

Proposed 2025 Amendments to Climate and Assurance Standards

Survey response 98

Company Name

Individual

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

It is taking substantial resource to gather relevant information. Our internal systems are not set up to make this easy, so it requires manual data collection and collation. Underlying this is the effort to survey what data might be available in the first place, and how that data could be manipulated into something useful. There are so many assumptions in the data and in how to convert it to CO2e, that it does somewhat undermine the usefulness of the exercise. We've struggled to find peer companies internationally who have completed this exercise, so we've had to make a bunch of informed guesses. This also makes it difficult for the assurer who then has very little to go on, when trying to decide whether our approach is reasonable.

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

Yes - By four or more years

Please give a reason for your answer

Please extend AP2 or simply make AFI optional. The vast number of assumptions, judgements, scenarios etc that must be used to calculate a figure makes quantification just about worthless. Users would not be able to rely on the figures, and which user would even be in a position to credibly critique the figure? The conservative approach is simply to acknowledge that all future earnings and assets are potentially at risk - but how does such a statement benefit the user?

Any other comments

There needs to be some time to bed-in the systems and changes that we've undertaken to date. The delays to a number of provisions are welcome. On the reporting side, it is an ongoing challenge to make the disclosure readable. The standards require a heavy burden of methodology and technical language. This may suit specialists who are trying to analyse and compare multiple companies. But it makes it difficult for the average reader to understand what is being conveyed in an accessible way.