

McGuinness Institute Submission

External Reporting Board (XRB) Consultation on Proposed 2025 Amendments to Climate and Assurance Standards

24 September 2025

1.0 Introduction

The McGuinness Institute (the Institute) welcomes the opportunity to submit on the Proposed 2025 Amendments to Climate and Assurance Standards. We would like to thank the External Reporting Board (XRB) for inviting feedback on the proposals.

We note that the XRB is seeking perspectives on their proposal to extend the adoption provisions (AP) relating to (i) the reporting and assurance of scope 3 greenhouse gas (GHG) emissions and (ii) the reporting of anticipated financial impacts (AFIs, but also called AFEs by the International Accounting Standards Board [IASB])¹ by two further reporting periods. To summarise, the Institute considers that neither of the proposals should be progressed. The reasons are discussed below.

Please do not hesitate to contact us if you have any further questions on the following ideas.

1.1 About the McGuinness Institute

The Institute was founded in 2004 as a non-partisan think tank working towards a sustainable future for Aotearoa New Zealand. Project 2058 is the Institute's flagship project focusing on Aotearoa New Zealand's long-term future. Our observation that foresight drives strategy, strategy requires reporting, and reporting shapes foresight, led the Institute to develop three interlinking policy projects: *ForesightNZ*, *StrategyNZ* and *ReportingNZ*. All three of these must align if we want Aotearoa New Zealand to develop durable, robust and forward-looking public policies.

The policy projects frame and feed into our research projects, which address a range of significant issues facing Aotearoa New Zealand. The 13 research projects include: *BiodiversityNZ*, *CivicsNZ*, *ClimateChangeNZ*, *ForesightNZ*, *OneOceanNZ*, *PandemicNZ*, *PublicScienceNZ*, *ReportingNZ*, *SecurityNZ*, *StrategyNZ*, *TacklingPovertyNZ*, *TalentNZ* and *WaterFuturesNZ*.

1.2 About the consultation process

The short consultation period of three weeks has limited the Institute's response on this issue. For more detailed research we have undertaken in this area, see the following three working papers that explore climate statements and carbon offsets reported in the annual reports of NZSX-listed companies.

The three papers are listed in order of relevance to the two proposals put forward by the XRB:

1. ***Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies***²

This paper examines some aspects of recently published climate statements. The relevance of this paper is that it shows that scope 3 information can be prepared and is significant in terms of scale, and is therefore useful.

2. ***Working Paper 2025/07 – Analysing Carbon Offset Information Disclosed in 2021–2024 Annual Reports of NZSX-listed Companies*** (in press)³

This paper examines and identifies the extent to which carbon offset information has been disclosed in the 2021–2024 annual reports of NZSX-listed companies. We hope to publish this paper by the end of the month. The relevance of this paper is that the reporting of carbon offset information is a form of AFIs.

3. ***Working Paper 2025/05 – Reviewing Non-GAAP Financial Information in Annual Reports and Market Announcements of NZSX-listed Companies***⁴

This paper examines and identifies the extent to which non-GAAP information is currently being presented in annual reports, and in some cases financial statements and NZX announcements. The relevance of this paper is that reporters are currently preparing a lot of additional information outside of GAAP that is not required by the XRB. They are doing this voluntarily and at considerable cost, without common terms that enable investors and other stakeholders to compare companies.

2.0 Level of change is unprecedented

The intensifying global transition toward low-emission technologies and increases in defence spending is driving a substantial increase in demand for critical minerals such as lithium, cobalt, and rare earth elements. This surge results in both supply-chain vulnerabilities and pricing volatility, with implications for industries reliant on clean energy infrastructure. Simultaneously, the growing frequency and severity of climate-related events are contributing to population displacement and heightened immigration pressures. Recent examples include:

- ‘In July [2025], Pakistan saw record-breaking heat, with temperatures in Chilas, in the mountains, 48.5C, which may have contributed to the flooding that followed.’⁵
- ‘Extreme wildfire activity has more than doubled worldwide [in the last 21 years].’⁶ These wildfires have had severe consequences for air quality, biodiversity and human health, and they continue to shape global discussions on climate resilience and emergency preparedness.
- ‘More than 32,000 people have died trying to reach Europe in the past 10 years - including 1,300 dead or missing this year.’⁷
- ‘Cyclone Gabrielle in 2023 and the Auckland Anniversary floods caused an estimated \$14.5 billion in damage, of which insurers paid \$3.8 billion in claims ... global insured losses from natural catastrophes in 2025 are likely to surpass \$100 billion for the seventh straight

year ... The largest single loss to date is the Los Angeles wildfire, with insured losses of more than \$40 billion'.⁸

These shifts are straining local systems and amplifying demand for essential resources, including food and water, especially in regions already facing environmental stress.

It is not surprising, therefore, that the September 2025 *Mood of the Boardroom* survey revealed that 78% of chief executives in New Zealand report that their boards regularly assess geopolitical vulnerabilities as part of their risk matrix.⁹ This reflects a growing recognition that global instability, from trade tensions and resource competition to climate-induced migration, is creating significant challenges for businesses. It is for this reason the Institute considers scope 3 GHG emissions and AFI must be included in climate statements. We cannot afford to ignore risks on the basis that they are too hard to quantify.

Analysts and those undertaking intelligence frequently find themselves in situations where they need to acknowledge that they do not have perfect information, or that the cost of obtaining perfect information is too high. In those situations, imperfect information does have a place. In these cases, it is common to state the level of confidence the authors have in the data – i.e. low, medium or high confidence. If the goal is accuracy, of course climate-related information will be difficult to produce. However, if the goal is usefulness, there is a place for data where authors have low confidence. We consider that is the situation for scope 3 data and AFI information.

We acknowledge that directors, reporters and auditors may feel nervous about reporting data that they have low-confidence in. The solution is tried and true – protecting directors, preparers and auditors through the establishment of safe harbour provisions, or their equivalents. The information on scope 3 and AFIs will increasingly become important as we try to mitigate and adapt to climate change, and investors and other stakeholders need useful information to navigate the challenges we face.

Below we answer each of the specific questions in detail.

3.0 Specific questions

3.1 Scope 3 GHG emissions disclosure and assurance

3.1.1 Should AP 4, AP 5, AP 7 and AP 8, which relate to the disclosure and assurance of scope 3 GHG emissions, be extended?

No, we do not support this proposal.

3.1.2 Please give reasons for your answer:

In summary:

General

1. The effects of climate change are accelerating (see Section 2 discussion above).
2. The fact that information may be difficult or costly to prepare is not a valid reason to exclude it from reporting. Many disclosures (e.g. fair value estimates, contingent liabilities, notes to the accounts) are complex and resource-intensive yet are required information because they lead to better decision-making. See, for example, our [*Discussion Paper 2024/01 – Risks Hiding in Plain Sight: Does a commitment under the Paris Agreement to purchase offshore carbon credits create a requirement to report that commitment in the financial statements of the New Zealand Government?*](#)¹⁰
3. The purpose of reporting focuses on the needs of *primary users* to assess information on risk, value and strategy – not report preparers. The *New Zealand Conceptual Framework*¹¹ states: ‘Many existing and potential investors, lenders and other creditors cannot require reporting entities to provide information directly to them and must rely on general purpose financial reports for much of the financial information they need. Consequently, they are the *primary users* to whom general purpose financial reports are directed’ [italics added]. Hence, if the information is useful to *primary users*, even if hard to produce, it should be in the report.
4. Complexity and cost often decline over time as companies develop systems, share best practices, and adopt technology. Avoiding disclosure delays this progress and leaves markets in the dark.
5. Delaying disclosures in pursuit of perfect accuracy risks missing critical windows for mitigation and adaptation. Even imperfect data can guide capital allocation, risk management and strategic decision-making.
6. Imperfect information today is going to be more useful for investors and other stakeholders than accurate information in four to five years’ time.
7. Many companies are already producing financial information that is not comparable with other companies (e.g. non-GAAP measures), suggesting that comparability is not a prerequisite for usefulness.
8. 5% full disclosure is good given the level of work involved for preparers, but it will get easier. Further, it was interesting to see that 3% of non-CRE NZSX-listed entities were considering reporting, not because they had to, but because they could see it delivered benefits. See Figure A1.1: Types of NZ CS disclosures made in FY24 annual reports by CREs compared with non-CREs.

Specific

9. Scope 3 had one of the smaller provisions (40% compared with 81% for the largest). See Appendix 1, Figure A1.2: Adoption provisions applied in the FY23 and FY24 climate statements of NZSX-listed companies.
10. Companies have already demonstrated the ability to report scope 3 emissions. See figures and tables in Appendix 1 below.
 - Table A1.1: Six early adopters that chose to fully report against NZ CS in FY23 annual reports
 - Table A1.2: Six early adopters' GHG emissions (disclosed in FY23 annual reports)
 - Figure A1.3: Six early adopters' GHG emissions (disclosed in FY23 annual reports).
11. Mechanisms exist to mitigate the risks associated with disclosures of information of low confidence. For example:
 - exemptions could still exist but be harder to get (e.g. preparers must apply to FMA and meet certain criteria). See Appendix 1, Figure A1.2: Adoption provisions applied in the FY23 and FY24 climate statements of NZSX-listed companies.
 - grading data (low/medium/high level of confidence) and
 - safe-harbour provisions.

These tools allow companies to prepare and share estimates transparently while protecting them from undue liability.

Below we discuss the recommendations from our working papers that support why the proposal should not go ahead. *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies* addresses the Proposed 2025 Amendments to Climate and Assurance Standards and provides explicit recommendations on this issue. Please refer to sections 4.3, 8.0 (Recommendations 1 and 7), and Appendix 4 of *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*.

Please also read the Institute response to the Proposed 2024 Amendments to Climate and Assurance Standards in October 2024, as they discuss similar issues.¹²

A: Recommendation 1: Rather than delay the reporting and assurance of scope 3 GHG emissions, allow a low level of confidence for several years (e.g. three years)

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

A major opportunity exists for New Zealand to use the disclosure and assurance of climate statements to provide national and international confidence in the country's reduction of domestically generated emissions.

New Zealand's first Biennial Transparency Report (BTR1) was published on 18 December 2024. It outlines progress made towards New Zealand's first NDC (NDC1), and how New Zealand will meet its emissions reduction and climate finance targets.¹³ Projections in BTR1 note that the abatement gap to achieving NDC1 is 89.2 Mt CO₂e (not including the impact of policies and updated data included in the Government's second emissions reduction plan).¹⁴

The Institute notes that New Zealand's second NDC (NDC2) was submitted in January 2025 and has an emissions reduction level of 51–55% below gross 2005 levels by 2035 (compared to 50% below gross 2005 levels by 2030 in NDC1).¹⁵

The availability of evidence regarding work that domestic entities have undertaken to reduce domestic emissions may create an opportunity: New Zealand may find it needs to purchase fewer offshore carbon credits to meet emissions reductions declared under the Paris Agreement. A lack of this evidence will only hinder the country's chances to reduce these costs. It will also increase uncertainty, making it more difficult to produce effective, applicable and cost-efficient long-term plans and strategies around climate change.

Scope 3 emissions make up the largest proportion of total emissions for many companies. CDP reported in 2024 that the scope 3 emissions of the 19,000 companies that disclosed through them were on average 26 times higher than scope 1 and 2 emissions.¹⁶ Therefore, delaying disclosure and assurance of these emissions is particularly problematic.

In the short term, flexibility should be offered around the accuracy and reliability of scope 3 emissions, rather than the timeframe, as the latter provides no incentive for CREs to start developing the skills, processes and structures required to disclose. Additionally, for the government to design effective and deliverable climate strategies and assess the need for offshore carbon credits, an estimation is far more helpful than no information at all. Therefore, the Institute recommends that the XRB allows a low level of confidence for information disclosed in climate statements for the first few years (e.g. three years), and that Parliament passes legislation that provides safe harbour provisions for directors in relation to scope 3 emissions information (see below for Recommendation 7 in *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).¹⁷

Appendix 4: Further evidence for the consultation on the Proposed 2025 Amendments to Climate and Assurance Standards

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

Working Paper 2024/07 – Collating climate statements contained in 2023 annual reports of NZSX-listed companies found that six NZSX-listed companies had voluntarily reported against the Aotearoa New Zealand Climate Standards (NZ CS) in FY23 (see Appendix 1, Table A1.1 from *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).¹⁸ Appendix 1, Table A1.2 and Figure A1.3 from *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies* summarise the GHG emissions of the six NZSX-listed companies that made full disclosures under NZ CS in FY23, illustrating the change in scope 1, 2 and 3 emissions from FY19 to FY23.¹⁹

“This unequivocally proves that this data can be collected, and that changes over time can tell a useful story to shareholders and other stakeholders. However, it also demonstrates the extent scope 3 emissions have varied, and in many cases significantly increased, over time. Importantly, it showcases to the Ministry for the Environment, and others that this information could be a useful tool to reduce the need to purchase offshore carbon credits.”²⁰

Delaying disclosure requirements will slow progress, not enable it. Therefore, the Institute opposes the Proposed 2025 Amendments to Climate and Assurance Standards and recommends that the XRB does not extend the start date for the mandatory reporting regime on the disclosure and assurance of scope 3 GHG emissions (adoption provisions 4, 5, 7 and 8). The Institute recommends that the XRB allows entities to report and assure this information with a low level of confidence for the first few years (i.e. three years).

B: Recommendation 7: Amend the Companies Act 1993 to provide safe harbour provisions for directors in relation to scope 3 emissions until 31 October 2026

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

Directors are key to ensuring climate risks are identified, discussed around the board table, and reported to investors and other stakeholders. However, directors have legitimate concerns that they may accidentally produce and report poor-quality information (due to various challenges). Preparers and independent assurers will need to navigate and interpret new reporting standards and seek out and understand information on possible climate impacts.

Directors that fail to actively seek out ways to have key information assured may lose a valuable opportunity to discuss, test and ideally improve the quality of the discussion around the board table and the quality of reporting to owners (and other stakeholders).

Safe harbour provisions would allow directors to be more confident in producing information with the resources that are currently available to them. The COVID-19 Response (Further Management Measures) Legislation Act 2020 demonstrates that safe harbour provisions have been created in haste before; this process can be replicated.²¹

3.2 Anticipated financial impacts (AFIs)

3.2.1 Should AP 2, which relates to anticipated financial impacts, be extended?

No, we do not support this proposal.

3.2.2 Please give reasons for your answer:

In summary:

General

1. The effects of climate change are accelerating (see Section 2 discussion above).
2. The fact that information may be difficult or costly to prepare is not a valid reason to exclude it from reporting. Many disclosures (e.g. fair value estimates, contingent liabilities, notes to the accounts) are complex and resource-intensive yet are required information because they lead to better decision-making. See, for example, our [*Discussion Paper 2024/01 – Risks Hiding in Plain Sight: Does a commitment under the Paris Agreement to purchase offshore carbon credits create a requirement to report that commitment in the financial statements of the New Zealand Government?*](#)²²

3. The purpose of reporting focuses on the needs of *primary users* to assess information on risk, value and strategy – not report preparers. The *New Zealand Conceptual Framework*²³ states: ‘Many existing and potential investors, lenders and other creditors cannot require reporting entities to provide information directly to them and must rely on general purpose financial reports for much of the financial information they need. Consequently, they are the *primary users* to whom general purpose financial reports are directed’ [italics added]. Hence, if the information is useful to *primary users*, even if hard to produce, it should be in the report.
4. Complexity and cost often decline over time as companies develop systems, share best practices, and adopt technology. Avoiding disclosure delays this progress and leaves markets in the dark.
5. Delaying disclosures in pursuit of perfect accuracy risks missing critical windows for mitigation and adaptation. Even imperfect data can guide capital allocation, risk management and strategic decision-making.
6. Imperfect information today is going to be more useful for investors and other stakeholders than accurate information in four to five years’ time.
7. Many companies are already producing financial information that is not comparable with other companies (e.g. non-GAAP measures), suggesting that comparability is not a prerequisite for usefulness.
8. 5% full disclosure is good given the level of work involved for preparers, but it will get easier. Further, it was interesting to see that 3% of non-CRE NZSX-listed entities were considering reporting, not because they had to, but because they could see it delivered benefits. See Appendix 1, Figure A1.1: Types of NZ CS disclosures made in FY24 annual reports by CREs compared with non-CREs.

Specific

1. Removing anticipated financial impacts (AFIs) from climate statements undermines their core purpose. These impacts are not peripheral; rather, they are the reason climate disclosures exist.
2. Section 131 of the Companies Act 1993 sets out the ‘Duty of directors to act in good faith and in best interests of company’. Importantly the purpose of the Act includes: ‘(a) to reaffirm the value of the company as a means of achieving economic and social benefits through the aggregation of capital for productive purposes, the spreading of economic risk, and the taking of business risks’. Hence, risk identification, risk assessment, and risk management are all key underlying principles that exist in New Zealand’s legal and regulatory landscape. ‘Risk’ and ‘anticipated impacts’ are very similar concepts, and anticipated financial impacts’ meet in our mind, align with the core purpose of the Act. From corporate governance to financial reporting, entities are expected to evaluate and disclose material risks, including those posed by climate change. Reporting on anticipated financial impacts is not new. It aligns with existing practices under accounting standards, directors’ duties, and continuous disclosure obligations. Climate-related financial risks are simply an extension of this well-established framework.
9. Mechanisms exist to mitigate the risks associated with disclosures of information of low confidence. For example:

- exemptions could still exist but be harder to get (e.g. preparers must apply to FMA and meet certain criteria). See Appendix 1, Figure A1.2: Adoption provisions applied in the FY23 and FY24 climate statements of NZSX-listed companies.
- grading data (low/medium/high level of confidence) and
- safe-harbour provisions.

A: Recommendation 1: Rather than delay the disclosure of anticipated financial impacts, allow a low level of confidence for several years (e.g. three years)

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

The disclosure of anticipated financial impacts of climate risks and opportunities offers greater transparency, allowing investors and stakeholders to assess the potential impacts of climate change on an organisation's future financial position.²⁴ This supports informed decision-making and confirms the credibility of an entity's strategy and transition plan. Climate change affects all economic sectors; however, the type and extent of exposure and impact of climate-related risks differ between sectors, industries, geographies and organisations.²⁵ Therefore, this information is key to upholding the core purpose of the NZ CS to 'support the allocation of capital towards activities that are consistent with a transition to a low-emissions, climate resilient future'.²⁶

The Companies Act 1993 recognises the importance of reporting risk. The Act's purpose is in part 'to reaffirm the value of the company as a means of achieving economic and social benefits through the aggregation of capital for productive purposes, the spreading of economic risk, and the taking of business risks'.²⁷ Given the need for urgent climate action, entities should not be excused from disclosing crucial information to shareholders and stakeholders.

Delaying disclosure requirements will slow progress, not enable it.

Appendix 4: Further evidence for the consultation on the Proposed 2025 Amendments to Climate and Assurance Standards

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

The Institute is also concerned that directors and other parties may wish to extend assurance requirements on anticipated financial impacts. Unlike scope 3 GHG emissions calculations, which rely on information from third parties, there can be no significant uncertainty on anticipated financial impacts as they are determined by the Board based on the information available to them at that time. In other words, there is no reason that directors and preparers cannot disclose this information at present.²⁸

Therefore, the Institute opposes the Proposed 2025 Amendments to Climate and Assurance Standards and recommends that the XRB does not extend the start date for the disclosure of anticipated financial impacts (adoption provision 2) and instead allows a low level of confidence for the first few years (e.g. three years).

4.0 Further comments

Appendix 4: Further evidence for the consultation on the Proposed 2025 Amendments to Climate and Assurance Standards

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

The results from *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies* show that 95% (80 out of 84) of FY24 climate statements applied the adoption provisions provided to CREs under NZ CS 2 (with a total of 417 adoption provisions applied throughout the 80 FY24 statements) (see Appendix 1, Figure A1.2 from *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*). Evidently, the vast majority of companies apply adoption provisions when given the opportunity and are far less inclined to disclose information if they are not required to. Providing further relief to companies will only further delay crucial action.

‘New Zealand should continue to work hard to lead in this space. It is difficult for small countries to be seen and heard, but our actions to create mandatory climate reporting were acknowledged globally as world leading. Delaying assurance at this stage of the process is a step back from our current leadership role.’²⁹

Additional recommendations to the XRB and other entities:

Recommendation 2: Provide a voluntary standard, or make it clear companies can adopt the existing mandatory standard

(From *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*).

This approach aims to replicate the Australian model, which provides both a voluntary standard (AASB S1) and a mandatory standard (AASB S2) (see section 5.3 from *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies* for detail on the Australian Sustainability Reporting Standards). In FY24, no non-CREs published either a partial or full NZ CS disclosure, and only one non-CRE expressed an intent to publish a disclosure (see Appendix 1, Figure A1.1 from *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*). By implementing a voluntary standard, non-CREs would be encouraged to disclose climate-related information. As well as this, non-CREs should be able to upload their reports to a voluntary Climate-related Disclosure Register that would sit alongside the mandatory register for CREs, managed by MBIE.

Please also see the other seven recommendations in *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies* which relate to climate reporting in Aotearoa.

5.0 Conclusion

The McGuinness Institute opposes the Proposed 2025 Amendments to Climate and Assurance Standards and recommends that the XRB does not extend the start date for the mandatory reporting regime in regard to (i) the disclosure and assurance of scope 3 GHG emissions (adoption provisions 4, 5, 7 and 8); and (ii) the disclosure of anticipated financial impacts (adoption provision 2).

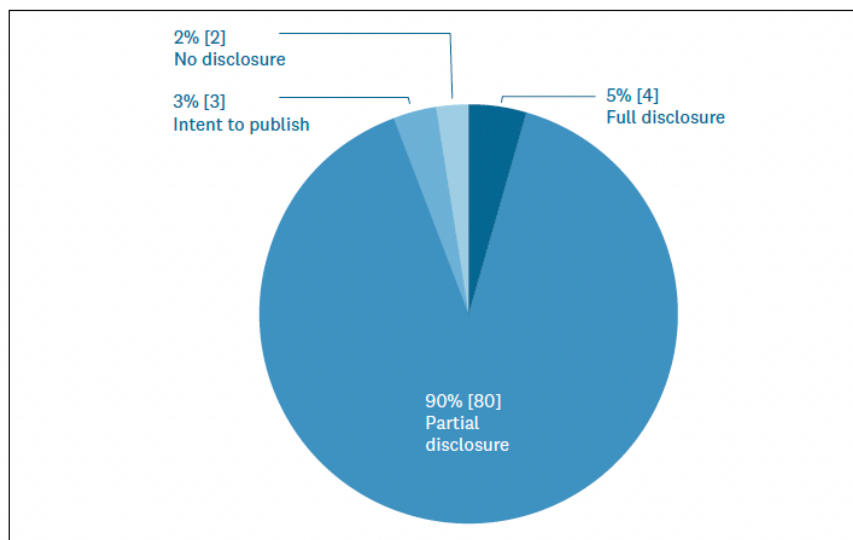
Instead, the Institute recommends that the XRB allows preparers to report the level of confidence they have in the information disclosed in climate statements for the first few years (e.g. three years), and that safe harbour provisions are provided for directors in relation to scope 3 emissions until 31 October 2026.

Appendix 1: Selected Tables and Figures from Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies

Figure A1.1: Types of NZ CS disclosures made in FY24 annual reports by CREs compared with non-CREs

Source: McGuinness Institute, *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*, September 2025.³⁰

(a) CREs only



(b) Non-CREs

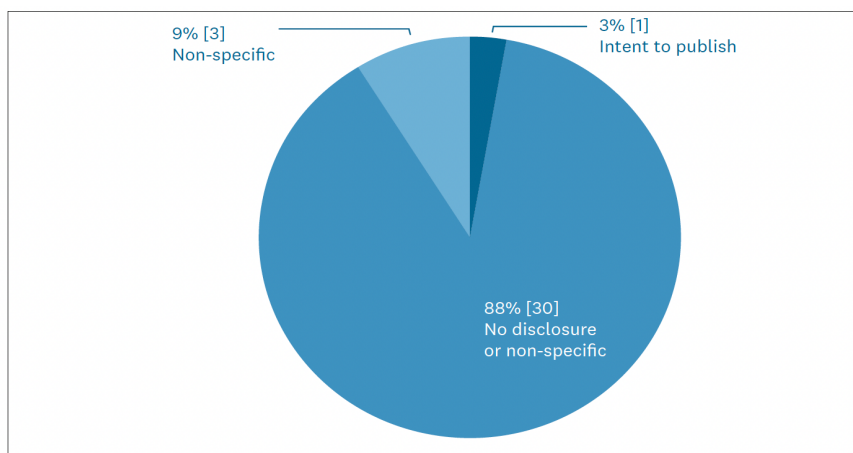


Figure A1.2: Adoption provisions applied in the FY23 and FY24 climate statements of NZSX-listed companies

Source: McGuinness Institute, *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*, September 2025.³¹

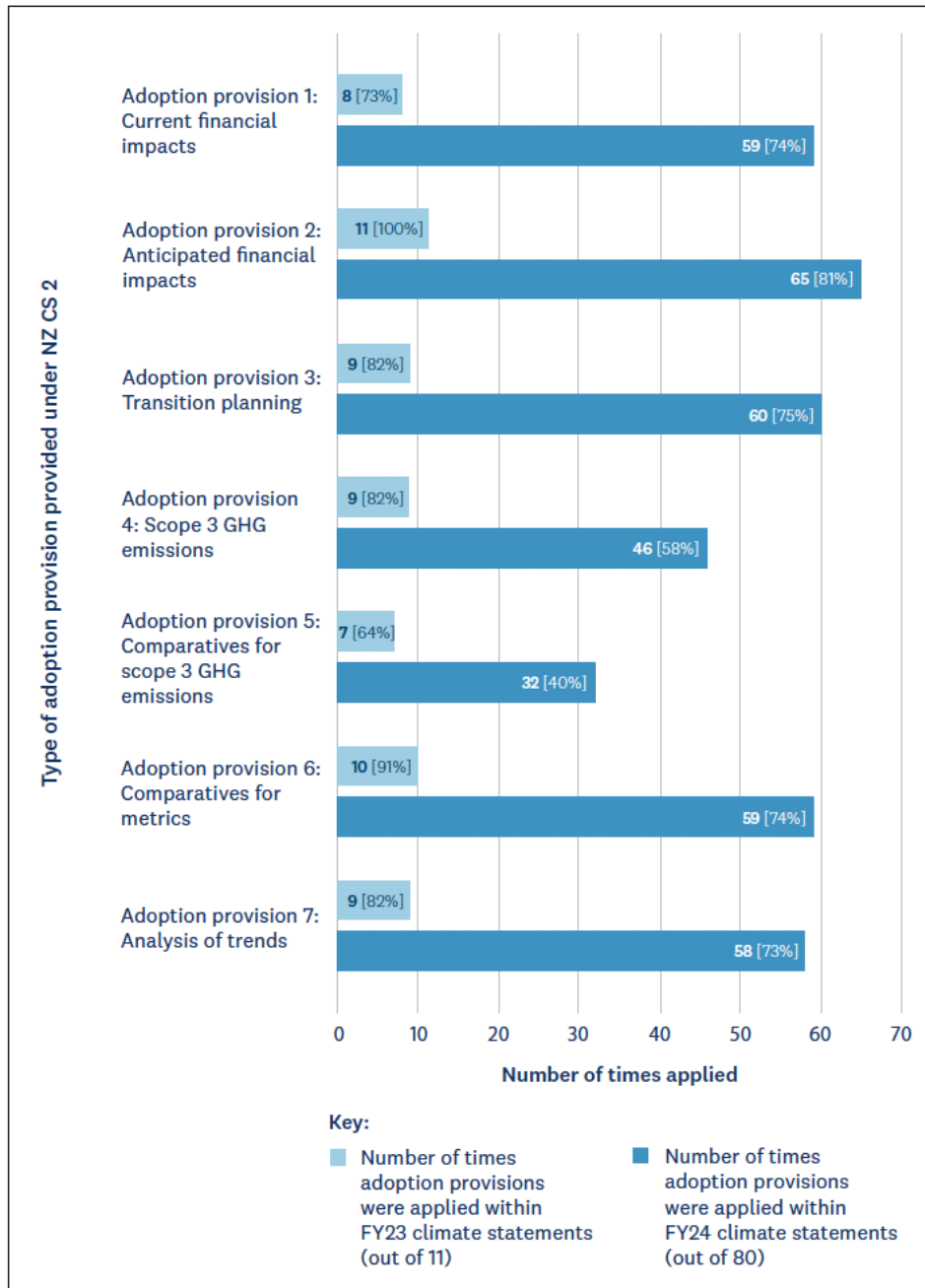


Table A1.1: Six early adopters that chose to fully report against NZ CS in FY23 annual reports

Source: McGuinness Institute, *Working Paper 2024/07 – Collating Climate Statements Contained in 2023 Annual Reports of NZSX-listed Companies*, September 2024.³²

NZSX code	Legal name	Number of pages	See page
AIA	Auckland International Airport	13	27
IPL	Investore Property	10	42
MEL	Meridian Energy	32	62
SAN	Sanford	13	92
SEK	Seeka	15	105
THL	Tourism Holdings	22	121

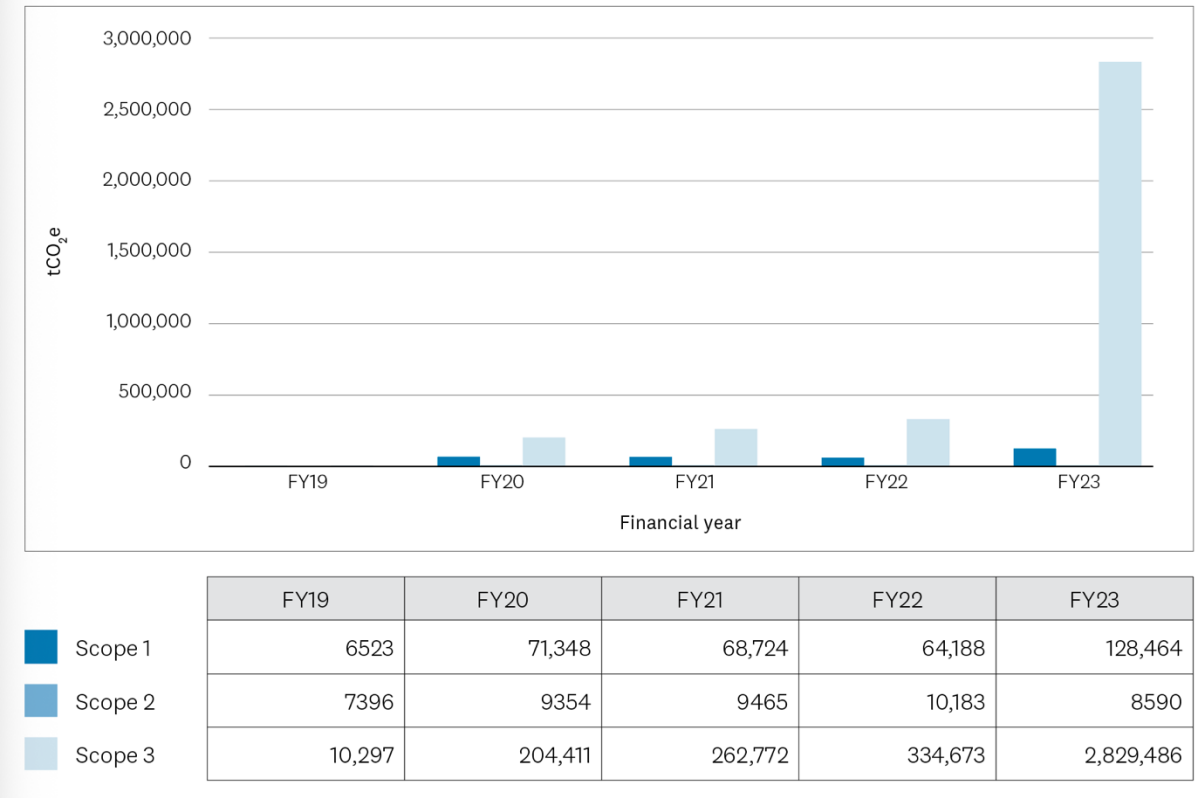
Table A1.2: Six early adopters' GHG emissions (disclosed in FY23 annual reports)

Source: McGuinness Institute, *Working Paper 2024/07 – Collating Climate Statements Contained in 2023 Annual Reports of NZSX-listed Companies*, September 2024.³³

		Auckland International Airport	Investore Property	Meridian Energy	Sanford	Seeka	THL Holdings	Total
FY19	Scope 1	2472	–	–	–	4051	–	6523
	Scope 2	3423	–	–	–	3973	–	7396
	Scope 3	6228	–	–	–	4069	–	10,297
	Total tCO ₂ e	12,123	–	–	–	12,093	–	24,216
FY20	Scope 1	2397	79	–	65,069	3803	–	71,348
	Scope 2	3224	11	–	2423	3696	–	9354
	Scope 3	5185	–	–	194,774	4452	–	204,411
	Total tCO ₂ e	10,806	90	–	262,266	11,951	–	285,113
FY21	Scope 1	1674	–	1020	62,130	3900	–	68,724
	Scope 2	2615	–	14	2349	4487	–	9465
	Scope 3	16,497	–	29,841	212,447	3987	–	262,772
	Total tCO ₂ e	20,786	–	30,875	276,926	12,374	–	340,961
FY22	Scope 1	2004	–	643	57,076	4465	–	64,188
	Scope 2	3007	–	2	1466	5708	–	10,183
	Scope 3	77,523	–	40,467	212,065	4618	–	334,673
	Total tCO ₂ e	82,534	–	41,112	270,607	14,791	–	409,044
FY23	Scope 1	2060	32	1191	60,103	5685	59,393	128,464
	Scope 2	2231	19	2	1493	2892	1953	8590
	Scope 3	2,579,061	10,861	46,565	184,386	4487	4126	2,829,486
	Total tCO ₂ e	2,583,352	10,912	47,758	245,982	13,064	65,472	2,966,540

Figure A1.3: Six early adopters' GHG emissions (disclosed in FY23 annual reports)

Source: McGuinness Institute, *Working Paper 2024/07 – Collating Climate Statements Contained in 2023 Annual Reports of NZSX-listed Companies*, September 2024.³⁴



Endnotes

¹ For example, an August 2025 IFRS guide, *Disclosing information about anticipated financial effects applying ISSB Standards*, notes: 'IFRS S2 requires a company to provide information about the company's strategy to mitigate and adapt to climate-related transition and physical risks and respond to climate-related opportunities. This information might include information that is also relevant to anticipated financial effects [AFEs] —for example, information about the effect of the implementation of the company's transition plan on its financial position, financial performance and cash flows.' International Financial Reporting Standards (IFRS) (2025). *Disclosing information about anticipated financial effects of sustainability-related risks and opportunities*. [online] Available at: <https://www.ifrs.org/news-and-events/news/2025/08/disclosing-information-anticipated-financial-effects> [Accessed 24 Sep. 2025].

² McGuinness Institute (2025). *Working Paper 2025/06 – Analysing Climate Statements Contained in 2023 and 2024 Annual Reports of NZSX-listed Companies*. [online] Available at: <https://www.mcguinnessinstitute.org/publications/working-papers> [Accessed 15 Sep. 2025].

³ McGuinness Institute (2025). *Working Paper 2025/07 – Analysing Carbon Offset Information Disclosed in 2021–2024 Annual Reports of NZSX-listed Companies*. [in press] Available at: <https://www.mcguinnessinstitute.org/publications/working-papers> [Accessed 24 Sep. 2025].

⁴ McGuinness Institute (2025). *Working Paper 2025/05 – Reviewing Non-GAAP Financial Information in Annual Reports and Market Announcements of NZSX-listed Companies*. [online] Available at: <https://www.mcguinnessinstitute.org/publications/working-papers> [Accessed 24 Sep. 2025].

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