

Meeting: International Public Sector Accounting
Standards Board

Meeting Location: Virtual Meeting

Meeting Date: July 24, 2025

Agenda Item 3

For:

☐ Approval

☒ Discussion

☐ Information




CLIMATE-RELATED DISCLOSURES


Project summary	The project objective is to support global action to combat climate change by providing principles for public sector climate-related disclosures that provide information for improved decision-making and accountability.	
Project staff leads	<ul style="list-style-type: none"> Karen Leung, Manager Alex Metcalfe, Principal Consultant 	
Task Force members	The composition of the Climate Topic Working Group to be confirmed in project planning.	
Meeting objectives	Topic	Agenda Item
Project management	Final Pronouncement Dashboard	3.1.1
	Instructions up to Previous Meeting	3.1.2
	Decisions up to Previous Meeting	3.1.3
	Climate-related Disclosures: Project Roadmap	3.1.4
Decisions required at this meeting	Project Overview	3.2.1
	Issue 1: Transition Reliefs	3.2.2
	Issue 2: General Requirements – Timing and Location of Reporting	3.2.3
	Issue 3: Other Issues (SMC 10)	3.2.4
	Issue 4: Structure of [draft] IPSASB SRS 1	3.2.5
	Next Steps	3.2.6

Prepared by: Karen Leung and Alex Metcalfe (July 2025)

The 'International Public Sector Accounting Standards Board', 'International Public Sector Accounting Standards', 'Recommended Practice Guidelines', 'International Federation of Accountants', 'IPSASB', 'IPSAS', 'RPG', 'IPSASB SRS', 'IFAC', the IPSASB logo, and IFAC logo are trademarks of IFAC, or registered trademarks and service marks of IFAC in the US and other countries.

**CLIMATE-RELATED DISCLOSURES:
FINAL PRONOUNCEMENT DASHBOARD**

Topic	Past Meetings	July 2025	Sept 2025	Oct 2025	Dec 2025
Project Management	✓				
Review of responses and identification of key themes and other issues	✓				
Review the Final Pronouncement					
Review and Approve the Final Pronouncement					
Climate-related Disclosures (Phase 1) – Key Issues					
Single or Separate Standards	✓				
Alignment with GHG Protocol	✓				
Scope 3 GHG Emissions	✓				
Materiality	✓				
General Requirements					
Transition					
Other Issues (SMC 10)					
Structure of the Standard					
IPSASB SRS ED 1 Feedback Statement					

Legend	
✓	Task Completed
	Planned IPSASB Discussion
	Page-by-page Review

INSTRUCTIONS UP TO PREVIOUS MEETING

Meeting	Instruction	Actioned
September 2024	1. All instructions provided up until September 2024 were reflected in IPSASB SRS ED 1, <i>Climate-related Disclosures</i> .	1. All instructions provided up until September 2024 were reflected in IPSASB SRS ED 1, <i>Climate-related Disclosures</i>
March 2025	2. Address implementation-related issues through an ongoing phase of the project.	2. In progress
April 2025	3. Ensure responses are sufficiently reflected for the following issues: (a) Alignment with IFRS S2; (b) Just transition and trade-off decisions; (c) Proportionality considerations; and (d) Potential implications of adopting IPSASB SRS independently of IPSAS.	3. In progress; Agenda Item 3.2.2 (Appendix B) , Agenda Item 5.2.2 , Agenda Item 5.2.3
	4. Consider further and analyze potential reasons for high rates of non-response to certain SMCs.	4. In progress; To be addressed in Phase 2 of project
	5. Prepare a feedback statement for publication with the final pronouncement on how the IPSASB has addressed the feedback received.	5. To be prepared with the publication of the final pronouncement
	6. Present a detailed project plan at the June 2025 meeting, including possible options for addressing the cross-cutting issue of developing a single standard or separate standards.	6. Agenda Item 5.2.8
	7. Provide analysis on issues of principle related to Own Operations at the June 2025 meeting.	7. Agenda Item 5.2.3 , Agenda Item 5.2.4 , Agenda Item 5.2.5
	8. Defer discussion on issues of principle related to Public Policy Programs to future meetings.	8. Agenda Item 5.2.8

Agenda Item 3.1.2

June 2025	9. Communicate the Board's decision to pursue separate standards, including a timeline for progressing Public Policy Programs, based on the proposed guidance in IPSASB SRS ED 1 and informed by consultation feedback.	9. IPSASB News: IPSASB Decides Key Next Steps in Landmark Climate-related Disclosures Project
	10. Maintain communication with International Sustainability Standards Board (ISSB) and monitor updates to the ongoing amendments to IFRS S2.	10. In progress
	11. Engage with the World Resources Institute (WRI) to promote consideration of public sector needs in the GHG Protocol update.	11. In progress
	12. Consider the development of Scope 3 guidance on application in the public sector context during the subsequent implementation phase of the project.	12. To be discussed during the implementation phase
	13. Explore options to highlight Appendix B: General Requirements more effectively within the core text for improved usability and clarity.	13. Agenda Item 3.2.5
	14. Address the issues of principle raised in relation to Appendix B: General Requirements in the upcoming meetings.	14. Agenda Item 3.2.3
	15. Leverage existing guidance from existing national and international standard setters to support understanding of the proposed materiality definition.	15. In progress
	16. Develop options to address the perceived lack of clarity associated with the materiality definition.	16. In progress

DECISIONS UP TO PREVIOUS MEETING

Meeting	Instruction	BC Reference
September 2024	1. All decisions have been reflected in IPSASB SRS ED 1, <i>Climate-related Disclosures</i> .	1. Not Applicable
March 2025	2. Maintain flexibility and transparency in undertaking the consultation analysis and in the categorization of key issues.	2. In progress
June 2025	3. Based on constituent feedback and pragmatic considerations, the project should proceed with developing separate standards.	3. In progress
	4. The two standards should be developed across two phases: (i) Phase 1: Own Operations; and (ii) Phase 2: Public Policy Programs.	4. In progress
	5. The Own Operations principles should continue to align with IFRS S2, while retaining the public sector specific guidance proposed in the Exposure Draft.	5. In progress
	6. The rebuttable presumption that entities use the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless another methodology is more appropriate for its circumstances should be retained.	6. In progress
	7. The disclosure requirements on Scope 3 GHG emissions should be retained.	7. In progress
	8. The proposed alignment of Appendix B: General Requirements with the relevant parts of IFRS S1 should be retained.	8. In progress
	9. The proposed materiality definition, should be retained.	9. In progress

**CLIMATE-RELATED DISCLOSURES:
PROJECT ROADMAP**

Meeting	Completed Actions or Discussions / Planned Actions or Discussions:
March 2025	1. Summary of outreach and managing consultation responses
April 2025	2. Preliminary analysis of responses
June 2025	1. Review Responses 2. Discuss Issues
July 2025	3. Review Responses 4. Discuss Issues
September 2025	5. Develop [draft] IPSASB SRS 1
October 2025	6. Review [draft] IPSASB SRS 1 7. Review [draft] IPSASB SRS 1 Feedback Statement
December 2025	2. Approve IPSASB SRS 1

Project Overview

Purpose

1. This paper provides an overview of the climate-related disclosures project to date.

Background

2. The [IPSASB SRS ED 1, Climate-related Disclosures](#), was published for consultation in October 2025 for a 120-day period ending February 28, 2025. The ED included 10 Specific Matters for Comment (SMCs) and an Alternative View. The IPSASB received 96 comment letters from around the world, representing a variety of regions and functions.
3. At the April 2025 check-in meeting, the IPSASB reviewed a staff summary of responses, identified thematic categories, and instructed staff to consider further on some significant issues.
4. At the June 2025 meeting, the IPSASB discussed those key issues identified, and decided that it would move forward with separate standards developed across two phases:
 - (a) Phase 1: Own Operations; and
 - (b) Phase 2: Public Policy Programs.
5. In preparation for the July 2025 check-in meeting, and consistent with the next steps discussed at the June 2025 meeting, staff analyzed stakeholder responses relating to the following key issues relevant to finalizing Phase 1 of the project. Based on this analysis, staff have developed recommendations for the Board's consideration:
 - (a) The proposed transitional provisions, which are aligned with the relevant [IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information](#) (IFRS S1) and [IFRS S2 Climate-related Disclosures](#) (IFRS S2) private sector guidance ([Agenda Item 3.2.2](#));
 - (b) The proposed timing and location of reporting, where climate-related disclosures are included in general purpose financial reports (GPFRs) and published at the same time as GPFRs ([Agenda Item 3.2.3](#));
 - (c) Other issues identified from SMC 10 ([Agenda Item 3.2.4](#)); and
 - (d) The proposed structure of the [draft] IPSASB SRS 1, reflecting structural considerations raised by respondents to the ED ([Agenda Item 3.2.5](#)).
6. In addition, [Agenda Item 3.2.6](#) presents an updated project timeline for finalizing the final pronouncement for Phase 1, reflecting the Board's decision to develop two separate standards to address the two reporting perspectives of public sector entities in climate action.

Decision Required

7. No decision required. For information purposes only.

Issue 1: Transition Reliefs

Question

1. Does the IPSASB agree with the staff recommendation?

Recommendation

2. Staff recommend that the IPSASB:
 - (a) Retain the proposed transition reliefs relating to Own Operations; and
 - (b) Extend the transition timeline for reporting an entity's Scope 3 greenhouse gas (GHG) emissions from one to three years.

Background

3. IPSASB SRS ED 1 proposed four transitional reliefs. For the first annual reporting period only, an entity is not required to:
 - (a) Disclose comparative information (this relief is aligned with IFRS S2; see paragraph 30 of the ED);
 - (b) Publish its climate-related disclosures at the same time as its financial statements (this relief is aligned with IFRS S2; see paragraph 31(a) of the ED);
 - (c) Disclose its Scope 3 GHG emissions (this relief is aligned with IFRS S2; see paragraph 31(b) of the ED); and
 - (d) Disclose the change in GHG emissions from existing climate-related public policy programs (an additional relief to reflect public sector context; see paragraph 31(c) of the ED).

See [Appendix A](#) for a full text of the proposed transition reliefs as set out in the ED.

4. In line with the June 2025 decision to separate the project into two phases, the fourth relief, under paragraph 3(d), will be addressed as part of Phase 2 of the IPSASB's climate-related disclosures project.

IPSASB's commitment to implementation support

5. Throughout the consultation process of the ED, respondents consistently highlighted the capacity challenges faced by public sector entities and the need for clear implementation support. In response, in March 2025, the IPSASB reaffirmed its commitment to supporting effective adoption and implementation, and agreed that implementation issues identified through the consultation process would be addressed through additional supporting guidance developed during a subsequent phase of the project (see [Agenda Item 13.2.3](#)).
6. In June 2025, the IPSASB noted that separating its climate-related disclosures project into two phases would allow the Board to utilize the growing body of implementation guidance provided by the ISSB. This would support public sector preparers with the adoption and implementation of Phase 1 of the project.

Analysis

7. In April 2025, the IPSASB reviewed a staff summary of consultation responses, which included a summary of key feedback to SMC 9 – Transition (see [Agenda Item 2.2.10](#)). SMC 9 sought feedback from constituents on whether they agreed with the proposed transition provisions. In reviewing the responses, staff identified common areas of focus:
- (a) The appropriateness of the relief; and
 - (b) The proposed transition timeline.
8. This feedback is summarized in the following table:

Transition Relief	Feedback on the appropriateness of the relief	Feedback on the transition timeline
Paragraph 30 – An entity is not required to disclose comparative information	General agreement that the relief is appropriate.	Overall, support for the proposed timeline.
Paragraph 31(a) – An entity is not required to publish its climate-related disclosures at the same time as its financial statements	General agreement that the relief is appropriate.	Overall, support for the proposed timeline. A few respondents felt that the timing of reporting would remain a challenge for public sector entities beyond the transition period, and that this temporary relief should instead be made permanent (see Agenda Item 3.2.3 on timing and location of reporting).
Paragraph 31(b) – An entity is not required to disclose its Scope 3 GHG emissions	General agreement that the relief is appropriate.	Most respondents felt that the one-year transition period for reporting on an entity's Scope 3 GHG emissions was insufficient, recommending a two- to five-year transition instead.

Other proposed reliefs

9. Respondents also recommended the introduction of other reliefs to support entities applying the draft standard. In particular, a few respondents suggested an additional transition relief for certain quantitative disclosures, such as anticipated financial effects and the more advanced quantitative disclosures that can arise from the climate-related scenario analysis requirements. Staff are of the view that the suggested relief does not reflect a public sector-specific reason to depart from private sector guidance.
10. A defense-focused organization also suggested a derogation from full compliance to the standard when it would jeopardize the organization's operations in the areas of security and defense. Staff

consider this concern to be appropriately addressed in the ED, specifically through paragraphs B.AG47¹ and BC102².

Rationale for extending the Scope 3 transition relief

11. Despite general agreement on the importance of transition relief for Scope 3 GHG emissions, most respondents expressed the view that the one-year transition relief for Scope 3 emissions reporting would be insufficient for building the necessary processes and systems to capture Scope 3 emissions data across complex public-sector value chains.
12. Staff identified three key reasons in support of extending the Scope 3 transition relief:
 - (a) **GHG Protocol under revision:** The GHG Protocol is undergoing a significant update, with the revised Scope 3 standard expected to be finalized in Q4 of 2027 (see [Scope 3 Standard Development Plan](#)). Granting a multi-year relief period would ensure that public sector preparers can align with the revised international standards;
 - (b) **Complexity of the public sector context:** Many respondents cited that public sector entities operate within complex environments of inter-linked networks of government bodies, service providers and third-party contractors. Respondents highlighted that gathering reliable Scope 3 data requires years of coordination, system-to-system integration and new data-sharing agreements; and
 - (c) **Building data maturity across the public sector:** Scope 1 and 2 emissions of one entity often form a part of another entity's Scope 3 emissions. Adopting a phased approach – starting with reporting Scopes 1 and 2 emissions, then progressing to Scope 3 – would create momentum for increasing data maturity across the public sector, ultimately simplifying data collection across the value chain.
13. In the case of public sector entities with limited capacity, staff also note that the ED provides proportionality mechanisms, which includes reporting Scope 3 information without undue cost or effort (see [Appendix B](#) for an overview of the proportionality mechanisms in the ED). Despite this flexibility, staff are aware that many still lack expertise, IT systems and budget to deliver comprehensive Scope 3 reporting within a single year. Extending the relief period would provide these entities with additional time to build internal capacity, upgrade technology and pilot data-collection methods. In turn, by improving the practicality and supporting more consistent adoption across the public sector, extending the transition timeline for Scope 3 emissions may boost adoption of the final standard.

¹ B.AG47: "An entity need not disclose information otherwise required by this [draft] Standard if a law or regulation prohibits the entity from disclosing that information. If an entity omits material information for that reason, it shall identify the type of information not disclosed and explain the source of the restriction to the extent allowed by law and regulation."

² BC102: "The IPSASB considered whether information that is sensitive and/or confidential should be excluded from disclosure. The IPSASB decided that such information in the public sector is expected to be rare and should not be excluded in the public interest. An entity should evaluate the needs of the primary user in light of any applicable legal requirements."

Transition timeline for Scope 3 GHG emissions

14. Respondents typically proposed a transition period ranging from two years to more than five years. While two years may be insufficient for entities with limited reporting infrastructure to build capacity, staff are also aware that a transition period of up to five years risks delaying climate action and may fall behind evolving stakeholder expectations.
15. Staff note the ongoing revisions to the GHG Protocol, with the updated Scope 3 standard expected to be finalized in Q4 2027. While the rationale for extending the transition timeline in paragraph 13 is not public sector-specific, staff note that IFRS S2 was finalized in June 2023, before the GHG Protocol entered its revision phase. A transition period of one to two years would likely require entities to implement systems based on guidance that is still evolving, while a longer timeline would allow entities to monitor these developments, incorporate private sector developments, and integrate the revised GHG Protocol Scope 3 Standard as part of their long-term sustainability reporting approach.
16. In addition, staff identified that some jurisdictions, in transposing the ISSB standards, extended the transition timeline for Scope 3 GHG reporting. For example, the Canadian Sustainability Standards Board [increased the Scope 3 transition relief to three years](#), and Malaysian Advisory Committee on Sustainability Reporting [extended the relief to between two and three years](#), depending on the entity type (see [IFRS Foundation's Jurisdictional Profiles](#) for more information on jurisdiction-level changes in transition reliefs).
17. Finally, staff note that [IPSAS 33](#) provides a three-year transition relief for entities undertaking first-time adoption of accrual basis IPSAS. BC43 – BC44 of IPSAS 33 note that the IPSASB agreed that a grace period not exceeding three years should be allowed, as this would balance a “manageable” transition with reducing the period over which entities will not be able to assert compliance with IPSAS.
18. Therefore, to strike the right balance between urgency and feasibility, staff recommend a three-year transition period for reporting Scope 3 GHG emissions. Extending the relief to three years would provide preparers the time needed to work collaboratively with suppliers and value-chain partners to collect, validate or reasonably estimate Scope 3 emissions, and to integrate the finalized GHG Protocol Scope 3 Standard into their long-term reporting approach, ensuring higher-quality disclosures and smoother implementation.

Decision Required

19. Does the IPSASB agree with the [staff recommendation](#)?

Appendix A: IPSASB SRS ED 1 Transition Reliefs

1. The following is an excerpt from IPSASB SRS ED 1, setting out the proposed transition reliefs:

Transition

30. *An entity is not required to provide the disclosures specified in this [draft] Standard for any period before the date of adoption. Accordingly, an entity is not required to disclose comparative information in the first annual reporting period in which it applies this [draft] Standard.*
31. *In the first annual reporting period in which an entity applies this [draft] Standard, the entity is permitted to use the relief below:*
- (a) The entity is permitted to report its climate-related disclosures after it publishes its related financial statements, within nine months of the end of the annual reporting period in which the entity first applies this [draft] Standard;*
 - (b) An entity is not required to disclose its Scope 3 greenhouse gas emissions (see paragraph 17(a)(i)c); and*
 - (c) An entity is not required to disclose the change in greenhouse gas emissions from climate-related public policy programs that were in place on the date of adoption of this [draft] Standard (see paragraph 26(a)).*
32. *An entity may elect an earlier date of adoption without a transition period.*
33. *If an entity elects to apply the relief in paragraph 30, the entity is permitted to continue to use that relief for the purposes of presenting that information as comparative information in subsequent reporting periods.*

Appendix B: Proportionality Mechanisms

1. One of the important themes that emerged in feedback to the IFRS S1 and IFRS S2 Exposure Drafts was proportionality, where stakeholders requested that more consideration be given to the range of capabilities and preparedness of entities to apply the requirements in the two standards (see [Feedback Statement to IFRS S1 and S2](#)). This message was echoed by public sector respondents to the IPSASB SRS ED 1. To address these concerns, the ISSB developed a set of proportionality mechanisms for the subset of preparers that are less able to comply with the disclosure requirements.
2. In particular, the ISSB noted that some preparers would be:
 - (a) Resource constrained, such that the costs of investing in and implementing the systems needed to support disclosure are proportionally higher than for larger reporting entities; and
 - (b) Operating in a market where high-quality external data is less available or where it is more challenging to attract the human resources needed to comply with the requirements.
3. The final pronouncements of IFRS S1 and IFRS S2 included provisions that specifically address proportionality. These include:
 - (a) The use of reasonable and supportable information that is available at the reporting date without undue cost or effort; and
 - (b) Consideration of an entity's skills, capabilities and resources.
4. Given the alignment of the IPSASB SRS ED 1 to IFRS S2, these proportionality mechanisms are also reflected and can be applied to the IPSASB SRS ED 1. The table below presents a summary of the disclosure requirements that attract these two proportionality mechanisms, as adapted from the ISSB [Factsheet Series – Proportionality Digest](#):

Mechanisms that Address Proportionality	Reasonable and supportable information that is available at the reporting date without undue cost or effort	Consideration of skills, capabilities, and resources
Identification of risks and opportunities	✓	
Scope of the value chain	✓	
Anticipated financial effects	✓	✓
Approach to climate-related scenario analysis	✓	✓
Measurement of Scope 3 GHG emissions	✓	
Climate-related metrics (paragraph 18)	✓	

Issue 2: General Requirements – Timing and Location of Reporting

Question

1. Does the IPSASB agree with the staff recommendation?

Recommendation

2. Staff recommend that the IPSASB retain the proposed requirements within General Requirements where entities are required to:
 - (a) Report climate-related disclosures at the same time as their general purpose financial reports (GPFRs); and
 - (b) Provide climate-related disclosures as part of an entity's GPFRs.
3. In June 2024, the IPSASB decided that it was appropriate to align Appendix B: General Requirements (General Requirements) with the relevant parts of the IFRS S1 guidance, along with public sector adaptations. In particular, the IPSASB decided to require entities to provide climate-related disclosures at the same time as GPFRs, and as a part of its GPFRs (see [Agenda Item 6.2.11](#)).
4. Therefore, the General Requirements section of the ED primarily aligns with IFRS S1, and includes the following sections: *Location of disclosures*, *Timing of reporting*, *Comparative information*, *Judgments*, *Uncertainties and errors*, and *Sources of guidance*. SMC 8 asked respondents whether they agree that the disclosure requirements proposed in the general requirements are appropriate for public sector entities, where the IPSASB saw broad support for the current drafting of the general requirements in the April 2025 check-in meeting (see [Agenda Item 2.2.9](#)).
5. In June 2025, the IPSASB had its first discussion of responses received, and decided that it was appropriate to retain the alignment of General Requirements to the relevant sections of IFRS S1 (see [Agenda Item 5.2.6](#)). The Board instructed staff to return with further analysis on the specific issues of principle that had been identified within General Requirements, which includes timing of reporting and location of disclosures.

Analysis

6. There was broad support for the current drafting of General Requirements, with respondents emphasizing the importance of presenting a complete set of financial and climate-related information to support decision-making. Respondents noted that this proposed approach ensures that users receive timely information, enhances the usefulness of the information for users in assessing the financial impacts of climate-related risks and opportunities, improves the connectivity between climate and financial information, and enhances transparency and accountability.
7. However, some respondents highlighted challenges to simultaneous reporting within GPFRs, where they shared the following concerns:
 - (a) **Timing of reporting:** Respondents that raised concerns in relation to reporting climate-related information at the same time as GPFRs pointed to challenges such as the timing and availability of secondary data with the financial reporting cycle, resource constraints in collecting and compiling climate information on an annual basis, and difficulties in cross-referencing reports with the proposed timing; and

- (b) **Location of disclosures:** Respondents that raised concerns about reporting climate-related information in GPFRs noted that information would be more comparable if in a standalone report. In addition, there were concerns regarding the assurance requirements applied on financial statements, and whether those would be expected to be applied to climate-related disclosures.

See [Appendix C](#) for a detailed summary of responses received.

8. Staff also note the consequential relationship between the two issues of principle identified from responses. Specifically, requiring that climate-related disclosures be presented within GPFRs means that they would be published at the same time as GPFRs. In response to the concerns raised by respondents:

- (a) Staff acknowledge that there are practical challenges to the proposed guidance, particularly in terms of capacity and data availability. However, staff note that these challenges are not unique to the public sector, and have also been identified by the ISSB in its [Feedback Statement to IFRS S1 and S2](#), where despite general support, stakeholders also identified concerns about the practical application of the proposed requirements including increased reporting burden, costs and time needed to collect and aggregate sustainability-related data.
- (b) Staff note that the following have been provided in the proposed drafting of the ED:
- (i) Paragraph 31(a) provides transition provisions providing temporary relief in the first reporting period, where entities are permitted to report climate-related disclosures within nine months of the end of the annual reporting period (discussed further in [Agenda Item 3.3.2](#));
 - (ii) Paragraph AG1.98 acknowledges that some secondary data sources rely on information collected in a reporting period that is different from the entity's own reporting period; and
 - (iii) Paragraph B.AG62 states that material information can be included in an entity's climate-related disclosures by cross-reference, provided that it is available on the same terms and at the same time as the climate-related disclosures;

See [Appendix C](#) for a detailed staff analysis to the responses received.

Public Sector Examples

9. In addition, to assess whether the challenges raised by respondents reflect widespread public sector-specific barriers, staff reviewed existing reporting practices in selected jurisdictions:
- (a) Australia – the [Australian Commonwealth Climate Disclosure \(CCD\) Requirements](#), which apply to Commonwealth entities and Commonwealth companies, require climate disclosures to be provided as an appendix to the entity's annual report, and to be reported at the same time as annual reports. This indicates that simultaneous reporting in the same report is feasible under a jurisdictional framework with appropriate support and planning; and
 - (b) Canada – The City of Mississauga voluntarily publishes both its financial statements and sustainability reports concurrently in a [Financial and Sustainability Report](#), further demonstrating that simultaneous disclosure is achievable in the public sector, even outside of mandatory disclosures; and

- (c) Singapore – The National Environment Agency provides an account of its corporate, financial and sustainability performance in an [Annual & Sustainability Report](#). Although not using the TCFD framework, sustainability information is reported in accordance with the GRI Standards and published as a part of its annual report.
10. Staff consider it important that climate-related information be provided as part of the GPFRs, and that the information is available at the same time as GPFRs. This reflects the connectivity between financial and sustainability information, the decision-usefulness of the information for primary users, and maintains alignment with private sector reporting practices.
11. Staff also acknowledge that there may be implementation challenges to reporting climate-related disclosures at the same time as GPFRs and within GPFRs. However, staff consider that these challenges are appropriately addressed by transition provisions and existing guidance, as highlighted in paragraph 8(b). In addition, existing public sector examples demonstrate the feasibility of the proposed approach.
12. Overall, staff did not identify a public sector-specific reason to depart from private sector guidance on the timing and location of disclosures. Accordingly, staff recommend that the IPSASB retain the proposed requirements in relation to timing of reporting and location of disclosures.

Decision Required

13. Does the IPSASB agree with the staff [recommendation](#)?

Appendix C: General Requirements – Responses and Analysis

1. The following table provides an overview of respondents' views on the key issues of principle identified in the proposed Appendix B: General Requirements, along with staff analysis addressing the concerns raised.

Issue of Principle	Respondent Support for Current Approach	Respondent Concerns	Staff Analysis
Timing of Reporting – Reporting climate-related disclosures at the same time as GPFRs	<ul style="list-style-type: none"> Enhances comparability and transparency Provide a complete set of information for decision-making, and improves decision usefulness and accountability Strengthens the connection between financial and climate-related information Aligns with user expectations for high-quality and decision-useful information, consistent with private sector reporting practices Some respondents noted that the proposed timing of reporting is feasible with transition relief 	Data Availability	
		The timing of climate data availability often does not align with the financial reporting cycle, as certain indicators and metrics may not be finalized until well after the financial year-end; Entities are often dependent on third-party or value chain data, particularly for Scope 3 GHG emissions, which can be delayed or incomplete, making timely and comprehensive disclosures difficult.	Staff recognize the dependence of secondary data on external parties, and that this may be a challenge to timely reporting. Staff also note that the ED has provided guidance to address the issue. Paragraph AG1.98 clarifies that while entities using secondary data must prioritize data that is timely and representative, it also acknowledges that such data may originate from different reporting periods.
		Resource Constraints	
		Public sector entities may face challenges due to limited internal capacity and resources, which can affect their ability to collect, compile, and validate climate-related information in line with financial reporting timelines. Respondents noted that the proposed timing of reporting may be too resource	Staff acknowledge that some public sector entities may face resource constraints that affect their ability to disclose climate-related information in line with financial reporting timelines, and believe that the principle of proportionality is important in this context. To address such challenges, the ED includes a set of proportionality

Agenda Item 3.2.3

		intensive for public sector entities to perform on an annual basis.	mechanisms, where entities are not required to disclose information that requires undue cost or effort (see Appendix B).
		Public Sector Reporting Cycle	
		A respondent noted that climate-related information is sometimes used for budget and resource allocation planning, rather than the evaluation of financial statements.	Staff acknowledge that this may be the case for some entities. However, the objective of the proposed Standard is to ensure that climate-related risks and opportunities are disclosed in a way that supports users of GPFRs, consistent with the IPSASB's Conceptual Framework.
		Jurisdictional Constraints	
		In some jurisdictions, legal or regulatory constraints can prevent the publication of cross-referenced or supplementary reports on the same timeline, where certain cross-reference reports require external assurance or verification mandated by public oversight bodies or legislation.	Staff recognize that this may be the case in some jurisdictions. However, staff note that the IPSASB developed the ED with flexibility to accommodate for such situations, where paragraph B.AG62 allows entities to cross-reference climate-related information on a conditional basis, provided that it is available on the same terms and at the same time as the climate-related disclosures.
		Frequency of Reporting	

		One respondent noted that the level of detail and frequency of governance and strategy arrangements may not change significantly on an annual basis, and recommended that the IPSASB consider the appropriate level of detail and frequency required for such disclosures.	Staff acknowledge that certain governance and strategy arrangements may not change significantly on an annual basis. However, staff are of the view that governance and strategy are foundational to understanding an entity's climate-related risks and opportunities, and should therefore be disclosed regularly, even where there are no major changes.
Location of Disclosures – Reporting climate-related disclosures in GPFRs	<ul style="list-style-type: none"> Enhances connectivity between climate-related information and financial information Provides a better assessment of the financial impact of climate-related risks and opportunities when in the same report Aligns with user expectations for high-quality and decision-useful information, consistent with private sector reporting practices 	Clarity and Comparability	
		A respondent noted that a standalone report would be more appropriate for entities with extensive climate-related activities. Another respondent added that clear separation of this information is important for the comparability of information between reports.	Staff acknowledge that some entities might have extensive climate-related disclosures as a result of its activities, and note that entities are welcome to provide a separate report as part of its GPFRs. However, staff are of the view that presenting climate-related disclosures within GPFRs, consistent with private sector guidance, strikes a balance by allowing flexibility in presentation while supporting connectivity and integration with financial reporting.
		Audit and Assurance	

Agenda Item 3.2.3

		A respondent was concerned that the assurance requirements applied on financial statements would be expected to be applied to climate-related disclosures, and assurance related to the climate-related disclosures should not adversely impact the unqualified audit opinion of the organizations' audited financial statements.	Staff note that the ED does not introduce any assurance requirements for climate-related disclosures, and assurance over such disclosures should be subject to jurisdictional regulations or at the entity's discretion. Staff also note that in practice, entities typically obtain assurance only over certain components of the GPFRs. Including climate-related disclosures within GPFRs does not mean that they are subject to the same assurance expectations as financial statements, nor should it affect the audit opinion.
		Greater flexibility needed for entities to present climate-related disclosures in a way that is most meaningful for primary users – a few suggested allowing public sector entities to report on their websites and only require a link to that information in annual reports.	Staff note that entities are not precluded from publishing their disclosures on other platforms, such as their websites. However, to support comparability, connectivity, and accessibility, staff are of the view that such disclosures should be included within the GPFRs. Entities may include links or cross-references within their GPFRs where this meets the needs of primary users.

Issue 3: Other Issues (SMC 10)

Question

1. Does the IPSASB agree with the staff recommendation?

Recommendation

2. Staff recommend that the IPSASB:
 - (a) Address the remaining issues as recommended below in the analysis; and
 - (b) Appropriately reflect Board response to these issues in the Feedback Statement.

Background

3. SMC 10 invited respondents to provide any additional comments to the ED, and was intended to capture all remaining comments not captured in SMCs 1-9.
4. In April 2025 (see [Agenda Item 2.2.11](#)), the Board reviewed the staff summary of these additional comments and confirmed that staff had appropriately summarized the significant issues raised by respondents. On that basis, the issues presented in this paper form the complete set of remaining matters requiring the Board's attention in relation to the responses received in relation to own operations.

Analysis

5. The table below shows a summary of additional issues raised by respondents, for which staff have *proposed changes*:

Description of Issue	Summary of Staff Recommendation
(c) Climate Financing Mechanisms	Staff recommend a non-authoritative Illustrative Guidance (IG) to address the disclosure of climate financing mechanisms. See full analysis in Appendix D .

6. The table below shows a summary of additional issues raised by respondents, where staff propose to *make no changes but instead to appropriately reflect the reasons for not making any changes in the Basis of Conclusions (BCs)*:

Description of Issue	Summary of Staff Recommendation to Make No Changes
(a) Adaptation and Mitigation	The ED appropriately addresses both aspects, and no public sector-specific reason was provided to support departing from the proposed guidance. See full analysis in Appendix D .

(b) Additional Definitions	The Board has previously considered these suggestions and no public sector-specific reason was identified to support revisions. See full analysis in Appendix D .
(d) Climate Stress Testing	Staff note that in practice, the term is often interchangeable with scenario analysis. See full analysis in Appendix D .
(e) Connectivity with financial statements	The proposed guidance ensures appropriate connectivity with financial statements, and no public sector-specific reason was provided to justify a departure. See full analysis in Appendix D .
(f) Consolidation	The proposed approach is aligned with private sector guidance and the international sustainability landscape. No public sector-specific reason was provided to justify a departure. See full analysis in Appendix D .
(g) Metrics and Targets	The ED appropriately reflects metrics and targets applicable to the public sector context, including jurisdictional commitments and carbon credit disclosures. See full analysis in Appendix D .
(h) Proportionality	Staff recommend strengthening communication around the proportionality mechanisms in the implementation phase. See full analysis in Appendix D .
(i) Statement of Compliance	Staff note that the two-phase approach and the transition relief provided in the ED appropriately address the need for flexibility in achieving full compliance over time. See full analysis in Appendix D .
(j) Statement of Emissions	Staff note that while entities may choose to provide a statement of emissions, the respondent did not provide a public sector-specific reason to depart from the proposed guidance. See full analysis in Appendix D .

Decision Required

7. Does the IPSASB agree with the staff [recommendation](#)?

Appendix D: Detailed Analysis of Other Issues Raised in SMC 10

1. The table below provides a detailed summary of additional issues raised by respondents, along with staff analysis and recommendations.

Description of Issue	Staff Analysis	Staff Recommendation
(a) Adaptation and Mitigation		
A few respondents highlighted that climate action is often framed around mitigation and adaptation. They expressed concern that the ED is overly focused on mitigation efforts, such as greenhouse gas reduction, while giving insufficient emphasis to adaptation and climate resilience, and urged the IPSASB to reflect the full spectrum of climate-related risks and strategies relevant to the public sector.	Staff acknowledge the importance of both mitigation and adaptation in climate action. However, staff also consider that the ED provides adequate disclosure requirements of both aspects. For example: (i) The strategy pillar requires entities to disclose current and anticipated mitigation and adaptation efforts; (ii) The metrics and targets pillar requires entities to disclose the objective of each target, including objectives for mitigation or adaptation.	No changes recommended, and to reflect reasons in BCs. Staff are of the view that the current drafting appropriately reflects climate-related information applicable to public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.
(b) Additional Definitions		
Some respondents suggested modifications or additional key definitions to enhance clarity and consistency, including those that are based off IFRS S2. These suggestions include additional definitions for: <ul style="list-style-type: none"> Climate change; Sustainability; and Revising the proposed definition for definitions that are aligned with IFRS S2: <ul style="list-style-type: none"> Climate resilience; CO₂ equivalent; 	In developing the ED, the IPSASB reviewed existing definitions across the broader sustainability reporting landscape and did not identify any public sector-specific justification for departing from the definitions used in private sector guidance. With respect to the suggestion to reconsider the term “own operations”: <ul style="list-style-type: none"> Staff note that the term “own operations” is informally associated with Scopes 1 and 2 emissions in the GHG Protocol, whereas in the ED it refers to Scopes 1, 2 and 3 emissions; 	No changes recommended, and to reflect reasons in BCs. Staff are of the view that the current drafting provides appropriate guidance for public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance. In addition, subject to drafting decisions at future meetings, staff consider that further work will be required in developing the draft final pronouncement to determine

Description of Issue	Staff Analysis	Staff Recommendation
<ul style="list-style-type: none"> Global warming potential; Greenhouse gases; Value chain; and <p>Considering an alternative terminology for:</p> <ul style="list-style-type: none"> Own operations. 	<ul style="list-style-type: none"> As a result of the IPSASB's decision to proceed with a two-phase approach, and with Phase 1 now positioned as an alignment project with IFRS S2, staff consider that the use of the term "own operations" may no longer be necessary and may be phased out as the IPSASB develops the final pronouncement, subject to drafting considerations in the upcoming meetings. 	<p>whether the term "own operations" should be retained.</p>
(c) Climate Financing Mechanisms		
<p>One respondent highlighted the need for clearer guidance on disclosing climate financing mechanisms for climate programs, such as green bonds, sustainability-linked bonds, blended finance models, and public-private partnerships.</p>	<p>Staff acknowledge the growing use of climate financing instruments and note that this need has been raised during several outreach events.</p> <p>While the ED is not intended as a climate financing standard and does not explicitly reference such mechanisms, staff note that these instruments should be reflected in an entity's financial statements, and that the principles in the ED can support related disclosures where relevant.</p> <p>However, staff also note that the IPSASB has undertaken some work in this area, having issued non-authoritative guidance in RPG 1 and RPG 3 that addresses the reporting of sustainability program information, including programs financed through green bonds.</p>	<p>In consideration of the existing relevant work by the IPSASB, staff recommend providing an additional non-authoritative Illustrative Guidance (IG) to address the disclosure of climate financing mechanisms within the standard, with a draft to be brought forward for consideration at the next meeting. For example:</p> <ul style="list-style-type: none"> What information should an entity disclose in relation to green financing instruments?

Description of Issue	Staff Analysis	Staff Recommendation
(d) Climate Stress Testing		
One respondent posed that, in addition to scenario analysis, the ED should require climate stress testing to ensure the long-term fiscal sustainability of the public sector entity.	<p>Staff note that the terms “stress testing” and “scenario analysis” are in many cases, used interchangeably in practice.</p> <p>In addition, the ED does not preclude entities from providing additional disclosures – staff encourage entities to refer to RPG 1 and RPG 3 in consideration of the entity’s long-term fiscal sustainability.</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff are of the view that the current drafting provides appropriate guidance for public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>
(e) Connectivity with financial statements		
One respondent felt the proposed climate-related disclosures should be better integrated with the financial statements.	<p>Staff note that the proposed climate-related disclosures are intended to be a part of GPFRs, consistent with the IPSASB CF. Accordingly, these disclosures are expected to be situated within the broader financial report, even if they are presented outside the financial statements themselves. Staff consider that the proposed approach ensures appropriate connectivity with the financial statements.</p> <p>Overall, staff did not identify a substantive rationale to support a departure from the proposed guidance.</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff are of the view that the current drafting provides appropriate guidance for public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>
(f) Consolidation		
One respondent also raised the challenges that could arise from “heterogenous sustainability reporting standards” in the public sector, where “consolidation” could be further complicated in jurisdictions where some entities (e.g., state-owned enterprises)	<p>Staff note that consolidation considerations primarily arise in relation to the Metrics and Targets pillar, particularly in the context of GHG emissions reporting.</p> <p>Within GHG emissions, staff observed that international sustainability reporting standards (IFRS S2, GRI 102: Climate Change 2025) also align with</p>	<p>Staff are of the view that the current drafting provides appropriate guidance for public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>

Description of Issue	Staff Analysis	Staff Recommendation
<p>are required to report under different sustainability reporting standards.</p> <p>In addition, a few respondents raised concerns about the reporting entity and “consolidation”, noting that the ED needs to be “more specific on consolidation”.</p>	<p>the GHG Protocol, and therefore do not expect significant divergence from other international sustainability reporting standards.</p> <p>From an accounting perspective, the IPSAS approach to consolidation is fully aligned with private sector standards. Staff note that respondents who raised concerns in this area did not offer suggestions as to how the proposed guidance can be made “more specific on consolidation”, and are also of the view that the concerns are made in relation to measurement approaches, rather than “consolidation” in the accounting context.</p> <p>Specifically, BC101-BC104 of IFRS S2 indicate that while the GHG Protocol allows entities to choose amongst different measurement approaches, these differences do not reflect inconsistencies in consolidation.</p> <p>In addition, staff note that the GHG Protocol has identified consolidation as one of its key themes in its Summary of Proposal Submissions Related to Corporate Standard, and ongoing revisions may lead to further developments in this area.</p> <p>Finally, staff acknowledge that consolidation considerations may present added complexity in the context of public policy programs, which will be considered and revisited when the IPSASB moves ahead to Phase 2 of its climate-related disclosures project.</p>	<p>Staff further note that consolidation considerations will need to be revisited when the IPSASB develops its climate-related disclosures standard for public policy programs.</p>

Description of Issue	Staff Analysis	Staff Recommendation
(g) Metrics and Targets		
One respondent noted that in addition to laws and regulation, the IPSASB should acknowledge that government policy can also drive the climate-related targets public sector entities are expected to work towards.	<p>Staff acknowledge the role of jurisdictional commitments and policies in shaping climate-related targets, but are of the view that that the current drafting appropriately addresses these concerns.</p> <p>Paragraph 21 of the ED requires entities to disclose how the latest international climate agreement – and any related jurisdictional commitments – has informed each target. This is intended to reflect the broader drivers towards an entity’s climate-related targets.</p> <p>In addition, as a part of <i>Understanding the Entity’s Context</i>, the ED highlights the importance of considering an entity’s own activities, relationships, and stakeholders, as well as the broader sustainability context, including national targets and commitments relevant to subnational entities.</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff are of the view that the current drafting provides appropriate guidance for public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>
One respondent suggested that the Standard should require disclosure of carbon credits purchased, rather than solely focusing on the entity’s planned use of carbon credits.	<p>Staff note that the purchase of carbon credits is a financial transaction and should be recognized in an entity’s financial statements. In addition, AG1.115 states that entities may also disclose carbon credits already purchased if they are intended to be used toward meeting net greenhouse gas emissions targets.</p> <p>Accordingly, the guidance does not preclude entities from disclosing carbon credits they have purchased. Staff are of the view that this proposed disclosure requirement, which is aligned with IFRS S2, provides a forward-looking disclosure focus while allowing</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff are of the view that the current drafting provides appropriate guidance for public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>

Description of Issue	Staff Analysis	Staff Recommendation
	relevant historical information to be included where it meets user needs.	
(h) Proportionality		
Some respondents called for the IPSASB to consider proportionality, particularly for smaller public sector entities and jurisdictions. They expressed concern about the potential reporting burden, noted that the private sector standards are typically mandated for large publicly traded companies, and highlighted the importance that the requirements are scalable and adaptable to the size, capacity, and nature of different entities.	<p>Staff acknowledge the importance of considering proportionality for public sector entities, particularly for smaller entities. Staff note that the ED already incorporates several proportionality mechanisms (see Appendix C), including disclosure requirements that require entities to (i) use all reasonable and supportable information that is available at the reporting date without undue cost or effort; and approaches that are (ii) commensurate with the skills, capabilities and resources that are available to the entity.</p> <p>While respondents emphasized the need to ensure proportionality, staff note that no specific alternatives were suggested for the public sector context.</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff recommend that the IPSASB consider strengthening communication around the proportionality mechanisms embedded in the Standard during the implementation phase.</p> <p>For example, material similar to the ISSB's Factsheet Series – Proportionality Digest might be beneficial for preparers.</p>
(i) Statement of Compliance		
One respondent suggested that the IPSASB consider allowing a partial statement of compliance to support broader adoption, recognizing that full compliance will take multiple years to achieve.	<p>Staff note that allowing for a partial statement of compliance may facilitate broader adoption over time. However, the IPSASB's decision to proceed with a two-phase approach, through the development of two climate-related disclosures standards for own operations and public policy programs, was in part intended to address this concern (see Agenda Item 5.2.2).</p> <p>In addition, staff note that the ED provides transition relief (Agenda Item 3.2.2), recognizing that full</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff are of the view that the current drafting appropriately reflects climate-related information applicable to public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>

Description of Issue	Staff Analysis	Staff Recommendation
	compliance may take time to achieve and allowing entities to build capacity over time.	
(j) Statement of Emissions		
One respondent suggested that the IPSASB requires entities to disclose a summary statement of GHG emissions to provide users with a comprehensive view of the entity's overall climate impact.	<p>This standard is based on the four pillars of Governance, Strategy, Risk Management, and Metrics and Targets.</p> <p>Staff note that while a summary of GHG emissions may be a useful way for some entities to present their climate-related information, the proposed Standard adopts a principles-based approach that allows entities flexibility in how disclosures are structured and communicated.</p> <p>This type of summary statement is not required under IFRS S2, and staff have not identified a public sector-specific reason to introduce such a requirement. Entities are welcome to include a summary if they consider it useful for users, not precluding from reporting at the national level but staff are of the view that this should remain at the entity's discretion.</p>	<p>No changes recommended, and to reflect reasons in BCs.</p> <p>Staff are of the view that the current drafting appropriately reflects climate-related information applicable to public sector entities, and did not identify a public sector-specific reason to depart from the proposed guidance.</p>

Issue 4: Structure of [draft] IPSASB SRS 1

Question

1. Does the IPSASB agree with the staff recommendation?

Recommendation

2. Staff recommend that the IPSASB maintain the overall structure of the ED in developing the [draft] IPSASB SRS 1, and removing the relevant Public Policy Program guidance.

Background

3. In June 2025, the IPSASB decided to separate the climate-related disclosures project into two phases, first addressing the Own Operations reporting perspective and then developing a separate standard for the Public Policy Program perspective.
4. To advance the project, staff informed the Board that a full draft of the final pronouncement would be presented in September 2025 ([Agenda Item 5.2.8](#)). This paper presents a high-level overview of the proposed structure for IPSASB SRS 1, enabling Board members to provide feedback on the overall structure prior to reviewing the draft final pronouncement in September 2025.

Analysis

5. The primary distinction between the ED and the final pronouncement is the removal of Public Policy Programs guidance, which addresses recurring concerns relating to the complexity of the ED. To further reduce the complexity of the proposed structure of the ED, respondents suggested that the IPSASB take the following actions:
 - (a) **Relocate the definitions to an appendix to improve the readability of the final standard** – Staff note that IPSAS have historically provided definitions at the beginning of each standard. To maintain consistency across IPSASB publications, staff are of the view that it is preferable to retain the IPSASB's approach rather than introduce a new structure for the IPSASB SRS;
 - (b) **Prominently state that IPSASB SRS is a standalone framework**, independent of IPSAS or any GAAP – Staff note that paragraph 6 of the Exposure Draft already clearly states that the SRS is a standalone framework, separate from IPSAS and any other financial reporting frameworks;
 - (c) **Enhance signposting on materiality** from the main text to the relevant appendices, to clearly inform preparers that all disclosures are subject to materiality considerations – Staff note that this was an instruction from the June 2025 meeting ([Agenda Item 3.1.2](#)) and will be reflected in the draft final pronouncement; and
 - (d) **Develop a separate standard for Appendix B: General Requirements** – Staff note that in June 2025, the Board decided that it was appropriate to retain Appendix B: General Requirements within the Standard (see [Agenda Item 5.2.6](#)). Further, the upcoming [2025 Work Program Consultation](#) will seek input from constituents on whether to prioritize a future project to develop a general sustainability-related disclosures standard that is aligned with IFRS S1.
6. The table below summarizes the proposed structure for the final pronouncement, along with the structure of the IPSASB SRS ED 1 and IFRS S2.

Agenda Item 3.2.5

IPSASB SRS 1	IPSASB SRS ED 1	IFRS S2
Objective	Objective	Objective
Scope	Scope	Scope
Definitions	Definitions	Core Content
Governance	Governance	<ul style="list-style-type: none"> Governance
Strategy	Strategy	<ul style="list-style-type: none"> Strategy
Risk Management	Risk and Outcome Management	<ul style="list-style-type: none"> Risk Management
Metrics and Targets	Metrics and Targets	<ul style="list-style-type: none"> Metrics and Targets
Effective Date and Transition	Effective Date and Transition	Appendix A: Defined Terms
Appendix A: Application Guidance	Appendix A1: Application Guidance – Own Operations	Appendix B: Application Guidance
Appendix B: General Requirements for Climate-related Disclosures	Appendix A2: Application Guidance – Climate-related Public Policy Programs	Appendix C: Effective Date and Transition
Appendix B.AG: Application Guidance – General Requirements for Climate-related Disclosures	Appendix B: General Requirements for Climate-related Disclosures	
Appendix C: Qualitative Characteristics	Appendix B.AG: Application Guidance – General Requirements for Climate-related Disclosures	
Basis for Conclusions	Appendix C: Qualitative Characteristics	
Implementation Guidance	Basis for Conclusions	
Illustrative Examples	Alternative View	
Comparison with IFRS S2	Implementation Guidance	
	Illustrative Examples	
	Comparison with IFRS S2	

Decision Required

7. Does the IPSASB agree with the [staff recommendation](#)?

Next Steps

Purpose

1. This paper provides an update for delivering the first phase of the climate-related disclosures project, including a timeline that staff intend to deliver on.

Project Plan

2. The updated project timeline below summarizes the cross-cutting issues and issues of principle, as identified and discussed in the April 2025 meeting. The items highlighted in grey represent completed discussions.
3. A project plan for Phase 2, which covers the Public Policy Program guidance, will be presented in due course as the IPSASB progresses the project.

#	Thematic Category	Issue	Agenda Item
June 2025			
1	Cross-cutting Theme	Single or separate standards	Agenda Item 5.2.2
2	Issues of Principle	Own Operations – Alignment with IFRS S2	Agenda Item 5.2.3
3	Issues of Principle	Own Operations – Use of GHG Protocol	Agenda Item 5.2.4
4	Issues of Principle	Own Operations – Scope 3 GHG emissions	Agenda Item 5.2.5
5	Issues of Principle	General Requirements – Alignment with IFRS S1	Agenda Item 5.2.6
6	Issues of Principle	Materiality	Agenda Item 5.2.8
July 2025			
7	Issues of Principle	Transition	Agenda Item 3.2.2
8	Issues of Principle	General Requirements – Timing and location of reporting	Agenda Item 3.2.3
9	N/A	SMC 10 – Other issues	Agenda Item 3.2.4
10	Issues of Principle	Outline of structure	Agenda Item 3.2.5
September 2025			
11	Issues of Principle	Review restructured standard	September 2025
12	Implementation Issue	Materiality (<i>Interface with materiality project Phase 3 – Other guidance needed?</i>)	September 2025
13	Issues of Principle	Own Operations – Any additional issues	September 2025
October 2025			
14	N/A	Review drafting and implementation of decisions	October 2025
December 2025			
15	N/A	Final review of drafting	December 2025
16	N/A	Approval of final pronouncement	December 2025
17	N/A	Effective Date	December 2025
2026			
18	N/A	Phase 2 of Project	March 2026 Onwards

Decision Required

4. No decision required. For information purposes only.