

Proposed 2025 Amendments to Climate and Assurance Standards

Survey response 91

Company Name

South Port New Zealand Limited

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 four or more years

Please give a reason for your answer

South Port supports the proposed extension of the adoption provisions relating to scope 3 GHG emissions disclosure and assurance. South Port already discloses all of its scope 3 GHG emissions, and in FY25 relied on AP 7 and AP 8 in relation to scope 3 emissions. However, development of the scope 3 inventory is time consuming and complex. There is currently significant uncertainty, assumptions, and generalisations present in source classification, factor selection, and emissions calculation. This extension will provide welcome additional time to refine emissions calculation methodologies, increasing the chances of highquality and accurate disclosure. In relation to assurance, South Port obtained Scope 1 and 2 assurance in FY25 but as noted relied on AP 8 for scope 3 emissions. South Port's costs associated with GHG emission disclosure and assurance were \$NZD70,000 in FY25. South Port welcomes the additional time to refine the development and assurance of its scope 3 inventory, and to reduce the upfront pressure and cost of obtaining assurance. Additionally, our experience with Scope 1 and 2 assurance has indicated to us that assurance providers also require more time to mature their processes and team.

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

Yes - By four or more years

Please give a reason for your answer

South Port supports the proposed extension of AP 2 for anticipated financial impacts. Although South Port has begun quantifying some anticipated impacts of climate-related risks, this is a complex process involving forward looking judgements and internal testing of inputs. It is also not yet clear how this information will be valuable for South Port's primary users if the outputs are highly uncertain. Additional time before this disclosure requirement is mandatory would therefore be highly beneficial, allowing South Port's climate-related risk management frameworks and their connection with financial planning to mature. South Port considers that allowing climate reporting entities the option of additional time to disclose anticipated financial impacts will result in more robust disclosures.

Any other comments

Overall, South Port considers that extending the adoption provisions will result in increased accuracy and maturity for climate-related disclosures. An extension of time will also provide further opportunity to adopt external guidelines (including eventual sector specific guidance) to increase the likelihood of sector alignment.