



# Corporate Net-Zero Standard Version 2.0 Public Consultation

COMPLETE

Started:

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Time Spent:

Over a week

Page 1: About you

Q1

First name

Q2

Last name

Q3

Job title

Q4

Email

Q5

Confirm email

Q6

Organization name

Q7

Type of organization

Q8

What country is your organization headquartered in? If you are responding in a personal capacity, please select the country where you are based.

Q9

In which regions does your organization have significant operations or value chain activities?

Q10

Results of this consultation will be made publicly available but may be anonymized to the stakeholder group level. For example, "ABC Corporation" becomes "Company". Would you like your responses to be made anonymous?

Page 2: General introductory questions - continued

Q16

Are you a current or previous SBTi advisory or working group member?

No

Q17

If so, which group? (select as many as are relevant)

Respondent skipped this question

Q18

To what extent do you agree or disagree with the following statements?

CNZS V2.0 is readable and easy to understand	Somewhat agree
--	----------------

CNZS V2.0 is ambitious enough to meaningfully take science-based climate action	Somewhat agree
---	----------------

CNZS V2.0 is actionable	Strongly agree
-------------------------	----------------

CNZS V2.0 will assure the credibility of companies' climate action	Somewhat agree
--	----------------

CNZS V2.0 strives for equity and does not compromise environmental sustainability	Somewhat disagree
---	-------------------

Page 3: General introductory questions - explain your response

Q19

Please explain why you do not think that CNZS V2.0 is readable and easy to understand.

Respondent skipped this question

Q20

Please explain why you do not think that CNZS V2.0 is ambitious enough to meaningfully take science-based climate action.

Respondent skipped this question

Q21

Please explain why you do not think that CNZS V2.0 is actionable.

Respondent skipped this question

Q22

Please explain why you do not think that CNZS V2.0 will assure the credibility of companies' climate action.

Respondent skipped this question

Q23

Please explain why you do not think that the draft CNZS V2.0 strives for equity and does not compromise environmental sustainability.

While the overall requirement level is acceptable, some sectoral pathways allow (typically intensity-based) reduction rates that cannot be regarded as science-based. There should be no compromise to accept unsustainable business models in to the SBTi. This should be addressed by revising some sector specific requirements as soon as possible. For example, a intensity-based FLAG targets should be acceptable only for companies in primary production. Now, for example, a restaurant company that uses a lot of beef, can set an intensity target based on that, while science-based approach would be to replace beef with low-emission alternatives. There is a similar problem with the air transportation guidance: the requirements are set in a way that allows a growth of air transportation, while science-based approach would be to travel by land whenever possible.

Page 4: Response preference

Q24

How would you like to respond to this survey?

I would like to respond to all questions in the survey (estimated time ~2 hours)

Page 5: Introduction (company categorization)

Q26

To what extent do you support or oppose the following elements of company categorization?

1. Differentiation of requirements based on company size and location	Somewhat support
2. Proposed company size thresholds	Somewhat support
3. Proposed geographical categorization	Somewhat support
4. Proposed conditions to determine the geographical categorization of companies (see note below)	Somewhat support

Page 6: 1. General requirements

Q27

How does requiring a public commitment to net-zero impact a company's ability to seek validation under SBTi standards?

Neutral

Q28

Should the provision for transition plans be a mandatory requirement or a best practice recommendation?

Requirement for all companies

(Optional) Please explain your response.:  
All companies should back their targets with a specified transition plan to demonstrate that they have a serious interest and intent to achieve those targets. And if there won't be a specific set of requirement for these plans, the requirement should not be too burdensome for the B companies.

Q29

To what extent do you think it is feasible for category B companies to develop a transition plan within 12 months from the initial validation?

Somewhat feasible

(Optional) Please explain your response.:  
In practice, many elements that could be included in the transition plan, are required in order to assess the feasibility of the targets.

Q30

Should SBTi introduce any further requirements for transition plans?

Yes

(Optional) Please explain your response.:  
SBTi can rely on external frameworks if they are considered sufficient to ensure climate transition. It would be desirable for SBTi to develop high-level criteria on what requirements these external frameworks should meet. This would also encourage legislators to ensure that the transition planning frameworks currently being developed by law are not watered down (especially referring to Omnibus I -proposal currently being discussed at the EU level). The ideal situation would be that the legal frameworks would be sufficient to ensure climate transition in line with climate science and that SBTi could directly refer to them. This would reduce administrative burden from all parties, especially companies.

Q31

Should the provision for ensuring that policy engagement, lobbying activities, and advocacy efforts are consistent with and supportive of net-zero be a mandatory requirement or a best practice recommendation?

Requirement for all companies

(Optional) Please explain your response.:  
Science-based practice should include a requirement to keep own advocacy efforts in line with their emission reduction targets. As this provision would be a mere statement (i.e. not requiring comprehensive reporting or auditing) it should be mandatory requirement for all companies.

Page 7: 2. Determining performance in the base year

Q32

Which approach do you most support for companies to follow when setting their organizational and operational boundary?

Option 2: Companies set organizational boundaries consistent with the boundary in their consolidated financial statements

(Optional) Please explain your response.:  
The SBTi should strive to align its requirements with the regulation. However, companies should be required to disclose any exclusions (e.g. partially owned assets) that are material in terms of their total emissions.

Q33

At what assessment stage should companies present their GHG inventories?

Entry Check

(Optional) Please explain your response.:  
Early overview would give companies more time to adjust their practices if not already in line with the requirements. Furthermore, companies should have a clear understanding of their emissions before committing to reductions.

Q34

GHG emissions reporting at activity level should be required:

For scope 1 and 2

(Optional) Please explain your response.:  
Should be a requirement for scopes 1 and 2, and recommended for scope 3.

Q35

What GHG emissions data do you have at the activity-level?

Respondent skipped this question

Q36

What percentage of scope 3 GHG emissions data is available at the activity-level?

Respondent skipped this question

Q37

Do you have activity-level GHG emissions data for emission-intensive activities within scope 3?

Respondent skipped this question

Q38

How often do you think companies should be required to publicly report their scope 3 emissions?

Full scope 3 inventory annually

Q39

What percentage of traceable emissions data do you have available for your scope 3 emissions approximately?

Respondent skipped this question

Q40

To what extent do you think it is feasible to have fully traceable data by 2035 for emission-intensive activities?

Agree with 2035  
(Optional) Please explain your response.:  
Ten years is a suitable timeframe to develop a full traceability of emissions.

Q41

To what extent do you think that the 5% significance threshold for scope 3 categories is a meaningful way to identify relevant emissions sources to be included in scope 3 targets?

The threshold is appropriate

Q42

In addition to those listed in Annex D, are there additional emission-intensive activities you believe should be considered?

No

Q43

To what extent do you think the 1% significance threshold for emission-intensive activities is meaningful in identifying relevant emissions sources to be included in near-term scope 3 targets?

The threshold is appropriate

Q44

To what extent do you think the 10,000 tCO2e significance threshold for emission-intensive activities is meaningful in identifying relevant emissions sources to be included in near-term scope 3 targets?

The threshold is appropriate

Q45

Should SBTi set a cumulative limit (as a percentage of total scope 3 emissions) on the exclusion of value chain and emission sources from the near-term target boundary? (Note: a higher percentage allows for more exclusions)

Yes, 10%

Q46

To what extent do you support the requirement for companies to obtain third-party assurance of their GHG emissions inventory?

Strongly support

(Optional) Please explain your response.:  
It is well-known that there are inconsistencies in the emissions accounting and reporting. Third-party assurance would help to mitigate these (and is already a regulatory requirement for some companies).

Q47

Do you already have your inventory assured by a third party?

Respondent skipped this question

Q48

If yes, what level of assurance are you aiming for?

Respondent skipped this question

Q49

If not, why?

Respondent skipped this question

Q50

Do you think improvements in data quality that lead to a 5% or more cumulative change in base year emissions should trigger base year emissions recalculation?

Yes

Q51

To what extent do you support or oppose the requirement for category A companies to set long-term targets?

Strongly support

(Optional) Please explain your response.:  
A requirement for long-term targets helps to ensure that the emission reducing action for the short term is compatible with the long term change (e.g. avoiding a lock-ins with transitional solutions).

Q52

To what extent do you support or oppose the option for category B companies to set only near-term targets?

Strongly oppose

(Optional) Please explain your response.:  
At minimum, the B companies should be strongly encouraged to set long-term targets and give an explanation if one is not presented.

Q53

To what extent do you agree that companies should have the option to set near-term targets for the second upcoming milestone year, if it is within 7 years (i.e. near-term targets with a timeframe of up to 7 years)? For example, a company setting targets in 2025 and 2027, should not face 2025/6 as the first year, but rather set 2025/5 as the first year, as 2025/6

2028 sets a 7-year target for 2035 (versus the current options of a 5-year timeframe or 2030).

Somewhat agree

Q54

To what extent do you agree that companies should be required to set a mid-term target (e.g. a 10-year target) in addition to their 5-year near-term target?

Strongly agree

(Optional) Please explain your response.:  
Currently there can be a 20 year gap between near-term target in 2030 and a net-zero target in 2050. While such gap diminishes over time, there should be requirement for mid-term target to ensure that there is no significant discontinuation in the emission reduction path.

Q55

Should the use of sector specific pathway be an option or a requirement for companies?

Companies can choose between sector-specific pathways and cross-sector pathway

(Optional) Please explain your response.:  
However, as some sector-specific pathways (e.g. aviation, FLAG) allow less ambitious emission reduction trajectories than the cross-sector pathway, the SBTi should urgently revise these pathways to make it clear that some business models (such as aviation with fossil fuels or selling beef) cannot be aligned with science-based targets as there are low-emission alternatives (such as alternative transportation modes/fuels and plant-based protein).

Page 9: 3. Target-setting: Addressing operational (scope 1) emissions

Q56

Do you have access to your annual scope 1 emissions data from 2020, to be able to estimate cumulative emissions over time?

Respondent skipped this question

Q57

Which option do you prefer for calculating scope 1 targets (per Appendix 1, p.9)?

Option 1: Budget-Conserving Contraction approach, where target ambition levels are a function of past performance and ensure emissions are reduced at levels required to reach net-zero by 2050 and conserving the budget of cross-sector pathway

(Optional) Please explain your response.:  
Budget-Conserving approach is preferable as it gives less incentive for delayed action. However, as this approach will result earlier net-zero target years for those that overshoot, the relevant claims should be revised not to give an impression that a company that delays and overshoots has an earlier net-zero target because of it's higher ambition.

Q58

To what extent would you support or oppose including alignment metrics and targets for scope 1 in addition to emission reduction metrics targets?

Neutral

(Optional) Please explain your response.:  
Absolute overall emission reduction targets should always be a priority. While alignment metrics can support companies in achieving their emission reduction targets, they pose a theoretical risk to the efficiency of the emission reductions (i.e. due to alignment metrics the most cost-efficient reductions will ignored in order to achieve the alignment target).

Q59

To what extent do you support or oppose including measures to address underperformance against near-term scope 1 targets when targets have been missed by a limited amount?

Somewhat agree

(Optional) Please explain your response.:  
The conditional support is highly dependent on the nature of said measures and the level of underperformance accepted.

Q60

At what level of underperformance (see example above) should SBTi allow companies to continue to claim conformance with the standard in the next cycle, and be eligible for corrective measures to address that underperformance?

Up to 5%

(Optional) Please explain your response.:  
Five percent would give some flexibility, without compromising the overall reduction path. Lower values are also acceptable, but anything higher than five percent leaves too much room for gaming the system (see our explanation in 43).

Q61

What option would you prefer for companies to address underperformance of scope 1 targets?

Option 1: Budget-Conserving Contraction approach

(Optional) Please explain your response.:  
Also, option 3 is preferable to the option 2. However, it should be noted here that the stated "financial incentive" (option 3) may be perverse, if the price of permanent removals is lower than the abatement cost (which for some companies can be very high). This is one reason to keep the accepted level of underperformance low.

Q62

Should the provision for companies with equipment or assets powered by fossil fuels to develop a fossil fuel policy in which they commit to end the consumption of fossil fuels in line with a net-zero pathway be a mandatory requirement or a best practice recommendation?

Requirement for all companies

Page 10: 3. Target-setting: Addressing operational (scope 2) emissions

Q63

To what extent do you support the requirement for companies to have a location-based target as well as a market-based or zero-carbon electricity target?

Strongly support

(Optional) Please explain your response.:  
Such target would address the over-reliance on certificates (on reducing scope 2 emissions) and would incentivise operations (and energy use) in locations where energy actually is cleaner.

Q64

To what extent do you support the transition from renewable electricity targets to zero-carbon electricity targets?

Strongly support

Q65

To what extent do you support the requirement for companies to contribute to zero-carbon electricity in other grids as an interim measure to address scope 2 emissions where sourcing within the grids in which the company powers its operations is not possible?

Strongly support

Page 11: 3. Target-setting: Addressing value chain (scope 3) emissions

Q66

To what extent do you agree companies should be required to set long-term scope 3 targets in addition to the commitment to reaching net-zero emissions by 2050?

Somewhat agree

(Optional) Please explain your response.:  
The long-term scope 3 targets would provide clarity on which emissions (and the level of emissions) the company considers residual.

Q67

To what extent do you agree activity-level targets should be mandatory for emission-intensive activities?

Somewhat agree

Q68

If you agree, what do you think is the significance threshold for requiring an emissions-intensive activity to have its own specific activity-level target?

Option 1: the emission-intensive activity represents at least 1% of total scope 3 emissions

(Optional) Please explain your response.:  
Emissions-intensive activities should be covered by the reduction targets as comprehensively as possible.

Q69

Which of the following options do you support for determining that the procurement of an emission-intensive activity is net-zero aligned? (select all that you agree with):

The procured activity must have achieved zero emissions or a net-zero aligned physical emissions intensity benchmark as specified in Table E.2 (current proposal) (e.g. purchased steel was produced at net-zero benchmark of 0.11 kgCO2e/kg steel)



The procured activity must meet or fall below the physical emissions intensity benchmark required in a 1.5°C sector pathway for the specified year (which may still be transitioning toward net-zero rather than having already reached the net-zero end state) (e.g. purchased steel in 2030 was produced at 0.24 kgCO2e/kg steel, or less but has not yet met the net-zero benchmark)

The procured activity must be below a physical emissions intensity as specified in a credible green taxonomy (e.g. purchased aluminium average emissions intensity at or below 1,484 tCO2e/tonne aluminium by 2025, from EU green taxonomy)

The procured activity must be certified as being Paris-aligned by a credible third-party certification scheme (e.g. steel purchased directly from a site which is certified by ResponsibleSteel certification scheme)

The procured activity must be delivered using a specific low-carbon technology (e.g. all leased vehicles and transportation is undertaken with zero emissions vehicles)

Unsure

Q70

To what extent do you support or oppose the proposal for indirect mitigation to count towards scope 3 target achievement, under the condition that it is only used as an interim measure if direct mitigation is not possible, delivers measurable comparable outcomes to direct mitigation and is reported separately to direct mitigation?

Somewhat support

(Optional) Please explain your response.:  
Highly dependent on the criteria used. For example, with the given example ("procuring sustainable aviation fuel through a book-and-claim approach could help address jet-fuel-related emissions") how can it be assessed that "direct mitigation is not possible"? Companies can, for example, at some cost use land-based options (travel/shipping by rails or sea) or avoid the transportation need (i.e. replace business travel with teleconferences etc.).

Q71

How do you think tier 1 supplier engagement targets should be incorporated into the standard?

Option 1: As a mandatory requirement for all companies setting scope 3 targets (i.e. in addition to other targets covering this portion of emissions)

(Optional) Please explain your response.:  
There should always be a mandatory requirement for absolute scope 3 emission reductions. If used, any supplier engagement targets should be additional to that.

Q72

Which of the following options do you support for measuring supplier alignment?

Alignment based on % emissions

(Optional) Please explain your response.:  
Alignment based on spend could direct climate action to the suppliers with a high-value spend for a low-emission production.

Q73

To what extent do you think it is feasible for companies to achieve 100% of spend on tier 1 suppliers providing emission-intensive activities to be going to suppliers that are “transitioning” (i.e. have set an SBT) by 2030?

Infeasible, but 90% would be feasible

Q74

Should the following policies be included as a requirement or recommendation?

Sourcing policy to progressively align sourced products and services with net-zero	Recommendation for all companies
--	----------------------------------

Policies to minimize the use of emission-intensive activities	Recommendation for all companies
---	----------------------------------

Transport policy to optimize transport activities and prioritize zero-emitting transport options	Recommendation for all companies
--	----------------------------------

Energy efficiency policy for buildings	Recommendation for all companies
--	----------------------------------

Policy to progressively align sold products and services with net-zero (i.e. electrification)	Recommendation for all companies
---	----------------------------------

(Optional) Please explain your response.	These policies should be recommended, but companies should be able to prioritise the measures they deem necessary to achieve their targets.
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Q75

To what extent do you think that the proposed approaches could present a barrier to entry for companies seeking validation against SBTi standards?

Option 1: Require removal targets	1 - No barrier
Option 2: Recognize removal targets	1 - No barrier
Option 3: Residual emissions addressed through additional abatement or removals	1 - No barrier
(Optional) Please explain your response.	The uncertainty on the availability and pricing of carbon removals may be a barrier for some companies.

Q76

To what extent do you think the proposed approaches support the SBTi in its mission “to drive science-based climate action in the corporate sector consistent with limiting warming to 1.5°C”?

Option 1: Require removal targets	Strongly support
Option 2: Recognize removal targets	Somewhat support
Option 3: Residual emissions addressed through additional abatement or removals	Somewhat support
(Optional) Please explain your response.	As climate change is already close to (or already over the) 1.5 threshold and causes significant damage all across the globe, the science-based approach must require efforts not only to reduce emissions (as SBTi does) but also the mitigate the negative impact of any unabated ongoing emissions (that are released on the way to net-zero) with removals.

Q77

Do you have any suggestions for other approaches that could support the SBTi in its mission “to drive science-based climate action in the corporate sector consistent with limiting warming to 1.5°C”?

Short-term and long-term targets should include a mandatory requirement to remove all unabated emissions. If (or as) there is a limited supply of high-quality removals, companies could have some limited flexibility to address unabated emissions with removals. Ideally, a company that claims to be science-based in its climate action should already have a net-zero impact on climate.

Q78

Which companies do you think the proposed removal requirements should apply to?

Required for category A companies and recommended for category B companies

(Optional) Please explain your response.:  
As the large-scale availability of high-quality carbon removals is unclear on a medium term, the requirements could be applied as an interim solution only to the A companies that have means to initiate their own carbon removal projects if needed.

Q79

Which of the following approaches do you support for determining the minimum durability threshold for eligible removals? (Figure 5, Documentation of Target Setting Methods).

Option 1a: Like-for-like approach

Q80

Which durability threshold do you support for addressing CO<sub>2</sub> residual emissions as outlined in Appendix 1 (case 1(a))?

200 years

(Optional) Please explain your response.:  
While not strictly science-based approach the requirement of 200 years could be a compromise solution that eases the availability of removals.

Q81

Which of the following approaches for removals do you support most for companies without projected residual emissions? (Figure 5, Documentation of Target-setting Methods).

Case 2(a) Removals for justified hard-to-abate emissions up to a threshold, with minimum durability of removals based on atmospheric lifetime

Q82

What standards and certification frameworks should be referenced in the standard to ensure that carbon dioxide removals adhere to robust quality standards?

While the overall requirements, as stated above, should be explicitly expressed in the CNZS V2.0, the more detailed requirements could come from the recognized standards such as the core carbon principles (ICVCM), article 6 (UNFCCC) and CRCF (EU). As the development and implementation of these frameworks is on-going, the SBTi should prepare for a revision in few years time. Also, it must be taken into account that these standards may allow for some methods that should not be regarded as permanent by the SBTi (e.g. in biological removals).

Page 13: 3. Target-setting: Target transparency

Q83

Should SBTi require companies to disclose their dependency on public policy (e.g., laws, regulations) and other dependencies in meeting their targets?

Yes

(Optional) Please explain your response.:  
Such dependency should not be used as a justification for conditional target.

Q84

To what extent do you support or oppose SBTi increasing transparency around the dependencies (e.g. public policy, technology) embedded within SBTi pathways for target-setting?

Neutral

(Optional) Please explain your response.:  
We support increasing transparency on this matter, but such dependencies should not be used as a justification for lower or conditional targets (or lesser requirements from SBTi). Companies that want to claim as having science-based targets must find ways and means to address such dependencies.

Q85

How can SBTi support the wider ecosystem in overcoming the external barriers (e.g., policy, technology, financing) companies face when implementing their science-based targets?

By having strict requirements that drive companies to develop new technological solutions and to speak for policy changes that support the transition.

Page 14: 4. Addressing the impact of ongoing emissions

Q86

To what extent do you think that the proposal for opt-in recognition on SBTi dashboard and the enabled claims will incentivize companies to take action to address ongoing emissions?

Strongly agree

(Optional) Please explain your response.:  
Science-based approach should be to address all emissions. This means, first and foremost, emission reductions covering the whole value chain. But in addition to this, companies should address their unabated/ongoing/residual emissions on an annual basis. Ideally this should be done with high-quality removals, but – at least as an intermin solution, other types of carbon credits can be accepted (with proper requirements on quality and safeguards).

Q87

To what extent do you support or oppose offering category B companies recognition for addressing ongoing emissions if they address only scope 1 and 2?

Somewhat oppose

(Optional) Please explain your response.:  
This should be clearly labelled as not covering all emissions. Requirement for all three scopes would be preferable.

Q88

Which timescale do you support most for companies making BVCM contributions to address ongoing emissions?

Option 1: On an annual basis

Q89

To what extent do you support or oppose adopting the following elements from SBTi’s BVCM report’s (p41) best practice method for determining the scale of BVCM contribution in CNZS V2.0?

Method: Money-for-ton as the method to determine the BVCM budget	Neutral
Coverage of emissions: Companies take full responsibility for ongoing emissions i.e. total scope 1, 2 and 3	Strongly support

(Optional) Please explain your response.

The unabated emissions should be addressed with an equal amount of financed climate action (i.e. ton-for-ton). The ton-for-ton approach aims at carbon neutrality and is not subject to uncertainties with regard to having a correct internal carbon price. In addition, if a company chooses to direct its money-for-ton BVCM finance towards high quality projects (e.g. DACCS) for which the price per ton is (at least currently) a lot higher than whatever is the likely "science-based carbon price", it effectively finances less emission reductions/removals than its ongoing emissions are.

Q90

Which threshold for target progress should companies meet to be eligible for optional recognition?

Option 1: Achievement of their science-based targets

Q91

If you selected option 2, which of the following options do you support as ‘meaningful progress’ for optional recognition?

Full achievement of scope 1, scope 2 and scope 3 targets

Q92

What standards and certification frameworks should be referenced in the standard to ensure that BVCM measures adhere to robust quality and sustainability standards?

While the overall requirements should be explicitly expressed in the CNZS V2.0, the more detailed requirements could come from the recognized standards such as the core carbon principles (ICVCM), article 6 (UNFCCC) and CRCF (EU). As the development and implementation of these frameworks is on-going, the SBTi should prepare for a revision in few years time.

Q93

How clear is the described process for companies to report their actions to address ongoing emissions?

Somewhat clear

(Optional) Please explain your response.:  
In addition to the draft the following should be explicitly required: 1) If money-for-ton is applied, the used carbon price and its justification should be reported. 2) The "detailed description of the measures employed" should go beyond "the type of actions undertaken" and require project-specific information (which projects, which certifications, how many tons from each etc.).

Q94

Beyond the reporting elements outlined in CNZS-C22, which of the following reporting elements, if any, do you consider important to ensure transparent and credible communications of companies’ BVCM efforts? (Select all that apply)

Volume of mitigation outcomes achieved from BVCM efforts

Geographical and / or sectoral relevance of interventions (to demonstrate alignment with climate priorities)

Carbon-price and rationale for chosen carbon-price

Social and environmental safeguarding principles for BVCM investments

Q95

Which verification mechanisms do you consider the most credible and effective for recognizing companies' BVCM contributions? (Select all that apply)

Third-party verification programs

Independent audits for assurance standards

Reporting through established GHG protocols (e.g., GHG Protocol Land Sector and Removals Guidance, CDP Reporting)

Page 15: 4. Addressing the impact of ongoing emissions - continued

Q96

Please rank your selected mechanisms in order of credibility and effectiveness.

Third-party verification programs	1
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Independent audits for assurance standards	2
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Page 16: 5. Assessing and communicating progress

Q97

To what extent do you think that the proposed requirements are sufficient to ensure robust and reliable data for substantiating target progress?

Strongly agree

Q98

To what extent would you support a requirement for category B companies to provide evidence of third-party assurance for data substantiating target progress?

Somewhat support

(Optional) Please explain your response.:  
Requirements for a third-party assurance on emissions may become more common even for a smaller companies as their larger business partners are required by the regulation (and also by stakeholders such as SBTi) to provide more reliable information on their value chain emissions. Thus, the additional burden of this requirement for B companies may not be as heavy in the future as it may now appear.

Q99

If the Budget-Conserving Contraction target-setting method proposed for scope 1 is implemented, do you think that C23.5 should be a requirement or a recommendation (third-party assurance for scope 1 emissions)?

It should be included as a requirement

Q100

To what extent do you agree that the progress assessment process is sufficiently robust?

Strongly agree

Q101

How clear is the process for setting new targets?

Very clear

Q102

To what extent do you think it is feasible to undergo progress assessment and renewal validation within 12 months of the end of the previous target cycle?

Feasible

Page 17: 6. Claims

Q103

To what extent do you support or oppose the proposed claims?

Application claims (e.g., "Company A has submitted their application to enter the SBTi system, committed to reach net-zero emissions by year X.")	Somewhat support
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Ambition claims (e.g., "Company A has set target X for year X, consistent with achieving net-zero emissions latest by 2050.")	Strongly support
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Conformance claims (e.g., "After an independent third-party assessment, company A is found conformant to the SBTi CNZS V2.0.")	Neutral
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Renewal claims (e.g. "Company A has been found conformant with SBTi standard and has renewed its targets.")	Somewhat support
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(Optional) Please explain your response.	Claims including specific information about the target are clearer than the ones proclaiming general compliance with the standard.
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Q104

To what extent do you agree that the proposed claims provide clear and credible information for stakeholders such as investors, consumers, and regulators?

Application claims (e.g., "Company A has submitted their application to enter the	Somewhat agree
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SBTi system, committed to reach net-zero emissions by year X.")

Ambition claims (e.g., "Company A has set target X for year X, consistent with achieving net-zero emissions latest by 2050.")

Strongly agree

Conformance claims (e.g., "After an independent third-party assessment, company A is found conformant to the SBTi CNZS V2.0.")

Somewhat agree

Renewal claims (e.g. "Company A has been found conformant with SBTi standard and has renewed its targets.")

Somewhat agree

Q105

What additional elements, if any, should be included to enhance the clarity and credibility of these claims?

Claims should differentiate between A and B companies if these will have different requirements.

Q106

To what extent do you agree that the claims proposed incentivize voluntary corporate climate action?

Application claims (e.g., "Company A has submitted their application to enter the SBTi system, committed to reach net-zero emissions by year X.")

Somewhat agree

Ambition claims (e.g., "Company A has set target X for year X, consistent with achieving net-zero emissions latest by 2050.")

Somewhat agree

Conformance claims (e.g., "After an independent third-party assessment, company A is found conformant to the SBTi CNZS V2.0.")

Somewhat agree

Renewal claims (e.g. "Company A has been found conformant with SBTi standard and has renewed its targets.")

Somewhat agree

Q107

To what extent do you agree that SBTi should explore these additional claims to effectively incentivize voluntary climate action while ensuring credibility and preventing greenwashing?

Paris-Alignment claims (e.g., "Company A has set targets aligned with the ambition set in the Paris Agreement." Note this claim is a derivative from the ambition claim)

Neutral

Temperature-Alignment claims (e.g., "Company A has set targets aligned with limiting warming to 1.5°C."Note this claim is a derivative from the ambition claim)

Neutral

Net-Zero-Alignment claims(e.g., "Company A has set targets consistent with achieving net-zero emissions latest by 2050."Note this claim is a derivative from the ambition claim)

Strongly agree

Target Progress claims(e.g., "Company A has demonstrated progress of X% against their science-based target Y.")

Strongly agree

Performance claims(e.g., "X% of Company A’s supplier base has set SBTs between year X and year Y.")

Neutral

Target Achievement claims(e.g., "Company A has reduced emissions by X% between year X and year Y.")

Strongly agree

Net-Zero Achievement claims(e.g., "Company A has achieved a state of net-zero emissions across their organizational boundaries.")

Strongly agree



boundary. )

(Optional) Please explain your response and/or suggest any additional types of claims.

Once again the claims with explicit numbers are the clearest. Claims aligned with Paris Agreement and temperature goals are subject to many interpretations (reading of Paris Agreement, assumptions on overshoot etc.). Also, as SBTi continues to accept some flawed goals via sectoral pathways (see previous comments on the aviation and FLAG for details), targets should not be described as 1.5 or Paris aligned. Supplier engagement claim is unclear (not even making a distinction if the stated share is based on purchases or on emissions).

Q108

To what extent do you think these claims would ensure clear and transparent communications after initial validation?

Ambition claims (currently proposed)	Somewhat agree
Paris-Alignment claims (e.g., "Company A has set targets aligned with the ambition set in the Paris Agreement." Note this claim is a derivative from the ambition claim)	Somewhat disagree
Temperature-Alignment claims (e.g., "Company A has set targets aligned with limiting warming to 1.5°C."Note this claim is a derivative from the ambition claim)	Somewhat disagree
Net-Zero-Alignment claims(e.g., "Company A has set targets consistent with achieving net-zero emissions latest by 2050."Note this claim is a derivative from the ambition claim)	Somewhat agree
(Optional) Please explain your response.	Claims about ambition matching the Paris Agreement or some specific level of warming are subject to interpretation and many assumptions and may thus be misleading. Net-Zero-Alignment claims (with target year) are clearer.

Q109

To what extent do you agree that the currently proposed Conformance claims incentivize performance and recognize progress against targets?

Strongly agree

Q110

To what extent would you support or oppose any of the below additional claims, knowing the potential risks and intensified assurance requirements?

Target Progress claims(e.g., "Company A has demonstrated progress of X% against their science-based target Y.")	Somewhat support
Performance claims(e.g., "X% of Company A’s supplier base has set SBTs between year X and year Y.")	Somewhat oppose
Target Achievement claims(e.g., "Company A has reduced emissions by X% between year X and year Y.")	Somewhat support
Net-Zero Achievement claims(e.g., "Company A has achieved a state of net-zero emissions across their organizational boundary.")	Somewhat support
(Optional) Please explain your response.	Supplier engagement claim is unclear (not even making a distinction if the stated share is based on purchases or on emissions).

Q111

How important do you think the following elements are to substantiate progress, performance, or achievement claims?

Data assurance from a third-party for the base year	Somewhat important
Data assurance from a third-party for the target year	Very important
Independent assessment from a third-party (e.g. SBTi Services or other certification entity)	Somewhat important

Evidence of indirect mitigation measures  
(e.g. commodity certificates)

very important

Q112

To what extent do you agree that enabling a Contribution Claim, e.g. “Company A has been found conformant with SBTi standard and contributed \$1 million to climate projects beyond its value chain, supporting global decarbonization efforts” would incentivize companies to take responsibility for ongoing emissions?

Somewhat disagree

(Optional) Please explain your response.:  
A claim that explicitly states that that company has taken responsibility for all (or some specified share) of its emissions on a ton-for-ton basis would be significantly stronger. For example, in the example a sum like "\$1 million" may sound like a lot, but the climate impact of such contribution can be just a tiny fraction of the overall emissions.

Page 18: Overarching input

Q113

If you have any additional feedback, insights, or considerations that you believe would contribute to the development of CNZS V2.0, please share them below.

We hold SBTi in high regard and have recommended companies to set their targets in accordance with the SBTi requirements. However, we see a pressing need to address some sector-specific requirements that allow companies to continue their high-emission, business-as-usual activities even when there are low-emission alternatives available. In our research, we have highlighted the insufficiency of aviation and FLAG pathways in recognising the opportunities to reduce emissions by making changes in the business models. For example, a restaurant company that serves currently a lot of beef can set itself an intensity-based target that assumes current or even increased sales of beef products. Such approach should not be accepted as a science-based climate action, as any restaurant can shift its use of ingredients towards low-emission products. In aviation, the current approach takes the current level (or even a growth of) global air travel as granted and allows business-mostly-as-usual companies to have their targets accepted as science-based and neglects the need for a transformative change, where the number of flights must decrease until low-emissions fuels and/or planes are widely available.

Page 19: Closing questions

Q114

How did you find out about this public consultation? (Select all that apply)

SBTi newsletter

LinkedIn

Other (please specify):  
I knew to expect it and checked SBTi website regularly

Q115

If you do not already receive the SBTi newsletter, would you like to sign up to stay informed with the latest news from the SBTi?

Yes

Q116

SBTi would like to keep you updated regarding major milestones of CNZS 2.0 and other feedback opportunities. Please let us know if you consent to SBTi contacting you this way?

Yes

Q117

How accessible did you find this survey?

Not so accessible

(Optional) Please explain your response.:  
While the survey was well designed and implemented for ad hoc answers, it was a bit cumbersome to collect all the questions so that they could be scrutinised with my colleagues in advance. For example, providing the questionnaire template as a single pdf file would have facilitated preparing answers in advance.