

Wednesday 24 September 2025

External Reporting Board
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By email: assurance@xrb.govt.nz

Proposed 2025 Amendments to Climate and Assurance Standards

This submission on Proposed 2025 Amendments to Climate and Assurance Standards (the Consultation Document) is from the Financial Services Council of New Zealand Incorporated (FSC).

As the voice of the sector, the FSC is a non-profit member organisation with a vision to grow the financial confidence and wellbeing of New Zealanders. FSC members commit to delivering strong consumer outcomes from a professional and sustainable financial services sector. Our 110+ members manage funds of more than \$100 billion and pay out claims of \$2.8 billion per year (life and health insurance). Members include the major insurers in life, health, disability and income insurance, fund managers, KiwiSaver, and workplace savings schemes (including restricted schemes), professional service providers, and technology providers to the financial services sector.

Our submission has been developed through consultation with FSC members and represents the views of our members and our industry. We acknowledge the time and input of our members in contributing to this submission.

In summary, our members support XRB's proposed 2 year extension for both Anticipated Financial Impacts (AP 2) and disclosure and assurance of Scope 3 emissions (AP 4, 5, 7 and 8). We would be grateful for a prompt confirmation of the outcome of the consultation, to ensure certainty and enable timely planning.

There was a range of views amongst our members on the various issues raised in the Consultation Document. In relation to both Adoption Provisions, our members all recognise the importance of dealing with the practical issues that have arisen that affect the ability of CREs to comply, and the need to deal with those effectively in order to enable confident compliance with the relevant elements of NZCS1, and at a cost which is manageable for all CREs.

Our members understand that if the XRB were to propose any further extensions to these Adoption Provisions, it will have good reasons for doing so and our members will consider those reasons as or when the time comes.

In relation to Scope 3 emissions in particular, our members who already disclosed and assured their Scope 3 emissions inventory were keen to ensure that climate reporting in New Zealand is carried out on a 'like for like' basis, thus encouraging comparability between CREs.

We welcome continued discussions and engagement. Please contact Carissa Perano, Head of Regulatory Affairs, at carissa.perano@fsc.org.nz, to discuss any element of our submission.

Yours sincerely

Kirk Hope
Chief Executive Officer

Financial Services Council of New Zealand Incorporated

Scope 3 GHG emissions disclosure and assurance (AP 4, AP 5, AP 7 and AP 8) 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? Please give reasons for your answer.

We support the XRB's proposal to extend by two years for those who wish to use it, noting the time should be used well to prepare and in doing so also considering the wider impacts of extending the adoption provision.

The adoption provisions have always and continue to be elective or optional. CREs can report all their Scope 3 now (and many already do). CREs who are reporting all Scope 3 may gain competitive advantage in the eyes of primary users over those who are not.

Anticipated Financial Impacts (AP 2)

2. Should AP 2, which relates to anticipated financial impacts, be extended? Please give reasons for your answer.

We support the XRB's proposal to extend by two years. The international uncertainty referred to creates a logical argument to defer this until clarity is obtained.

Further comments or feedback

For FSC members who have Australian parents or groups, we note that they may be looking alignment with the Australian regime dates.