# Deloitte.



# **ESG & Climate Risk**

An introduction for financial services institutions Federal Home Loan Bank of NY – 2021 Member Education Series

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## Meeting with you today





- Specializes in non-financial risk management, served as the Lead Business Partner for the European Central Bank, where some of the original climate risk regulations and guidance originated
- Experience across several regulatory and compliance remediation initiatives



- Leads Deloitte's Credit Risk Advisory practice in the US
- 21+ years of experience in financial modeling, credit analysis, valuation, ALLL/CECL, stress testing, DRR engagements
- Member of Deloitte's US Climate Risk leadership team (co-leads the Climate Risk Modeling area)

### Michael Monaco, Senior Manager

- 9 years of experience with risk and modeling in the financial services industry
- Experience developing and validating models used for credit risk, market risk, liquidity risk, and operational risk
- Member of Deloitte's internal Climate Risk Modeling working group



## **Discussion Agenda**

- Overview of ESG and Climate Concepts
- Climate Considerations for FHLB Members
- Regulatory & Industry Trends in Climate Risk
- Climate Risk Management Implications
- Initiating Change

## **Environment, Social, and Governance (ESG) Themes**

Below are typical themes we see financial institutions, their stakeholders and counterparts prioritize in their sustainability assessments; these can include self-assessments, but also assessments of others.

### **Environment**

## **Environmental Footprint**

- Climate change, GHG emissions, and global pollution
- Local pollution
- Impacts on landscapes, ecosystems and biodiversity
- Overuse and wasting of resources
- Waste issues
- Animal mistreatment

### Social

## **Community Relations**

- Human rights abuses and corporate complicity
- Impacts on communities
- Local participation issues
- Social discrimination

## **Employee Relations**

- Forced Labour
- Child labour
- Freedom of association and collective bargaining
- Discrimination in employment
- Occupational health and safety issues
- Poor employment

## **Governance**

## **Corporate Governance**

- Corruption, bribery, extortion, money laundering
- Executive compensation issues
- Misleading communication
- Fraud
- Tax evasion
- Tax Optimization
- Anti-competitive practices

## **Cross-theme Issues**

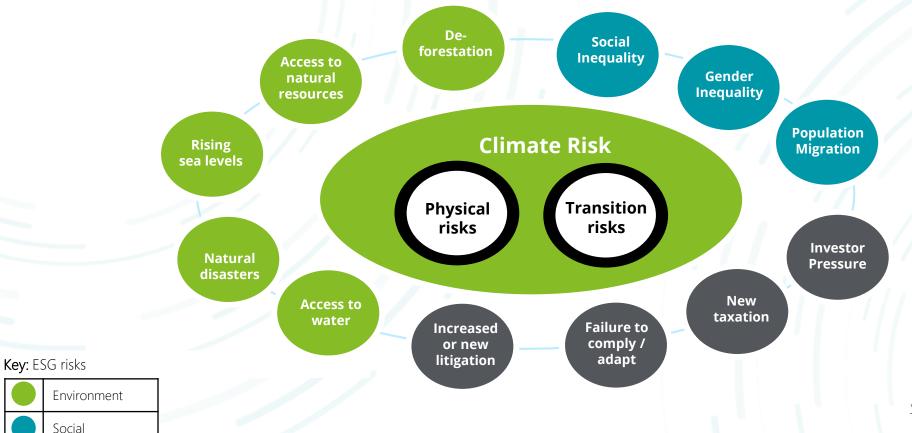
Controversial products and services

- Products (health and environmental issues)
- Supply chain issues

- Violation of national legislation
- Violation of international standards

## **Overview of Climate and other ESG-Risks**

ESG themes in aggregate translate into a broad range of risks to financial institutions. These risks are often interdependent, latent, and difficult to quantify.



"Climate change is one of the greatest challenges faced by mankind this century, and there is now broad agreement that we should act. But that agreement needs to be translated more urgently into concrete measures."

Christine Lagarde, President of the European Central Bank\*

\*Source: Climate change and central banking (europa.eu)

Governance

## **Climate Risks and their Business Impacts**

Physical and transition risks manifest as business risks via micro- and macro-economic transmission channels.

## **Climate Risks**

### **Transition Risk**

- Policy & regulation (e.g., carbon tax)
- Technological development (e.g., electric vehicles)
- Consumer preferences

## **Physical Risk**

- Chronic (e.g., temperature changes, sea level rise)
- Acute/catastrophic (e.g., heatwaves, floods)

## **Transmission Channels**

### Microeconomic

- Financial impact on individual households and businesses
- Business disruption
- Property damage & liabilities

### Macroeconomic

- Unemployment
- GDP changes
- Capital depreciation

## **Business Risks**

### **Financial Risk**

- Credit
- Market
- Liquidity

## Non-Financial Risk

- Operational
- Reputational
- Strategic
- Physical Security
- Model
- Compliance & Regulatory



## **Risk Considerations for FHLB Members**

Both physical and transition risks can impact financial institutions, with physical risk posing a larger threat to mortgage markets, transition risks impacting wholesale exposures more heavily.

## **Considerations**

## **Physical Risks**

### **Transition Risks**

# Real Estate Exposure

- Acute/catastrophic weather events (e.g., hurricanes) may cause near term damage to loan collateral and/or disruption in the financial condition mortgages borrowers or insurance policy holders
- Chronic physical risks (e.g., sea level rise) may have protracted impacts on mortgage collateral values/default frequencies or insurance claims

- Changing consumer preferences & new policy incentives may impact demand for energy efficient homes and use of green lending programs
- Future policy changes (e.g., redefining FEMA flood maps)
  could impact both insurance markets and collateral values

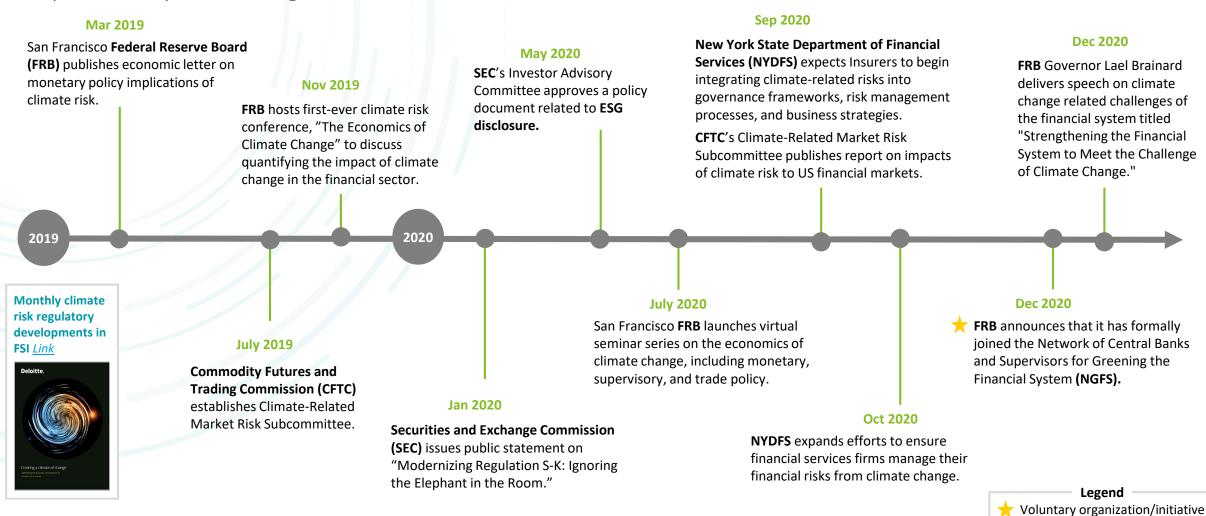
# Wholesale Exposure

 Financial institutions have indirect exposure via loan counterparties with portfolio concentrations in sectors sensitive to physical risk such as retail credit, agriculture, and CRE.

- Financial institutions face direct costs as they undergo transformational efforts to respond to regulatory requirements, social and political factors, and reduce scope 1,2, and 3 emissions
- Financial institutions have indirect exposure via loan counterparties with portfolio concentrations in sectors sensitive to transition risk such as energy and transportation.

## Regulatory & Industry Trends in Climate Risk (US 2019-2020)

Although formalized policies on climate risk have been limited in the US to date, regulatory focus has been accelerating and additional guidelines and policies are expected to emerge.



## Regulatory & Industry Trends in Climate Risk (US 2021)

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#### Jan 2021

FRB creates a new leadership committee focused on supervising the banking system for financial risks posed by climate change.

#### Jan 2021

SEC appoints a new senior policy advisor for Climate and ESG to oversee and coordinate the agency's efforts related to climate risk and other ESG developments, which are "issues of great significance to investors and the capital markets."

#### Feb 2021

FRB Governor Lael Brainard endorses mandatory climate risk disclosures for public companies and encourages climate-related scenario analysis as a helpful but distinct approach from the Fed's existing regulatory stress tests at banks.

#### Mar 2021

The SEC's Division of Examinations announces its 2021 examination priorities, including plans to focus on climate risks "by examining proxy voting policies and practices to ensure voting aligns with investors' best interests and expectations.

2021

# Monthly climate risk regulatory developments in FSI *Link*



Jan 2021

Treasury Secretary Janet Yellen proposes new efforts by the Treasury to address climate risks in the financial system during her Senate confirmation hearing.

Feb 2021

The House Financial Services Subcommittee on Investor Protection features ESG disclosure in its hearing, "Climate Change and Social Responsibility: Helping Corporate Boards and Investors Make Decisions for a Sustainable World."

Mar 2021

The SEC announces a newly created Climate and ESG Task Force in the Division of Enforcement to proactively identify ESG-related misconduct using "sophisticated data analysis to mine and assess information across registrants, to identify potential violations.

Apr 2021

**The SEC issues a risk alert** for ESG investing.

Secretary Yellen appoints new Climate Counselor to oversee Treasury's coordination on climate-related financial risks across the US government and globally.

## **Regulatory & Industry Trends in Climate Risk**

A global ecosystem of public and private initiatives will continue to shape the agenda and pace of change. Constant monitoring of progress and evolving practices is necessary.

#### International Initiatives

Set standards for diverse set of climate topics including disclosures, regulation, and modeling methodologies



















#### Research Institutes

Provide valuable climate science research, generating data and developing scenarios in collaboration with regulators















Network of global central banks and regional authorities establishing regulatory requirements for climate risk













Rating agencies incorporate climate considerations into credit analysis



Moody's

**Fitch**Ratings

**Data Providers** 

Vendors providing data on physical and transition risks, as well as broader ESG metrics











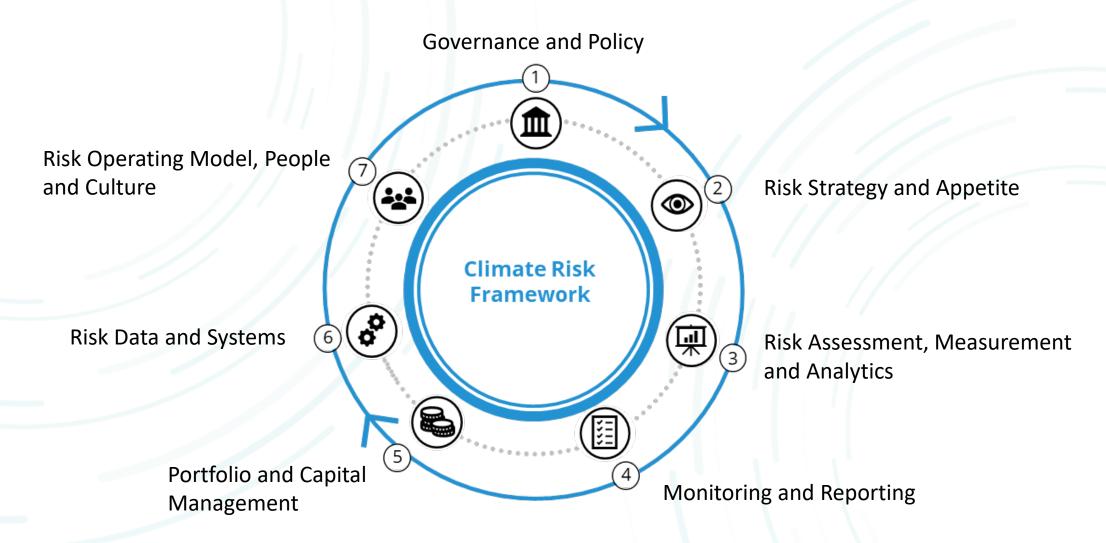






## **Climate Enterprise Risk Management (ERM) Components**

Management of financial and nonfinancial risks derived from climate risks require careful updates to the ERM framework; leading firms have assessed key changes and requirements.



## **Climate Risk Management Functional Roles & Responsibilities**

Working across business units and functions is essential to firmly embed climate risk management into your business and ERM framework

**ESG** 

**Impact** 

on FSI

## **Strategy**

 Shaping innovative and brand-enhancing sustainable finance strategies, which successfully capture (and even create) attractive market demand

### **Sustainability function**

 Designing sustainable finance programmes which add-value, deliver positive impact, and support delivery of strategic objectives

### Front office (Markets & products)

 Understanding customers ESG preferences, and incorporating into these into the sale of products, and provision of advice, in a rapidlydeveloping regulatory environment

#### **Communications**

 Communicating credibly and effectively to the market the sustainability of firms operations and financing, it's ESG impacts, and the resilience of its strategy to climate change

#### **Procurement & HR**

 Managing supply chain ESG risks, and ensuring firms do business with suppliers with consistent values and standards

#### Risk

- Identifying, quantifying, managing and responding to latent and emerging ESG risks
- Integrating ESG (and particularly climate) capabilities into existing risk frameworks

#### **Finance**

 Incorporating climate-related financial risks into pricing, forecasting and budgeting, financial reporting, and capital-allocation

### Legal

 Understanding and managing liability risks from climate change – from inadequate, or inaccurate disclosure of material financial risks

## Compliance

 Maintaining currency with the rapidly evolving, and complex, regulatory climate risk and sustainable finance landscape

#### Internal audit

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 Setting appropriate audit programmes to focus on material risks to firms climate risk identification and management

## **Initiating Change**

Organizations typically begin their journey with climate risk by developing a high-level understanding of key risks and aligning on strategic vision for the future.



## **Establish enterprise ESG framework**

- Develop governance framework for ESG and climate risk
- Establish strategic vision for climate risk, including sustainability metrics & targets



## Perform an initial climate risk exposure analysis

- Consider asset portfolio characteristics (e.g., geography, counterparty loan profiles)
- · Obtain climate risk data relevant for asset portfolio (e.g., physical risks such as flooding)
- Overlay climate data onto loan portfolio characteristics to develop understanding of key risks



## Consider climate risk scenarios to understand impact on key portfolios

- Develop climate risk scenarios based on key risks identified in exposure analysis
- Calculate scenario impact for portfolio risk attributes (e.g., defaults, recoveries)
- Consider impact of climate scenarios on strategic objectives



## Align risk analysis with enterprise activities

- Embed climate risk management practices into ERM framework
- Align risk analysis with strategic decisions and activities

### **Illustrative Climate Risk Data Heatmap**



### **Illustrative Scenario Analysis Tool**



Source: ClimWise

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