SBTi CORPORATE NET ZERO STANDARD SECOND CONSULTATION

A public consultation issued by the Science Based Targets Initiative

Comments from ACCA to the Science Based Targets Initiative

12 December 2025

REF: TECH-CDR-2305

About ACCA:

We are ACCA (the Association of Chartered Certified Accountants), a globally recognised professional accountancy body providing qualifications and advancing standards in accountancy worldwide.

Founded in 1904 to widen access to the accountancy profession, we've long championed inclusion and today proudly support a diverse community of over **257,900 members** and **530,100 future members** in 180 countries.

Our forward-looking qualifications, continuous learning and insights are respected and valued by employers in every sector. They equip individuals with the business and finance expertise and ethical judgment to create, protect, and report the sustainable value delivered by organisations and economies.

Guided by our purpose and values, our vision is to develop the accountancy profession the world needs. Partnering with policymakers, standard setters, the donor community, educators and other accountancy bodies, we're strengthening and building a profession that drives a sustainable future for all.

Find out more at: www.accaglobal.com

For further enquiries please contact:

Jessica Bingham

Global Sustainability Lead, Strategy

jessica.bingham@accaglobal.com

GENERAL COMMENTS

ACCA welcomes the opportunity to respond to the *Science Based Targets initiative (SBTi) Corporate Net-Zero Standard V2* second public consultation. We are pleased to engage with SBTi on the continued development of this important standard and are encouraged by SBTi's efforts to refine and strengthen the standard and would welcome further dialogue on these points should SBTi wish to explore any of them in more detail. Though we believe that the changes are progressing appropriately to achieve climate ambitions, ACCA is concerned by the potential administrative burden of transitioning from V1.0 to V2.0. Despite the issuance of transition guidance, with 2030 and near-term target deadlines in sight, there is a level of uncertainty around how organisations will navigate these changes. However, overall, we believe the changes to the standard demonstrate a desire to continuously improve and show commitment to environmental sustainability.

ACCA strongly supports science-based approaches to net-zero target setting. Our net-zero targets have been independently *verified by the SBTi*, underlining our commitment to credible climate action grounded in the latest climate science.

We have consistently voiced our stance on making meaningful reductions to emissions rather than offsetting and have taken the most transparent approach possible with our first climate action plan published and by setting year on year emissions targets. Therefore, consistent with ACCA's focus on decarbonisation, we recommend that criteria should continue to emphasise emissions reduction pathways rather than reliance on removals or offset mechanisms. As the new limitations on carbon credits and emissions offsetting help to encourage real change.

We believe that there is scope for the SBTi to create a more tailored standard for service-based companies, though we recognise that by having a consistent framework by adopting 1.5 degrees-aligned targets across all Scopes (previously 2 degrees for Scope 3), this improves comparability within sectors. We recognise the complexity inherent in aligning global best practice with the diverse operational contexts of companies worldwide. We continue to encourage interoperability with global reporting standards to ensure a global baseline and improve consistency and comparability of climate-related disclosures.

Based on our review of the consultation materials and draft criteria, we would also like to highlight several issues that we believe affect the accessibility and effectiveness of the consultation process.

CONSULTATION FORMAT

ACCA is concerned as to how meaningful the consultation responses will be, given that many of the questions are highly technical and academic in tone. This is likely to limit meaningful engagement from a broad range of stakeholders, including non-experts, SMEs and organisations without dedicated climate specialists. We believe that the consultation would benefit from a more accessible framing of questions, though we recognise this is a technical standard, by having clearer questions it would allow for smaller and less specialist organisations to respond without compromising on rigour.

Lack of consistent structure:

For many of the questions, we observed that there was a lack of structure or comparative context. This made it difficult to evaluate the material impact of the proposed changes from the existing criteria. To enable the survey to be filled out as efficiently as possible, it would be useful to have examples or side by side comparisons, where there is a more explicit evaluation of changes. This would likely improve the quality of feedback and enhance transparency.

Supporting documentation:

Supporting documents are referenced, however more user-friendly examples would assist stakeholders in understanding the practical implications and evolution of specific requirements — for example, how new approaches to Scope 1, Scope 2, and Scope 3 target-setting will be applied in different sectors and operational realities.

COMMENTS AND RECOMMENDATIONS

Target time horizon changes:

ACCA agrees with the recommendation that long-term targets (e.g., net zero by 2045) do not need to be adjusted follow re-baselining, as this maintains ambition in light of the global climate crisis. Given the Paris Agreement date of 2050, we agree that the new near-term targets should cover a five-year period, and these will also help us to ensure we are making a measurable impact over a shorter time period. However, we do caution that this may be unattractive to certain organisations that are already struggling to meet commitments, and therefore it may cause a reduction in the number of SBTi target setters. Therefore, we think that this reasoning should be taken into account when considering the approach to mid-term targets.

New target setting methods to be introduced:

We agree with the more detailed and sector specific target setting methods, these are likely to increase the practicability of targets.

Equity in approach:

We believe that the SBTi should consider whether greater equity can be achieved if the science-based approach could be adapted to suit business types and locations. The availability of 'green' resources is not distributed fairly on a global scale, and there are limitations on the impact a global company can realistically make without compromising on the business objectives.

Further, with regard to equity, re-baselining could be difficult, but not impossible, and though it can lead to improved data accuracy, validity, and possibly more relevant target setting it could also increase barriers to entry and ambition for some organisations.

Scope 2 Changes:

There have been minimal changes to Scope 1 and 2, and ACCA would consider this fully actionable.

ACCA agrees with the change in terminology from the term 'zero-carbon' to 'low-carbon' as we believe this is a more accurate description of activities and mitigates against potential greenwashing or legal risks for organisations.

Scope 3 Changes

ACCA believes that the increased flexibility and adaptability proposed in V2.0 will make it more realistic for companies to comply. For this reason, we believe that some of the new recommendations are in line with the ambition levels that ACCA already has.

With supply chain emissions dominating scope 3 for organisations, we would recommend careful consideration of the introduction of mandatory supplier engagement targets being removed. Many organisations have set targets without practical transition planning in place and having specific requirements around their targets is useful in ensuring accountability. However, the requirement for 'real' targets, as opposed to supplier engagement targets, should have a positive impact in the long term. If companies within our supply chain set real targets and demonstrate real impact, this will feed into our supply chain reporting and support our work. Although we are already engaging with suppliers, this shift may increase the ease of retrieving data from our suppliers, leading to better data availability and accuracy for our reporting.