MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

COVERSHEET

Minister	Hon Scott Simpson	**Portfolio**	Commerce and Consumer Affairs
Title of Cabinet paper	Amendments to the Climate-Related Disclosures Regime	**Date to be published**	14 November 2025

List of documents that have been proactively released		
Date	**Title**	**Author**
October 2025	Amendments to the Climate-Related Disclosures Regime	Office of the Minister of Commerce and Consumer Affairs
15 October 2025	Climate-Related Disclosures Regime: Proposed Amendments ECO-MIN-25-0166 Minute	Cabinet Office
29 May 2025	Regulatory Impact Statement: Capital markets – adjustments to the climate-related disclosures regime	MBIE

Information redacted **YES**

Any information redacted in this document is redacted in accordance with MBIE's policy on Proactive Release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

Some information has been withheld for the reasons of confidential advice to government, legal professional privilege, international relations and negotiations.

Cabinet Economic Policy Committee

Minute of Decision

Climate-Related Disclosures Regime: Proposed Amendments

Portfolio **Commerce and Consumer Affairs**

On 15 October 2025, the Cabinet Economic Policy Committee (ECO):

1 **noted** that in December 2024, ECO:

1.1 noted that stakeholders have raised concerns about aspects of the climate-related disclosure regime (CRD regime);

1.2 agreed to the release of a discussion document on proposed adjustments to the CRD regime, and invited the Minister of Commerce and Consumer Affairs to report back with the results of the consultation and with any proposed policy decisions;

[ECO-24-MIN-0296]

2 **agreed**:

2.1 to raise the threshold for listed issuers to report, in relation to both market capitalisation (equity issuers) and face value of debt (debt issuers), from an amount exceeding $60 million to an amount exceeding $1 billion;

2.2 that managers of registered managed investment schemes (MIS managers) will no longer be climate reporting entities captured by the obligations in Part 7A of the Financial Markets Conduct Act 2013 (FMC Act);

2.3 that the monetary thresholds that currently form part of the definition to define a climate reporting entity may only be adjusted upwards, no more than once every three years for each type of climate reporting entity, on the recommendation of the responsible Minister by Order in Council, subject to:

2.3.1 consultation with the Financial Markets Authority, the External Reporting Board, the Reserve Bank of New Zealand as relevant, and affected parties;

2.3.2 criteria including considering whether change is necessary or desirable to ensure that entities are not subject to disproportionate compliance costs, whether any increase is consistent with facilitating informed businesses and markets, and comparable international jurisdictions;

2.4 to amend Part 7A of the FMC Act to align the terminology for when an entity is considered a climate-reporting entity with current accounting standards, and to enable financial reporting standards to be issued by the External Reporting Board to apply for the purposes of section 461Q of the FMC Act;

2.5 that directors of climate reporting entities should not have deemed liability for entity breaches, i.e. disapply section 534(1)(cb) of the FMC Act;

2.6 that climate reporting entities and their directors should not be liable for unsubstantiated representations in their climate statements if they comply with the climate standards;

2.7 that entities and directors that produce voluntary climate statements should also not be liable for unsubstantiated representations in those voluntary climate statements, if they comply with the climate standards – applied with all necessary modifications as if the statements were required to be prepared under Part 7A of the FMC Act;

2.8 to make related changes to the Fair Trading Act 1986 so that entities and directors producing mandatory and voluntary climate reports are not caught by a similar prohibition in the Fair Trading Act relating to unsubstantiated representations;

Financial implications

3 Confidential advice to Government

Legislative implications

4 **noted** that the Minister of Commerce and Consumer Affairs intends to pursue the amendments relating to the CRD regime via the Financial Markets Conduct Amendment Bill, which is currently before the Finance and Expenditure Committee;

5 **authorised** the Minister of Commerce and Consumer Affairs to:

5.1 issue drafting instructions to the Parliamentary Counsel Office to give effect to the above decisions;

5.2 make minor and technical changes during drafting that are consistent with the policy intent of the paper under ECO-25-SUB-0166.

Rachel Clarke
Committee Secretary

Present:
Hon David Seymour
Rt Hon Winston Peters
Hon Shane Jones
Hon Paul Goldsmith (Chair)
Hon Louise Upston
Hon Todd McClay
Hon Tama Potaka
Hon Simon Watts
Hon Chris Penk
Hon Andrew Hoggard
Hon Mark Patterson
Hon James Meager
Hon Scott Simpson
Simon Court MP

Officials present from:
Office of the Prime Minister
Office of Hon Scott Simpson
Officials Committee for ECO