

Accounting Alert

Quarterly update – Public Benefit Entities

Connect to what's new in financial reporting for March 2024

This quarterly update includes a high-level overview of new and revised financial reporting requirements that need to be considered by public benefit entities for annual and interim financial reporting periods ending on 31 March 2024. Information is also included for December 2023 year-ends for entities who are still finalising their financial statements. [➔](#)

Financial reporting standards update

Five new financial reporting standards or amendments became effective for the financial year ended 31 December 2023 and are applicable for the financial year ending 31 March 2024, including **PBE IFRS 17 Insurance Contracts** and related amendments (currently applicable to not-for-profit entities) and amendments to **PBE IPSAS 41 Financial Instruments**, which clarify the accounting for public sector specific financial instruments. All entities will need to assess the impact of the new standards and amendments and ensure that relevant policies are in place to implement the changes.

Insurance Contracts in the Public Sector (Amendments to PBE IFRS 17), issued in June 2023, includes modifications for public sector entities and requires the application of the amended insurance standard by public sector PBEs for periods beginning on or after 1 January 2026. Public sector PBEs may early adopt the amended PBE IFRS 17 for periods ending on or after 20 July 2023.

All Tier 1 entities need to consider the new requirements and appropriate disclosure of approved but not yet effective standards. Disclosure requirements relating to new standards are outlined at [Appendix A](#).

Important disclosures

Climate disclosures

Financial statement preparers must consider the accounting implications of climate change and the appropriate disclosures to include in the entity's financial statements. See [page 10](#) for information about reflecting climate risk in financial statements.

The XRB issued its first climate disclosure standards, applicable to certain entities referred to as Climate Reporting Entities. Refer to [page 11](#) of this publication for more information.

Service Performance Reporting

Service performance reporting is an important disclosure and is an area of interest for PBE stakeholders. Refer to [page 11](#) of this publication for resources and guidance.

Accounting implications of natural disasters

CAANZ has issued guidance on [accounting implications of natural disasters](#). The guidance addresses financial reporting areas including impairment of assets, provisions and post balance date events. This guidance will be useful for entities that continue to be impacted by the weather events from last year.

The New Zealand Accounting Standards Framework

The Accounting Standards Framework is a two sector (for-profit and public benefit entities (PBE)), multi-tiered framework. The PBE framework is based on International Public Sector Accounting Standards (IPSAS). Refer to [Appendix B](#) for the suite of standards that applies to PBEs.

[XRB A1 Application of the Accounting Standards Framework](#) (XRB A1) sets out the tiers for reporting, the standards that apply to each tier and the requirements for transitioning between tiers. Entities will need to carefully consider which tier applies, to determine whether they will be required to apply PBE Standards or PBE Standards RDR.

Each reporting period, entities should consider whether there have been any changes to their operations that would



result in a change in reporting requirements. These could include changes resulting from higher or lower expenses causing the entity to cross the threshold between tiers.

You may find our framework publication, **The New Zealand financial reporting landscape** useful. This publication provides a summary of the legislative and accounting standards requirements for New Zealand entities and is available: [here](#).

New accounting standards for Tier 3 & 4 Public Sector and Not-for-Profit PBEs are applicable for annual reporting periods beginning on or after 1 April 2024:

[Tier 3 \(NFP\) Standard](#)

[Tier 4 \(NFP\) Standard](#)

[Tier 3 \(PS\) Standard](#)

[Tier 4 \(PS\) Standard](#)

These are available for early adoption for periods ended after 15 June 2023. In addition, effective for periods ending on or after 28 March 2024, **the size thresholds for Tier 2 and 3 PBEs will be increased to:**

- ≤ \$33 million expenses for Tier 2
- ≤ \$5 million expenses for Tier 3

The size changes can be applied immediately for **31 March 2024 balance dates**. Refer to the XRB guidance page [here](#) for more information. You may also refer to [Appendix B](#) for the update on the accounting standards framework for PBEs.

Frequently Asked Questions Tier 1 & 2 (NFP)

The XRB has provided FAQs for Tiers 1 and 2 not-for-profit entities. Topics include the accounting standards framework, accounting for donations, statement of service performance, deciding on materiality, low interest loans, and a guide for applying PBE IPSAS 41. Find out more [here](#).

Incorporated Societies Act

The Incorporated Societies Act 2022 came into force in October 2023 and requires all Societies except those that are 'small' to prepare their financial statements using the XRB standards.

Refer to the [XRB guidance page](#) for more information.

What are the new and revised accounting pronouncements for March 2024?

Changes in accounting standards can have a significant impact on an entity's financial statements. New pronouncements should be carefully reviewed for any potential impacts or opportunities.

The table below outlines the new and revised pronouncements that are either to be applied for the first time for a March 2024 annual or interim reporting period or may be early adopted¹. The footnotes distinguish between mandatory initial application, and pronouncements that were also mandatory in a previous period.

In the majority of cases, the disclosure requirements of the individual pronouncements listed in the table below would not

be applicable to half-year financial reports; however, the recognition and measurement requirements would be applied where those pronouncements have been adopted by the entity.

In addition, disclosure of the application of new and revised accounting pronouncements needs to be carefully considered, along with the impact of those that are approved but not yet effective. We have outlined some considerations in respect of these in [Appendix A](#).

The summary of new pronouncements below was updated on 8 March 2024 for developments to that date.

New and revised pronouncements	Effective date*	Year ending				Interim ending	
		Dec 2023		Mar 2024		Mar 2024	
		PS	NFP	PS	NFP	PS	NFP
PBE Standards (Tiers 1 and 2)							
PBE IFRS 17 Insurance Contracts**	1 Jan 2023	O	M	O	M	O	M
<i>Amendments to PBE IFRS 17**</i>	1 Jan 2023	O	M	O	M	O	M
<i>Initial Application of PBE IFRS 17 and PBE IPSAS 41 – Comparative Information**</i>	1 Jan 2023	O	M	O	M	O	M
<i>2022 Omnibus Amendments to PBE Standards</i>	1 Jan 2023	M	M	M	M	M	M
<i>Public Sector Specific Financial Instruments (Non-Authoritative Amendments to PBE IPSAS 41)</i>	1 Jan 2023	M	M	M	M	M	M
<i>Disclosure of Fees for Audit Firms' Services (Amendments to PBE IPSAS 1)</i>	1 Jan 2024	O	O	O	O	O	O
<i>Insurance Contracts in the Public Sector (Amendments to PBE IFRS 17)**</i>	1 Jan 2026	O	N/A	O	N/A	O	N/A



Key

- O** Optional
- M** Mandatory – first time

* Annual reporting periods beginning on or after this date. **Note regarding early adoption:** Standards and amendments issued by the XRB take legal effect 28 days after they are published under the Legislation Act 2019. Early adoption of certain standards and amendments is permitted, but not for accounting periods ending before the date those standards and amendments take legal effect. For recent amendments, the table below includes the dates these are available for early adoption.

**PBE IFRS 17 applies to not-for-profit PBEs for accounting periods beginning on or after 1 January 2023. In June 2023, the NZASB issued *Insurance Contracts in the Public Sector (Amendments to PBE IFRS 17)*, which includes modifications for public sector entities and requires the application of the amended insurance standard by public sector PBEs for periods beginning on or after 1 January 2026. Public sector PBEs may early adopt PBE IFRS 17, including all amendments, for periods ended on or after 20 July 2023.

¹ Amendments to PBE FRS 47 *First-time Adoption of PBE Standards* have not been fully considered in this publication. First time adopters should consult the latest version of PBE FRS 47 when preparing their first financial statements in compliance with PBE Standards.

Impact of each new and revised pronouncement

The following tables set out information on the impact of the recent new pronouncements (see key on page 3).

New and revised pronouncement	Effective date	Year ending				Interim ending	
		Dec 2023		Mar 2024		Mar 2024	
		PS	NFP	PS	NFP	PS	NFP
<i>PBE IFRS 17 Insurance Contracts</i>	1 Jan 2023	O	M	O	M	O	M
<p>The NZASB initially issued PBE IFRS 17 with a scope modification to limit its application to Tier 1 and Tier 2 not-for-profit PBEs. In June 2023, the NZASB issued Insurance Contracts in the Public Sector (Amendments to PBE IFRS 17), which added public sector-specific amendments and expanded the scope of the standard to include public sector PBEs from 1 January 2026.</p> <p>The information about PBE IFRS 17 below describes the requirements of the standard and how it applies to <u>not-for-profit PBEs</u>. Information about the amendments to the standard for public sector entities is here.</p> <p>PBE IFRS 17 supersedes PBE IFRS 4 <i>Insurance Contracts</i>. PBE IFRS 17 is closely based on NZ IFRS 17 <i>Insurance Contracts</i>. The scope of PBE IFRS 17 differs from PBE IFRS 4 because it introduces:</p> <ul style="list-style-type: none"> a requirement that in order to apply the insurance standard to investment contracts with discretionary participation features, an entity has to also issue insurance contracts; and an option to apply PBE IPSAS 9 <i>Revenue from Exchange Transactions</i> to fixed-fee contracts with customers, provided certain criteria are met. <p>PBE IFRS 17 requires not-for-profit PBEs to identify portfolios of insurance contracts which are subject to similar risks and managed together. Each portfolio shall be divided into a minimum of three groups:</p> <ul style="list-style-type: none"> a group of contracts that are onerous at initial recognition, if any; a group of contracts that at initial recognition have no significant possibility of becoming onerous subsequently, if any; and a group of the remaining contracts in the portfolio, if any. <p>A not-for-profit PBE is not permitted to include contracts issued more than one year apart in the same group. Furthermore, if a portfolio would fall into different groups only because law or regulation constrains the not-for-profit PBE's practical ability to set a different price or level of benefits for policyholders with different characteristics, the not-for-profit PBE may include those contracts in the same group.</p> <p>The standard measures insurance contracts either under the general model or a simplified version of this called the <i>Premium Allocation Approach</i>.</p> <p>The general model is defined such that at initial recognition an entity shall measure a group of contracts at the total of:</p> <ul style="list-style-type: none"> the amount of the fulfilment cash flows ("FCF"), which comprise probability-weighted estimates of future cash flows, an adjustment to reflect the time value of money ("TVM") and the financial risks associated with those future cash flows and a risk adjustment for non-financial risk; and the contractual service margin ("CSM"). <p>On subsequent measurement, the carrying amount shall be the sum of the liability for remaining coverage and the liability for incurred claims. The liability for remaining coverage comprises the FCF related to future services and the CSM of the group at that date. The liability for incurred claims is measured as the FCF related to past services allocated to the group at that date.</p>							

New and revised pronouncement	Effective date	Year ending				Interim ending	
		Dec 2023		Mar 2024		Mar 2024	
		PS	NFP	PS	NFP	PS	NFP
<p>An entity may simplify the measurement of the liability for remaining coverage of a group of insurance contracts using the <i>premium allocation approach</i> on the condition that, at initial recognition, the entity reasonably expects that doing so would produce a reasonable approximation of the general model, or the coverage period of each contract in the group is one year or less.</p> <p>The new standard may also result in changes to presentation in the statement of financial performance.</p> <p>A not-for-profit PBE shall apply the standard retrospectively unless impracticable, in which case entities have the option of using either the modified retrospective approach or the fair value approach.</p> <p>At the date of initial application of the standard, those not-for-profit PBEs already applying PBE IPSAS 41 may retrospectively re-designate and reclassify financial assets held in respect of activities connected with contracts within the scope of the standard.</p> <p>On 13 August 2020, the NZASB issued Amendments to PBE IFRS 17 which includes deferral of the effective date by one year from annual periods beginning on or after 1 January 2022 to 1 January 2023. Other amendments to ensure alignment of PBE IFRS 17 with NZ IFRS 17 are discussed below.</p> <p>The new standard may also result in changes to presentation in the statement of financial performance.</p>							
Amendments to PBE IFRS 17	1 Jan 2023	O	M	O	M	O	M
<p>The other amendments to PBE IFRS 17 include the following:</p> <ul style="list-style-type: none"> • Scope exclusion for credit card contracts and similar contracts and optional scope exclusion for loan contracts with insurance coverage limited to the loan amount; • Recognition of insurance acquisition cash flows relating to expected contract renewals, including guidance for insurance acquisition cash flows recognised in a PBE combination; • Application of PBE IFRS 17 in interim financial statements; • Allocation of CSM attributable to investment-return service and investment-related service; • Risk mitigation option using instruments other than derivatives; • Recovery of losses from underlying insurance contracts through reinsurance contracts held; • Presentation in the statement of financial position; • Transition issues: classification of contracts acquired in their settlement period and guidance on the restatement of the risk mitigation option applied in prior periods; and • Minor application issues. <p>Information about additional recent amendments to the standard for public sector entities is here.</p>							
Initial Application of PBE IFRS 17 and PBE IPSAS 41 – Comparative Information	1 Jan 2023	O	M	O	M	O	M
<p>The amendments will help insurers avoid temporary accounting mismatches due to different transition requirements in PBE IFRS 17 and PBE IPSAS 41 <i>Financial Instruments</i>.</p>							

New and revised pronouncement	Effective date	Year ending				Interim ending	
		Dec 2023		Mar 2024		Mar 2024	
		PS	NFP	PS	NFP	PS	NFP
2022 Omnibus Amendments to PBE Standards	1 Jan 2023	M	M	M	M	M	M
<p>The amendments make changes to several PBE standards, including:</p> <ul style="list-style-type: none"> Clarifying which fees an entity includes when it applies the '10 percent' test for derecognition of a financial liability. (PBE IPSAS 41) Clarifying that the cost of fulfilling a contract comprises the 'costs that relate directly to the contract' which are both: <ul style="list-style-type: none"> incremental costs of fulfilling the contract (e.g. direct materials and labour); and an allocation of other costs that relate directly to fulfilling contracts (e.g. overheads such as allocation of depreciation expense on an item of property, plant and equipment used in fulfilling the contract). (PBE IPSAS 19) Prohibiting deducting from the cost of an item of property, plant and equipment any proceeds from selling items produced before that asset is available for use, i.e. proceeds while bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Consequently, the sales proceeds and related costs should be recognised in the profit or loss. (PBE IPSAS 17) Adding guidance and illustrative examples to illustrate the extent to which borrowing costs can be capitalised. (PBE IPSAS 5) Introducing an exception to the initial recognition exemption in PBE IAS 12. Applying this exception, an entity does not apply the initial recognition exemption for transactions that give rise to equal taxable and deductible temporary differences. (PBE IAS 12) Removing the requirement to exclude taxation cash flows when measuring the fair value of a biological asset using a present value technique because PBE IPSAS 27 does not require the use of a pre-tax discount rate. (PBE IPSAS 27) <p>The Omnibus Amendments also make minor clarifications or amendments to other PBE standards.</p>							
Public Sector Specific Financial Instruments (Non-Authoritative Amendments to PBE IPSAS 41)	1 Jan 2023	M	M	M	M	M	M
The amendments clarify the accounting for public sector specific financial instruments, including some instruments with characteristics similar to financial instruments including monetary gold, currency in circulation, IMF special drawing rights, and IMF quota subscriptions.							

New and revised pronouncement	Effective date	Year ending				Interim ending	
		Dec 2023		Mar 2024		Mar 2024	
		PS	NFP	PS	NFP	PS	NFP
<p><i>Disclosure of Fees for Audit Firms' Services (Amendments to PBE IPSAS 1)</i></p> <p>The amendments update the required disclosures for fees relating to services provided by the entity's audit or review firm. The fees must be disaggregated into specified categories, including audit and review services, other assurance services, agreed-upon procedures engagements, taxation services, and other services. There is guidance to assist entities in determining the types of services to include in each category. There are reduced disclosure requirements for Tier 2 entities.</p> <p>The amendments are available for early adoption for accounting periods ending on or after 15 June 2023.</p>	1 Jan 2024	○	○	○	○	○	○
<p><i>Insurance Contracts in the Public Sector (Amendments to PBE IFRS 17)</i></p> <p>The amendments modify PBE IFRS 17 to be suitable for public sector PBEs and require public sector PBEs to apply the standard from 1 January 2026. Public sector PBEs may early adopt the amended PBE IFRS 17 for periods ending on or after 20 July 2023.</p> <p>Key modifications to the standard for application by public sector PBEs include:</p> <ul style="list-style-type: none"> • Additional guidance for public sector PBEs on identifying whether an arrangement falls within the scope of PBE IFRS 17; • An exemption for public sector PBEs from dividing a portfolio of insurance contracts into groups based on the issue dates and whether the contracts are, or are likely to become, onerous (and a related amendment to the requirements determining the date at which insurance contracts are first recognised); • Guidance for public sector PBEs on which cashflows are within the boundary of an insurance contract for the purpose of measuring insurance contracts; • A choice for public sector PBE's to apply the premium allocation approach to insurance contracts and reinsurance contracts; and • A modification to the transition requirements. 	1 Jan 2026	○	N/A	○	N/A	○	N/A

Statement of Service Performance

PBE FRS 48 outlines service performance reporting requirements for Tier 1 and Tier 2 PBEs. While many public sector PBEs are already providing service performance information, this type of reporting will be new for many entities. The Standard requires PBEs to provide information to their stakeholders explaining why the entity exists, what it aims to achieve over the medium to long term, and how it has performed during the current period in meeting its objectives.

The Standard is designed to apply to all sizes and types of PBEs. It outlines principles and high-level requirements that allow each entity the flexibility to determine the disclosures that will be most appropriate for their stakeholders. For this reason, there are no Tier 2 disclosure concessions. The lack of prescriptive requirements means that entities will need to apply significant judgement in determining the information to be provided.

Entities required to apply PBE FRS 48

This standard applies to all Tier 1 and Tier 2 not-for-profit PBEs. It applies to Tier 1 and Tier 2 Public Sector PBEs if they are legally required to provide service performance information in accordance with generally accepted accounting practice.

Key Disclosures

Why does the PBE exist? – the entity must provide contextual information about its purpose, which is likely to include some information relating to past and future periods (such as baseline data). This background information should be consistent with the entity's founding, governance, and planning documents (such as the mission statement).

The entity should also include information about how it operates. For example, does the entity deliver goods or services? Give grants to individuals or organisations? Collaborate with other entities?

What has the PBE accomplished? – The entity must report on its activities in the current period. Where an entity engages in a wide range of activities, judgement will be required to determine the measures that provide the most meaningful information to readers. Considerations include:

- The amount of focus placed on current year targets compared to reporting progress made towards long-term objectives.
- Which measures to report. A few things to consider:
 - The entity may report both quantitative measures and qualitative measures and descriptions. However, entities will need to make sure all reported information is verifiable (particularly where an audit is required).
 - The entity may determine the appropriate format for presenting performance information. This could include graphs, tables, and other

visual aids to make the information easy to understand.

- If the entity has identified specific targets (for example in a funding application), the performance report will likely focus on the extent to which those were achieved. Management will also need to consider any internal reporting and how the entity measures its own performance.
- Linking the performance information to the financial information to better assist readers in understanding what the PBE accomplished with the resources it received. For example, an entity delivering goods to recipients could disclose the cost per unit of goods.

Comparative information

Service performance information for the comparative period is required, including in the year of initial application of PBE FRS 48. Entities must therefore plan ahead so that they will be able to gather the appropriate data.

Interim Financial Statements

PBE IAS 34 does not require service performance information in interim financial statements. However, if a PBE includes a complete set of service performance information in its interim financial statements, that information must comply with PBE FRS 48. If a PBE includes condensed service performance information in interim financial statements, the information should be presented in a manner that is consistent with the service performance information in its most recent annual financial statements (or the PBE should provide an explanation of any differences).

Audit Requirement

The Statement of Service Performance is part of the entity's general purpose financial statements prepared in accordance with PBE Standards. Therefore, if your financial statements are required by law (or otherwise, for example under your founding documents) to be audited, your Statement of Service Performance will be covered by that audit requirement.

Other information in the annual report

The Statement of Service Performance should include the most important measures of the entity's performance during the year that are critical to stakeholders for accountability and decision-making purposes.

It is important to note, however, that not all information about the entity's services needs to be included in the Statement of Service Performance. The entity may wish to include additional information in its annual report in a section that is separate to the financial statements.

Statement of Service Performance (continued)

Tips for getting started



Engage with your stakeholders – Management should consider talking to key stakeholders to understand what information is important to them for accountability and decision-making purposes.



Consider what data is already being collected – Some performance information that is currently provided to the entity's governing body may also be useful for readers of the entity's financial statements.



Consider materiality - Management will need to consider materiality in the context of the Statement of Service Performance, including the level of aggregation of performance measures. Reporting too many measures may obscure the information that is most critical to stakeholders.



Involve your finance team – The entity will need systems and processes in place to collect the data necessary to compile the Statement of Service Performance. The finance team is likely best placed to assist in determining how best to collect the required data for the proposed performance measures and consider any additional systems and processes that need to be implemented.



Consider the key judgements - Management will need to make judgements around selection, measurement, and presentation of information in the Statement of Service Performance. Ensure key judgements are documented, approved by those charged with governance, and disclosed in the Statement of Service Performance.



Engage with your auditor – If your financial statements are audited, you should discuss your proposed performance measures with your auditor. This will enable you to agree on the timing of verification procedures as well as the documentation that the entity will be required to produce for the purpose of the audit.

Other available guidance

Several organisations have issued guidance to assist entities in implementing PBE FRS 48.

External Reporting Board (XRB)



Explanatory Guide (EG A10) This explanatory guide provides a summary of the requirements and examples of how to report the components of the Statement of Service Performance.



Staff guidance provides [key considerations when applying PBE FRS 48](#).



The XRB recently issued additional staff guidance on [disclosures of how service performance is measured by an entity](#) and provides a reminder of the key principles to consider around what to disclose and how much to disclose.

Charities Services



Charities Services has some [information about service performance reporting](#) for registered charities.

Office of the Auditor General (OAG)



Performance reporting: The OAG has issued performance reporting guidance for public organisations including links to annual reports that the OAG determined were good examples of reporting what is important, providing a coherent account of performance and reporting on impacts and the contribution to outcomes. Other entities may find the guidance useful in preparing their own performance reports.

Need some good examples?

The Fred Hollows Foundation, 2023 winner of the NZ Charity Reporting Award for Tiers 1 and 2, has been recognised as having quality service performance reporting. The section of the accounting policies on significant judgements includes an explanation of how the Foundation selected the performance measures to report. You can see their Annual Reports [here](#).

Karori Sanctuary Trust/Zealandia is another Tier 2 PBE whose audited [Performance Report](#), including the Statement of Service Performance, has been recognised as high quality by Charities Services and CAANZ and includes a range of measures.

Reflecting climate risk in financial statements

Climate change is an urgent risk that entities around the world are already facing. With growing pressure from stakeholders, as well as increased government activity, entities must take action to consider and provide meaningful and useful disclosure about climate-related risks that could impact the entity and how management are responding to these risks.

The IFRS Foundation has issued educational materials on the [Effects of climate-related matters on financial statements](#). The International Public Sector Accounting Standards Board (IPSASB) staff have also issued a [Q&A publication on climate change](#).

As New Zealand financial reporting standards are based on IASB and IPSASB developed standards, the guidance is also relevant for financial statements prepared in accordance with NZ Generally Accepted Accounting Practice (NZ GAAP).

Preparers of financial statements must consider the **accounting implications of climate change** as well as the appropriate **disclosures** to include in the entity's financial statements, including the **consistency of that disclosure** with other information in the annual report or other entity publications.

Impacts on measurement and recognition

The risks and uncertainties arising from climate change are likely to have some impact on the financial statements of all entities, whether directly, or indirectly (through the supply / value chain).

For example, climate change could result in:

- changes to assumptions in forecasts when considering asset impairment, including for goodwill,
- effects on impairment calculations because of increased costs or reduced demand,
- changes in the useful life of assets,
- changes in the fair values of assets,
- changing availability of future tax profits when assessing recoverability of deferred tax assets,
- changes in provisions for onerous contracts because of increased costs or reduced demand,
- changes in provisions and contingent liabilities arising from fines and penalties,
- changes in expected credit losses for loans and other financial assets, and
- new financing arrangements and terms to be considered.

Forecasts used to assess going concern over a period of at least 12 months from the date of signing the financial statements may also be significantly affected in some cases. The likelihood and extent of impact will require judgement because there is significant uncertainty as to how much the global temperature will increase, what the impact of different climate change scenarios on an entity's operations might be, and how these factors may result in changes to cash flow projections or to the level of risk associated with achieving those cash flows.

Assumptions made will need to be consistent with:

- risk management, strategy and operating model disclosure,
- commitments made by the organisation to stakeholders,
- commitments made by governments of jurisdictions in which the entity operates, e.g., the NZ Government's commitment to 'net zero by 2050' and a carbon neutral public sector by 2025, and
- other disclosures made by the entity (such as the new climate-related disclosures issued by the XRB or other ESG reporting).



If your organisation has made climate commitments, the financial impact of these commitments should be reflected in any related accounting estimates and disclosures.

Increased Disclosure

Accounting standards note that *"omissions or misstatements of items are material if they could, individually or collectively influence the decisions or assessments of users made on the basis of the financial statements or service performance information"* (PBE IPSAS 1).

If stakeholders could reasonably expect that climate-related risks (or other emerging risks) will have a significant impact on the entity and this would qualitatively influence stakeholders' decisions, then information on the climate or other assumptions made should be disclosed, including information about the sensitivity of those assumptions. Such disclosure may be necessary, even if the effects of climate change on the entity are not expected in the short term. How this is disclosed in a way that highlights the important information for investors without overwhelming them with too much data will be important.



Climate disclosures in the financial statements should be consistent with information provided elsewhere, for example in management discussions in the annual report and information on the organisation's website.

The staff of the XRB have also issued some guidance on [Climate-related matters in the financial statements](#) and how these link to the climate-related disclosures below.

Climate-related disclosures

The XRB issued its first climate disclosure standards in December 2022. The standards are effective for annual reporting periods beginning on or after 1 January 2023. These disclosures do not form part of the financial statements but are rather contained in a separate standalone climate statement.

These standards affect the following types of entities, known as Climate Reporting Entities (CREs):

- Large, listed companies with a market capitalisation of more than \$60 million
- Listed issuers of quoted debt securities with a combined face value of quoted debt exceeding \$60 million
- Large, licensed insurers, registered banks, credit unions, building societies and managers of investment schemes with more than \$1 billion in assets
- Some crown financial institutions (via letters of expectation)

The [FMA guidance page](#) provides fact sheets and flow charts to help determine whether an organisation is a Climate Reporting Entity. The FMA has also released a brief [podcast](#) providing an overview of the new requirements.

Climate Reporting Entities will be required to prepare an annual climate statement that discloses information about the effects of climate change on their business or any fund they manage. They will need to obtain independent assurance about the part of the climate statement that relates to the disclosure of GHG (Greenhouse Gas) emissions, generally in the second year of reporting.

The new Climate Standards issued are:

- [Aotearoa New Zealand Climate Standard 1: Climate-related Disclosures \(NZ CS 1\)](#)

This standard requires disclosures explaining how the entity manages its climate-related risks and opportunities. The disclosure requirements cover four key areas (Governance, Strategy, Risk Management and Metrics and Targets). Entities must obtain assurance over the greenhouse gas emissions disclosures.

- [Aotearoa New Zealand Climate Standard 2: Adoption of Aotearoa New Zealand Climate Standards \(NZ CS 2\)](#)

This standard provides optional disclosure exemptions that entities may apply during the first few periods of climate reporting.

- [Aotearoa New Zealand Climate Standard 3: General Requirements for Climate-related Disclosures \(NZ CS 3\)](#)

This standard includes the principles for climate-related disclosures (such as relevance, accuracy, and verifiability), general requirements for how the information is disclosed, and guidance on topics such as materiality and estimation uncertainty.

The XRB has released additional supporting materials, including staff guidance and a preparation guide for directors. These and other resources can be found [here](#).

Appendix A – Shedding light on the disclosures required

PBE Standards require disclosures in relation to all the new or revised Standards and Interpretations that have had or may have a material impact on the annual financial report of the entity, whether they have been adopted or not. The requirements for interim financial reports are less onerous but must still be considered.

The disclosure requirements surrounding new or revised accounting pronouncements are specified by:

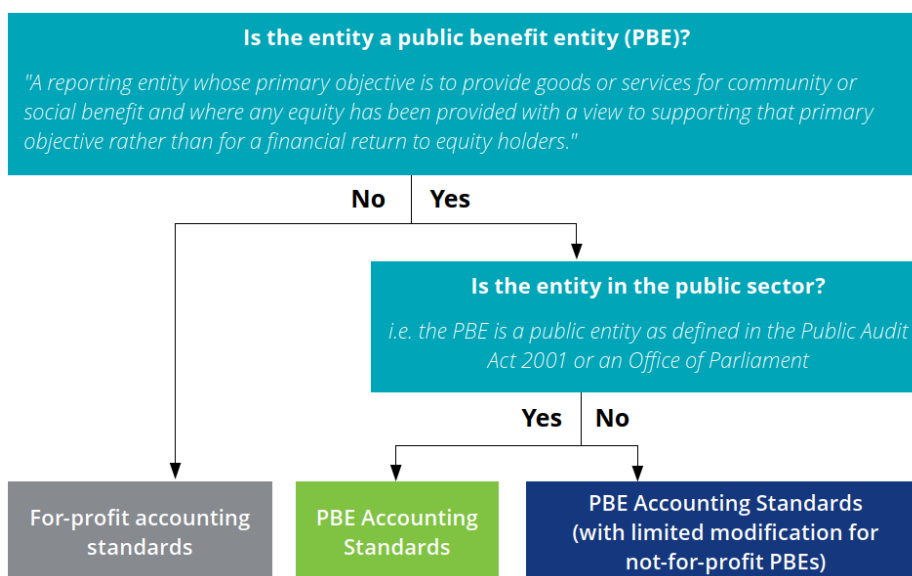
- for annual reporting periods – PBE IPSAS 3 *Accounting Policies, Changes in Accounting Estimates and Errors*
- for interim reporting periods – PBE IAS 34 *Interim Financial Reporting*.

Entities reporting under RDR (Tier 2 entities) are permitted exemptions from certain disclosures as noted below.

What disclosures are required?

Applicability of new or revised pronouncement	Summary of disclosures required	
	Annual financial statements	Interim financial statements
Initial mandatory or voluntary application of a new or revised pronouncement	<p>The relevant pronouncement, the nature of the change in accounting policy, details of any transitional provisions, and a line-by-line analysis of the effect of the change in policy on the financial statements.</p> <p><i>Tier 2 entities would not need to disclose details of transitional provisions.</i></p> <p>(PBE IPSAS 3.33)</p> <p>In addition, each standard may have specific transitional provisions with which the entity needs to comply.</p> <p>When initial application has not had a material impact on the financial statements (and is also not expected to have a material impact in future periods), an entity may wish to include a generic disclosure such as:</p> <p><i>“All mandatory Standards, Amendments and Interpretations have been adopted in the current year. None had a material impact on these financial statements.”</i></p>	<p>The nature and effect of any change in accounting policy compared with the most recent annual financial report.</p> <p>(PBE IAS 34.16A(a))</p> <p>PBE IAS 34 does not specify the level of detail of the disclosures required, and accordingly the level of detail may be less than is presented in an annual financial report in accordance with PBE IPSAS 3. However, best practice might suggest that the requirements of PBE IPSAS 3 be used as a guide.</p>
Pronouncement on issue but not adopted	<p>The financial report must disclose which pronouncements have been issued but not adopted in the financial report, when the pronouncements have mandatory application, when those pronouncements are going to be applied by the entity and the possible impact on the entity’s financial report (where known or reasonably estimable).</p> <p>The tables within the body of this update could be reviewed to identify such pronouncements for periods ending 31 December 2023 or 31 March 2024 (updated to 8 March 2024).</p> <p>When initial application is genuinely not expected to have a material impact on the financial statements, an entity may wish to include a generic disclosure such as:</p> <p><i>“There are a number of Standards, Amendments and Interpretations which have been approved but are not yet effective. The [entity] expects to adopt these when they become mandatory. None are expected to result in a material impact on the [entity’s] financial statements.”</i></p> <p>Tier 2 entities are exempt from these disclosures.</p> <p>(PBE IPSAS 3.35-36)</p>	<p>The impacts of new or revised accounting pronouncements that have not been early adopted are not explicitly required to be disclosed in interim financial reports. Entities should consider making additional disclosures where the effects of these pronouncements are expected to be material and those effects have not been previously disclosed in the prior annual financial report.</p> <p><i>Tier 2 entities are exempt from these disclosures in an annual financial report, and accordingly would also be exempt at the interim period.</i></p>

Appendix B – The Accounting Standards Framework for PBEs



The Accounting Standards Framework for PBEs consists of the following suites of standards:

Accounting Standards Framework for Public Benefit Entities		
	Public sector PBEs	Not-for-profit PBEs
	PBE Standards	PBE Standards
Tier 1	Public accountability ¹ , or Large (expenses ² > \$33m ³)	Public accountability ¹ , or Large (expenses ² > \$33m ³)
	PBE Standards RDR	PBE Standards RDR
Tier 2	Non-publicly accountable and non-large Elect to be in Tier 2	Non-publicly accountable and non-large Elect to be in Tier 2
	Simple Format (Accrual) (PS)	Simple Format (Accrual) (NFP)
Tier 3⁴	Non-publicly accountable & expenses ² ≤ \$5 million ³ Elect to be in Tier 3	Non-publicly accountable and expenses ² ≤ \$5 million ³ Elect to be in Tier 3
	Simple Format (Cash) (PS)⁵	Simple Format (Cash) (NFP)⁵
Tier 4⁴	Entities allowed by law to use cash accounting Elect to be in Tier 4 Non-GAAP standard	Entities allowed by law to use cash accounting Elect to be in Tier 4 Non-GAAP standard

¹ Definition of 'public accountability':

- Entities that meet the International Accounting Standards Board's (IASB) definition of public accountability:
 - entities that have debt or equity instruments that are traded, or that will be traded, in a public market; or
 - entities that hold assets in a fiduciary capacity for a broad group of outsiders as one of its primary businesses.
- Entities deemed to be publicly accountable. An entity would be deemed to be publicly accountable in the New Zealand context if:
 - it is an FMC reporting entity or a class of FMC reporting entities that is considered by the FMA to have a higher level of public accountability than other FMC reporting entities under section 461K of the Financial Markets Conduct Act 2013 (FMCA 2013); or
 - it is an FMC reporting entity or class of FMC reporting entities that is considered by the FMA to have a higher level of public accountability by a notice issued by the Financial Markets Authority (FMA) under section 461L(1)(a) of the FMCA 2013.

For information on which entities the FMA has designated as having 'higher or lower public accountability' refer to the link: <https://www.fma.govt.nz/compliance/exemptions/financial-reporting-exemption-information/#accountability>

² 'Expenses' are the total expenses (including losses and grant expenses) recognised and measured in accordance with the relevant tier's standards.

³ The size threshold increased from **\$30 million to \$33 million effective for periods ending on or after 28 March 2024**. For Tier 3, the size threshold **increased from \$2 million to \$5 million**. See [page 2](#) for the link on this amendment.

⁴ The New Zealand Accounting Standards Board issued new Tier 3 and 4 standards for reporting periods beginning on or after 1 April 2024. The new standards are available for early adoption for entities with reporting periods ending after 15 June 2023. See [page 2](#) for links to these new standards.

⁵ In order for an entity to be able to report under Tier 4 PBE Accounting Standards, an entity must, among other requirements, not meet the legislative size threshold to be a specified not-for-profit entity. When applying the legislative size threshold entities must consider combined total operating payments of the entity and all its controlled entities. The size threshold is \$140,000.

The above Framework applies when an entity is required to comply with NZ GAAP or a non-GAAP Standard. Requirements to comply with GAAP or a non-GAAP Standard are specified in legislation but may be included in other arrangements (e.g. contracts).

The XRB's website reflects the multiple sets of accounting standards that are available, so check you are using the right version. You can find the PS PBE standards and the NFP PBE standards [here](#).

New Zealand Directory

Auckland Private Bag 115033, Shortland Street, Ph +64 (0) 9 303 0700, Fax +64 (0) 9 303 0701

Hamilton PO Box 17, Ph +64 (0) 7 838 4800, Fax +64 (0) 7 838 4810

Rotorua PO Box 12003, Rotorua, 3045, Ph +64 (0) 7 343 1050, Fax +64 (0) 7 343 1051

Wellington PO Box 1990, Ph +64 (0) 4 472 1677, Fax +64 (0) 4 472 8023

Christchurch PO Box 248, Ph +64 (0) 3 379 7010, Fax +64 (0) 3 366 6539

Dunedin PO Box 1245, Ph +64 (0) 3 474 8630, Fax +64 (0) 3 474 8650

Queenstown PO Box 794 Ph +64 (0) 3 901 0570, Fax +64 (0) 3 901 0571

Internet address <http://www.deloitte.co.nz>

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organisation"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 415,000 people worldwide make an impact that matters at www.deloitte.com.

Deloitte New Zealand brings together more than 1800 specialist professionals providing audit, tax, technology and systems, strategy and performance improvement, risk management, corporate finance, business recovery, forensic and accounting services. Our people are based in Auckland, Hamilton, Rotorua, Wellington, Christchurch, Queenstown and Dunedin, serving clients that range from New Zealand's largest companies and public sector organisations to smaller businesses with ambition to grow. For more information about Deloitte in New Zealand, look to our website www.deloitte.co.nz.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organisation") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

This publication is intended for the use of clients and personnel of Deloitte. It is also made available to other selected recipients. Those wishing to receive this publication are asked to communicate with:

The Editor,
Accounting Alert

Private Bag 115033,
Shortland Street,
Auckland, 1140

Ph +64 (0) 9 309 4944
Fax +64 (0) 9 309 4947

© 2024. Deloitte Limited.