

Submission to the XRB: Integrating Eco Choice Aotearoa Standards with 2024 Climate and Assurance Amendments

Eco Choice Aotearoa (ECA) proposes aligning its Type 1 ecolabel standards with the XRB's amended climate-related disclosure requirements, partnering with GS1's GTIN-based Digital Product Passports (DPPs) to support transparent, consistent Scope 3 reporting, financial impact, and transition disclosures. This approach allows both certified and uncertified businesses access to critical data standards, advancing compliance across New Zealand's business ecosystem.

1. Scope 3 GHG Emissions Disclosures and Assurance

- **XRB Consultation References:**
 - **Section 4:** Extension on Scope 3 disclosure requirements.
 - **Section 5:** Extension on mandatory Scope 3 assurance.

ECA's lifecycle-based standards address Scope 3 emissions, enabling businesses to leverage Eco Choice data as part of their compliance pathway. GTIN-based product identifiers further streamline emissions data tracking, allowing consistent references across business entities. ECA intends to publish the aligned data formats and taxonomy to facilitate broader access, allowing non-certified businesses to use these standards, ensuring marketplace-wide alignment and reducing bottlenecks in Scope 3 reporting.

- **Assurance Readiness and Market Support:**

ECA-certified data supports reliable Scope 3 assurance, reducing the need for additional auditing. We recognise that not every product category will be ECA-certified; however, with the right investment and funding, we can develop high-demand standards across various sectors, using ISO-aligned methodologies and rigorous international best practices.

2. Anticipated Financial Impact Disclosures

- **XRB Consultation Reference:**
 - **Section 6:** Extension on anticipated financial impact disclosures.

Eco Choice standards require lifecycle financial impact assessments, inherently addressing risks such as resource scarcity. With GTIN-based tracking, these insights become accessible to businesses needing consistent data formats for XRB compliance. ECA's publicly accessible standards allow both certified and uncertified entities to ground financial disclosures in reliable data, supporting accuracy and consistency across disclosures.

3. Transition Planning and Climate Resilience

- **XRB Consultation Reference:**
 - **Section 7:** Extension on transition planning disclosures.

Eco Choice standards promote resilience through lifecycle management. GTIN-linked DPPs extend this accessibility, ensuring businesses can reference consistent data in their transition plans, regardless of ECA certification. ECA's accessible standards allow companies to align with XRB's criteria for climate resilience, helping businesses achieve credible, evidence-based transition planning.

4. Assurance Support through Eco Choice Certification and GTIN Integration

- **XRB Consultation Reference:**
 - **Section 8.2:** Assurance of GHG emissions disclosures.

ECA's Type 1 ecolabel provides validated data supporting Scope 3 assurance, in line with XRB's requirements. GTIN-linked DPPs reinforce this by centralising access to verified lifecycle data. By making these standards publicly accessible, we support consistent reporting practices and strengthen data traceability, supporting broader assurance readiness across New Zealand businesses.

5. EU CSDDD Alignment and Consumer Transparency

- **XRB Consultation Reference:**
 - **Section 7.3:** Lifecycle disclosure alignment.

By aligning Eco Choice standards with GS1's GTIN-based DPPs, New Zealand businesses are positioned to meet EU Corporate Sustainability Due Diligence Directive (CSDDD) standards, enhancing global competitiveness. ECA's commitment to open-access standards fosters trust and transparency, with GTIN-linked DPPs providing consumers access to clear, consistent sustainability claims.

Summary of Recommendations

1. **Formal Partnership between ECA and XRB:**
Establish ECA's standards and GS1's GTIN-based DPPs as recognised pathways for XRB compliance, advancing transparency and consistency.
2. **DPP-Certification Pilot for SMEs:**
Implement a pilot integrating ECA standards into Scope 3, financial, and transition disclosures for SMEs, enhancing accessibility and reducing compliance burdens.
3. **Guidance for Compliance:**
Develop clear guidance and templates for businesses to map Eco Choice certification data directly to XRB standards.
4. **Broader Access to Standards:**
Publish data formats and taxonomy to ensure non-certified businesses can align with ECA standards, creating consistency and preventing bottlenecks.

Conclusion

By integrating ECA's transparent standards with GS1's GTIN-based DPPs, Eco Choice and XRB can enhance New Zealand's climate reporting framework, providing clear, scalable pathways for compliance. This open-access approach supports data integrity, international alignment, and consumer trust, helping New Zealand businesses achieve reliable, verifiable climate reporting while preparing for emerging global sustainability requirements.

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