

**From:** [REDACTED]  
**To:** [Climate Reporting](#)  
**Subject:** Consultation - climate-related financial disclosure  
**Date:** Monday, 17 July 2023 1:31:11 PM

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Dear Sir / Madam,

I am writing in response to the subject consultation request, in my role as a Registered Greenhouse and Energy Auditor (RGEA) from a non-financial auditing firm.

Zephyr Environmental is a specialist air quality and carbon management practice providing audit and assurance services under the schemes operated by the Clean Energy Regulator (CER).

My present understanding of the anticipated mandatory climate-related financial disclosures for listed and larger unlisted companies is that these are proposed to be led by financial auditors, with the discretion to select who they wish to delegate this assurance provision to.

Whilst there appears to be encouragement that this delegation be to RGEAs, this does not appear to be mandated.

My concern therefore is that financial auditors will be unlikely to delegate this assurance to professionals outside their own firms, and that therefore the proposal will entrench domination of the big-4 accounting firms in delivery of this assurance.

I wish to highlight that all Category 2 RGEAs are required to have the professional qualifications and knowledge of assurance processes, as well as independence requirements and quality control / management as set out in the standards of the Audit and Assurance Standards Board (AUASB).

In addition, RGEAs (and in particular those from non-financial backgrounds) have the requisite climate-related disclosure competence as we generally come with decades of applicable experience in this area and must operate per the requirement of section 2.5 of the NGER (Audit) Determination.

In view of the above, I would request that Treasury consider changes around the requirement for assurance engagements to be 'financial auditor led' with the option to 'delegate it to other professionals'.

Rather, Category 2 RGEAs should also be allowed to lead these audits, given our formal qualification and experience in applying the relevant AUASB standards, including in respect of quality control / management, independence and relevant assurance standards such as ASAE 3000 and ASAE 3410. Further, we complement this with relevant experience in leading assurance of climate-related matters.

I trust that you will consider this feedback and thank you for your time.

Best regards,

[REDACTED]  
Principal / Founder

