focused on financial impact.

We're seeing this trend reflected in frameworks like the ISSB, which is closely linked to IFRS, emphasizing the financial implications of sustainability on organizations. This shift is leading to the integration of sustainability reporting teams into finance departments, often reporting directly to the CFO—a direction we've already embraced at Downer. This integration is crucial as it applies a financial lens to sustainability reporting, ensuring that these impacts are accurately reflected in financial statements.

As we begin with the climate-related standards, it's essential to collaborate closely with finance teams to analyze how sustainability efforts affect assets, cash flows, and cash-generating units. This work will be foundational as these standards continue to evolve.

Weather events have always significantly impacted infrastructure and the construction sector. However, the level of scrutiny and the demand for detailed reporting on these impacts have increased dramatically. It's no longer sufficient to attribute a challenging year to a certain number of rain days that halted work. Stakeholders now expect to know how you're mitigating these risks and what adaptation strategies you're implementing. They want reassurance that their investments won't be jeopardized by adverse weather conditions.

> *"We are very much looking at this as a financial instrument, and our finance team is largely doing the groundwork with assistance from the sustainability and ENS teams"*

Ben Hale
Sustainability Lead, Gamuda Australia

For instance, stakeholders are unlikely to invest in a company that appears vulnerable to wet weather disruptions. They want to see proactive measures, not just excuses. This shift in expectations highlights the need for qualified professionals to prepare and deliver these reports. It's essential that this process is fully integrated into the organization's financial teams and systems to ensure transparency and accountability.

Ben Hale: Interesting to hear Ricky talking about rain days, because we often hear about climate change impacts as being these big-ticket items; the increase in storms. The reality of it is smaller; it's the increase in wet weather days. To give a bit of a highlight of the scale: generally speaking, you put down about 15 or so rain days per year. In the last 6 months, on one of our projects we have lost 47 of our rain days in 6 months. It's a 3-year project; our entire wet weather budget has gone in in the 1st 6 months of the project. What we are going to do in the next 2 and a half years, we'll have to figure that out with the client, and I'm sure we'll find a way. But that's the kind of thing we're now looking at. It's not just about in 20 years' time, "Do you have a bushfire plan?". It's more immediate.

And so, in terms of the integration piece for Gamuda we are very much looking at this as a financial instrument, and our finance team is largely doing the groundwork with assistance from the sustainability and ENS teams. As Ken said, it's a financial instrument. We're quite lucky, that we are a building company, and we don't hold a portfolio yet. But I do feel for those who would hold a portfolio. There's a lot of those bigger real estate-type construction companies that would have a much more difficult time reporting on this.

Moving to the challenges of those requirements for the sector. What are some of the barriers that need to be overcome?

Ben Hale: I think, in terms of where we are now compared to where we need to be, we are in an enviable position by comparison to other sectors. The climate change requirements of Australia's reporting standards essentially require us to look at climate related risks as well as scope 1 and 2 reporting, and then, in a year's time, mandatory scope 3 reporting. Infrastructure does all of that generally for projects, above a certain size at least and so any of those projects above 50-million-dollar value would have the vast majority of the requirements built into their contracts anyway, even if they're not doing an IS rating. So climate change risk assessment that's a standard part of our contractor requirements and have been for the last 10 years. So we are in an enviable position from a project perspective. It's just whether your systems are sufficient to get all your information, data, reporting from a project level into a collated and usable dataset at a corporate level.

Ricky Bridge: I think data is a key one, having your systems and processes that underpin your reporting, and the technology to help both the data and the consolidation of work that needs happen in this space. I think that's going to be really important. It's also an evolving space, like any sort of emerging technology. As soon as a new product comes out, it's superseded the next day, and they're challenges that the organisations have got to work through. And to underpin that, it's about people, process, and capability. It's a very small pool of people that have got full comprehensive skill sets and capability across all the areas of climate, reporting and disclosure writing, I think that's one of the limitations we've got at the moment. There's certainly a need to upskill and to provide opportunities. It's such a complex but exciting area to work in, getting people into this space and getting them skilled up is going to be super important in the coming 2-3 years.

Ben Hale : Some of the online platforms are brilliant. But they're set up as sector specific or discipline specific, so we get ESG reporting platforms. I don't need an ESG reporting platform. When you look at some of the construction-based industries, some of their online platforms are brilliant, but they don't talk to each other. We have a really good data set

somewhere, but we don't have it in a format that we need. Being able to make that translation, and finding people who can make that translation will become key very quickly.

Ken Lunty: I'll build on the experience and skill set comment. I think that's the biggest barrier. The four of us have relatively similar levels of experience and skills, we are talking about 15 – 20 years' experience each. Back when we started, I couldn't have predicted this level of structure, development and career pathway in sustainability as a discipline. I have to admit, I'm not sure my parents were to confident about my career choice when I finished my studies. But it's a massive boom, right? Sustainability is a big, shiny thing. As Ricky said 5, 10 years ago, and even now, there are many sustainability reports that are slick marketing brochures rather than reports that influence business strategy and outline a pathway to manage impacts. This, unfortunately doesn't sound as marketable as "saving the world or creating a future for the global community". There are a lot of great professionals out there, but with any boom there are also plenty of people in decision making positions who may not necessarily have the experience or the right advice. It's a new area and with that comes significant risk which needs to be managed. Within Arcadis, our team has actively focused on providing advice in areas we are good at. This is the design and engineering side of sustainability. We provide credible, evidence backed advice on managing and implementing decarbonization initiatives rather than how to structure their reporting requirements or auditing. There are people who can do that, that's not us. In the market there's a whole bunch of service providers, no one can provide a silver bullet so I would recommend avoiding those services and products that say they can. Ben talked about software providers. You can go on LinkedIn, and there'll be a thousand software providers. And how do you know which is the right one? How do you know that the consultant you have engaged is going to deliver value? So currently, I believe the biggest challenge is that we haven't quite settled yet as an industry. There's still a lot of noise out there that can be distracting when people are looking for the one cheap solution that's going to solve everyone's problems. This really is a journey, and it's about having a sound, business integrated strategy that has board endorsement. This needs to become real, integrated and we need to be held accountable to our commitments. We can't continue to operate the way that have in the last few decades. Sustainability is not about a shiny new thing that sells more product. As boring as it sounds, I think we'll be in a better place if we approach this from a risk management and business strategy position over marketing and sales. We're in a transition phase that I'm confident we'll get to the right side of. We are in a better place than we were 20 years ago when I started in this career. The fact that there's so much action happening is a great thing. But now it's about continuing to keep going in the right direction.

Question: Looking then at getting started, how can companies prepare themselves? Are there any tools and resources that are available at this stage?

Ricky Bridge: There are lots of external organisations that can help your organisation. Since the TCFD was released, people sort of got on board with that as early adopters. So there's a tried and tested methodology and framework and process, which you can take an organisation through to uplift their maturity when it comes to the reporting. And that starts off with understanding your governance structures in your organisation, doing facilitated risk and opportunity workshops, which then leads into your scenario analysis and understanding which scenarios are applicable. There' are several that you choose from, so which ones are most suited to your organisation. Documenting all those processes and then asking, how does that impact your organisation?

And feeding that into your business planning and strategy processes, then looking at what your material risks and opportunities are, what are some of the targets or key metrics that would be suitable for your organisation to start tracking. So when you go through that framework, I think there's a lot of organisations out there that can help take you through that. Then there's a lot of systems and platforms that can help support different aspects of that. A lot of it is just looking at what your organisation currently has, and seeing whether they are suitable or could be used for this purpose. Most organisations will already have a risk management or risk and opportunity management framework. So how do you build ESG or climate into those? You've already got board structures, you've already got committees, you've already got charters. How do you then go and review and uplift those. How do you communicate that? There's lots of training providers that can provide different courses to upskill both management and the board, so it's just going through and looking at those looking at those opportunities, getting that external help.

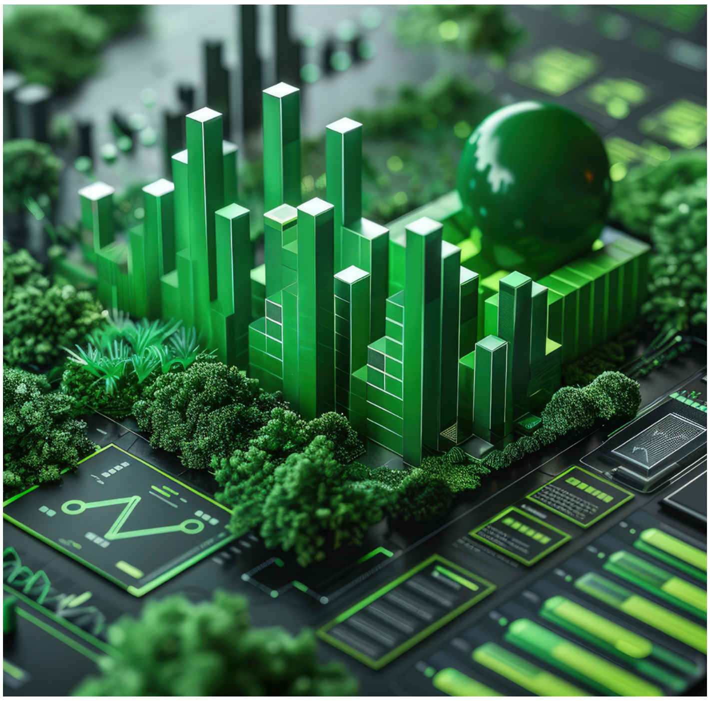
And benchmarking yourself against other organisations, and that's the beautiful thing about the disclosures as they start to roll out - it's public. So you can start to benchmark your organisation, and you start to get a sense of what good looks like. So they are some of the key things you could do as an organisation to get help and get on the journey, and then improve your maturity.

"I think data is a key one, having your systems and processes that underpin your reporting, and the technology to help both the data and the consolidation of work that needs to happen in this space."

Ricky Bridge

Group Executive General Manager for Sustainability and Environment, Downer

Ben Hale: Ken was my boss at one point, and he's given me a great piece of advice, which was "The only reason you bring in consultants, is if they can do it better or quicker than you can", and I think at this stage the majority of organisations won't be able to do this for themselves. They won't



necessarily have the maturity of system, they won't necessarily have the people involved. So there are a lot of organisations, consultants and similar, who will be able to help and to point you to the right platform for the recording system, whatever you need to set up for the climate related stuff, and also set yourself up for the wider reporting standards in a year or so.

Ken Lunty: I think everything's been covered. I think the only thing I would add is to look at the resources you have internally as well. We've talked about that before with the financial team, but it's not just them. It's legal, people and culture, training, and trying to get this movement embedded across the entire business. That comes from within, right? If there are people in your business that weren't interested in its growth or future from a financial or cultural point of view, would you still want them in the business? Many people join organisations now because they want to do something positive for the planet and its people, something more than collecting a paycheck with no other satisfaction. So employers need to be able to show that they are legitimate and they are improving their surroundings through their practices to attract and retain the best talent. These ESG frameworks allow a pathway to show this. But if your own staff aren't involved, then how are you going to manage any impact, or create value? So the only thing I'd add, is look inwards to see who can help within their own disciplines within the business.

Isabella Levi: Reporting and mandatory disclosures, investor pressure and public scrutiny are all starting to be the driver of that effort beyond what it already has been in the background. Whilst there is upskilling and capability required across organisations to meet some of those new elements that are coming in, fundamentally, what we're talking about is critical to business strategy and risk management. So I suppose, keeping that in mind at its core. The additional uplift required for new reporting is good and important. But ultimately what we're talking about with the TCFD and TNFD is really understanding what changes are required, both from a risk and opportunity space to business strategy, and how to manage the risks associated with nature and biodiversity impact, and then also with climate change, and how to manage and mitigate those risks accordingly. So whilst this is a reporting and disclosure problem. In some respects, this is also a much bigger consideration across all facets of any organisation, and particularly this is relevant in the infrastructure space which is acutely prone to both nature and biodiversity impacts, and then also the material impacts around climate change.

Ben Hale: This is a relatively new industry and moving into a step change, and so our newness can be our strength as well as our weakness. And I think things like the Australian Sustainable Finance Taxonomy will give us a bit more of a level playing field, when that gets developed. So we'll at least be able to speak the same language on the topic but in the meantime, just continue upskilling and carry on with sessions like these.

Thank you very much, Isabella, Ben, Ken and Ricky for sharing your insights!

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