

30 September 2026

External Reporting Board (XRB)
154 Featherston Street
Wellington 6011
Email: c/o.sustainability@xrb.govt.nz

RE: Submission on the Draft Climate Reporting Roadmap for New Zealand

Tēnā koutou,

Thank you for the opportunity to provide feedback on the XRB Draft Climate Roadmap for New Zealand. Overall, we are supportive of the proposed changes and provide a response to each question below.

Question 1: Do you support the overall direction of travel?

Yes, agree that it is important to improve the alignment of the NZ standards to internationally recognised climate reporting standards (Global and Australian) to ensure New Zealand remains relevant in international markets. Also to avoid the need for duplication for reporters who are operating internationally.

Question 2: Would adopting IFRS S2 improve the information available to primary users?

Agree that adoption of IFRS S2 is likely to improve the usefulness and comparability of climate disclosures for investors, lenders, insurers and other primary users, particularly from an international perspective. Given that some reporters may need to report in multiple regions (especially NZ and Australia), the alignment will reduce the need for duplication, helping to reduce compliance costs (or perceived compliance burden).

Question 3: What are the practical implications for reporting entities?

There are likely to be both benefits and challenges. Benefits may include improved alignment, reduced need for duplication, more certainty on the future direction of reporting, increased ability for reporters to access multinational markets/investors due to following an internationally recognised approach.

On the other hand, there will likely be challenges for reporting entities to transition to the new requirements, when they have only just begun to understand the current NZ requirements (and already invested in meeting current reporting requirements through engagement with consultants). Also, may add additional challenges/costs for voluntary reporters and deter them from reporting.

Question 4: How should we approach harmonisation with Australia?

Harmonisation should ideally focus on the same principles, but not necessarily the same pathway. As an assurance provider we would support harmonisation focused on reducing complexity, improving comparability and reducing compliance costs.

We encourage the XRB to retain or adapt existing New Zealand guidance where it addresses practical reporting challenges unique to the New Zealand market, so that negative unintended consequences are not created through harmonisation.

Question 5: Are any New Zealand-specific modifications needed?

We support the concept of adopting IFRS S2 while retaining limited and clearly justified New Zealand-specific modifications.

The most significant issue from our perspective relates to assurance practitioner eligibility, which in the Australian climate reporting regime is restricted to registered financial auditors. New Zealand has a mature market of specialist carbon assurance providers who have already been effectively engaged in the verification of Carbon Related Disclosures against the NZ Climate Standards and SAE 1.

We support maintaining the current NZ approach that allows suitably qualified assurance practitioners, including those who are not a registered financial auditor, to provide climate assurance services. This approach promotes competition, helps avoid unnecessary increases in compliance costs, and preserves access to specialised sustainability expertise that may not be available via traditional financial audit engagements.

Question 6: Do you support the proposed timeline?

Yes, the stable phased transition, allows reporters ample time to adjust to new reporting requirements, whilst also supporting/allowing early adoption. The extended timeframe also sends a signal for stability and provides time for reporters to build the needed capacity. From the perspective of an assurance provider the timeline supports sufficient time to develop procedures aligned with the new reporting requirements

Ngā mihi,



Jeska McHugh

Managing Director
McHugh & Shaw Limited