
ISSB meeting

Date **July 2025**

Project **Amendments to Greenhouse Gas Emissions Disclosures (Amendments to IFRS S2)**

Topic **Preliminary feedback summary**

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Purpose of this paper

- This paper provides:
 - a summary of preliminary feedback on the Exposure Draft *Amendments to Greenhouse Gas Emissions Disclosures* that is informed by feedback gathered during outreach activities and a preliminary review of the comment letters and survey responses received; and
 - the staff comments on redeliberations.
- This paper does not seek any decisions from the ISSB.
- At a future ISSB meeting, the staff will provide a more comprehensive feedback summary and further analysis informed by a detailed review of comment letters and survey responses.

Questions for the ISSB

1. Do you have any questions or comments about the feedback themes included in this summary of preliminary feedback as outlined on pages 8–30? Are there any other feedback themes not included in this paper that should be included for further analysis?
2. Do you have any questions or comments on the staff commentary related to redeliberations as outlined on pages 31–39?

Agenda

Background

Preliminary feedback

Preliminary feedback overview

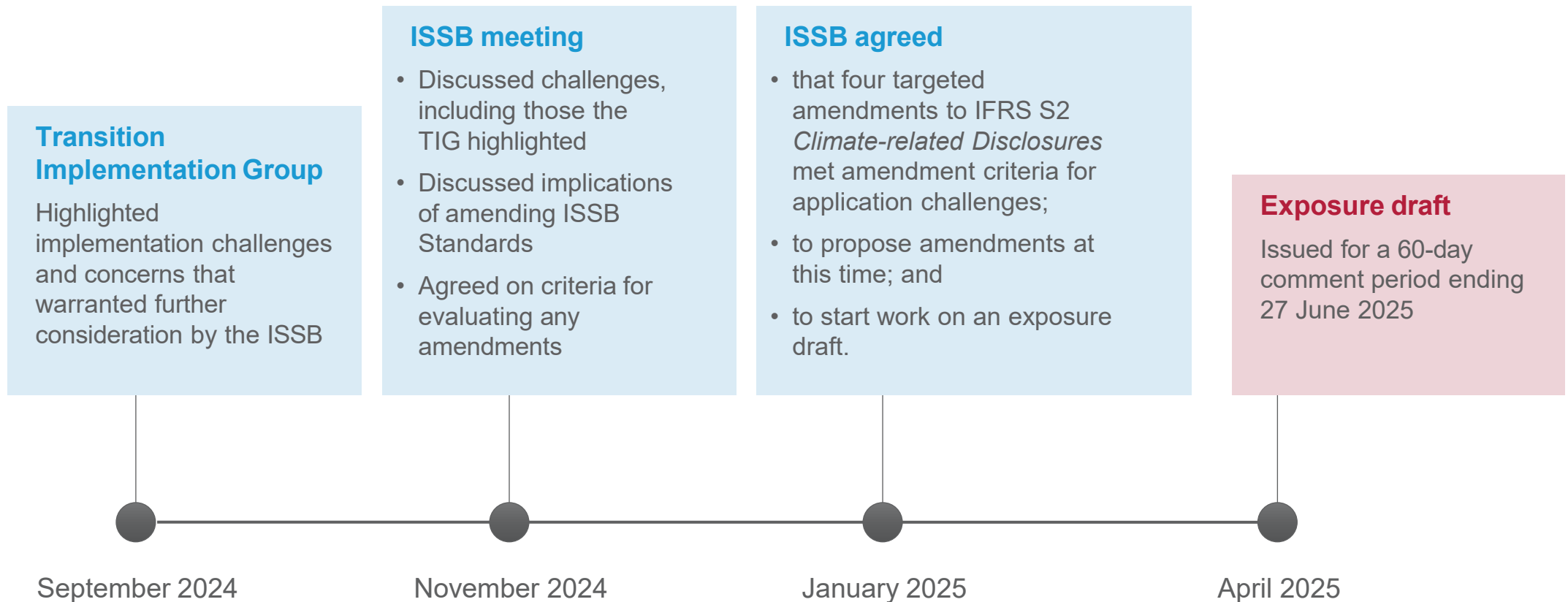
Preliminary feedback on each proposed amendment

Staff comments on redeliberations

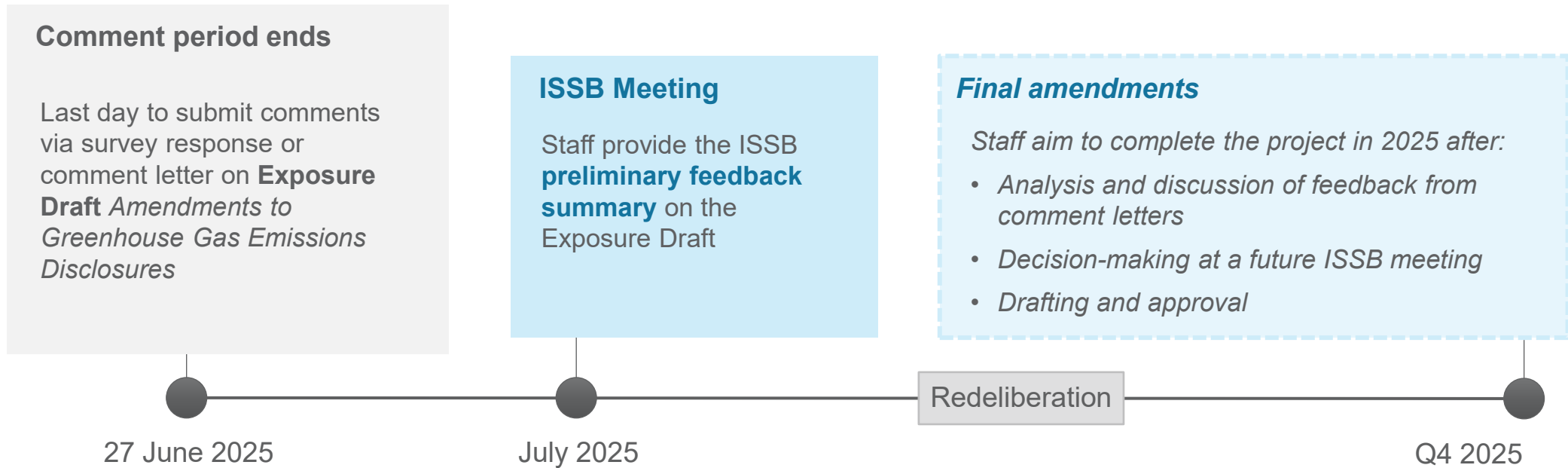
Next steps

Background

Project history



Project plan



Project objective

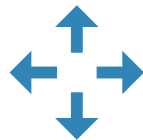
The proposed amendments are targeted toward aspects of **greenhouse gas (GHG) emissions disclosures** and **provide reliefs** to existing requirements in IFRS S2

The ISSB considered the **perspectives of multiple stakeholder** groups in developing the amendments



Providing application support to companies

- Make it easier and reduce related costs to apply IFRS S2
- Optional reliefs that entities can choose to apply



Minimising disruption to jurisdictions

Optional reliefs that jurisdictions can choose to make available — without affecting their degree of alignment with ISSB Standards



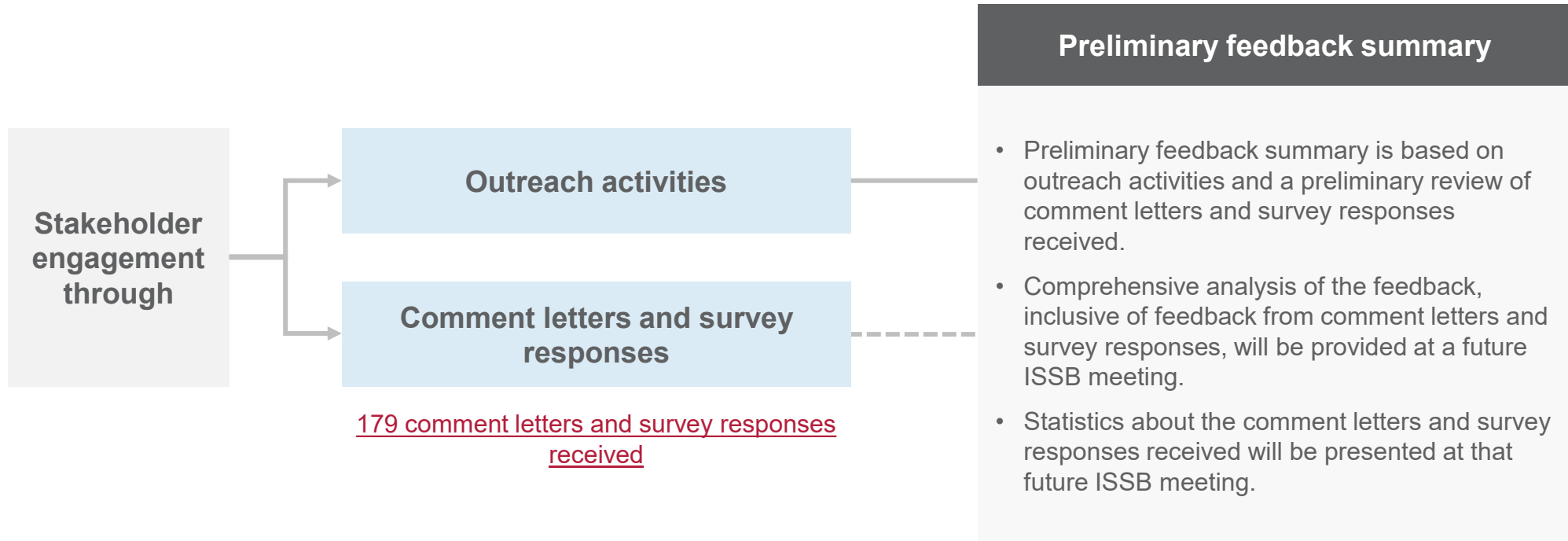
Keeping investors' needs in focus

Ensure the usefulness of sustainability-related financial information provided by companies

No fundamental change in disclosures

Preliminary feedback overview

Preliminary feedback



Overview of outreach activities

Outreach activities

Through discussions with stakeholders during outreach, the staff gathered preliminary feedback on the Exposure Draft.

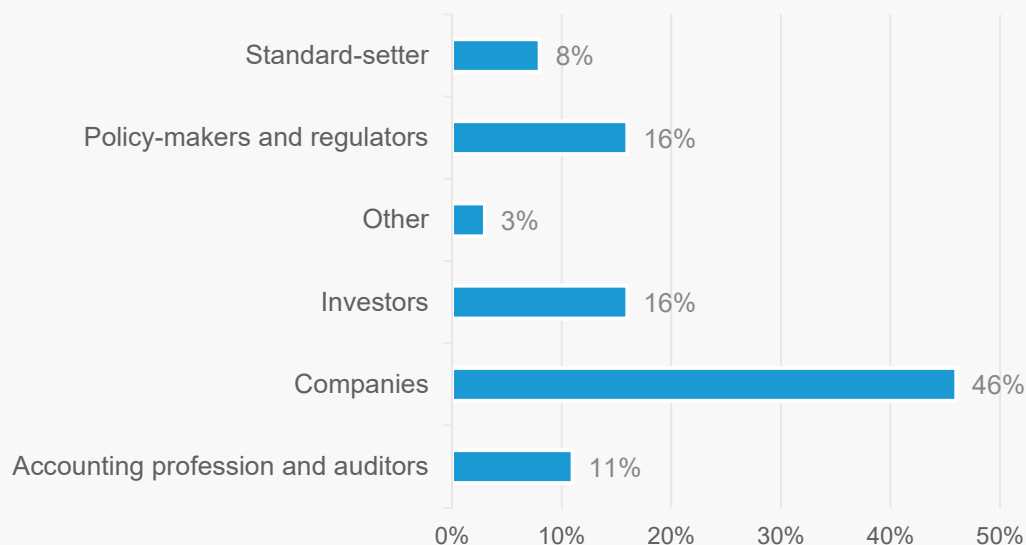
Format of outreach activities

- Webcast
- Meetings with advisory bodies and other groups that engage with the ISSB regularly:
 - the Sustainability Standards Advisory Forum;
 - the ISSB Investor Advisory Group;
 - the Transition Implementation Group on IFRS S1 and IFRS S2;
 - the IFRS Advisory Council; and
 - the IFRS Sustainability Reference Group.
- Targeted engagement focusing on stakeholders who are most likely to be affected by the proposed amendments

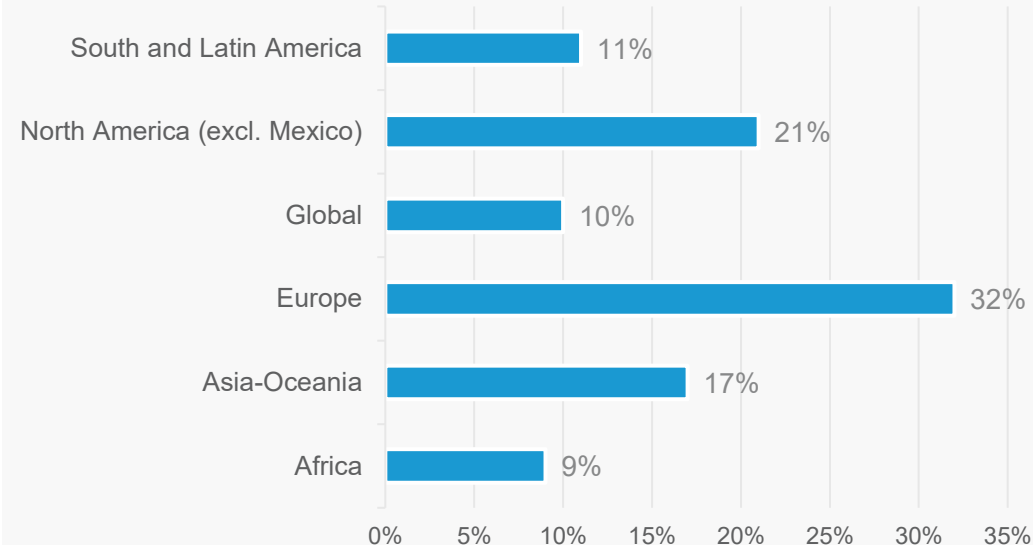
Outreach activity statistics

- **64** outreach meetings held
- **237** organisations engaged¹

Engagement by stakeholder group










Engagement by geography



1. The number of organisations engaged is determined from the available list of meeting attendees. However, in some instances, such as an outreach meeting organised through industry association, the complete list organisations in attendance is not available.

Overview of feedback

Topic	Feedback
Measurement and disclosure of Scope 3 Category 15 GHG emissions	
Proposed relief – permit an entity to limit its measurement and disclosure of Category 15 to financed emissions	
Disclosure requirement about the use of the relief	
Use of Global Industry Classification Standard (GICS) for specific financed emissions disclosures	
Proposed relief – limit the requirement to use GICS to specific circumstances	
Disclosure requirement about the use of the relief	
Jurisdictional relief from using the GHG Protocol Corporate Standard²	
Applicability of the jurisdictional relief for global warming potential (GWP) values	
Effective date and early application	

2. The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) is referred to as the 'GHG Protocol Corporate Standard' for brevity.

Overview of feedback

General feedback heard across stakeholder groups

- Broad **support for proposed targeted amendments**, which aim to provide additional relief and clarify existing relief from specific GHG emissions disclosure requirements in IFRS S2.
- Broad support for ISSB's **timely action to** respond to application challenges identified during the implementation phase of IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2.
- Emphasis that the proposed reliefs—given their optional nature—should be **supported by requirements that provide transparency** about whether and how an entity is using such reliefs, which would facilitate comparability of disclosures.

General feedback from specific stakeholder groups

- Support the proposal to provide **optional reliefs as a pragmatic** approach to:
 - mitigating the risk of disruption to the adoption and implementation of IFRS S2 for jurisdictions and entities already in the process of doing so (**preparers, jurisdictional standard-setters and regulators**);
 - facilitating the global adoption and implementation of IFRS S2 by allowing reference to jurisdictional requirements (**investors, preparers, jurisdictional standard-setters, regulators, and accounting firms**); and
 - reducing duplicative reporting where specific GHG emissions requirements in IFRS S2 do not align with jurisdictional requirements (**preparers, jurisdictional standard-setters and regulators**).

Preliminary feedback by proposed amendment

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Application challenge

Uncertainty about what has to be included in the measurement of Scope 3 Category 15 GHG emissions due to a **perceived misalignment between requirements**:

- to measure and disclose Scope 3 Category 15 GHG emissions—as a part of Scope 3 GHG emissions disclosure (IFRS S2.29(a)(i)(3)); and
- to disclose additional information about financed emissions.

That is, a perceived misalignment between the requirement to disclose additional information about Category 15 that is limited to financed emissions (ie, excluding all other Category 15 items such as derivatives, facilitated emissions and insurance-associated emissions) and the requirement to measure and disclose Scope 3 Category 15 GHG emissions that has no such limitation.

Proposed amendments

Permit an entity to **limit its measurement and disclosure of Scope 3 Category 15 GHG** emissions (Category 15) to financed emissions (as defined in IFRS S2), thus allowing an entity to exclude emissions associated with:

- derivatives; and
- other financial activities (for example, facilitated emissions or insurance-associated emissions).

If applying the relief, **disclose information about the magnitude of derivatives and financial activities associated with excluded** Scope 3 Category 15 GHG emissions to help investors understand the completeness of this category of emissions.

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

Permit an entity to **limit its measurement and disclosure of Scope 3 Category 15** GHG emissions to financed emissions (as defined in IFRS S2), thus allowing an entity to exclude emissions associated with:

- derivatives; and
- other financial activities (for example, facilitated emissions or insurance-associated emissions)

Preliminary feedback

Broad **support for the proposed relief**.

- Preparers appreciate the proposal to clarify the requirements in IFRS S2 about which particular Scope 3 Category 15 GHG emissions entities are required to consider for inclusion in the entity's measure of Scope 3 GHG emissions.
- Generally, investors did not raise concerns that the potential loss of information would be significant.

Calls for **additional clarity about the terminology** used to define the scope of relief. A limited number of stakeholders were confused about the implications of defining what is required to be included versus what is permitted to be excluded.

- Broad support for the approach of amending the requirement to disclose Scope 3 Category 15 GHG emissions by specifying what is required to be disclosed (ie, financed emissions), as opposed to what is permitted to be excluded.
- Stakeholders broadly agree with the proposal, but feedback indicated challenges associated with the nascency and evolving nature of Scope 3 Category 15 GHG emissions affecting the understanding of:
 - the composition of and terminology used to describe Category 15 GHG emissions; and
 - the term 'financed emissions' as defined in IFRS S2.

For example, questioning why the proposed amendment in paragraph 29A does not expressly mention 'facilitated emissions' or 'insurance associated-emissions', but mentions derivatives.

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

Permit an entity to **limit its measurement and disclosure of Scope 3 Category 15** GHG emissions to financed emissions (as defined in IFRS S2), thus allowing an entity to exclude emissions associated with:

- derivatives; and
- other financial activities (for example, facilitated emissions or insurance-associated emissions)

Preliminary feedback

Misunderstanding about the **intent of the proposed disclosure** requirement.

- Misconception that the proposal would relieve some entities, such as insurers, from disclosing *any information* about climate-related risks and opportunities related to their insurance activities or relieve them from disclosing financed emissions.
- Misconception that the proposals were made due to a question about the decision-usefulness of information about GHG emissions associated with derivatives, facilitated emissions and insurance-associated emissions.

The Exposure Draft did not include a question about the **duration of relief**. However, a number of investors, standard-setters and regulators suggest that the relief should be temporary particularly for insurance-associated and facilitated emissions.

- Although stakeholders generally acknowledge the nascency and limited extent of entities' disclosure of emissions associated with facilitated and insurance-associated emissions to date, a number of these stakeholders (including a number of investors) are concerned that not having a time-bound relief might disincentivise further development of methodologies and reporting practice. Entities that are already disclosing these emissions are generally doing so on a voluntary basis and generally using methodologies from the Partnership for Carbon Accounting Financials (PCAF).
- Limited feedback related to prudential regulators mandating or proposing reporting of insurance-associated emissions.
- A number of stakeholders emphasise that, if the relief is finalised, it would be important for the ISSB to continue to monitor developments in measurement methodologies and reporting practice for Scope 3 Category 15 GHG emissions and revisit the relief in due course.

Consistent feedback on the limited extent of entities' disclosure of emissions associated with derivatives, hence broad support for undated relief for derivatives.

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

If applying the relief, **disclose information about the magnitude of derivatives and financial activities** associated with **excluded** Scope 3 Category 15 GHG emissions to help investors understand the completeness of this category of emissions

Preliminary feedback

Broad **support** from stakeholders, including investors, for **providing transparency** about:

- the extent to which an entity's measure of Scope 3 Category 15 GHG emissions is complete; and
- what instruments an entity treats as derivatives when applying the relief.

Concerns that disclosing the **amount** of excluded financial activities and derivatives would **not provide useful information**.

- A number of preparers interpret the proposed disclosure as intending to provide information about transition risk in place of disclosing information about GHG emissions. Interpreted this way, some are concerned about the complexity and cost of providing such an amount (for example, an entity interpreting "amount" as a quantitative data point that would be an input to an emissions calculation, and that this amount would be required by financial activity in the subcategories of services and investments in Category 15 per the GHG Protocol Corporate Value Chain Standard).³
- Preparers also commented about the usefulness of particular 'amounts' in providing information about derivatives, for example the carrying value of derivatives might not help primary users in understanding the magnitude of derivatives excluded from an entity's Scope 3 Category 15 GHG emissions disclosure.
- A number of accounting firms and investors suggest that the usefulness of the amounts would be improved if it was disclosed with qualitative information about the amounts.
- A number of stakeholders suggest replacing disclosure of amounts with qualitative information about the financial activities.

3. The Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011) is referred to as the 'GHG Protocol Corporate Value Chain Standard' for brevity.

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

If applying the relief, **disclose information about the magnitude of derivatives and financial activities** associated with **excluded** Scope 3 Category 15 GHG emissions to help investors understand the completeness of this category of emissions

Preliminary feedback

Concerns about the **clarity of the proposed disclosure requirement**, specifically aspects of the proposal that may lead to diversity in practice and reduce comparability such as the lack of definitions for ‘financial activities’, ‘derivatives’ and ‘amount’.

- Although the GHG Protocol Corporate Value Chain Standard lists various types of financial investments and services in Category 15, there is some concern about the lack of a common understanding of the complete population of what would be considered “financial activities” that is necessary for determining the scope of financial activities excluded from an entity’s Category 15 disclosure. Stakeholders also highlighted concern about comparability due to derivatives not being defined.
- Although stakeholders generally understand the ISSB’s rationale for not defining ‘amount’, there are some uncertainties about how an entity would apply judgement when providing this information without further clarity about what the ‘amount’ is meant to represent (for example, whether the purpose of disclosing the amount is to provide proxy information about transition risk in place of disclosing information about GHG emissions; how granular the amount needs to be; whether the amount should be an amount in the related financial statements; whether qualitative information is required to be provided in addition to quantitative information; whether the amount could be a relative value).

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

If applying the relief, **disclose information about the magnitude of derivatives and financial activities** associated with **excluded** Scope 3 Category 15 GHG emissions to help investors understand the completeness of this category of emissions

Preliminary feedback

A number of stakeholders that broadly agreed with the proposed disclosure requirement suggest that the **objective** of the disclosure requirement should be **made clearer or guidance be provided** to support application of the requirement.

Additional suggestions from stakeholders include explicitly requiring entities to disaggregate their Scope 3 Category 15 GHG emissions if they are disclosing information beyond financed emissions (that is, when an entity either does not use the relief at all or uses the relief in part).

- A limited number of stakeholders consider this to be important in understanding what is included in an entity's measure of Scope 3 Category 15 GHG emissions if an entity does not use the relief in whole or in part.
- These stakeholders raise this view despite their awareness of the general disaggregation requirements in IFRS S1.

Use of GICS for specific financed emissions disclosures

Application challenge

Legal and cost implications related to the requirement to use GICS for classifying counterparties when disclosing financed emissions disaggregated by industry (IFRS S2.B62–B63).

Proposed amendments

Retain the requirement to disclose financed emissions disaggregated using an industry-classification system, but **limit the requirement to use GICS** to specific circumstances—when GICS is already being used in any part of an entity to classify lending or investment activities as at the reporting date.

If applying the relief, **disclose the alternative industry-classification system** used to disaggregate financed emissions—if not using GICS—and **explain the basis** for selection.

Use of GICS for specific financed emissions disclosures

Proposed amendment

Retain the requirement to disclose financed emissions disaggregated using an industry-classification system, but **limit the requirement to use GICS to specific circumstances**—when GICS is already being used in any part of an entity to classify lending or investment activities as at the reporting date

Preliminary feedback

Broad **support for a proposed relief** from the requirement to use GICS for disaggregating specific financed emissions information.

Broadly, investors did **not express concern about a significant loss of useful information** due to the proposed relief in the context of the challenges faced by preparers.

Concern about the design of the proposed relief **continuing to position GICS as the default** for disaggregation by industry, and if used, concern about whether the proposed relief adequately addresses the application challenge.

- Preparers concerns include:
 - Potentially significant incremental legal and cost implications for those using GICS but not for the whole entity, in particular for those only using GICS in a small part of the entity;
 - Challenges associated with the extent to which GICS codes are assigned for unlisted counterparties; and
 - GICS not being specifically designed for a climate-related objective.
- Despite the proposal requiring the use of GICS to disaggregate specific financed emissions information only for entities already using this industry-classification system for classifying their lending and investing activities, a number of jurisdictional regulators and standard-setters have concerns about the principle of prioritising use of a commercial product to in order to meet a disclosure requirement.

Use of GICS for specific financed emissions disclosures

Proposed amendment

Retain the requirement to disclose financed emissions disaggregated using an industry-classification system but **limit the requirement to use GICS to specific circumstances**—when GICS is already being used in any part of an entity to classify lending or investment activities as at the reporting date

Preliminary feedback

Concerns about the design of the hierarchy **not adequately reducing duplicative reporting** – one of the application challenges that the proposal is intended to address.

- Stakeholders' concern that the industry-classification system used by potentially a small part of the entity can drive the reporting of the entire entity. Stakeholders highlighted that this aspect of the proposal:
 - would, in many cases, result in an entity being required to use a different industry-classification system than the one it uses for internal risk management or other regulatory reporting purposes; and
 - is inconsistent with the general principle and practice of disclosure policies being driven at the parent entity level.
- A number of stakeholders highlighted specific concerns about the proposed hierarchy of jurisdictional classification systems:
 - In some jurisdictions, commonly used industry classification systems are used as best practice rather than being required to meet jurisdictional financial reporting or climate-related reporting requirements. Such a scenarios are not reflected in the jurisdictional options in the proposed hierarchy.
 - Suitability of using a single jurisdictional classification system for groups that operate in multiple jurisdictions. A jurisdictional classification system might not be suitable for classifying counterparties in different jurisdictions.

Use of GICS for specific financed emissions disclosures

Proposed amendment

Retain the requirement to disclose financed emissions disaggregated using an industry-classification system but **limit the requirement to use GICS to specific circumstances**—when GICS is already being used in any part of an entity to classify lending or investment activities as at the reporting date

Preliminary feedback

Concerns about the design of the proposed amendment **not adequately reducing duplicative reporting** – one of the application challenges that the proposal is intended to address (...continued).

- A number of preparers explain that their use of industry-classification systems is nuanced and suggest that this nuance be considered in the design of the relief.
 - Some industry classification systems that are commonly used in their jurisdictions for general purpose financial reporting, came into common use for through regulation or practice that is unrelated to general purpose financial reporting (eg, use of classification systems designed for broader collection of national or regional statistical information).
 - A number of preparers shared that they use more than one industry classification system because different classification systems are used for different purposes (eg, classifications for internal risk management and investing may differ).
 - Preparers that are already reporting climate-related information by industry might, as a starting point, use an industry-classification system they are already using for other purposes, but making some reclassifications of counterparties so that their counterparties' industry classification better represents the related climate risk.

Stakeholders' suggestions to address concerns about the design of the proposal include simplifying or removing the hierarchy in favour of a requirement that allows an entity to apply judgement in the selection of the industry-classification system.

Use of GICS for specific financed emissions disclosures

Proposed amendment

If applying the relief, **disclose alternative industry-classification system used** to disaggregate financed emissions—if not using GICS—and explain the basis for selection

Preliminary feedback

Broad support for the proposed disclosure requirement, aiding **transparency** about use of the relief and allowing users to **better understand** the disclosure.

Jurisdictional relief from using the GHG Protocol Corporate Standard

Application challenge

Lack of clarity about whether the jurisdictional relief (IFRS S2.29(a)(ii)) is available when a jurisdictional requirement to measure GHG emissions using a method other than the GHG Protocol Corporate Standard only **applies to a part of an entity**.

Proposed amendments

Clarify that the relief is available when a jurisdictional requirement **applies to an entity, in whole or in part**, and would only apply to the part of the entity subject to such a jurisdictional requirement.

Jurisdictional relief from using the GHG Protocol Corporate Standard

Proposed amendment	Preliminary feedback
<p>Clarify that the relief is available when a jurisdictional requirement applies to an entity, in whole or in part, and would only apply to the part of the entity subject to such a jurisdictional requirement</p>	<p>Broad support for the proposed clarification.</p>
	<p>Misunderstanding about the intent of the proposed amendment, with a number of stakeholders being unaware of the existence of the relief in IFRS S2 and thus mistaking the proposal for an introduction of a new relief.</p>
	<p>Concerns about reduced comparability limited because the jurisdictional relief already exists in IFRS S2.</p>
	<p>Stakeholders emphasise the importance of entities applying the principle of aggregation and disaggregation set out in paragraphs B29–B30 of IFRS S1 when applying the relief, such that material information about the use of different measurement methods is provided and to mitigate the risk of reduced comparability of GHG emissions disclosures.</p>

Applicability of the jurisdictional relief for GWP values

Application challenge

Duplicative reporting and increased costs for entities subject to a jurisdictional requirement to use GWP values other than the GWP values required by paragraphs B21–B22 of IFRS S2, to convert the seven constituent GHG emissions into CO₂ equivalents.

Proposed amendments

Extend the jurisdictional relief in IFRS S2 such that it would permit an entity to use the GWP values required by a jurisdiction to convert the seven constituent GHG emissions to CO₂ equivalent values for the part of the entity subject to such a jurisdictional requirement when applying IFRS S2.

Applicability of the jurisdictional relief for GWP values

Proposed amendment

Extend the jurisdictional relief in IFRS S2 such that it would permit an entity to use the GWP values required by a jurisdiction to convert the seven constituent GHG emissions to CO₂ equivalent values for the part of the entity subject to such a jurisdictional requirement when applying IFRS S2

Preliminary feedback

Broad support for extending the jurisdictional relief to GWP values. Stakeholders agreed it is a logical extension of the existing jurisdictional relief.

Stakeholders emphasise the importance of entities applying the **principle of aggregation and disaggregation** set out in paragraphs B29–B30 of IFRS S1 when applying the relief, such that material information about the use of different measurement methods is provided and to mitigate the risk of reduced comparability of GHG emissions disclosures.

Limited number of stakeholders suggest that the ISSB introduce an **explicit disclosure requirement** for entities using the relief to state the GWPs used and why.

Effective date and early application

Proposed amendment

Set the effective date so that the amendments would be **effective as early as possible** and permit **early application**.

Preliminary feedback

Broad **support** for the proposal.

Stakeholders **agreed with the ISSB's rationale** for proposing to make the amendments available to entities as soon as possible.

A limited number of stakeholders sought clarity about **treatment of comparatives** for entities already disclosing information subject to the proposed amendments (ie, whether a revision of metrics would be required should an entity use the reliefs).

Staff comments on redeliberations

Staff comments on redeliberations

- As noted on page 2, the staff will complete the analysis of feedback and provide a general overview of the comments received and major points raised in the feedback at a future ISSB meeting.
- This section provides staff comments on the necessity of redeliberations based on the preliminary feedback (see [pages 8–30](#)). Specifically, we provide comments that are directional in nature to indicate where we think the ISSB will need to focus in redeliberations. This may change as a result of the completion of the feedback analysis.
- The staff are not asking the ISSB to make decisions in this meeting. Comments from ISSB members on the matters presented will help the staff's analysis related to potential areas for redeliberation.

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

Permit an entity to **limit its measurement and disclosure of Scope 3 Category 15 GHG** emissions to financed emissions (as defined in IFRS S2), thus allowing an entity to exclude emissions associated with derivatives and other financial activities (for example, facilitated emissions or insurance-associated emissions).



Aspect of proposal	Staff comments on redeliberation
Scope of the relief	<ul style="list-style-type: none"> Staff do not expect the scope of the relief, which includes both the proposal to provide the relief and the approach to provide the relief—by stating what is required to be disclosed as part of Scope 3 Category 15 GHG emissions (ie, Category 15 is limited to financed emissions) rather stating what is not required—to be subject to significant redeliberation.
Duration of the relief	<ul style="list-style-type: none"> Staff expect to perform further analysis to support discussion of feedback on this area.

Measurement and disclosure of Scope 3 Category 15 GHG emissions

Proposed amendment

If applying the relief, **disclose information about the magnitude of derivatives and financial activities associated with excluded** Scope 3 Category 15 GHG emissions to help investors understand the completeness of this category of emissions.



Aspect of proposal	Staff comments on redeliberation
Requiring the disclosure of the amount of derivatives and financial activities excluded	<ul style="list-style-type: none"> Staff expect redeliberation will be needed related to the requirement to disclose the amount of derivatives and financial activities excluded from an entity's measurement of Scope 3 Category 15 GHG emissions. Possible areas of discussion and further staff analysis include considering the usefulness of information about the amount of derivatives and financial activities excluded and clarifying the objective of the disclosure requirement.
Understanding of the financial activities within scope of Category 15	<ul style="list-style-type: none"> Staff expect redeliberation will be needed in relation to which activities are included as part of Scope 3 Category 15 GHG emissions for this disclosure and how to support consistent understanding of terminology.

Use of GICS for specific financed emissions disclosures

Proposed amendment

Retain the requirement to disclose financed emissions disaggregated using an industry-classification system, but **limit the requirement to use GICS** to specific circumstances—when GICS is already being used in any part of an entity to classify lending or investment activities as at the reporting date.



Aspect of proposal	Staff comments on redeliberation
GICS as the default industry-classification system	<ul style="list-style-type: none"> Staff expect redeliberation will be needed in relation to whether to maintain GICS as the default requirement to disaggregate financed emissions information.
The proposed hierarchy of industry-classification systems	<ul style="list-style-type: none"> Staff expect redeliberation will be needed in relation to the hierarchy of industry-classification systems. Possible areas of discussion and further staff analysis include considering concerns about duplicative reporting and the design of the hierarchy.

Use of GICS for specific financed emissions disclosures

Proposed amendment

If applying the relief, **disclose alternative industry-classification system used** to disaggregate financed emissions—if not using GICS—and explain the basis for selection.



Aspect of proposal	Staff comments on redeliberation
Disclosure requirement about the use of the relief	<ul style="list-style-type: none"> • Staff do not expect the aspect of the proposal to be an area for significant redeliberation. • Staff will continue to find any opportunity to improve the proposed requirement (eg, drafting clarity) based on a more complete analysis of stakeholder feedback on this aspect of the proposal.

Jurisdictional relief from using the GHG Protocol Corporate Standard

Proposed amendment

Clarify that 1) the jurisdictional relief is available when a jurisdictional requirement applies to an entity, in whole or in part and 2) that the relief would only apply to the part of the entity subject to such a jurisdictional requirement.



Aspect of proposal	Staff comments on redeliberation
Clarification of the jurisdictional relief	<ul style="list-style-type: none">• Staff do not expect the aspect of the proposal to be an area for significant redeliberation.• Staff will continue to find any opportunity to improve the proposed requirement (eg, drafting clarity) based on a more complete analysis of stakeholder feedback on this aspect of the proposal.

Applicability of the jurisdictional relief for GWP values

Proposed amendment

Extend the jurisdictional relief in IFRS S2 such that it would permit an entity to use the GWP values other than those from the latest IPCC assessment report if required by a jurisdiction.



Aspect of proposal	Staff comments on redeliberation
Extension of the jurisdictional relief	<ul style="list-style-type: none">• Staff do not expect the aspect of the proposal to be an area for significant redeliberation.• Staff expect to perform further analysis to determine whether redeliberation is required related to the disclosure of information about alternative GWP values by an entity applying the relief.

Effective date and early application

Proposed amendment

Set the effective date so that the amendments would be **effective as early as possible** and permit **early application**.



Aspect of proposal	Staff comments on redeliberation
Effective date and early application	<ul style="list-style-type: none">• Staff do not expect the aspect of the proposal to be an area for significant redeliberation.• Staff expect some redeliberation on the approach to comparative information for entities applying the reliefs proposed in the Exposure Draft.

Next steps

Next steps

Staff plan to complete the following tasks before the next ISSB meeting on this project:

Complete comment letter and survey analysis



Continue analysis of the feedback



Prepare recommendations for the ISSB

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