



20 March 2023

External Reporting Board

By email only: assurance@xrb.govt.nz

Kia ora

Thank you for the opportunity to make a submission on the XRB exposure draft on GHG assurance.

About ACE New Zealand

The Association of Consulting and Engineering New Zealand (ACE New Zealand) is a firm-based membership organisation representing over 250 professional services firms working across the built and natural environment – from large global firms to employee-owned SMEs. Our members have a wide range of specialist expertise that will be required to support new reporting and assurance on climate-related and wider sustainability issues. They employ approximately 14,000 staff, including engineers, project managers, planners, scientists, architects, surveyors and other technical disciplines. Our teams work together to advise, design and deliver on critical technology, policies and practices, and construction and infrastructure across the built and natural environment in Aotearoa.

General comments on XRB proposal

Overall, we agree with the approach set out in the exposure draft. In particular:

- We note that there are currently two standards to provide assurance over GHG disclosures in use in New Zealand. We agree with the decision to allow practitioners to continue to use either of those standards and agree that these assurance standards are fit for purpose for undertaking assurance over GHG disclosures.
- We also support a principle-based approach to ethics and quality management requirements as this recognises that other professional and accreditation bodies have formal ethical and quality frameworks in place. We do not consider there are any other measures that should be included in the standard.
- We have no other comments on the proposed standard.

Conclusion

We trust these comments are helpful to XRB in finalising the proposed standard.

We would be happy to discuss any aspect of this submission and are available and willing to contribute to further work by XRB.

Ngā mihi

A handwritten signature in black ink, appearing to read 'Helen Davidson', written in a cursive style.

Helen Davidson

Chief Executive