Proposed 2025 Amendments to Climate and Assurance Standards

Survey response 72

Company Name

PGG Wrightson

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

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

Please give a reason for your answer

PGG Wrightson supports the XRB's proposal to extend the Scope 3 greenhouse gas emissions disclosure and assurance provisions by two years. Our support is primarily based on the current limitations in data availability and quality from third-party sources, which are essential for compiling our Scope 3 emissions profile. Many of our supply chain partners are not subject to climate-related disclosure requirements and, as a result, lack both the obligation and incentive to provide the necessary information. This challenge is particularly evident in cases where suppliers are significantly larger entities or operate in monopolistic market positions, which can limit our ability to obtain relevant emissions data through voluntary engagement. We believe that extending the adoption period will allow additional time to either obtain the required data or develop robust estimation methodologies. This will help ensure that Scope 3 disclosures meet the standards expected for external assurance and contribute to the overall integrity of climate-related reporting.

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

PGG Wrightson supports the XRB's proposal to extend the anticipated financial impacts disclosure provision by two years. Our support for this extension is primarily driven by the lack of detailed 'how to' guidance on quantifying anticipated financial impacts, particularly in relation to complex and interconnected climate-related risks (such as land-use change). Without a standardised approach, different methodologies may yield varied outcomes, which could reduce the comparability and practical value of the disclosures for stakeholders and investors. We also note that the potential liability associated with anticipated financial impact disclosures may influence reporting behaviour. In the absence of clear guidance, entities may default to conservative or least-risk disclosures, which may not reflect the full scope of climate-related risks and opportunities. A longer implementation period will allow for the development of both clear guidance and robust methodologies, supporting more consistent, meaningful, and decision-useful reporting across the sector. We encourage the XRB to consider providing further clarity on expectations around timeframes, ranges, and levels of detail, to help entities navigate the complexity of anticipated financial impact disclosures with confidence.

Any other comments