

Addressing climate change: An action plan for DC schemes

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The financial consequences of the climate crisis are already being felt and, if unchecked, its future impact will dwarf anything experienced to date. Action on climate change can no longer be delayed.

Members' investments and future financial wellbeing are at risk. The scale and complexity of the issue means that a tick-box exercise will not suffice. The good news now is that there is a range of practical steps available to help address the risks – and opportunities – generated by climate change.

Here, we pull together those steps into a nine-point action plan that will enable DC trustees to:

- understand climate-related risks and opportunities and assess their financial materiality;
- manage these risks and opportunities appropriately; and
- demonstrate to your members, the regulator and others that you are taking the meaningful action required.

For help tailoring this action plan for your scheme, please contact your usual LCP adviser.

Topic	Action	Questions to consider
Training 	Ensure you have sufficient knowledge of climate topics	<ul style="list-style-type: none"> • Are you familiar with concepts such as physical impacts, transition impacts, stranded assets and carbon footprinting? • Do you understand their relevance to pension scheme investments and member expectations? • Do you know what is expected of DC schemes regarding climate change, and how these requirements are likely to develop?
Scenario analysis 	Investigate the financial impacts of different climate pathways	<ul style="list-style-type: none"> • What might be the impact of (say) a 2°C and a 4°C climate scenario on your members' investments and the adequacy of their pension? • How might the impacts vary for members of different ages and pot sizes? • What are the implications of uncertainty about the magnitude and timing of climate impacts for the de-risking phase of lifestyle strategies?
Employer dialogue 	Discuss how climate change is reflected in your employer's business strategy	<ul style="list-style-type: none"> • How significant is climate change for the business and what is the employer's stance on the issue when communicating with staff? • How might this affect member expectations regarding your climate approach? • Are there any reputational risks arising, for example, from inconsistencies between your climate approach and that of the employer?
Investment beliefs 	Include climate change explicitly in your investment beliefs	<ul style="list-style-type: none"> • How do you expect physical and transition impacts to affect the economy and financial markets? • To what extent do you think these impacts are already reflected in asset prices? • Which investment approaches do you consider appropriate for addressing climate change, particularly in the default strategy, eg active vs passive, engagement vs divestment?

Topic	Action	Questions to consider
Manager oversight 	Probe the approach to climate change in your investment manager selection and monitoring	<ul style="list-style-type: none"> • How is the manager addressing climate risks and opportunities? • Is the manager's approach effective and (for the default strategy) consistent with your investment beliefs? • What plans does the manager have for evolving its approach?
Climate-aware investments 	Consider low carbon alternatives	<ul style="list-style-type: none"> • Do your managers offer low carbon alternatives for the funds currently used in your default strategy? • For passive funds, should you track a low carbon index? • Should you offer any climate-focused self-select funds, eg one that invests in climate solutions such as renewable energy, energy efficiency and sustainable transport?
Metrics and targets 	Monitor and improve your default strategy's climate exposure	<ul style="list-style-type: none"> • For each fund, what is your exposure to greenhouse gas emissions, fossil fuel reserves and climate solutions? • How does the fund's exposure compare to the average and leading strategies in its asset class? • What targets could and should you set to improve these exposures over time?
Risk register 	Document climate risks and develop mitigating actions	<ul style="list-style-type: none"> • Which climate-related risks does your scheme face over the short, medium and long term? • How might these risks affect your default strategy and self-select funds? • Are you taking sufficient action to mitigate the risks?
Disclosure 	Report to members and others on your progress	<ul style="list-style-type: none"> • Will your public disclosures about your climate approach (eg in your Statement of Investment Principles and Implementation Statement) stand up to scrutiny? • Should you include information about climate change in member-friendly communications and fund information sheets? • Will you be required to produce detailed disclosures of your climate approach and, if not, will you do so voluntarily?

Want to find out more?

If you would like further information, please contact the partner who normally advises you.



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