#7

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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?

Yes,

Comment:

Support this change. Many CREs have relied on organisations such as Toitu to support GHG emissions data collection but in preparing for assurance have become aware of issues in the approach used by such organisations that means the process is not sufficiently robust. This particularly impacts scope 3 emissions and ability to obtain assurance in relation to those omissions.

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:

As noted above, some challenges in processes for collecting GHG emissions data relative to assurance expectations so enabling more time to address these challenges is valuable. Hard to tell whether "one to many" assurance reports will be readily available with a one year delay but they are not readily available now so a delay makes sense.

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:

As noted above, it is difficult to tell whether a one year delay will be sufficient with this being impacted by international alignment on this question.

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:

This is a significant area of disclosure involving both significant areas of judgement and potential for disclosure of commercially sensitive information. More time to enable suitable guidance that is consistent with the approach being taken internationally would be beneficial.

Q5

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

Yes,

Comment:

This is an area which should deliver strategic value for organisations if done well therefore enabling more time to conduct a high quality process rather than a compliance driven one would be beneficial, noting that most CREs have used the adoption provision to delay this aspect of their reporting.

Q6

Please provide your contact details:

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Abby Foote

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