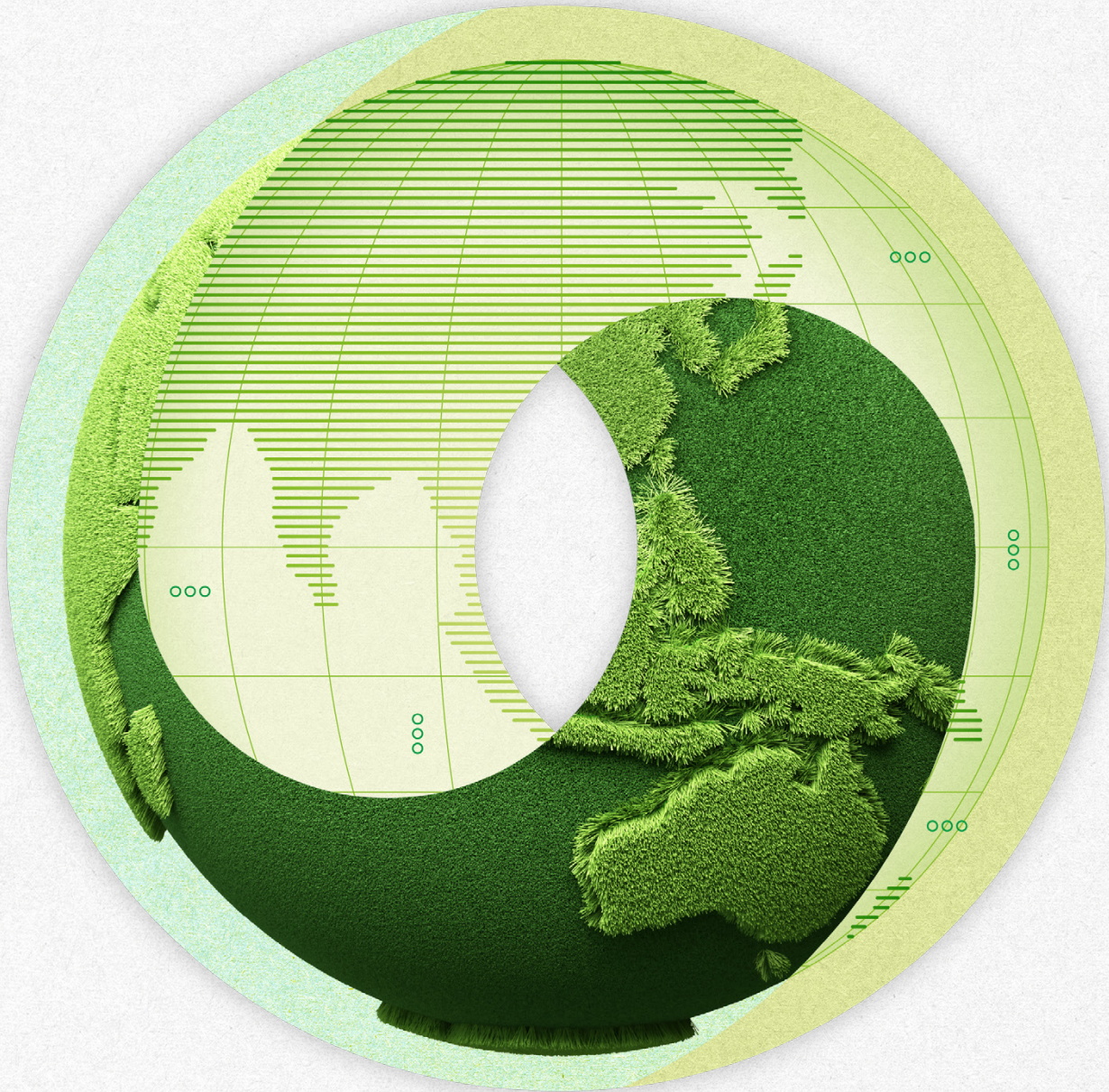




The CFO's guide to sustainability data

Sustainability Reporting Data Foundations

Asia Pacific Mandatory Sustainability
Reporting Series: Paper 5

Across Asia Pacific, mandatory sustainability reporting is setting a new standard, turning effective data management into a strategic imperative.

After all, a report is only as strong as the data behind it. Yet for many organisations this remains a challenge: three-quarters of respondents in Deloitte's 2024 ESG reporting study cited a lack of sustainability data analysis and management skills, and almost half reported critical gaps in the data itselfⁱ.

The stakes are high. The quality of data inputs determines not just the quality of reporting outputs and achieving compliance – but the value organisations can create from new sustainability insights. Getting the data foundations right is critical.

About the series

This is the fifth of six papers in the Asia Pacific CFO Sustainability Reporting series. This paper explores effective sustainability data management. The following paper explores how to adapt controls to achieve assurance-ready reporting.

- 1. What CFOs need to know today
- 2. The CFO's building blocks for success
- 3. How CFOs drive impact and realise value
- 4. The CFO's operating blueprint
- 5. The CFO's guide to sustainability data
- 6. How CFOs can build confidence and control

[Access the full series here](#)

Unique challenges for sustainability data

Sustainability reporting demands high-quality, assured disclosures across a broad set of emerging topics, risks and challenges. Unlike financial reporting, it relies more heavily on forward-looking and qualitative assessments of strategy and risk.

Organisations already reporting on sustainability face broader data demands and increased assurance standards to the new mandatory requirements. For first-time reporters the challenge is even greater.

Reporting teams must manage a new and complex data landscape – from carbon emissions to value chain impacts to physical climate risk – while coordinating across internal and external data owners. There is often reliance on estimates and proxy data (such as emissions factors), with limited benchmarks currently available for comparison. At the same time, many organisations face skills shortages and capability gaps in data management and emerging sustainability domains (see Paper 4 in this series: *The CFO's operating blueprint*).

For most organisations, achieving reporting compliance the first time will require significant cross-functional coordination, capability uplift and process alignment. Together with these gaps in data and capability, this can drive a near-term focus on compliance. As disclosure deadlines approach, accountability is increasingly shifting to CFOs, sometimes without clear alignment to the organisation's broader sustainability ambition or stakeholder expectations.

i. Deloitte ESG Reporting Benchmark, 2024

What should CFOs consider?

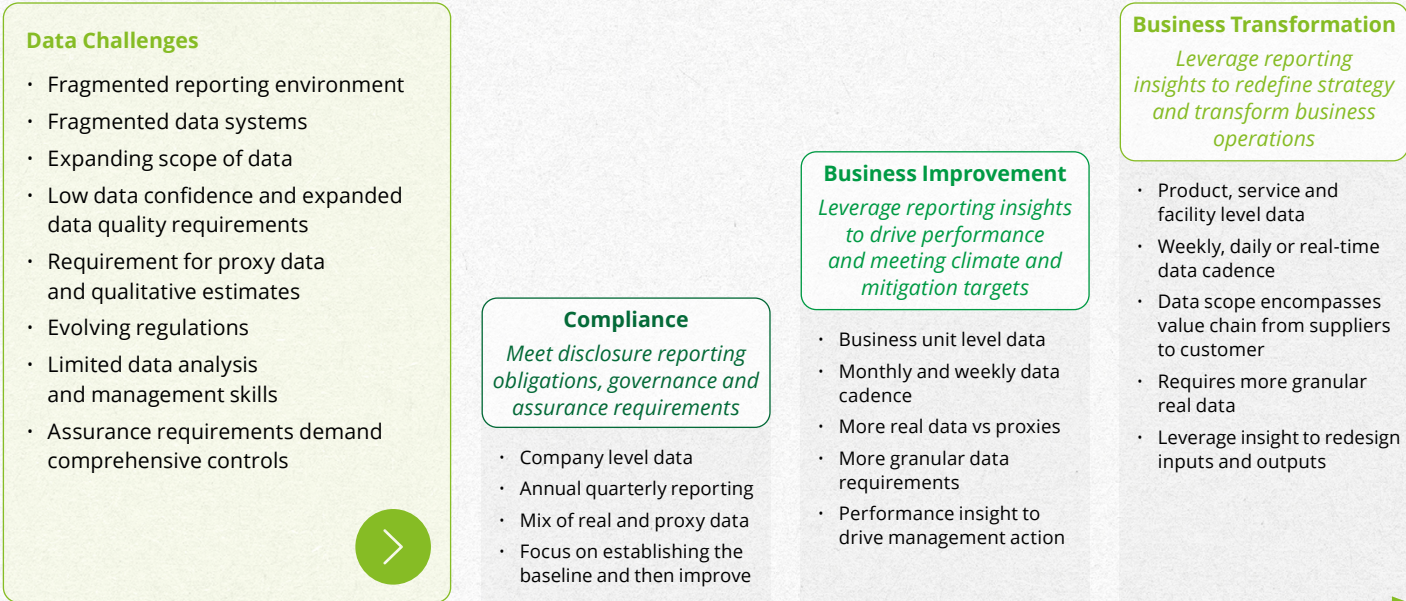
Taking charge of the reporting agenda starts with a clear understanding of reporting obligations and clarifying the organisation's sustainability ambition. Together these clarify not only what data is needed, but how it will be used. Compliance requires accurate, well-controlled data. Driving performance or transformation demands more frequent, granular, and wide-ranging data (see Figure 1).

A structured data management plan is essential to overcome data challenges and turn reporting into a driver of insight and business value. To shape the plan, CFOs should ask four key questions:

- What is our sustainability ambition and what does this require from reporting?
- What data is essential for compliance and our strategic objectives and what must be prioritised?
- How can reporting create greater value through better insight and action?
- What level of effort, capability and investment is needed to deliver?



Figure 1. Sustainability reporting data maturity



Source: Deloitte analysis

Build a strong data foundation for reporting success

Sustainability data management is complex, with many stakeholders. Most organisations start from a low base – limited data availability and quality, inconsistent processes and documentation, and with data owners being unfamiliar with reporting controls or assurance requirements (see Paper 6 in this series: *How CFOs can build confidence and control*).

This does not always require a full-scale data transformation or new technology solutions. What it does require is clarity on data requirements and a practical plan to meet them. Some organisations can use existing systems and tools; others may rely on spreadsheets and well-defined processes to meet initial reporting needs.

Regardless of the starting point, the high effort required to manage data, combined with evolving reporting demands, makes it essential to begin building the foundations for robust and repeatable data management.

Many businesses understand good data practices, but these have not consistently been applied to sustainability data. And for sustainability reporting, each of the building blocks for data management presents distinct challenges (see Figure 2). CFOs should assess their organisation's specific context and prioritise the actions needed to manage sustainability data effectively.

Figure 2. Sustainability data reporting model

Sustainability Reporting Data/Architecture		Watch Points	Actions
Data Foundations	Sustainability Reporting & Insights - Synthesise reporting data and insights - Regulatory and management reporting	- High risk of misstatement - Materiality and disclosure decisions - Consistency across multiple reports	- Start with reporting risk assessments - Understand reporting connectivity (e.g. with financial reports) - Clear governance and accountability over disclosure content decisions - Automate and integrate reporting over time
	Data Analysis Performance & Risk Management - Production of sustainability insight - Integrate into risk and performance management	- Analyse talent capacity and capability - New and complex model requirements - Reliance on incomplete or proxy data	- Secure and/or develop analyst resource - Clearly define KPIs and measures - Prioritise testing and validation and documentation of new models - Clear direction on transparency, accountability and process documentation - Leverage AI, analytics and visualisation tools
	Data Consolidation, Aggregation & Insights Data aggregation, integration and transformation	- Incomplete and variable data - New and immature data sources - Lack of data standards and processes	- Establish sustainability data hub - Focus on quality checks and validation - Leverage external standards and benchmarks - Identify remediation needs - Establish and document data processes, controls and governance
	Data Generation & Collection Management of data sources across internal and external systems	Variability of data source quality and reliability	- Establish process for data collection and ownership - Educate data owners on reporting and disclosure requirements - Prioritise data sourcing and collection for material topics - Proactive approach to data gaps and quality issues - Automate data collection over time
	Sustainability Data Platform Underlying systems to ensure data is available, secure and high quality	Existing systems and new data sources may not meet reporting, security or quality standards	- Start with requirements assessment - Right-sized approaches for any new system requirements - Establish security and data standards for new systems

Define the scope for reporting upfront

CFOs should begin with a clear understanding of regulatory requirements, and the full scope of reporting topics. From these, data requirements can be communicated across the business, and a structured gap assessment can begin. This is important where risks and opportunities are new, and the supporting data, systems and models are untested. Delays in identifying requirements or defining material issues can lead to significant rework and last-minute effort:

- Identify the full scope of reporting requirements, particularly where multiple jurisdictions apply.
- Conduct a materiality assessment to define the sustainability issues, risks and opportunities to be reported.
- Translate these issues into metrics, KPIs and targets to define the underlying data and what analysis is required.
- Establish governance over key decisions – not only materiality, but also methodologies, assumptions and final disclosures.

Data challenges for complex businesses

Multi-national and conglomerate organisations face distinct challenges in preparing for sustainability reporting. Reporting regimes differ in scope, timing and requirements – especially for Asia Pacific-based groups with subsidiaries subject to the EU's Corporate Sustainability Reporting Directive (CSRD), which goes beyond the climate-focused International Financial Reporting Standards (IFRS) standards. In some cases, subsidiaries can receive less focus as group-level reporting takes priority – creating downstream risks. While group consolidation is familiar territory for finance teams, sustainability reporting introduces new complexities that require attention:

- Conduct a stocktake of reporting entities and regulatory requirements. Material issues may differ by region as well as by disclosure regime – early assessment is critical to avoid misalignment between group and subsidiary reporting.
- Set consistent definitions and expectations for KPIs and data granularity, particularly where third party or procured data is involved.
- Plan for data delays and gaps between group entities, especially in the first reporting cycle. Build contingency into timelines and workflows.
- Use this as a strategic opportunity. CFOs can lead early alignment across the group and reduce complexity, while subsidiaries can use the process to build capability, improve collaboration and help shape group-level reporting.

Identify technology or process accelerators

Reporting teams are often working with fragmented data sources and systems, such as externally supplied value chain data, and they need to perform complex, often new analysis, such as emissions accounting and physical risk modelling. While many organisations are advancing digital, automation and AI capabilities across core operations, sustainability reporting is often less mature. Technology or process accelerators can free up expert teams to focus on high-value activities such as addressing data gaps, developing mitigation strategies, and identifying cost or performance improvements (see spotlight). To achieve this, organisations should:

- ✓ Assess current capabilities and identify where external solutions can accelerate readiness – from emissions calculators to end-to-end reporting platforms.
- ✓ Establish a sustainability data hub to consolidate inputs, enforce common standards, and manage control processes.
- ✓ Target high-effort, manual processes for simplification and automation such as data collection, validation and consolidation.

Spotlight

Deloitte data offerings

Deloitte is helping clients around the world to manage sustainability reporting data, reduce compliance burdens, and unlock value beyond regulatory compliance. With organisations facing challenges of how to start, where to focus and how to uplift their sustainability data management, Deloitte can help accelerate reporting readiness.

Whether your organisation needs a specific solution or end-to-end support for sustainability data management and reporting, Deloitte's combination of sustainability reporting expertise, data management advisory and technical solutions can help cut through complexity at each stage of the reporting process. These solutions include:

- **Simplified compliance**
A step-by-step solution to navigate sustainability disclosure requirements and materiality assessments and identifying the underlying data requirements.
- **Assurance-ready reporting**
Combining expert sustainability and assurance advisory with AI-powered tools to streamline data collection, validation and generate reports with audit trails to accelerate assurance readiness.
- **Specific solutions focused on complex sustainability reporting challenges**
Including AI-accelerated benchmarking of existing reporting, value chain mapping, Greenhouse Gas (GHG) emissions analysis, physical and transition risk assessment and climate-related risk and opportunity identification.

While each organisation's starting point and goals will differ, testing the plan and spotting quick wins can ease the compliance burden.



Strengthen managerial judgement

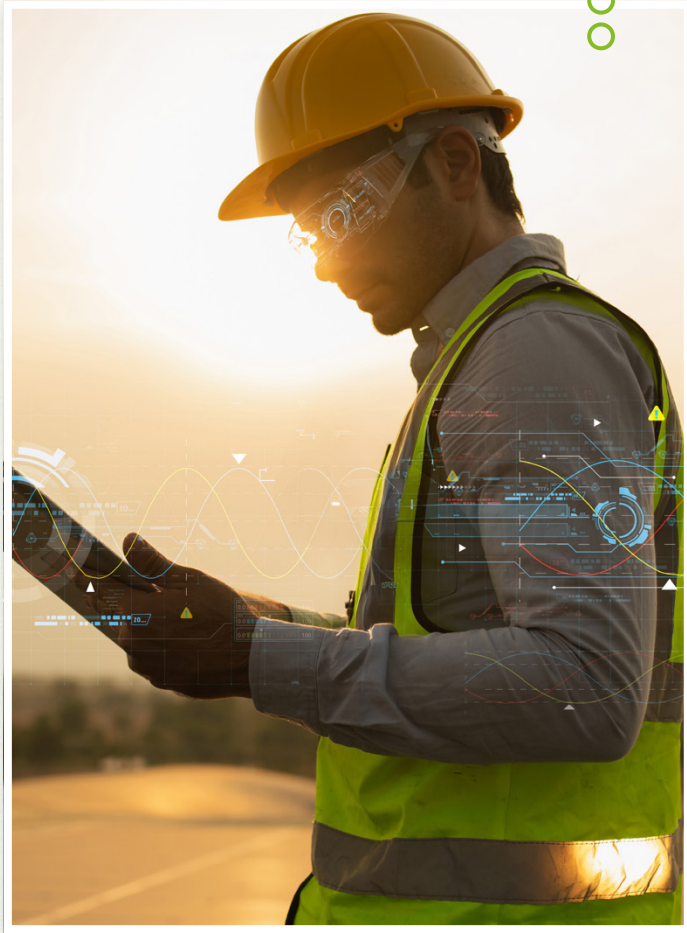
Even with strong plans, sustainability data will often still be incomplete or inconsistent. CFOs and reporting teams must make pragmatic decisions about where to focus and how to resolve data and analytical challenges. Establishing clear governance and decision-making processes helps to surface issues early and resolve them efficiently. Strong judgement not only supports assurance readiness but can also support leadership and stakeholder confidence:

- ✓ Map key data processes, responsibilities and decision points, including calculation approaches, critical assumptions and where proxy data may be used to resolve gaps.
- ✓ Ensure reporting teams understand the data, methodologies and assumptions, enabling them to spot gaps, assess risks and anticipate potential issues.
- ✓ Establish proactive review processes to test assumptions, validate models and address issues when they arise.
- ✓ Ensure decisions and decision-making processes are documented and well governed.

Where to begin?

Data management remains one of the more complex aspects of establishing sustainability reporting. It goes beyond technical systems – it requires leadership buy-in, planning, and cross-functional coordination. While initial compliance will drive the immediate focus, CFOs should establish a clear and pragmatic plan to develop strong data foundations that will support the ongoing development of sustainability reporting:

- ✓ **Build leadership engagement** – board and leadership need to be educated in the new disclosure obligations, risk ownership and the central role of data. Leadership commitment is also critical to secure investment, mobilise resources and drive organisation-wide support.
- ✓ **Align the data model to business maturity** – right-size the data requirements and approach to the organisation's sustainability ambition. This is not about achieving perfection at the first attempt but understanding the challenges and setting a path for continuous improvement.
- ✓ **Proceed in a modular way** – focus on priority areas and phased improvements. Pragmatic, targeted efforts, such as improving supply chain transparency in a single category, can develop an approach to be applied elsewhere.



Building on strong foundations

CFOs know the importance of high-quality data to drive trust, insight and performance.

To meet sustainability disclosure standards, data management and reporting capabilities must mature quickly. Without dedicated systems, clear ownership, and technical expertise, organisations may struggle to meet reporting expectations – risking delays or inconsistent disclosures. This is why clear accountability, defined responsibilities and early visibility of the reporting agenda and data plan are critical.

For many organisations, the near-term goal is compliance. But sustainability data is more than a regulatory requirement – it is the foundation for strategic insights, risk mitigation and value creation.

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Methodology

Deloitte ESG Benchmark

Deloitte ESG Benchmark is based on surveys of 19 clients around the world. The survey focused on experiences, efforts and challenges around ESG reporting to key market trends. This was complemented by interviews with 14 Deloitte project teams to qualitatively understand challenges firms are facing around ESG reporting.

The benchmark is focused on six ESG reporting themes and four priority areas that firms are facing challenges in.

Deloitte 2024 CxO Sustainability Report

The report is based on a survey of 2,103 C-level executives, conducted by KS&R Inc. on behalf of Deloitte, and was administered in a double-blind manner during May and June 2024, ensuring impartiality and confidentiality for both respondents and researchers. The survey polled respondents from 27 countries: 46% from Europe/Middle East/South Africa, 17% from North America, 9% from Latin America, and 28% from Asia-Pacific. All major industry sectors were represented in our sample. Additionally, KS&R and Deloitte conducted select, one-on-one interviews with global industry leaders.

Limitations

While every effort was made to ensure the reliability and validity of the data, it is important to acknowledge some limitations. The selection of clients and executives, while rigorous, may not fully capture the diversity of perspectives within every industry or region. Additionally, while the double-blind process was meticulously followed, there may still be inherent biases that could influence the findings. These limitations are considered in our analysis and interpretation of the data.