Proposed 2025 Amendments to Climate and Assurance Standards

Survey response 39

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?

No

Please give a reason for your answer

Delaying reporting requirements means delaying climate action - and that is time we cannot afford to lose. The impacts of climate change are already evident, and our focus should not be on finding reasons why action is difficult, but on identifying what we can do now to make a meaningful difference. From the consultation document, it is not clear why delay is necessary. While it refers to “significant implementation efforts,” the more pressing question is how we can provide the right support and resources to enable implementation, rather than postponing it. A delay would be a serious mistake, with consequences that may extend further than we can currently anticipate. This is a moment to come together, take responsibility for our collective impact, and act decisively to reduce emissions - both for our own sake and for future generations.

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

No

Please give a reason for your answer

Undermines accountability and comparability Without early disclosure of financial impacts, entities can avoid showing the real cost (or opportunity) of climate risks in the short term. This creates inconsistent reporting across entities, making it difficult for stakeholders to compare organisations, assess risk, or allocate capital effectively. Delaying suggests a lack of urgency, which undermines confidence in the reporting regime. If financial impact disclosure is postponed, entities may overlook or downplay the scale of their climate risk exposure.

Any other comments

We are in a climate crisis, and delay sends the wrong signal, i.e. that full transparency and accountability can wait. Instead, we should be working together to build the systems, guidance, and support needed to make Scope 3 reporting achievable now. Only by taking Scope 3 seriously from the outset can we drive meaningful action across value chains, encourage collaboration, and ensure that disclosures genuinely support climate goals. To delay it is to weaken the entire purpose of the Standards—turning climate disclosure into a compliance exercise, rather than a tool for informed decision-making and real climate action.