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Yes - all these users should be included in the primary user category. Furthermore, the possibility exists for the list of primary users to be expanded to explicitly include the Boards and executive management representatives, as well as any other relevant governance structures, of reporting entities themselves. This may seem like an unnecessary inclusion, as the NZ CS 1 is intended for external reporting - at the same time, however, these Boards, executives and governance structures are responsible for internal capital allocation within reporting entities, and are therefore key users of the information contained in the disclosures of these entities.

Yes, the the Governance section of the standard appears to meet primary user needs. Some adaptation of the language used in the disclosures under the Governance section might be required, in the event that the list of primary users is expanded to include Boards, executive management representatives and other governance structures, as suggested above.

No - I think the definition of risks should be expanded to explicitly include financial risk, along with physical and transition risk. Although the NZ CS 1 standard will implicitly require users to consider the financial implications of physical and transition risks, it would to my mind benefit the standard for financial risks to be explicitly mentioned.

Yes - as the structure of NZ CS 1 aligns closely with that of the TCFD, the definitions used in NZ CS 1 should as far as possible be aligned with those of the TCFD. At the same time, deviations from TCFD definitions should be considered, as justified by New Zealand-specific considerations.

"Climate-related" risk, opportunities and issues should be considered in as broad a context as possible, covering both mitigation and adaptation activities, and the financial implications of these. These definition should also include risks, opportunities and issues that may not exist at present, but that might arise in the future. The term "climate-related" should also be interpreted as broadly as possible.

I do not foresee the necessity for adoption provisions in relation to Governance and Risk Management disclosures in NZ CS 1.

Yes, although as noted above, I see potential benefits in the expansion of the definition of primary users, and the specific inclusion of financial risk in the risk management section of NZ CS 1