

#4

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Page 1

Q1

Do you agree with Proposal 1 to extend Adoption Provisions 4, 5 and 7 for scope 3 GHG emissions disclosures from one accounting period to two accounting periods?

Unsure,

Comment:

Adoption provision 4: Delaying adoption provision 4 for one reporting year will not solve data collection challenges. This challenge will persist for a long time.

Q2

Do you agree with Proposal 2 to add a new Adoption Provision 8 that gives relief of one accounting period before scope 3 GHG emissions assurance is mandatory?

Yes,

Comment:

I agree on the basis that assurance practitioners need more time to prepare their processes as it was evident in the first year that there is much to learn on the assurance side. This issue can be easily fixed in one year.

Q3

Do you agree that a one-year delay for scope 3 GHG emissions assurance is sufficient to enable systems to mature to support the availability of sufficient reliable data and to enable increased consistency across the assurance market?

Unsure,

Comment:

Only to provide consistency across the assurance market. The availability of sufficient and reliable data will not happen in one year.

Q4

Do you agree with Proposal 3 to extend Adoption Provision 2 for anticipated financial impacts from one accounting period to two accounting periods?

Yes,

Comment:

I agree, but only if the XRB will provide guidance in 2025 on how to do this and meet the standard.

Q5

Do you agree with Proposal 4 to extend Adoption Provision 3 for transition planning from one accounting period to two accounting periods?

Unsure,

Comment:

It makes sense to extend this if you are going to extend scope 3 reporting given how interlinked these are. If you were to keep transition planning in and keep scope 3 out, this undermines the transition planning disclosures. However, given that transition planning is at the heart of the disclosure regime and to some extent is the most important piece of information that primary users may be interested in, the XRB risks undermining the legitimacy of the regime if it extends this adoption provision. I don't believe primary users can make informed decisions based on the disclosure of climate-related risks and opportunities (without financial quantification) and scope 1 and 2 GHG emissions alone. For further context, businesses are not scared of transitioning, they are scared of director liabilities and litigation.

Q6

Please provide your contact details:

Name	.
Company	.
Email Address	.
Phone Number	.
