

# Proposed 2025 Amendments to Climate and Assurance Standards

## Survey response 31

### Company Name

Goodman Property Services (NZ) Ltd

### 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

Adoption Provision 4: We do not support the delay to Scope 3 Emissions Reporting We do not support the proposed delay to the requirement to report Scope 3 greenhouse gas emissions. Whilst we acknowledge the challenges in data availability and reliability, we believe that Scope 3 emissions are a critical component of a Climate Reporting Entity's (CRE) climate impact and risk profile. Delaying their disclosure risks undermining the integrity and completeness of climate statements and may reduce their usefulness to investors and other stakeholders. Goodman Property Trust has reported on Scope 3 GHGs for the past two years and had a limited assurance engagement undertaken in respect of all GHG emissions for its FY25 Climate Report. We expect to continue this reporting and assurance irrespective of the final decision on the proposed extension. Adoption Provision 8: Case-by-Case Relief for Scope 3 Assurance We recognise the cost and complexity associated with obtaining assurance over Scope 3 emissions. Rather than a blanket deferral, we recommend that relief be considered on a case-by-case basis, based on objective criteria such as the size, revenue, or asset base of the reporting entity. Such an approach would maintain momentum in improving data quality and assurance readiness, while acknowledging the disproportionate burden on smaller or less complex organisations.

### 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

Adoption Provision 2: Support for delay in Anticipated Financial Impact Disclosures We support the proposed extension of the adoption provision regarding disclosure of anticipated financial impacts of climate-related risks and opportunities. These disclosures require substantial resourcing, investment and methodological development to ensure they are meaningful. After consultation with our key stakeholders, we do not expect the level of this total investment from CREs to be matched by the value of these disclosures to primary users. A further two-year deferral would allow CREs to build the necessary internal capability and improve the consistency and comparability of disclosures across the market.

### Any other comments