

CLIMATE-RELATED DISCLOSURES: PUBLIC POLICY OUTCOMES 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			✓		
Conceptual Foundations					
General Requirements					
Transition Relief					
Proportionality					

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

Supporting Document 1 – Response Analysis to SMC 9 (Transition)

1. This paper provides supporting information to [Agenda Item 8.A.4](#). It sets out the transition relief available in IPSASB SRS 1, the principles the IPSASB gave for providing these reliefs, and how these principles apply to the [draft] Standard.

Transition Relief in IPSASB SRS 1

2. IPSASB SRS 1 provides transition relief in paragraphs 39 to 43, as summarized below:

Table 1: Transition relief in IPSASB SRS 1

Transition relief	Length of relief
Disclosures for any period before the date of adoption, so that no comparative information is required	First annual reporting period
Publishing climate-related disclosures at the same time as the related financial statements, allowing publication within nine months of the period end	First annual reporting period
Disclosing Scope 3 greenhouse gas (GHG) emissions	First three annual reporting periods

3. Each of these reliefs applies for the first annual reporting period, except for Scope 3 GHG emissions, where the Board provided three years of transition relief to allow entities time to build the processes and systems needed to capture emissions data across complex public sector value chains. In July 2025 ([Agenda Item 3.2.2](#)), the Board agreed to extend the Scope 3 relief from one year to three years based on the following rationale:
 - (a) The GHG Protocol was under revision, with the revised Scope 3 standard expected in the fourth quarter of 2027, so a multi-year period would let preparers align with the revised international standard rather than build systems on guidance that was still evolving;
 - (b) Public sector entities operate within interlinked networks of government bodies, service providers and third-party contractors, and respondents said that gathering reliable data across those networks requires years of coordination, system integration and new data-sharing agreements;
 - (c) Scope 1 and 2 emissions of one entity often form part of another entity's Scope 3, so relieving Scope 3 first builds data maturity across the public sector and improves data availability; and
 - (d) In balancing the need for a manageable transition with timely compliance and comparability, IPSAS 33 permits a first-time adopter of the accrual basis IPSAS Accounting Standards to apply transitional exemptions for a period of up to three years (see paragraphs BC43–BC44 of IPSAS 33). Jurisdictions transposing the ISSB standards reached comparable conclusions. For example, the Canadian Sustainability Standards Board extended the Scope 3 relief to three years, and the Malaysian Advisory Committee on Sustainability Reporting to between two and three years depending on the type of entity.

Agenda Item 8.B.2

IPSASB Meeting (September 2026)

4. Respondents to IPSASB SRS ED 1 proposed transition periods ranging from two years to more than five. Staff considered two years insufficient for entities with limited reporting infrastructure to build capacity, and that a period of up to five years would risk delaying climate action and would fall behind stakeholder expectations.
5. Having considered respondent concerns about trade-offs for developing economies and smaller public sector entities, the IPSASB concluded that the transition reliefs, together with the proportionality mechanisms, appropriately balance feasibility for preparers with the urgency of climate action (paragraph BC78 of IPSASB SRS 1).
6. [Agenda Item 8.A.4](#) strikes the same balance for the [draft] Standard. Transition relief applies where an implementation issue requires building reporting readiness. Where an implementation issue relates to resource constraints, limited availability of high-quality external data, and limited availability of specialist skills, a proportionality mechanism applies.

Transition Relief in the [draft] Standard

7. The [draft] Standard provides transition relief using the same principles as IPSASB SRS 1, offering three years for the disclosures that require an entity to build new processes and systems before it can report. Table 2 sets out the transition provisions as currently drafted, which reflect the staff recommendations in [Agenda Item 8.A.4](#).

Table 2: Transition Relief in the [draft] Standard as Currently Drafted

Relief	Length of relief	Requires new processes and systems
Disclosures for any period before the date of adoption, so that no comparative information is required in the first annual reporting period	First annual reporting period	No
Publishing climate-related disclosures at the same time as the related financial statements, allowing publication within nine months of the period end	First annual reporting period	No
Disclosing the change in greenhouse gas emissions reasonably attributable to a public policy, and the approach the entity uses to measure that change (paragraph 14(a) and 15)	First three annual reporting periods	Yes
Disclosing the other metrics the entity uses to measure and monitor the climate-related outcomes of public policies, and the approach it uses to measure those metrics (paragraph 14(b) and 15)	First three annual reporting periods	Yes

8. The two first-period reliefs are maintained from IPSASB SRS ED 1 unchanged. The three-year relief attaches to the disclosure requirements in paragraph 14 about metrics and the approach the entity uses to measure them, including the methodology, measurement approach, inputs and assumptions.

Agenda Item 8.B.2

In addition, an entity that uses the three-year relief is not required to present the relieved information as a comparative in the subsequent periods.

9. The principle that supports a three-year transition for Scope 3 emissions in IPSASB SRS 1 is also present in the [draft] Standard. Paragraph AG8 provides that entities that only implement a public policy, or monitor and evaluate its performance, and would not otherwise be primarily responsible for it, are not required to apply the [draft] Standard. The draft guidance also notes that those implementing or monitoring entities may be expected to provide information to the entity with primary responsibility to support its reporting. The application guidance on responsibility adds that an entity with primary responsibility will often need to coordinate with, and collect information from, the other entities involved in a public policy – including metric information from the entities that implement the policy and that monitor and evaluate its performance.
10. An entity reporting on the climate-related outcomes of a public policy therefore depends on other entities for the information from which an outcome is measured, in the way that an entity reporting on its own operations depends on its value chain for Scope 3 data. Collecting metrics data from the entities that implement a public policy, and that monitor and evaluate its performance, requires new processes, coordination between entities, systems integration and data-sharing arrangements. None of these are in place when an entity first applies the [draft] Standard, and building them is a similar task for which the IPSASB provided three years of relief in IPSASB SRS 1. Therefore, staff recommend transition relief for the disclosure of metrics.
11. Table 1 in [Agenda Item 8.A.4](#) sets out the resulting allocation of transition reliefs and proportionality mechanisms across the [draft] Standard.

Supporting Document 2 – Response Analysis to SMC 10 (Other Comments)

1. This paper summarizes staff analysis of respondent comments to SMC in two parts:
 - (a) Part 1 supports the proportionality analysis in [Agenda Item 8.A.4](#) by setting out what the IPSASB decided for IPSASB SRS 1 and why; and
 - (b) Part 2 sets out the staff analysis of the other issues raised by respondents in SMC 10.

Part 1: The Basis for Applying Proportionality Mechanisms

Proportionality in IPSASB SRS 1

2. IPSASB SRS 1 includes two proportionality mechanisms, aligned with IFRS S1 and IFRS S2, where an entity may use:
 - (a) All reasonable and supportable information that is available to the entity at the reporting date without undue cost or effort; and
 - (b) An approach that is commensurate with the skills, capabilities and resources that are available to the entity for preparing those disclosures.
3. Paragraph BC7 of IPSASB SRS 1 provides an overview of where each mechanism applies.

Table 3: Proportionality Mechanisms in IPSASB SRS 1 (paragraph BC7)

Disclosure Requirement	Reasonable and Supportable Information	Skills, Capabilities and Resources
Identifying the climate-related risks and opportunities that could reasonably be expected to affect an entity's long-term fiscal sustainability (paragraphs 12, B.AG2(a) and B.AG16–B.AG20)	Yes	None
Determining the scope of the entity's value chain (paragraph B.AG2(b))	Yes	None
Disclosures about the anticipated financial effects of a climate-related risk or opportunity (paragraphs 18 and 20)	Yes	Yes
The entity's approach to climate-related scenario analysis (paragraphs AG23–AG44)	Yes	Yes
Providing Scope 3 greenhouse gas emissions data that is verified (paragraph AG79)	Yes	None
Disclosures on climate-related metrics (paragraph 29)	Yes	None

4. In IPSASB SRS 1 both mechanisms apply only to the two most analytically demanding requirements (i.e., the anticipated financial effects of a climate-related risk or opportunity, and the approach to

Agenda Item 8.B.3

IPSASB Meeting (September 2026)

climate-related scenario analysis). Otherwise, the IPSASB applied the reasonable and supportable information mechanism alone.

5. The IPSASB drew on the ISSB's reasoning in setting out these mechanisms. Paragraph BC21 of IPSASB SRS 1 records that proportionality was one of the areas in which the IPSASB prioritized alignment with IFRS S2, departing only where a public sector-specific difference justified it. Paragraph BC14 of the Basis for Conclusions on IFRS S2 records the reasons respondents gave the ISSB for seeking proportionality: resource constraints, the limited availability of high-quality external data, and the limited availability of specialist skills.

6. Paragraph BC8 of IPSASB SRS 1 notes the IPSASB's reasoning for adopting the proportionality mechanisms:

"In aligning with the proportionality mechanisms provided in IFRS S1 and IFRS S2, the IPSASB acknowledged that, although such mechanisms could be perceived as creating opportunities for inconsistent application, they are essential to ensure that the requirements can be applied effectively across public sector entities. The IPSASB noted that these proportionality mechanisms support a capacity-building approach to achieving the objective of this Standard, encouraging entities to strengthen their skills, capabilities, systems, and resources progressively over time."

7. Paragraph BC78 notes how the IPSASB weighed proportionality against transition relief, having considered respondent concerns about trade-offs, particularly the balance between financial constraints and the need for climate-related disclosures in developing economies and smaller public sector entities:

"Overall, the IPSASB decided that the transition reliefs provided, together with the proportionality mechanisms built into this Standard (see paragraph BC7), appropriately balance feasibility for preparers with the urgency of climate action."

8. That is the same balance [Agenda Item 8.A.4](#) strikes for the [draft] Standard, distinguishing constraints that are a matter of resource constraints, limited availability of high-quality external data, and limited availability of specialist skills, which would be addressed through a proportionality mechanism, from constraints that are a matter of adoption and implementation readiness, which would be addressed through transition relief.

Application to the [draft] Standard

9. The requirements in the [draft] Standard concern the climate-related outcomes of an entity's public policies rather than the effects of climate-related risks and opportunities on the entity itself. At the same time, staff view these principles applicable for the [draft] Standard, since they are related to the nature of the constraint for a requirement rather than on the subject matter of the disclosure.
10. Staff considered each disclosure requirement in the [draft] Standard against those principles and propose a proportionality mechanism applies to the following:
 - (a) Identifying the climate-related outcomes reasonably attributable to a public policy. Paragraph 10 applies the reasonable and supportable information mechanism; and
 - (b) The change in greenhouse gas emissions reasonably attributable to a public policy (paragraph 14(a)). The IPSASB agreed both proportionality mechanisms in June 2026, which are applied through paragraph 16.

Agenda Item 8.B.3

IPSASB Meeting (September 2026)

- (c) Other metrics used to measure and monitor the climate-related outcomes of public policies (paragraph 14(b)). [Agenda Item 8.A.4](#) proposes that both mechanisms apply, and paragraph 16 of the [draft] Standard covers all the disclosures required by paragraph 14.

Part 2: Response Analysis for SMC 10

April 2025 Summary of Responses

11. SMC 10 asked respondents whether they had any other comments on IPSASB SRS ED 1. In April 2025, the Board reviewed a summary of responses to SMC 10 and agreed that the staff summary appropriately captured all significant issues raised by respondents. Table 2 includes staff analysis for each SMC 10 issue, grouped into:
- (a) Issues that were already addressed in finalizing IPSASB SRS 1 and conclusions continue to apply to this [draft] Standard as there are no specific differences for public policy outcomes that require divergence; and
 - (b) Issues addressed in this [draft] Standard that are unique to public policy outcomes.

Table 4: Staff Analysis of Responses to SMC 10

Transition relief	Length of relief
(1) Issues Addressed in Finalizing IPSASB SRS 1	
Additional Definitions Some respondents suggested modifications or additional key definitions to enhance clarity and consistency, including those that are based off IFRS S2.	The IPSASB decided that the proposed definitions provide appropriate guidance for public sector entities, and did not identify a public sector-specific justification to depart from private sector guidance (paragraph BC39 of IPSASB SRS 1). The [draft] Standard draws its climate-related definitions from IPSASB SRS 1.
Climate Financing Mechanisms 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.	The IPSASB acted on this comment in IPSASB SRS 1, deciding to provide additional illustrative guidance on the disclosure of climate financing mechanisms (paragraph BC104). Paragraph IG6 of IPSASB SRS 1 sets out what an entity discloses in relation to green financing instruments. Staff have not identified a public sector-specific reason for a different approach where a financing mechanism supports a public policy.
Connectivity with Financial Statements One respondent felt the proposed climate-related disclosures should be better integrated with the financial statements.	The IPSASB decided that the disclosures form part of the general purpose financial reports, consistent with the IPSASB Conceptual Framework (paragraph BC100 of IPSASB SRS 1).

Agenda Item

8.B.3

	The [draft] Standard applies the same general requirements.
Metrics and Targets One respondent said the IPSASB should acknowledge that government policy, as well as law and regulation, drives the climate-related targets that public sector entities work towards. Another suggested requiring disclosure of carbon credits purchased, rather than only the entity's planned use of carbon credits.	This issue was addressed in IPSASB SRS 1, and staff have not identified a public sector-specific reason to depart from that approach for reporting on climate-related outcomes of public policies.
Statement of Compliance One respondent suggested allowing a partial statement of compliance to support broader adoption, recognizing that full compliance will take multiple years to achieve.	The IPSASB acknowledged that such an approach could facilitate adoption, but decided that the standard already provides appropriate transition relief to address the concern (paragraph BC101 of IPSASB SRS 1). Agenda Item 8.A.4 sets out the transition reliefs proposed for the [draft] Standard.
Statement of Emissions One respondent suggested requiring a summary statement of GHG emissions to give users a comprehensive view of the entity's overall climate impact.	The IPSASB decided that the standard should remain principles-based, so that a summary of greenhouse gas emissions remains at the entity's discretion (paragraph BC58 of IPSASB SRS 1). This principles-based approach is also applicable to the [draft] Standard.
(2) Issues Addressed in this [draft] Standard	
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.	The IPSASB brought adaptation policy more explicitly within scope in March 2026. Mitigation outcomes are reported through the change in GHG emissions reasonably attributable to a public policy, and adaptation outcomes through the other metrics an entity uses to monitor those outcomes. Staff recommend no further change.
Consolidation A few respondents raised concerns on consolidation, asking about public policy programs implemented through consolidated entities, the disaggregation of GHG emissions between the consolidated group and other investees, and	The June 2026 instruction where the entity with primary responsibility for a public policy is expected to apply the [draft] Standard would anchor reporting to primary responsibility for the policy rather than to the boundary of a consolidated group. See Agenda Item 8.A.5.

Agenda Item 8.B.3

IPSASB Meeting (September 2026)

whether the reporting entity is the economic entity or the legal entity.	
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.	The timing of reporting is addressed in Agenda Item 8.A.2 , and how often a metric is measured in Agenda Item 8.A.3 .
Overlap with Service Performance Reporting One respondent noted a potential overlap between public policy program outcomes and RPG 3, Reporting Service Performance Information, and proposed that policy outcome reporting be approached through RPG 3 instead.	The March 2026 scope decision applies the same logic model from RPG 3 to the [draft] Standard. RPG 3 is non-authoritative and covers service performance information generally, so approaching climate-related outcomes only through RPG 3 would leave that reporting non-authoritative. Staff recommend no change.
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.	This issue is addressed in Part 1 of this paper.