Objective

1. This paper discusses the update to the proposed plan for redeliberating Exposure Draft IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information ([draft] S1).

Structure of the paper

2. This paper is structured as follows:

   (a) Background (paragraphs 3-5);

   (b) Additional topic proposed for redeliberation (paragraphs 6-8); and

   (c) Questions for the ISSB (paragraph 9).

Background

3. At the September 2022 ISSB meeting, the staff presented a paper (Agenda Paper 3B and 4B: General Sustainability-related Disclosures and Climate-related Disclosures—Plan for redeliberations) on the proposed plan for redeliberating [draft] S1 and Exposure Draft IFRS S2 Climate-related Disclosure ([draft] S2). The paper sought confirmation from the ISSB on the proposed plan and the topics for redeliberations for both projects.

4. The ISSB tentatively agreed to the following topics for redeliberation related to both [draft] S1 and [draft] S2:

   (a) scalability; and

   (b) current and anticipated effects of sustainability-related and climate-related risks and opportunities on an entity’s financial performance, financial position and cash flows.

5. The ISSB also tentatively agreed to the following topics for redeliberation related to [draft] S1:

   (a) enterprise value;

   (b) breadth of reporting required;

   (c) 'significant' sustainability-related risk or opportunity;

   (d) identifying significant sustainability-related risks and opportunities and disclosures (including using the materials of other standard-setters);
(e) application of the materiality assessment;
(f) connected information; and
(g) frequency of reporting.

Additional topic for redeliberation

6. In addition to the topics tentatively agreed for redeliberation by the ISSB at its September 2022 meeting, the ISSB also suggested the staff reconsider bringing back one further topic on the requirement to disclose comparative information that reflects updated estimates for redeliberation (paragraphs 63-65 of [draft] S1).

Comparative information and updated estimates

7. Respondents to the consultation on [draft] S1 raised potential challenges in the requirement to disclose comparative information that reflects updated estimates (see paragraph 114 of Agenda Paper 3A General Sustainability-related Disclosures—Summary of comments from the September 2022 ISSB meeting). In particular respondents:

(a) raised the complexity and burden in updating estimates for previous periods;
(b) queried why the proposal is not aligned with IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors which requires a change in estimate to be reported in the current period and prospectively; and
(c) questioned whether it is most decision-useful to provide comparative information to reflect updated estimates or to present this only in current and prospective information given that sustainability-related financial information is often based on estimates.

8. Following feedback from ISSB members and considering the mixed feedback on the proposal, the staff propose that the ISSB update its plan for redeliberations to reconsider the requirement to disclose comparative information that reflects updated estimates.

Questions for the ISSB

9. The staff presents the following questions for the ISSB:

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<thead>
<tr>
<th>Questions for the ISSB</th>
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<tbody>
<tr>
<td>1. Does the ISSB have comments or questions on the additional topic proposed for redeliberation?</td>
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<tr>
<td>2. Does the ISSB confirm the additional topic for redeliberation?</td>
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