

**From:** [Todd Foster](#)  
**To:** [XRB Climate Related Disclosures](#)  
**Subject:** Feedback  
**Date:** Friday, July 29, 2022 12:05:39 PM

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Kia ora,

The Climate Disclosures Standards are a great step in helping to fight climate change. My feedback is related to para. 19 in ED NZ CS 2, the exemption for disclosure of scope 3 emissions in an entity's first reporting period. The justification for the exemption provided in BC14 - BC16 is not acceptable and will result in significant underreporting. These emissions will not become any easier to report over the course of a year, and providing the exemption gives reporting entities an excuse to exclude a significant portion of their greenhouse gas emissions. Scope 3 is a broad emissions category, and providing a whole-of-scope exemption when the primary concern is with financed and underwritten emissions gives organisations the excuse to ignore the many other Scope 3 emissions which are relatively simple to measure and have robust and proven methodologies. The XRB should remove this exemption, and not allow the excuse of "it's too hard" to unduly influence these standards.

Thanks!  
Todd



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