

#37

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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**Yes**

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?

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 in principle with Proposal 3 to extend Adoption Provision 2 for anticipated financial impacts from one to two accounting periods. While I recognise that quantifying and costing climate-related risks is complex, I believe that the companies subject to this reporting generally have access to the necessary tools and expertise. Therefore, any extension should primarily serve to allow companies time to develop internal capabilities and ensure accuracy in using these tools, rather than as a means to delay full compliance. To support ongoing progress, there should be a requirement for companies to report on their development in this area, ensuring transparency on their steps towards robust climate risk quantification and disclosure.

Q5

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

No,

Comment:

I do not agree with Proposal 4 to extend Adoption Provision 3 for transition planning by an additional accounting period. Companies required to comply with the XRB standards have already had a full year to develop these plans, and the process is not unduly complex. If companies have yet to establish their transition plans, this suggests a lack of prioritisation rather than complexity in the task itself. Given the urgency of climate-related financial risks, granting an extension would only reward delays in meeting these critical standards. Therefore, companies should be expected to demonstrate meaningful progress within the original timeframe without further extension.

Q6

Please provide your contact details:

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