Proposed 2025 Amendments to Climate and Assurance Standards

Survey response 89

Company Name

SLR Consulting

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 one year

Please give a reason for your answer

While Scope 3 GHG emissions are complex to calculate, they are significant for many CREs and provide useful information for primary users looking to understand value chain impact and exposure. Disclosure also provides an impetus for Scope 3 GHG emissions reductions, and opportunities for collaboration by identifying shared sources. By extending the adoption provision slightly, this maintains the balance of recognising the challenges in calculating and disclosing emissions while achieving the objectives of the NZ CS. However, AP 8, assurance for Scope 3 GHG emissions, could be delayed by 2 years (the XRB's proposal) or even further to allow for data quality improvements in parallel with emissions reductions (which are, by definition, indirect for Scope 3 and therefore, often more challenging to achieve). From our work with companies calculating, disclosing, and assuring Scope 3 emissions, we find that there is value in doing these steps in stages over multiple reporting periods, and while the proposal does allow for flexibility in the APs, this may not be used to full advantage.

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

Yes - By one year

Please give a reason for your answer

As noted in the XRB's proposal, international standards and expectations are rapidly developing and New Zealand should support broader international alignment, especially as primary users may be looking across the standards. However, as Group 1 reporters under the Australian standards will be reporting AFIs from next year, with assurance in 2027, a one year delay would allow for New Zealand CREs to learn from this experience and prepare, while continuing forward progress. We look forward to guidance documents which are prepared with this in mind and agree that this will support disclosure of AFIs.

Any other comments