

22 September 2026

External Reporting Board (XRB)

Via email: sustainability@xrb.govt.nz

Draft Climate Reporting Roadmap Consultation

To the External Reporting Board (XRB),

Overview

Beca Group supports the strategic direction proposed in the Draft Climate Reporting Roadmap Consultation and the move to adopt an IFRS S2-based framework that is internationally aligned, closely harmonised with Australia's AASB S2 requirements, and appropriately tailored to Aotearoa New Zealand.

As a voluntary reporter preparing for future mandatory Australian obligations, Beca considers a clear, phased and proportionate pathway essential to reducing duplication, enabling a consistent Group-wide approach to data, governance, assurance readiness and reporting systems, and producing comparable, decision-useful climate information. This approach would build on New Zealand's climate-reporting leadership while strengthening transparency, accountability, strategic insight and stakeholder confidence for businesses operating across borders.

About Beca Group

Beca is an employee-owned professional services consultancy operating across New Zealand, Australia, and the Asia-Pacific region. Our purpose is to make everyday better, and we work with clients across infrastructure, water, energy, transport, industrial, food and beverage, buildings, government, and community sectors.

Beca has been voluntarily reporting on sustainability for many years and has developed voluntary climate-related disclosures to improve transparency, strengthen governance, inform strategic decision-making, and demonstrate the value of climate reporting beyond compliance. Our voluntary reporting has helped us build capability, develop climate-related data and processes, and better understand how climate-related risks and opportunities may affect our business and the clients and communities we serve.

We are also preparing for mandatory climate-related financial disclosure requirements that are expected to apply to our Australian business. This dual experience – as both a voluntary reporter and a group with emerging mandatory reporting obligations across jurisdictions – gives us a practical perspective on the importance of alignment, interoperability, proportionality, and clear transition pathways.

Response to consultation questions

Consultation question(s)	Beca Group response
Q1 Strategic direction	Beca supports the proposed strategic direction, including a new IFRS S2-based climate standard, closer alignment with Australia's AASB S2 and related obligations, and targeted New Zealand modifications where unavoidable. This is timely given the shift from the original TCFD-based settings to the ISSB global baseline. An IFRS S2-based end state is preferable to piecemeal amendments because it provides clearer regulatory direction, strengthens international comparability and interoperability, and reduces unnecessary complexity or divergence.
Q2 and Q8 Benefits, costs and implementation timeline	Beca supports a phased transition that gives entities sufficient certainty and time to build capability, systems, controls and disclosure quality. However, we recommend that the transition timeframe be compressed from the 2033 mandatory date to accelerate alignment with IFRS S2 and AASB S2 and support consistency in reporting. This would reduce parallel interpretation, duplicated evidence gathering, separate timetables, and the need to reconcile data, assumptions and narrative, allowing investment in stronger Group-wide data, governance, assurance readiness and reporting systems. To support implementation, the XRB should provide clear interoperability guidance for group entities, voluntary reporters and organisations preparing for Australian obligations, while retaining proportionality and scalability.
Q3 Primary-user perspective and priority disclosures	Adopting IFRS S2 would improve the comparability, consistency and decision usefulness of climate information for Beca and other users across jurisdictions. It would support decisions about risk, resilience, decarbonisation, investment, capital allocation, strategy and client delivery.

Q4 and Q7 Considering together whether IFRS S2 requirements should be changed or removed, and whether limited New Zealand-specific modifications are needed	Beca does not propose removing core IFRS S2 requirements or the climate-relevant portions of IFRS S1. IFRS S1 and IFRS S2 provide a coherent architecture linking sustainability and climate information with enterprise value, financial reporting, governance, risk management and strategy, and help avoid climate reporting becoming siloed from nature, water, resource use, resilience, social impacts and transition planning.
Q5 Australian harmonisation and industry-based disclosures	Beca supports close alignment with Australia and avoiding unnecessary trans-Tasman divergence in industry-based disclosures. For a multinational group, harmonisation enables one coherent approach to governance, risk management, strategy, metrics, targets and stakeholder communication, rather than parallel jurisdictional processes. The XRB should prioritise interoperability with AASB S2 and the ISSB industry-based guidance, clearly map any differences, and make New Zealand-specific modifications only where they are necessary for appropriate integration within the New Zealand context.
Q6 Australian harmonisation on scenarios and scenario analysis	Beca supports a consistent trans-Tasman approach to the scenarios and specified temperature outcomes to be used, as well as to the expectations and guidance for scenario analysis. This would enable a single Group-wide process, common data foundations and comparable assumptions, while preserving decision usefulness and proportionate application. Misaligned settings can create duplicate analysis, evidence gathering and governance conversations. The XRB should align as closely as practicable with Australia, clearly map any differences, and provide transition guidance for entities applying New Zealand and Australian requirements across a group. Highlighting the strategic opportunity that climate reporting presents beyond bare compliance will be important.
Q9 Other comments	Climate reporting increasingly sits within a broader sustainability landscape, with climate risks and opportunities interconnected with nature, water, resource use, inequality, community resilience, impact and double materiality. While supporting the current IFRS S2-based pathway, Beca recommends clarifying how future sustainability standards may

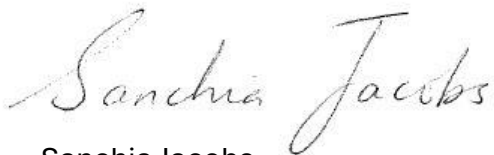
sit alongside NZ IFRS S2 so voluntary reporters can present integrated, decision-useful information.

Beca also supports an internationally aligned, proportionate pathway for mid-tier and voluntary reporters, helping organisations build capability without prematurely adopting a full compliance-oriented framework.

Early signalling will support durable investment in systems, governance, data, assurance readiness and capability. It will also help Beca support clients across New Zealand, Australia and other ISSB-aligned jurisdictions to focus on credible evidence, risk and governance processes, decarbonisation, adaptation, asset resilience and investment decisions rather than reconciling fragmented obligations.

A harmonised framework would reduce costs, improve consistency and assurance readiness, and enable climate reporting to inform strategy, capital planning, risk management and stakeholder engagement, rather than becoming an annual compliance exercise.

Kind regards,



Sanchia Jacobs

Chief Sustainability Officer

Beca Group