

#13

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Time Spent:

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Page 1

Q1

Yes

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?

Q2

Yes

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?

Q3

No,

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?

Comment:

As a fund manager, we will be required to report the aggregate emissions of the entities we invest into. This will be achieved using third party data. There is a lack of consistency and comprehensiveness with this data, typically provided by global data providers. I do not consider it likely that data providers will be able to provide the required information to allow for meaningful data assurance in the short to medium term. Further, even if they can, assurance will come at a considerable cost if it can be gained at all. At a fund manager level, we are unsure of what benefit assurance of fund manager scope 3 emissions would provide to clients and how and whether that would ultimately impact client outcomes. The specific issue of fund level data is limited to fund managers. However, I do not see the problem being resolved within the proposed additional year's delay prior to scope 3 assurance requirements being in force. The proposed one year delay for scope 3 GHG emissions assurance should be considerably longer, particularly for fund managers.

Q4

Yes

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

Q5

Yes

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

Q6

Please provide your contact details:

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Company

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