

# Proposed 2025 Amendments to Climate and Assurance Standards

## Survey response 16

### Company Name

Cogo

**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

### Please give a reason for your answer

We are concerned that XRB is proposing a delay in Scope 3 mandatory reporting and assurance based on the challenges being faced by a small set of industries e.g. financial services and insurance. While it is noted that those industries lack global reporting methodologies for reporting a sizeable component of their Scope 3 total emissions, this should not be used as justification for delaying the reporting and assurance requirement for all CREs. We instead propose that mandatory reporting be required without delay, but with the ability to exclude Scope 3 reporting components with strong supporting evidence. We believe that the Standard's approach to require full reporting of Scope 3 and full assurance is flawed, or at least needs to be modified to enable CREs to report Scope 3 components at varying levels of coverage and accuracy, including excluding them from reporting if e.g. there is no global standard to support measurement. By taking this approach, XRB will be both encouraging full, assured, transparent reporting by CREs, as well as providing those CREs with significant reporting barriers with the means to report partially. Scope 3 measurement is extremely challenging for all businesses - the evidence of the past 25+ years of measurement and reporting globally shows that the best approach is for each business to incrementally improve its coverage and accuracy to the maximum practicable level to meet its and stakeholder expectations. This takes many years. I am concerned that the XRB's approach is not reflecting this reality, and instead is encouraging CREs to delay measurement and reporting and therefore limiting both transparency and the CRE's ability to build an informed carbon strategy. The proposal also calls into question the requirement in the standard for assurance to be required for Scope 3 reporting. We note that in practice, CREs are nervous about having their footprint assured if it also includes any qualifications, but that if the above challenges are taken into account, qualifications should be seen as a necessary stage towards more complete assurance.

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

Yes - By two years (the XRB's proposal)

### Please give a reason for your answer

This requirement is a relatively new area of climate reporting internationally (in comparison to Scope 3 reporting, which is mature), so a delay is justifiable.

### Any other comments