

Climate Data Utility Response to the Consultation on New Zealand's Draft Climate Reporting Roadmap

This response is being provided by the team developing the Climate Data Utility. We appreciate the opportunity to provide feedback on New Zealand's Climate Reporting Roadmap.

The [Climate Data Utility](#) (formerly known as the Net Zero Data Public Utility) is a global, centralized, open repository for corporate climate data. It is freely accessible to all stakeholders as a public good, helping inform decision-making across financial markets and identify climate-related risks and opportunities.

The development of the Climate Data Utility is supported by the advice and recommendations of the [Climate Data Steering Committee \(CDSC\)](#), which was established by French President Emmanuel Macron and UN Special Envoy on Climate Ambition and Solutions Michael R. Bloomberg in June 2022. The CDSC brings together global policymakers, regulators, and international organizations to improve access to standardized climate data.

In 2022, the CDSC provided recommendations on the core corporate climate-related data that it identified as important for the public good and which it recommended to make accessible through the Climate Data Utility. This includes Scope 1, 2, and 3 GHG emissions, emissions targets, and the use of carbon credits.

As of September 2026, the Utility contains data from over 21,000 companies. Data sources include voluntary company-disclosed data through CDP, as well as data from the Climate Data Utility's first jurisdictional partnership with France and its ecological transition agency, ADEME. The partnership brings greenhouse gas emissions and targets data from over 5,000 companies, reported under France's mandatory national framework, onto the Utility. This demonstrates the critical role jurisdictions play in expanding global access to reliable climate-related data.

Looking ahead, as new country-specific disclosure requirements are implemented around the world, the Climate Data Utility aims to work with jurisdictions to ensure that the core climate data points identified by the CDSC are made accessible in a common location and format, enhancing the data's discoverability, comparability and usability.

We welcome New Zealand's approach of requiring companies to disclose their climate-related risks and opportunities in annual Climate Statements and making these disclosures publicly available through the Companies Office Climate-related Disclosures Register. We also welcome the alignment of the New Zealand Climate Standards with IFRS S2, an important step in promoting the global comparability of New Zealand companies' climate disclosures.

To maximize the utility of these disclosures, the data would ideally be made accessible in an open, downloadable, and machine-readable format. This helps ensure that the data can be easily found, accessed, and used by a broad range of stakeholders.

Through the work of the Climate Data Utility and CDSC Secretariat, we have observed that in the absence of digital reporting, users are often required to manually extract key data from reports. This reduces efficiency, increases costs, and heightens the risk of error and misinterpretation.

The use of artificial intelligence to extract unstructured data from disclosures is expanding. However, such approaches are currently less reliable than structured digital reporting and require additional human interpretation and verification.

Where artificial intelligence is used to extract data from disclosures, digital tagging can significantly improve the process. Structuring and tagging data improves extraction accuracy and allows analytical efforts to shift from basic data retrieval toward deeper qualitative assessments.

Open-access, machine-readable data can also facilitate the comparability of climate disclosures and enable the data's inclusion in global repositories such as the Climate Data Utility, magnifying the global visibility and use of climate data disclosed by New Zealand companies.

We therefore encourage the XRB to explore future pathways towards making this data digitally available. In line with options considered in previous [XRB reviews of digital reporting](#), this could include exploring the adoption of digital taxonomies and tagging systems, such as XBRL/iXBRL, as well as the use of digital tools that can support companies in digitizing core climate data. The Climate Data Utility and CDSC Secretariat would be happy to discuss these approaches further and share practices that we have observed in jurisdictions at different stages of their digitization efforts.

Additionally, to enhance the discoverability, use, and comparability of data from companies' Climate Statements, we would like to emphasize the importance of including essential metadata.

The use of a unique corporate identifier, such as a Legal Entity Identifier (LEI) or a national identifier, enables company-level data from different sources to be linked. We note that identifiers are frequently jurisdiction-specific and based on national systems, which can require open mappings and correspondence tables to support company matching. A global identifier such as an LEI can more readily support matching across jurisdictions. Requiring a unique corporate identifier can therefore significantly enhance the comparability and usability of disclosures, including by facilitating connections to information on the sectors in which a company operates, and supporting comparison across industries.

We also note that including information on the level and type of assurance obtained for climate data can significantly enhance users' confidence in the disclosures.

We appreciate the opportunity to provide input on New Zealand's Climate Reporting Roadmap. We remain at your disposal to discuss further technical insights related to global digital climate data infrastructure.