

Staff paper

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Sustainability Standards Advisory Forum meeting

Date May 2025

Project Sustainability Standards Advisory Forum (SSAF)

Topic Agenda planning and meeting summaries
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This paper has been prepared for discussion at a public meeting of the Sustainability Standards Advisory Forum (SSAF). This paper does not represent the views of the International Sustainability Standards Board (ISSB) or any individual ISSB member. Any comments in the paper do not purport to set out what would be an acceptable or unacceptable application of IFRS® Sustainability Disclosure Standards. The ISSB's technical decisions are made in public and are reported in the ISSB *Update*.

Introduction

1. This paper summarises the input provided by Sustainability Standards Advisory Forum (SSAF) members from the February 2025 SSAF meeting, including how that has informed the work of the International Sustainability Standards Board (ISSB). This paper also addresses the potential agenda topics for the next SSAF meeting, which is tentatively scheduled for 22–23 September 2025, and includes an update regarding the membership of the SSAF.

Agenda planning

- 2. The staff anticipates that the following topics would be most relevant at the next SSAF meeting:
 - (a) enhancements to the SASB Standards;
 - (b) the ISSB research projects; and
 - (c) the development of educational material to support the implementation of the ISSB Standards.
- 3. The staff anticipates that the September 2025 SSAF meeting will be in held in Frankfurt.
- 4. The staff welcomes SSAF members' views on any additional topics that members would like to discuss.







Call for nominations

5. As per the <u>SSAF Terms of Reference</u> the 'Membership of SSAF, which is renewable, is subject to review every three years'. ¹ As the inaugural membership of the SSAF was established in December 2022, the staff anticipates updating SSAF members at the September 2025 SSAF meeting about the next steps regarding the process for a call for candidates for the membership of the SSAF from 2026.

Meeting summary

18 February 2025

- 6. The SSAF held its first meeting of the year on 18 February 2025 in Montreal. SSAF members discussed the following items:
 - (a) Due Process Handbook;
 - (b) educational material—part 1;
 - (c) educational material—part 2;
 - (d) enhancements to the SASB Standards;
 - (e) research projects; and
 - (f) jurisdictional update.

Due Process Handbook

- 7. SSAF members received an update on the proposed amendments to the IFRS Foundation *Due Process Handbook*. The objectives of the proposed amendments are:
 - (a) to reflect the creation of the ISSB in the *Due Process Handbook*; and
 - (b) to make some targeted enhancements and clarifications to the *Due Process Handbook*.

¹ The SSAF Terms of reference can be found at https://www.ifrs.org/content/dam/ifrs/groups/ssaf/ssaf-tor.pdf.





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- 8. SSAF members were given the opportunity to ask questions and share any initial views about the proposed amendments.
- 9. SSAF members shared their support for the work done on the proposed amendments and noted the usefulness of the presentation.
- 10. Some SSAF members noted that, as it relates to due process considerations, the ISSB Standards have unique characteristics, including, for example, that they are aligned with external standards and frameworks such as the GHG Protocol Corporate Standard, and therefore the *Due Process Handbook* should address how to manage the use of these external standards and frameworks.
- 11. Some SSAF members sought clarification on the due process steps for third-party materials, including, for example, the upcoming revision of the GHG Protocol Corporate Standard. The staff emphasised that the version of the GHG Protocol Corporate Standard referenced in IFRS S2 *Climate-related Disclosures* is dated. Moreover, the staff clarified that when the GHG Protocol Corporate Standard is updated, the ISSB will make an assessment and decision about whether to change the requirement to use this Standard in IFRS S2, which would be subject to public consultation.
- 12. Some SSAF members sought clarification on the role of the IFRS Interpretations Committee and its interaction with the ISSB and other advisory bodies, including the Transition Implementation Group on IFRS S1 and IFRS S2 (TIG). Some SSAF members noted that the name of Interpretations Committee may create confusion given that the Committee deals exclusively with matters related to IFRS Accounting Standards. Other members noted that application questions arising from IFRS Sustainability Disclosure Standards may need a different process than the one currently in place, whereas other SSAF members acknowledged that the TIG is currently fulfilling this role. A SSAF member suggested that cross-cutting application questions (issues affecting both sustainability disclosure and accounting standards) could present a connectivity opportunity involving the TIG and Interpretations Committee.
- 13. In response the staff said that when the ISSB was created the Trustees of the IFRS Foundation considered whether the ISSB would need a separate committee to deal with







application questions. The trustees decided that the ISSB was at too early a stage in its development to make such a determination and the issue would be kept under review. Additionally, the proposed amendments to the *Due Process Handbook* reflect that, after issuing a Standard, a board might form a group comprising experts involved in the implementation of that Standard to discuss any implementation questions that arise. This proposal aimed to reflect the ISSB's experience with the TIG.

- 14. SSAF members commented on the due process for the SASB Standards. Some members questioned whether the ISSB's ratification of the amendments to the SASB Standards was sufficient given that they had not gone through the full due process steps outlined in the *Due Process Handbook* for IFRS Standards. The staff noted that the current due process for the SASB Standards is predicated on their role in IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and highlighted that the due process for amendments to the SASB Standards includes the usual full public consultation on the proposals. Should their status change to be requirements then those requirements would be subject to the same due process as for ISSB Standards.
- 15. The consultation period for the exposure draft of the *Due Process Handbook* closed in March 2025.² The DPOC will consider feedback and aims to publish the revised *Due Process Handbook* in the second half of the year.

Educational material—part 1

16. SSAF members received an overview of the educational material 'Sustainability-related risks and opportunities and the disclosure of material information' published in November 2024.^{3,4}

² The Exposure Draft of the *Due Process Handbook* and the comment letters can be found at: <a href="https://www.ifrs.org/projects/work-plan/2024-due-process-handbook-review/ed-cl-due-process-handbook-review/

³ The educational material 'Sustainability-related risks and opportunities and the disclosure of material information' can be found at: https://www.ifrs.org/content/dam/ifrs/supporting-implementation/issb-standards/issb-materiality-education-material.pdf.

⁴ The webcast series on 'Sustainability-related risks and opportunities and the disclosure of material information' can be found at: https://www.ifrs.org/supporting-implementation/supporting-materials-for-ifrs-sustainability-disclosure-standards/ifrs-s1-and-ifrs-s2/webcast-series-materiality-guide/.







- 17. SSAF members were asked to share questions or comments on the educational material and suggestions for making this material more accessible beyond the published document and webcast.
- 18. SSAF members shared their support for the document and emphasised the usefulness of the analysis of impacts and dependencies.
- 19. Some SSAF members sought clarification on the alignment of the definition of material information used by the ISSB and by the International Accounting Standards Board (IASB). The staff clarified that these definitions are aligned but applied to two different sets of information: information provided in an entity's financial statements and information provided in an entity's sustainability-related financial disclosures.
- 20. Some SSAF members sought clarification on making materiality judgements, including as it relates to thresholds for materiality. The staff clarified that the educational material serves as a foundation to understanding how to make those judgements. For example, chapter 3 of the educational material explains that an entity is required to consider qualitative and quantitative factors and provides examples of such factors that an entity might consider in making materiality judgements.
- 21. Some SSAF members noted a challenge related to understanding the information needs of primary users and the extent of detail that the educational material provides on this topic. For example, in relation to identifying the common information needs of primary users the challenge in a circumstance that primary users have conflicting information needs. The staff clarified that the educational material sets a foundation of understanding to support an entity identify what it might consider when making materiality judgements.

Educational material—part 2

22. SSAF members received an update on the development of educational material to support the implementation of IFRS S1 and IFRS S2.⁵ The update included an overview of educational

⁵ Supporting materials for IFRS Sustainability Disclosure Standards can be found at: https://www.ifrs.org/supporting-implementation/supporting-materials-for-ifrs-sustainability-disclosure-standards/.







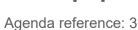
material that has been published or is under development, including educational material on disclosures about transition plans, building on materials from the Transition Plan Taskforce (TPT) for which the IFRS Foundation has assumed responsibility.

- 23. SSAF members were asked to share:
 - (a) any questions or comments on the educational material that has been published or is under development; and
 - (b) any comments on the approach the ISSB is taking to develop educational material on disclosures about transition plans, building on TPT materials.
- 24. Some SSAF members shared progress updates on the translation of educational material and on the benefits of the translation of this material for stakeholders in their jurisdictions.
- 25. Some SSAF members acknowledged the need for the ISSB to consider the implications of differences between the ISSB Standards and the TPT Disclosure Framework (for example, regarding disclosures outside the ISSB's remit) in integrating the TPT materials in the ISSB's educational material.
- 26. Some SSAF members highlighted the importance of reducing the risk of fragmentation in disclosures about transition plans, supporting the quality and comparability of information provided using IFRS S2 and considering interoperability.
- 27. SSAF member feedback has further informed the ISSB's work to support the implementation of IFRS S1 and IFRS S2, including the development of guidance on disclosures about transition plans.

Enhancements to the SASB Standards

- 28. SSAF members received an update on the project to enhance the SASB Standards and provided input on the project.
- 29. SSAF members were asked to share:
 - (a) feedback on the SASB Standards prioritised for enhancement by the ISSB; and







- (b) feedback on the industries that could be prioritised in the next phase of the work to enhance the SASB Standards, including enhancements to the Sustainable Industry Classification System® (SICS).
- 30. Some SSAF members made specific recommendations for enhancements to SASB Standards and SICS, including for the oil and gas, chemicals and financials sectors. These SSAF members stated that these enhancements would facilitate the adoption and use of SASB Standards in their jurisdictions.
- 31. Some SSAF members expressed support for the shortlist of industries which the staff indicated the ISSB could prioritise in a subsequent phase of work, stating that the listed industries reflected the priority industries in their own jurisdictions.
- 32. Some SSAF members sought clarification about how the enhancements to the SASB Standards are related to the *Industry-based Guidance on Implementing IFRS S2*. The staff clarified that the climate-related portions of the SASB Standards are identical to the industry-based guidance on implementing IFRS S2 and that any updates to the SASB Standards could be carried over to the industry-based guidance on implementing IFRS S2 through consequential amendments.
- 33. SSAF members requested clarity on how the SASB Standards could be integrated in the architecture of the ISSB Standards in the future, including as it relates to potential topical standards. The staff noted that the ISSB has not yet determined whether it will issue topical standards, and that the ISSB's research projects on biodiversity, ecosystems and ecosystem services (BEES) and human capital will help inform that decision.
- 34. Previous feedback from the SSAF has informed:
 - (a) the overall objective of the SASB enhancements work;
 - (b) the ISSB's approach to enhancing SICS; and
 - (c) the ISSB's prioritisation approach for the project to enhance the SASB Standards, including determining the set of SASB Standards to prioritise in the first phase of the project factoring in overlap with the work of other standard-setters and framework providers.





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- 35. The staff aims to continue to engage the SSAF in various aspects of the project to enhance the SASB Standards, including:
 - (a) soliciting feedback from stakeholders on the forthcoming exposure drafts of proposed amendments to the SASB Standards; and
 - (b) input on further industries or topics in the SASB Standards that could be prioritised in the next phase of the project, including enhancements to SICS.

Research projects

- 36. SSAF members received an update on the ISSB's research projects on risks and opportunities associated with biodiversity, ecosystems and ecosystem services (BEES) and human capital.
- 37. SSAF members were asked to share:
 - (a) any questions or comments on the design and approach of the research projects; and
 - (b) any comments on the findings in the four research areas for either project.
- 38. SSAF members shared their support for the ISSB's work on the research projects to date.
- 39. SSAF members shared their views on BEES and human capital-related disclosure practices and requirements in their jurisdictions, including in some cases their own research findings. Some SSAF members suggested particular BEES and human capital-related standards and frameworks, including both disclosure-focused and more normative standards and frameworks, for the ISSB to consider to the extent that they are within the scope of the research projects. Some SSAF members also highlighted the importance of considering the connections between the research projects and the ISSB's work to enhance the industry-based SASB Standards.
- 40. Some SSAF members said that a clear timeline on the research projects would be valuable to support SSAF members with the implementation of sustainability-related reporting in their own jurisdictions. The staff noted that the focus on the four areas of the BEES and Human Capital research projects in parallel, rather than sequentially, was implemented to streamline the overall research process with an eye to building on standards and frameworks being used in capital markets.



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41. Feedback from the SSAF and its members, including the feedback received though the jurisdictional survey, has informed the findings of the initial phase of research on BEES and human capital. SSAF member feedback is also being used to inform the next phase of work on the research projects, which will synthesise findings from the initial phase and analyse implications for potential standard-setting. This work will begin in the second quarter of 2025.

Progress updates from SSAF member jurisdictions

42. SSAF members provided updates relating to the status of adoption of IFRS S1 and IFRS S2 in their jurisdictions.

⁶ Agenda Paper 3 and 4 *Overview: Jurisdictional survey on biodiversity, ecosystems and ecosystem services and human capital* for the October 2024 ISSB meeting outlines the responses to the jurisdictional survey on the ISSB's research projects. This paper can be found at: https://www.ifrs.org/content/dam/ifrs/meetings/2024/october/issb/ap3-ap4-bees-human-capital.pdf