Staff paper

Agenda reference: DP5B

IFRS Foundation Trustees meeting – Due Process Oversight Committee

Date	**October 2025**
Topic	**ISSB Annual Reporting Protocol**
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Purpose

1. This paper considers various matters on which the International Sustainability Standards Board (ISSB) technical staff reports to the DPOC annually:
    - (a) the receipt of comment letters and survey responses including their public availability;
    - (b) the availability of board papers to observers; and
    - (c) the ISSB's dialogue with securities and other regulators.
2. This report is for the year ending 30 September 2025 and no formal action is required to be taken by the DPOC.

Summary

3. The technical staff confirms that:
    - (a) all comment letters analysed with respect to ISSB consultations have been posted on the IFRS Foundation website.
    - (b) all agenda papers distributed to ISSB members for public ISSB meetings were made available on the IFRS Foundation website. Furthermore, there were no cases in which a document discussed by the ISSB in a public meeting was withheld or had any material removed from observers.
    - (c) regular dialogue has been maintained with securities regulators and prudential supervisors.

Comment letters

4. The requirements of the Handbook related to comment letters are included in paper DP3B for this meeting.
5. In the year to 30 September 2025 the following comment letters were received:

	Number of comment letters
ISSB	179

6. Details of all the comment letters considered during the year are set out in the Appendix to this paper.

ISSB papers made available to observers

7. Paragraphs 3.11–3.12 of the Handbook explain the importance of making available to observers the papers discussed by ISSB members in their public meetings.

8. In the year to 30 September 2025, all agenda papers distributed to ISSB members for public ISSB meetings were made available on the IFRS Foundation website. Furthermore, there were no cases in which a document discussed by the ISSB in a public meeting was withheld or had any material removed from observers.

9. The staff have reported to the DPOC throughout the year on the late posting of papers for ISSB meetings (defined in the Handbook as papers posted less than five working days in advance of meetings).

Securities and other regulators

10. Paragraphs 3.55–3.58 of the Handbook explain the ISSB's dialogue with securities and other regulators.

11. The ISSB's engagement of regulatory authorities is focused on:

    (a) adoption of the ISSB Standards (including in relation to relevant prudential regulation);

    (b) education and capacity building (including their assistance in facilitating capacity building with relevant stakeholders); and

    (c) obtaining input on the ISSB's ongoing technical work.

Securities regulators

12. During the year to 30 September 2025, the ISSB and relevant staff have maintained extensive dialogue with securities regulators.

13. One of the main vehicles for engaging regulators continues to be through the Jurisdictional Working Group (JWG).[1] The JWG met in July 2025 to discuss the publication of the first set of jurisdictional profiles and snapshots, the IFRS Foundation resources to support jurisdictions in their adoption considerations through the Regulatory Implementation Programme and the projects in the ISSB work plan. ISSB staff have also engaged bilaterally with JWG members throughout the year. The ISSB leadership has shared a paper with the Trustees to evolve the JWG for enhanced effectiveness serving its purpose as a resource for the ISSB as jurisdictions advance the strategy for supporting adoption of the ISSB Standards.

14. Throughout the period there has been significant engagement with IOSCO through several different forums.[2] ISSB members and technical staff have engaged with the IOSCO Sustainable Finance Task Force and Committee 1 with a particular focus on the development of the jurisdictional profiles, the consultations on amendments to IFRS S2 and proposed enhancements to SASB Standards and

[1] The Japanese Financial Services Authority, the United Kingdom Financial Conduct Authority and the United States Securities and Exchange Commission and the Chinese Ministry of Finance have been members since the establishment of the JWG in April 2022 along with IOSCO as an observer. The Financial Markets Commission of Chile and the Monetary Authority of Singapore joined the JWG in May 2023,

[2] Including the IOSCO leadership, the IOSCO Sustainable Finance Task Force (STF), IOSCO Regional Committees and the IOSCO Committee on issuer accounting, auditing and disclosures (Committee 1).

educational materials resources relating to material information and transition plan disclosures. The ISSB's engagement with the IOSCO's Growth and Emerging Markets Committee (GEMC)[3] has also been relevant, resulting in the establishment of a dedicated GEMC Network for the adoption or other use of ISSB Standards, The Network comprises 35 GEMC member jurisdictions and will focus on enhancing GEMC members understanding of how they can leverage Jurisdictional Guide, the Regulatory Implementation Programme and other resources developed by the IFRS Foundation to further regulators adoption considerations and serve as a forum for peer learning. The establishment of the Network significant development supporting the adoption or other use of the ISSB Standards if emerging markets and developing economies.

15. Also, during the period there has been significant engagement bilaterally with jurisdictional regulators towards the development of jurisdictional profiles and snapshots. The publication of the first set of profiles was welcomed publicly by a significant number of jurisdictions. Engagement has also been meaningful with various regulators as jurisdictions progress their adoption considerations and consulted publicly on their adoption roadmaps or their national standard-setting proposals. As more jurisdictions embark in the process to develop roadmaps and regulators introducing ISSB Standards into regulatory frameworks, this type of engagement continues to increase.

Prudential regulators

16. The ISSB has continued its regular dialogue with prudential regulators, including specific engagements conducted about the Proposed Amendments to IFRS S2 given their connection with the banking and insurance industry. On that topic the staff engaged with the:

(a) Basel Committee on Banking Supervision (BCBS) secretariat;

(b) International Association of Insurance Supervisors (IAIS) secretariat and members of IAIS;

(c) European Central Bank (ECB);

(d) European Insurance and Occupational Pensions Authority (EIOPA); and

(e) Australian Prudential Regulation Authority (APRA).

17. In addition, together with the Network for Greening the Financial System (NGFS)[4] and the Bank for International Settlements (BIS), a virtual seminar was held on the ISSB Standards in March 2025.

[3] The Growth and Emerging Markets Committee of IOSCO comprises 90 members and 24 non-voting associate members who include the world's fastest growing economies and 10 of the G-20 members. Emerging economies are expected to represent a growing portion of IOSCO membership as new members continue to join.

[4] The Network for Greening the Financial System is a network of 114 central banks and financial supervisors.

Appendix

Comment letters received as at 30 September 2025

Project	Due Process Stage	No. of Letters
International Sustainability Standards Board		
Amendments to Greenhouse Gas Emissions Disclosures (Amendments to IFRS S2)	Exposure Draft	179