

**From:** Michael Nugent ([mnn@fastmail.fm](mailto:mnn@fastmail.fm)) <[mnn@fastmail.fm](mailto:mnn@fastmail.fm)>  
**Sent:** Wednesday, 29 March 2023 8:00 pm  
**To:** XRB Assurance Standards <[Assurance@xrb.govt.nz](mailto:Assurance@xrb.govt.nz)>  
**Subject:** Assurance Engagements over GHG Emissions Disclosures

Dear Madam/Sir,

I apologise for the tardiness of this response to your Consultation “Assurance Engagements over GHG Emissions Disclosures” and hope it can nonetheless be considered.

I have only one comment; it is in answer to your Question 1, in particular regarding the design principle of trust and confidence.

The Consultation recognises the importance of standards to ensuring trust and confidence. One aspect of standards is that they be fit for purpose, which is addressed in the Consultation. Another aspect of standards is that be available to the report reader - if they are not, then how is a curious/diligent reader to know what the reference to a standard means. ISAE 3410 as well as the other relevant assurance and ethical standards referenced in it, are available, free of charge to anyone. None of the ISO standards are. If a reader wanted to access the 3 x ISO standards mentioned in the Consultation, they would need to pay about NZD 800 (per <https://www.iso.org/home.html> and <https://themoneyconverter.com/CHF/NZD>). This is an unreasonable imposition on readers of assurance reports. I therefore suggest that ISO standards should not be recognised in your final document.

Thanks,



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use it up, wear it out, make it do, or do without

**“The optimist proclaims that we live in the best of all possible worlds, and the pessimist fears this is true.”**

James Branch Cabell