
ISSB meeting

Date	September 2025
Project	Amendments to Greenhouse Gas Emissions Disclosures (Amendments to IFRS S2)
Topic	Due process steps
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Purpose

1. In April 2025, the International Sustainability Standards Board (ISSB) published the [Exposure Draft Amendments to Greenhouse Gas Emissions Disclosures](#). The Exposure Draft sets out proposed targeted amendments to IFRS S2 *Climate-related Disclosures* in response to application challenges related to greenhouse gas (GHG) emissions requirements.
2. The purpose of this paper is to:
 - (a) explain the steps in the [IFRS Foundation Due Process Handbook](#) (Due Process Handbook) that the ISSB has taken in developing the amendments to IFRS S2;
 - (b) ask the ISSB's permission to begin the process for balloting the amendments to IFRS S2; and
 - (c) ask if any ISSB member plans to dissent from the publication of the final amendments to IFRS S2.

3. Agenda Paper 9A–9E ask the ISSB to vote on the staff recommendations on the proposed amendments to IFRS S2. We have prepared this agenda paper based on the assumption that the ISSB will be able to make decisions on all these matters and decide to finalise the amendments to IFRS S2.

Structure of the paper

4. This paper is structured as follows:
 - (a) Background;
 - (b) Considering re-exposure;
 - (c) Intention to dissent;
 - (d) Confirmation of due process steps;
 - (e) Questions for the ISSB;
 - (f) Appendix A—Extracts from the Due Process Handbook; and
 - (g) Appendix B—Due process steps.

Background

5. As noted in Agenda Paper 9 *Cover note*, at this meeting the ISSB will be asked to make decisions to finalise the proposals relating to:
 - (a) measurement and disclosure of Scope 3 Category 15 GHG emissions (Agenda Paper 9A and 9B);
 - (b) use of the Global Industry Classification Standard (GICS) in applying specific requirements related to financed emissions (Agenda Paper 9C);
 - (c) jurisdictional relief from using the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) (GHG Protocol Corporate Standard) and jurisdictional relief for global warming potential (GWP) values (Agenda Paper 9D); and

- (d) effective date and transition requirements for the final amendments (Agenda Paper 9E).

Consideration of whether re-exposure is necessary

6. The staff recommends that the ISSB finalise the amendments to IFRS S2 without re-exposure for another round of public comment because there are no substantive changes on which the respondents have not had the opportunity to comment and, thus, it is unlikely that re-exposure will reveal any new information or concerns. In making this recommendation, we have considered the requirements in paragraphs 6.25–6.27 of the Due Process Handbook (see Appendix A for extracts from the Due Process Handbook).
7. Stakeholder responses to the Exposure Draft show broad support for the proposed amendments and the ISSB’s timely action to propose the amendments in response to application challenges identified during the implementation phase of IFRS S2. Respondents generally agree with the proposals, although there were some mixed views on ‘how’ the following aspects of the proposals are designed:
 - (a) *the measurement and disclosure of Scope 3 Category 15 GHG emissions:* there is broad support for the proposed relief permitting an entity to limit its Scope 3 Category 15 GHG emissions to financed emissions. But there are concerns about the usefulness of quantitative information resulting from proposed disclosure requirements about an entity’s use of the relief, relative to the cost and effort to provide that information (see Agenda Paper 9B for more detail).
 - (b) *the use of GICS in applying specific requirements related to financed emissions:* there is broad support for the proposed relief to limit the circumstances in which an entity would be required to use GICS in applying particular requirements in IFRS S2. But there are concerns that the proposed hierarchy of industry-classification systems would not sufficiently address the application challenges (see Agenda Paper 9C for more detail).

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8. The staff considered stakeholder feedback and developed the staff recommendations in response to such feedback. If the ISSB agrees with the staff recommendations in Agenda Papers 9B and 9C, the proposals in the Exposure Draft will be finalised with changes. These recommended changes are intended to respond to comments raised to further simplify application for entities while maintaining decision-usefulness for primary users of general purpose financial reports (primary users).
9. The staff has assessed the recommended changes to the proposals against the re-exposure criteria specified in the Due Process Handbook and believes that the ISSB should not re-expose the amendments because:
- (a) the recommended changes are informed by, and in response to, feedback received. At this meeting, the ISSB will undertake the steps described in paragraph 6.25 of the Due Process Handbook before deciding to finalise the amendments;
 - (b) re-exposure would be unlikely to reveal any new information or feedback not already considered by the ISSB (see paragraph 6.26 of the Due Process Handbook) because the recommended changes:
 - (i) *are not fundamental changes on which respondents have not had the opportunity to comment*: these changes relate to ‘how’ the specific aspects of the amendments are designed as stakeholders broadly support the general direction of the proposals. The Exposure Draft includes specific questions for each proposed amendment and the Basis for Conclusions on the Exposure Draft includes explanations about concerns raised by some ISSB members on these matters (paragraphs BC22–BC24 and BC31–BC38 of the Basis for Conclusions on the Exposure Draft);
 - (ii) *are informed by robust stakeholder feedback*: there was strong engagement from stakeholders across different stakeholder groups and geographies in response to the Exposure Draft. This engagement was supported by outreach activities undertaken during the public consultation period. Additionally, the staff has conducted additional

targeted investors outreach to supplement feedback received on the Exposure Draft to more fully understand investors' perspectives in responding to stakeholder concerns noted in paragraph 7 of this paper in developing the staff recommendations;

- (c) urgency of the amendments (see paragraph 6.27 of the Due Process Handbook):
 - (i) *urgently needed by preparers*: many entities are already in the process of implementing IFRS S1 and IFRS S2. We expect that some entities will want to apply the amendments at the same time they first apply IFRS S1 and IFRS S2; and
 - (ii) *providing certainty to jurisdictions*: many jurisdictions have already decided to use or are taking steps to introduce IFRS Sustainability Disclosure Standards in their legal or regulatory frameworks. We expect that some jurisdictions will want to adopt the amendments as soon as possible. We are in fact aware of several jurisdictions that are seeking to navigate the GICS issue—by acting on a timely basis the ISSB will facilitate the adoption of an approach that can be used consistently by jurisdictions.

Intention to dissent

- 10. In accordance with paragraph 6.23 of the Due Process Handbook, the staff would like to ask whether any ISSB member intends to dissent from the amendments.
- 11. No ISSB member dissented from the Exposure Draft. Any ISSB members who intend to dissent from the final amendments are asked to make their intention known at this meeting.

Confirmation of due process steps

12. The staff believes that the ISSB has undertaken all of the due process activities identified as being required in the Due Process Handbook and hence able to finalise the amendments. Appendix B summarises the due process steps taken in developing the amendments to IFRS S2. We note that the applicable due process steps to date for the issuance of the amendments have been completed.
13. The staff requests permission to start the balloting process if the ISSB is satisfied that:
- (a) it has been provided with sufficient analysis, and
 - (b) it has undertaken appropriate consultation and due process to support issuing the amendments.

Questions for the ISSB

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

Questions for the ISSB

1. *Re-exposure*—Does the ISSB agree with the staff recommendation to finalise the amendments to IFRS S2 without re-exposing for a further round of public comment (paragraphs [6–9](#))?
2. *Dissent*—Does any ISSB member intend to dissent from the publication of the amendments? If so, on what grounds (paragraphs [10–11](#))?
3. *Due Process*—Is the ISSB satisfied that it has complied with the applicable due process requirements?
4. *Permission to ballot*—Does the ISSB grant the staff permission to begin the balloting process for the amendments to IFRS S2?

Appendix A—Extracts from the Due Process Handbook

A1. We reproduced below the paragraphs from the Due Process Handbook that include the requirements the ISSB applies in considering re-exposure:

6.25 In considering whether there is a need for re-exposure, the [ISSB]:

(a) identifies substantial issues that emerged during the comment period on the exposure draft and that it had not previously considered;

(b) assesses the evidence that it has considered;

(c) determines whether it has sufficiently understood the issues, implications and likely effects of the new requirements and actively sought the views of interested parties; and

(d) considers whether the various viewpoints were appropriately aired in the exposure draft and adequately discussed and reviewed in the basis for conclusions.

6.26 It is inevitable that the final proposals will include changes from those originally proposed. The fact that there are changes does not compel the [ISSB] to re-expose the proposals. The [ISSB] needs to consider whether the revised proposals include any fundamental changes on which respondents have not had the opportunity to comment because they were not contemplated or discussed in the basis for conclusions accompanying the exposure draft. The [ISSB] also needs to consider whether it will learn anything new by re-exposing the proposals. If the [ISSB] is satisfied that the revised proposals respond to the feedback received and that it is unlikely that re-exposure will reveal any new concerns, it should proceed to finalise the proposed requirements.

6.27 The more extensive and fundamental the changes from the exposure draft and current practice the more likely the proposals

should be re-exposed. However, the [ISSB] needs to weigh the cost of delaying improvements to financial reporting against the relative urgency for the need to change and what additional steps it has taken to consult since the exposure draft was published. The use of consultative groups or targeted consultation can give the [ISSB] information to support a decision to finalise a proposal without the need for re-exposure.

Appendix—Due process steps

B1. The table below shows how the ISSB has complied with the due process steps to date, as required to finalise amendments to IFRS S2 in accordance with the Due Process Handbook.

Step	Required / Optional	Actions
Consideration of information gathered during consultation		
The ISSB posts all of the comment letters and survey responses that are received in relation to the Exposure Draft on the project pages.	Required	All comment letters and survey responses received by the ISSB (179) have been posted on the project website here .
The ISSB meetings are held in public, with papers being available for observers. All decisions are made in public sessions.	Required	<p>The ISSB discussed a preliminary summary of stakeholder feedback on the Exposure Draft at the July 2025 ISSB meeting (see Agenda Paper 9 for that meeting).</p> <p>The feedback summary, analysis and recommendations on the matters identified in the feedback to the Exposure Draft will be discussed by the ISSB at this meeting (see Agenda Papers 9A–E for this meeting).</p> <p>All staff papers above are publicly available. All decisions with regards to the amendments were taken during these meetings.</p> <p>The project webpage has up-to-date information about all technical papers related to the project.</p>
Analysis of likely effects of the forthcoming Standard or major amendment, for example, costs or ongoing associated costs.	Required	<p>The ISSB considered the likely effects of the amendments at each stage of their development.</p> <p>Information relating to the likely effects of the amendments in the Exposure Draft were discussed by the ISSB at its January 2025 meeting (Agenda Paper 9A and 9C for that meeting). The Basis for Conclusions on the Exposure Draft includes discussion about the likely effects of the amendments. As there are no fundamental changes to the proposals in the Exposure Draft, this analysis of likely effects remains applicable. A discussion</p>

		of the likely effects of the amendments will be incorporated in the amendments to the Basis for Conclusions on IFRS S2.																												
Outreach meetings to promote debate and hear views on proposals that are published for public comment	Optional	<p>The proposed amendments were discussed with members of:</p> <ul style="list-style-type: none">(i) the Sustainability Standards Advisory Forum;(ii) the ISSB Investor Advisory Group;(iii) the Transition Implementation Group on IFRS S1 and IFRS S2;(iv) the IFRS Advisory Council; and(v) the IFRS Sustainability Reference Group. <p>Targeted engagements were also conducted focusing on stakeholders who are most likely to be affected by the proposed amendments, in addition to the meetings with the groups listed above.</p> <p>A total of 64 outreach meetings were held with 237 organisations. We summarise our stakeholder representation by type and jurisdiction:</p> <table><tr><th>Stakeholders by type</th><th>Number</th></tr><tr><td>Accounting profession and auditors</td><td>27</td></tr><tr><td>Companies</td><td>110</td></tr><tr><td>Investors</td><td>38</td></tr><tr><td>Policy-makers and regulators</td><td>37</td></tr><tr><td>Standard-setters</td><td>18</td></tr><tr><td>Other</td><td>7</td></tr></table> <table><tr><th>Stakeholders by jurisdiction</th><th>Number</th></tr><tr><td>Africa</td><td>21</td></tr><tr><td>Asia-Oceania</td><td>41</td></tr><tr><td>Europe</td><td>75</td></tr><tr><td>Global</td><td>24</td></tr><tr><td>North America (excl. Mexico)</td><td>50</td></tr><tr><td>South and Latin America</td><td>26</td></tr></table>	Stakeholders by type	Number	Accounting profession and auditors	27	Companies	110	Investors	38	Policy-makers and regulators	37	Standard-setters	18	Other	7	Stakeholders by jurisdiction	Number	Africa	21	Asia-Oceania	41	Europe	75	Global	24	North America (excl. Mexico)	50	South and Latin America	26
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Finalisation		
Due process steps are reviewed by the ISSB.	Required	This step will be met by this Agenda Paper. This paper will be provided to the Due Process Oversight Committee (DPOC).
Need for re-exposure is considered.	Required	Paragraphs 6–9 of this paper discuss re-exposure. We recommend not re-exposing the amendments.
The ISSB sets an effective date for the Standard, considering the need for effective implementation.	Required	As a necessary step before beginning the balloting process, at this month's meeting, the staff have recommended an effective date for the amendments for the ISSB to decide (see Agenda Paper 9E for this meeting).
Drafting		
Drafting quality assurance steps are adequate.	Required	<p>To be completed in due course.</p> <p>The Translations, Taxonomy and Editorial teams will review drafts during the balloting process.</p> <p>The staff also intend to send a draft of the amendments to external parties for review. This process allows external parties to review and report back to the staff on the clarity and understandability of the draft, mainly with editorial comments. The external review process does not grant external parties the opportunity to question the ISSB's technical decisions.</p>
Publication		
News release to announce the final Standard.	Required	To be completed in due course. A news release will be published with the amendments.
A Feedback Statement is provided which provides high level executive summaries of the Standard and explains how the ISSB has responded to the comments received.	Required	<p>Not considered necessary because these amendments are narrow in scope. According to paragraph 6.38 of the Due Process Handbook, a Feedback Statement is required for all new IFRS Standards and major amendments.</p> <p>The amendments to the Basis for Conclusions on IFRS S2 will explain how the ISSB has responded to feedback.</p>

Podcast to provide interested parties with high level updates or other useful information about the Standard.	Optional	Updates about the project were provided in some of the ISSB podcasts produced by the IFRS Foundation after each ISSB meeting.
Standard is published.	Required	The amendments will be made available on the IFRS Foundation website when published. The DPOC will be informed when the amendments are published.