



SUPPORTING DOCUMENT 1 – CLIMATE-RELATED DISCLOSURES: PUBLIC POLICY OUTCOMES FINAL PRONOUNCEMENT DASHBOARD

Topic	Past Meetings	March 2026	June 2026	Sept 2026	Dec 2026
Project Management		✓			
Review of responses and identification of key themes and other issues	✓	✓	✓	✓	
Review the draft Final Pronouncement					
Review and approve the Final Pronouncement					
Climate-related Outcomes of Public Policies – Key Issues					
Structure of the standard		✓			
Scope of public policy programs		✓			
Public sector-specific definitions		✓			
Responsibility for public policy programs					
Governance					
Strategy					
Outcome Management					
Metrics and targets					
Transition					
Conceptual Foundations					
General Requirements					

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

Supporting Document 2 – Response Analysis to SMC 3 (Responsibility for Public Policies with Climate-related Outcomes)

1. This paper provides supporting information to [Agenda Item 5.A.1](#).

April Summary of Responses

2. SMC 3 of the ED asked respondents whether they agreed with the proposed scope and approach to require disclosures on public policy programs with a primary objective to achieve climate-related outcomes. Seventeen respondents provided specific comments on the responsibility for outcomes as part of their response to SMC 3.
3. Most respondents provided specific suggestions and examples to enhance the proposed guidance, cautioning that insufficient guidance may result in gaps in disclosures and lack of clarity for primary users. Specifically, the feedback called on the IPSASB to:
 - (a) Provide additional guidance on determining the disclosures required of an entity where responsibility is shared across multiple public sector entities;
 - (b) Consider that entities have limited direct control of outcomes; and
 - (c) Address the relationship between individual entity-level reporting and whole-of-government reporting.

Staff Analysis to April 2025 Summary of Responses

Summary of Responses	Staff Analysis and Recommendation
Shared Responsibility	
Ambiguity of accountability for achieving intended outcomes may result in disputed responsibility or gaps in disclosure, or entities concluding that they do not have responsibility for outcomes that could be reasonably attributed to them.	Staff recommend that the change to “responsibility for public policies with climate-related outcomes” can help reduce the ambiguity of identifying responsibility for outcomes. See Agenda Item 5.A.1 for further proposed disclosure requirements on roles and responsibilities of other entities with shared responsibility for a public policy.
Integration and collaboration across entities is needed to provide users with a complete picture of the program's impact.	Staff note that the strategy disclosures in the ED paragraph AG2.24 requires entities to disclose their role and responsibilities with relation to the policy. Staff recommend adding disclosures about other entities involved where responsibilities are shared. See paragraph 12(a) in Appendix 1 to Agenda Item 5 .
Where entities share responsibility and jointly contribute, such as subsidies funded by both federal and local	Where multiple entities determine they have responsibility for different parts of a public policy,

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governments, it is unclear whether entities should be reporting on the entire program or if each entity make disclosures on part of the program.

entities shall provide disclosures about their own responsibility.

Staff recommend including this clarity in illustrative guidance IG4 and IG8. See proposed drafting revisions below.

IG4. Does a subnational government have responsibility for public policy with climate-related outcomes~~climate-related commitments set at a national level?~~

A: It depends. An entity will need to exercise judgment to determine whether or not it has delegated sovereign powers and responsibility for ~~outcomes of a climate-related~~ public policy ~~program that contributes to national climate commitments.~~

For example, a national government may create a public policy and provide funding for it to a subnational government to design a public policy for its jurisdiction. Although the subnational government does not have national level sovereign powers, it may have responsibility for designing and implementing public policy ~~programs~~ for its own jurisdiction, and must assess whether it has responsibility for the ~~outcomes of a climate-related~~ public policy ~~program~~ delegated by the national government. Entities shall report on the climate-related outcomes with respect to its role and responsibilities for the public policies where responsibilities are shared.

IG8. Do entities need to disclose all outcomes of ~~climate-related~~ public policy ~~programs~~?

A: No. Entities are only required to disclose information about those climate-related outcomes that are reasonably attributable (see paragraph 6) to the ~~climate-related~~ public policy ~~program~~ and that are expected to be material (paragraphs B8–B10) to primary users of the entity's general purpose financial reports.

Where responsibility for public policy is shared across multiple entities, entities shall report on the climate-related outcomes with respect to its role and responsibilities for the public policies.

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Where multiple entities share responsibility for a public policy program, entities may not be able to properly provide certain disclosures, such as strategy or financial implication where the development of strategy or funding and expenses are at another entity.	Similar to the above response on the need for integration and collaboration across entities, staff recommend that adding disclosures about other entities involved where responsibilities are shared would provide information for users to understand the role of other entities and identify those other entities that are share responsibility.
Some public policies are set by legislators (e.g., council, parliament) which themselves are not reporting entities, and operationalized by other government bodies (e.g. government agencies).	Though policies may be set by a council or parliament, these bodies would delegate responsibility for the policy to other government entities. Staff note that the factors provided in paragraph AG2.8 of the ED would address this delegation of responsibility.
Control over Outcomes	
Three respondents expressed strong views on the challenges for governments to be held responsible for outcomes. Two of these respondents pointed to the fact that outcomes of policies are dependent on the action or inaction of the broader market, society, third party or individuals, and therefore there is a view that it may not be possible for governments to be held responsible for outcomes. The third respondent noted that outcomes of policies are dependent on how an individual policy interacts with other policies as part of an economy wide “policy mix”; and, therefore, other policies also affect the climate-related outcomes of an individual policy.	<p>Staff note that AG2.12 of the ED acknowledged that “public policy program outcomes are often driven by interactions and dependencies outside the entity’s direct control through a series of cause-and-effect relationships. Factors beyond the entity’s control may intervene to either hinder or facilitate the entity’s achievement of a public policy program outcome. An entity’s identification of climate-related public policy program outcomes shall consider the extent to which outcomes can be attributed to the entity’s public policy programs and other factors that have influenced the outcomes...Disclosures shall be sufficient to ensure that the primary users can understand the entity’s role with respect to either improving or worsening public policy program outcomes.”</p> <p>Staff recommend additional drafting may be added to include examples of external factors such as broader market, society, individuals and policy mix noted in constituents’ comments to enhance the drafting and emphasize that entities should be held accountable for what they can control, including the ability to revise policies and tools used to achieve their objectives. See paragraph AG16 in Appendix 1 to Agenda Item 5 for proposed changes.</p>
Level of Reporting	
Two respondents noted that the ED does not address the interlinkage between reporting by a single public sector entity	Staff recommend adding a BC on this issue to explain the Board’s intention and thinking behind the interlinkage and how individual reporting entity level

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versus whole-of-government. One questions the usefulness of single public sector entity reporting and the other recommends providing clarity to avoid any unintended confusion for primary users of information.	information should support and enhance quality of information for whole-of-government reporting.
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Supporting Document 3 – Response Analysis to SMC 5 (Strategy)

1. This paper provides supporting information to Agenda Item 5.A.2.

April Summary of Responses

2. SMC 5 of IPSASB SRS ED 1 asked respondents whether they agreed that the proposed disclosure requirements regarding an entity's strategy for climate-related public policy programs meet the information needs of primary users.
3. In April 2025, the Board reviewed a summary of responses to IPSASB SRS ED 1, including the responses to SMC 5 ([Agenda Item 2.2.6](#)), and agreed that the staff summary appropriately captured all significant issues raised by respondents.
4. Overall, some respondents agreed that the proposed disclosure requirements on strategy for climate-related public policy programs meet the information needs of primary users. Respondents noted that the proposed disclosure requirements provide useful information for users to understand the rationale for the public policy program, the expected outcomes, and the quality of the public policy program over time:
 - (a) Strategy and decision-making – Some respondents agreed that the proposed disclosure requirements on strategy for climate-related public policy programs meet the information needs of primary users. Respondents noted that the proposed disclosure requirements provide useful information for users to understand the rationale for the public policy program, the expected outcomes, and the quality of the program over time;
 - (b) Anticipated challenges to achieving intended outcomes – Some respondents agreed that the proposed disclosure requirements on anticipated challenges provides useful information for users to understand, assess the program's effectiveness and the entity's approach to addressing climate-related issues; and
 - (c) Financial implications of climate-related public policy programs – Some respondents agreed that the proposed disclosure requirements on financial implications of climate-related public policy programs provide useful information for users, especially the linkage to public sector budgets.
5. Despite some support for the required disclosures, respondents also expressed concerns regarding the disclosure requirements, which are presented in the table below, along with staff analysis and recommendations:

Staff Analysis to April 2025 Summary of Responses

Summary of Responses	Staff Analysis
<i>Strategy and Decision-Making</i>	
A few respondents highlighted a need for strategy disclosures to better reflect public sector decision-making, emphasizing the	<i>Trade-off decisions and just transition</i> Staff acknowledge the importance of addressing trade-off decisions and just transition, particularly as the scope of disclosure now focuses on public policies which may have intended economic or social outcomes. Staff note that this has

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<p>importance of addressing trade-off decisions, scenario analysis, and broader strategic considerations – such as just transition goals, intersectoral governance, and complementary strategic actions arising from external partnerships.</p>	<p>now been elevated to paragraph 11(d)(i) of the core text, where entities are required to disclose factors and assumptions used in designing its public policies, including whether there were any trade-off decisions between climate-related outcomes and other outcomes. Further, examples on public policy outcomes (now in AG7) have been revised to better represent real life trade-off decisions, including which a public policy with a positive social impact might result in a negative environmental impact.</p> <p><i>Scenario analysis</i></p> <p>Two respondents asked for further guidance on the use of scenario analysis in public policies, noting that scenario analysis enables entities to stress-test policies and public policy outcomes across different climate scenarios. Staff note that AG2.25(b) of the ED addressed how scenario analysis might have informed policy design, and recommend that the Board further elaborate to show how scenario analysis can be used in the context of public policies:</p> <p><i>AG19. ... the entity may need to consider various factors in its decisions to set public policies, for example: ... A climate-related scenario analysis, <u>which may be used to that provided information for policy design, stress-test public policy outcomes under different climate scenarios, and could inform an entity in establishing its policy scenario (see paragraph AG27).</u></i></p> <p><i>Broader strategic considerations</i></p> <p>Staff view that in addition to respondents who highlighted broader strategic considerations, such as intersectoral governance arrangements and the need for complementary strategic actions, there was a consistent theme across responses emphasizing the importance of coordination across public sector entities. On this basis, staff consider it appropriate to address policy coherence through an entity's considerations in setting public policies:</p> <p><i>AG19. ... the entity may need to consider various factors in its decisions to set public policies, for example: ... <u>Policy coherence and coordination, such as how the public policy interacts with other public policies and other entities, and the extent to which achieving the policy objectives depends on coordinated actions across entities and public policies.</u></i></p>
<p>A few respondents noted that the broad scope and level of detail may create significant</p>	<p>Staff acknowledge that some public sector entities may face resource constraints and significant challenges to providing disclosures. Staff have considered proportionality mechanisms</p>

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administrative burdens, particularly for large or complex public sector entities. Some questioned whether the disclosures are duplicative and would potentially divert resources away from tangible climate action.	(see Agenda Item 5.A.2) and implementation guidance (see Implementation Guidance section below). Staff recommend adding a BC on this issue to explain the Board's intention and thinking behind the interlinkage and how individual reporting entity level information should support and enhance quality of information for whole-of-government reporting, rather than to be duplicative and divert resources from climate action.
Two respondents questioned the relevance of the proposed strategy and decision-making disclosure requirements for climate-related public policy programs, noting that they may duplicate existing international climate reporting frameworks (e.g. Paris Agreement, UN SDGs).	Staff note that while two respondents questioned the relevance of the proposed disclosure requirements, other respondents considered that the proposed disclosures would provide useful information. Staff recommend adding a BC on this issue to explain the Board's intention and thinking behind the interlinkage and how individual reporting entity level information should support and enhance quality of information for whole-of-government reporting, and the complementarity of entity level disclosures with international and national reporting frameworks.
<i>Anticipated Challenges to Achieving Intended Outcomes</i>	
Some respondents noted concerns around the potential sensitivity of information to disclosing "anticipated challenges", which may result in unfavorable outcomes if publicly available.	Staff note that disclosure requirements in relation to "anticipated challenges to achieving intended outcomes" are proposed for removal in Agenda Item 5.A.4 . Staff also note that BC102 of the ED notes the IPSASB's deliberations in relation to sensitive information, which notes that "...such [sensitive and/or confidential] 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."
One respondent suggested that the IPSASB also require disclosures on anticipated opportunities, such as job creation, to provide a more balanced and informative view for stakeholders.	Staff note that paragraph 13(a)(i) of the [draft] Standard (see Appendix 1), which includes "other outcomes, such as economic or social effects", would encompass these "anticipated opportunities" identified by the respondent, such as job creation.
<i>Financial Implications of Climate-related Public Policy Programs</i>	
Some respondents agreed that the proposed disclosure requirements on financial	See Agenda Item 5.A.2 for staff analysis on financial implications.

<p>implications of climate-related public policy programs provide useful information for users, especially the linkage to public sector budgets.</p> <p>However, there were also some respondents who felt the proposed approach may not capture the broader impact of climate-related public policy programs. They noted that the financial implications of climate-related public policy programs are likely to extend beyond the reporting entity, with a broader impact on the economy, environment and people, potentially leading to a misalignment with the IPSASB's intended scope.</p>	
<p><i>Implementation Guidance</i></p>	
<p>Respondents highlighted that some entities, particularly in resource-constrained contexts, may face challenges in disclosing the financial implications of climate-related public policy programs, due to limited data infrastructure, technical capacity, and experience with climate-related financial disclosures. They recommended that the IPSASB provide further guidance in this area, including methodologies and examples.</p> <p>A few respondents noted that the broad scope and level of detail may create significant administrative burdens, particularly for large or</p>	<p>Staff acknowledge that some public sector entities may face resource constraints, in particular in applying specific disclosure requirements such as financial implications and estimating GHG emissions reasonably attributable to a public policy.</p> <p>Overall, considering feedback received, staff propose to introduce proportionality mechanisms in relation to the current and anticipated financial implications of climate-related outcomes of public policies (see Agenda Item 5.A.2), and for disclosures on GHG emissions reasonably attributable to a public policy (see Agenda Item 5.A.3).</p> <p>Staff also note that these comments will be further considered during the implementation phase of the project.</p>

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complex public sector entities. Some questioned whether the disclosures are duplicative and would potentially divert resources away from tangible climate action.	
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Supporting Document 4 – Response Analysis to SMC 6 (Metrics and Targets)

1. This paper provides supporting information to [Agenda Item 5.A.3](#).

April Summary of Responses

2. SMC 6 asked respondents whether they agreed that the proposed disclosure requirements on metrics and targets for climate-related public policy programs meet the information needs of primary users.
3. In April 2025, the Board reviewed a summary of responses to IPSASB SRS ED 1, including the responses to SMC 6 ([Agenda Item 2.2.6](#)), and agreed that the staff summary appropriately captured all significant issues raised by respondents.
4. Some respondents were supportive of the IPSASB's proposed disclosures regarding the change in GHG emissions reasonably attributed to climate-related public policy programs. These respondents highlighted the decision-usefulness of this information for users. In addition, most respondents supported disclosure requirements on other metrics for climate-related public policy programs.
5. Despite some support for the required disclosures, respondents also expressed concerns regarding the disclosure requirements, which are presented in the table below, along with staff analysis and recommendations:

Staff Analysis to April 2025 Summary of Responses

Summary of Responses	Staff Analysis and Recommendation
<i>GHG Emissions</i>	
Some respondents noted the potential challenges with the complexity of the topic. In particular, they highlighted the complexity in attributing GHG emissions to specific public policy programs due to external factors and limitations in current data structures, and the estimation and attribution of GHG emissions to specific public policy programs, particularly in determining what may be considered “reasonably attributable”.	<p>Staff acknowledge that the disclosure requirement to attribute GHG emissions to public policies may present challenges for some entities. As described in paragraphs AG2.34 to AG2.36 of the ED, this would require entities to estimate emissions in the presence of the policy (“policy scenario”) against a baseline level of emissions without the policy (“baseline scenario”).</p> <p>Staff note that the capability required to prepare such disclosures is likely to vary across public sector entities and jurisdictions, and may be concentrated in well-resourced national finance and environment ministries. In addition, the data inputs required to prepare the information, including baseline emissions data and behavioral parameters, is also likely to differ across entities and jurisdictions.</p> <p>Accordingly, staff considered whether proportionality mechanisms could help address the practical challenges identified by respondents while retaining the usefulness of the disclosures for primary users. See Agenda Item 5.A.3</p>

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Summary of Responses	Staff Analysis and Recommendation
	for staff analysis and recommendations on proportionality mechanisms regarding attributing GHG emissions to public policies.
Some respondents questioned the added value of metrics and targets for climate-related public policy programs given the existence of established international and national reporting frameworks (e.g. the Paris Agreement and green budgeting processes). They cautioned that the proposed disclosure requirements may lead to duplication of reporting efforts and potentially create inconsistencies.	Staff note that although some respondents expressed these concerns, other respondents highlighted the importance of disclosures relating to greenhouse gas emissions attributable to public policies and progress towards climate-related targets. Staff recommend adding a BC on this issue to explain the Board's intention and thinking behind the interlinkage and how individual reporting entity level information should support and enhance quality of information for whole-of-government reporting, and the complementarity of entity level disclosures with international and national reporting frameworks.
<i>Other Metrics</i>	
One respondent suggested that entities be required to disclose the basis for selecting such metrics to reinforce transparency and accountability.	Staff acknowledge the importance of understanding an entity's considerations on selecting metrics it uses to monitor climate-related outcomes of public policies. Staff recommend the disclosures require an entity to explain "the reason why (it) has chosen the metric", consistent with SRS 1 metric requirements.
<i>Climate-related Targets</i>	
One respondent suggested that the Standard require disclosures on the contribution of climate-related public policy programs towards broader policy objectives.	Staff note that as a result of the March 2026 decision, the [draft] Standard would focus on the climate-related outcomes of public policies, which would provide information on the broader public policy. Staff further note that that the proposed Strategy disclosures require entities to describe the specific objectives of the public policy, as well as the entity's public policy mandate, and are of the view that the proposed disclosure requirements adequately address the respondent's suggestion.
<i>Implementation Guidance</i>	
Respondents raised a variety of areas that require additional implementation support, including further guidance on the appropriate methodologies to	Staff note that paragraphs AG2.34–AG2.37 of the ED provides guidance on methodologies entities may consider when estimating GHG emissions attributable to public policies, including the Greenhouse Gas Protocol Policy and

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Summary of Responses	Staff Analysis and Recommendation
estimate GHG emissions reasonably attributable to climate related public policy programs and baseline metrics for specific public sector functions.	Action Standard (2014), which includes methodologies for estimating baseline scenarios and policy scenarios. Staff also note that suggestions on areas requiring implementation support will be further considered during the implementation phase of the project.