
Sustainability Standards Advisory Forum meeting

Date	September 2025
Project	Enhancing the SASB Standards
Topic	Feedback on Exposure Draft published July 2025
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Purpose of this session

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- Provide SSAF members with an update regarding the project to enhance the SASB Standards
- Seek input from SSAF members on specific aspects of the Exposure Draft Proposed Amendments to the SASB Standards ('SASB Exposure Draft') published in July 2025
- Questions for discussion with SSAF members on these specific aspects are included in **Slide 8** and in **Slide 17**

Other questions for SSAF members

- What engagement activities have SSAF members performed to date regarding the SASB Exposure Draft?
- Have SSAF members received any initial feedback from their stakeholders?

SSAF Discussion topics

For this session, the ISSB requests that SSAF members engage with stakeholders in their jurisdictions to solicit input on two different aspects of the SASB Exposure Draft

Identification of sustainability-related risks and opportunities

Each SASB Standard contains **disclosure topics** which describe a sustainability-related risk or opportunity that could reasonably be expected to affect the prospects of entities in the industry.

- Do the nine priority SASB Standards in the exposure draft identify the most relevant sustainability-related risks and opportunities for the typical entity in each industry?

Nature- and human capital-related metrics

The SASB Exposure Draft proposes amendments to many SASB Standards regarding some nature and human capital topics such as **water management** and **workforce health & safety**.

- Do you agree with the proposed amendments to the water management and workforce health & safety metrics?
- Do you have any comments on the proposed enhancements to interoperability with other sustainability-related standards and frameworks related to these two topics?

Project background

Previous **ISSB** discussions on the project to enhance the SASB Standards:

- May 2024: ISSB discussion and voting on **SICS**
- June 2024: ISSB discussion on **criteria to use for prioritising enhancements** to the SASB Standards
- July 2024: ISSB discussion and **voting on approach to the SASB enhancements**
- December 2024: ISSB discussion on project update and **stakeholder feedback** on the priority industries
- March 2025: ISSB discussion on project update and **approach to developing enhancements**
- May 2025: ISSB discussion on **structure of the exposure draft** of proposed amendments to the SASB Standards and related accompanying materials

SSAF touchpoints on the project to enhance the SASB Standards:

- June 2024: SSAF provided input on project objective and the prioritisation of industries for first phase
- October 2024: SSAF provided input on potential enhancements to priority industries and other enhancements that could be made to SICS
- February 2025: SSAF discussion of stakeholder feedback on priority industries and potential industries to be prioritised in ‘Phase 2’ of project
- May 2025: SSAF discussed ISSB’s approach to developing proposed amendments

SASB enhancements – July 2025 Exposure Draft

Priority industries

Comprehensive review of nine SASB Standards:

Extractives sector



- Oil & Gas (four industries):
 - Exploration & Production
 - Midstream
 - Refining & Marketing
 - Services
- Metals & Mining
- Construction Materials
- Iron & Steel Producers
- Coal Operations



Food & Beverage sector

- Processed Foods

Targeted amendments

Alignment of metrics in **41 additional industries** on topics related to:

- Greenhouse gas emissions
- Energy management
- Water management
- Labour practices
- Workforce health & safety

Designed to maintain **consistent guidance** in various SASB Standards on key topics related to climate, nature and human capital, where relevant

New educational material:

Using ISSB Industry-based Guidance when applying ISSB Standards

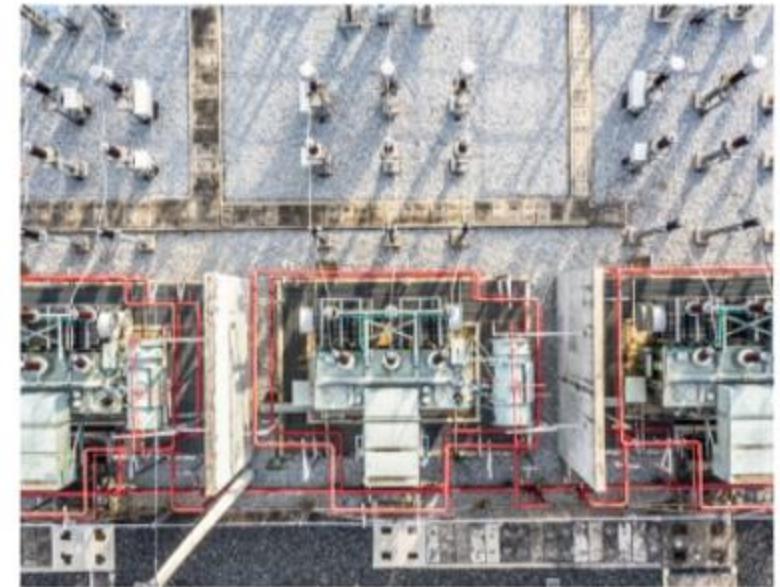
This educational material explains how the ISSB industry-based guidance—which collectively refers to the SASB Standards and *Industry-based Guidance on Implementing IFRS S2*—can serve as a useful resource for an entity applying the ISSB Standards to identify:

- sustainability-related risks and opportunities; and
- information to disclose about sustainability-related risks and opportunities.

The ISSB industry-based guidance does not impose additional requirements on an entity applying ISSB Standards. Instead, the guidance helps an entity to meet the requirements in ISSB Standards.

Using ISSB Industry-based Guidance when applying ISSB Standards

Educational material



Discussion topic:

Identification of
sustainability-related risks
and opportunities



Identification of sustainability-related risks and opportunities

Each SASB Standard contains **disclosure topics** that describe a sustainability-related risk or opportunity that could reasonably be expected to affect the prospects of most entities in the industry

For discussion:

- Do the **nine priority SASB Standards** in the exposure draft identify the most relevant sustainability-related risks and opportunities for the typical entity in each industry?
 - Are there considerations specific to your jurisdiction the ISSB should be aware of?
 - Do you agree with the proposed new topics?
 - Should any topics be removed?

Proposed new disclosure topics

- Supply chain management
(Metals & Mining; Construction Materials)
- Workforce health & safety
(Oil & Gas – Midstream)
- Labour practices
(Iron & Steel Producers)
- Operations in conflict areas
(Coal Operations)
- Product innovation
(Processed Foods)

Discussion topic:

Nature- and human capital-
related metrics



Background

- The SASB Exposure Draft proposes amendments to the SASB Standards regarding nature and human capital topics such as **water management** and **workforce health & safety**
- These topics appear in multiple SASB Standards and are the subject of **targeted amendments**
- The ISSB identified opportunities to simultaneously enhance the Standards while **improving interoperability and alignment** with other sustainability-related standards and frameworks

What are the proposed targeted amendments?

- Intended to maintain consistency of metrics that occur frequently in other SASB Standards (beyond the nine priority industries)
- Would affect five topics across 41 SASB standards:
 - greenhouse gas emissions
 - energy management
 - water management**
 - labour practices
 - workforce health & safety

Oil & Gas -- Ex

SUSTAINABILITY D

Table 1. Sustainability Disclos

TOPIC	
Greenhouse Gas Emissions	Gross global percentage m under emissi Amount of gr emissions fro (2) other com emissions, (4) (5) fugitive en Discussion of strategy or pl emissions, en and an analyt those targets
Air Quality	Air emissio (1) NO _x , (excl (3) volatile or and (4) partic
Water Management	(1) Total water consumed, pe with High or E Water Stress Volume of pr generated, pe (2) injected, (content in dis Percentage of for which the fracturing flui Percentage of hydraulic fracturing sites where ground or surface water quality deteriorated compared to a baseline ¹

Household & Personal Products SASB Standard

SUSTAINABILITY DISCLOSURE TOPICS & METRICS

Table 1. Sustainability Disclosure Topics & Metrics

TOPIC	METRIC	CATEGORY	UNIT OF MEASURE	CODE
Water Management	(1) Total water withdrawn, (2) total water consumed: percentage of each in regions with H Water		Thousand cubic metres	
Product Environmental, Health and Safety Performance	Desc and d to mit Rever subst Discu mana chem Rever green			
Packaging Lifecycle Management	(1) To (2) pe renew that is comp Discu envirc throu			
Environmental & Social Impacts of Palm Oil Supply Chain	Amou certifi Susta chain Segre & Cla			

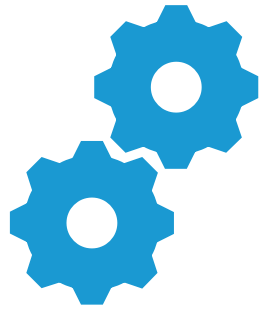
Real Estate SASB Standard

SUSTAINABILITY DISCLOSURE TOPICS & METRICS

Table 1. Sustainability Disclosure Topics & Metrics

TOPIC	METRIC	CATEGORY	UNIT OF MEASURE	CODE
Energy Management	Energy consumption data coverage as a percentage of total floor area, by property sector	Quantitative	Percentage (%) by floor area	IF-RE-130a.1
	(1) Total energy consumed by portfolio area with data coverage, (2) percentage grid electricity and (3) percentage renewable, by property sector	Quantitative	Gigajoules (GJ), Percentage (%)	IF-RE-130a.2
	Like-for-like percentage change in energy consumption for the portfolio area with data coverage, by property sector	Quantitative	Percentage (%)	IF-RE-130a.3
	Percentage of eligible portfolio that (1) has an energy rating and (2) is certified to ENERGY STAR, by property sector	Quantitative	Percentage (%) by floor area	IF-RE-130a.4
	Description of how building energy management considerations are integrated into property investment analysis and operational strategy	Discussion and Analysis	n/a	IF-RE-130a.5
Water Management	Water withdrawal data coverage as a percentage of (1) total floor area and (2) floor area in regions with High or Extremely High Baseline Water Stress, by property sector	Quantitative	Percentage (%) by floor area	IF-RE-140a.1
	(1) Total water withdrawn by portfolio area with data coverage and (2) percentage in regions with High or Extremely High Baseline Water Stress, by property sector	Quantitative	Thousand cubic metres (m ³), Percentage (%)	IF-RE-140a.2
	Like-for-like percentage change in water withdrawn for portfolio area with data coverage, by property sector	Quantitative	Percentage (%)	IF-RE-140a.3
	Description of water management risks and discussion of strategies and practices to mitigate those risks	Discussion and Analysis	n/a	IF-RE-140a.4

Interoperability considerations



When developing the proposed amendments, the **ISSB regularly engaged with the GRI, EFRAG and the TNFD** to inform interoperability and alignment efforts.



Appendix B in the Basis for Conclusions in the SASB Exposure Draft provides an overview of the metrics where interoperability with the **GRI Standards** and alignment with the **TNFD disclosure recommendations** have led to significant proposed amendments to the SASB Standards.



The ISSB is now **seeking specific input** on how the proposed amendments would affect the SASB Standards' interoperability and alignment with other sustainability-related standards or frameworks.

Proposed amendments to water metrics

Current metric: (1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress

Feedback:

- Aggregate water withdrawal data alone is unlikely to be material information
- Current definition of water stress does not always accurately reflect local water stress conditions



Proposed metric: (1) Total water withdrawal, by source, (2) total water consumed; (3) percentages of water (a) withdrawn and (b) consumed from water-stressed locations

Response:

- Require disaggregation of withdrawals by source (groundwater, seawater, etc.) to provide insight into nature of potential risks and opportunities
- Revise definition of water stress to enhance accuracy of data

Current metric: Number of incidents of non-compliance associated with water quality permits, standards and regulations

Feedback:

- Metric does not provide sufficient information regarding risks associated with water discharges
- Non-compliance incidents may take years to reach conclusion, reducing timeliness of information



Proposed metric: Total water discharged by (1) destination and (2) level of treatment

Response:

- New metric provides insights into quantity of discharged water and potential flood risks
- Treatment level provides information on risks arising from impacts on surrounding communities and ecosystems

Water metrics: proposed improvements to interoperability

Metric in the SASB Exposure Draft	Disclosures in GRI Standards
<i>(1) Total water withdrawal, by source, (2) total water consumed; (3) percentages of water (a) withdrawn and (b) consumed from water-stressed locations</i>	303-3 Water withdrawal 303-5 Water consumption

- **Common disclosure** of the same quantitative data related to water withdrawals disaggregated by source and water consumed, including unit of measure
- Verbatim definitions of water withdrawal, water sources, water consumption and water stress
- Shared guidance for assessing water stress and identifying water stressed locations
- Aligned disclosure of water withdrawn and consumed from water-stressed locations
 - SASB Standards require percentage of total water withdrawn/consumed, whereas GRI Standards require absolute value

Metric in the SASB Exposure Draft	Disclosures in GRI Standards
<i>Total water discharged by (1) destination and (2) level of treatment</i>	303-4 Water discharge

- **Common disclosure** of the same quantitative data related to water discharge disaggregated by destination and treatment level
- Verbatim definitions of water discharge and levels of treatment
- Shared guidance for determining level of water treatment

Proposed amendments to workforce health & safety metrics

Current metric: (1) *Total recordable incident rate (TRIR)*, (2) *fatality rate*, (3) *near miss frequency rate (NMFR)* and (4) *average hours of health, safety and emergency response training for (a) direct employees and (b) contract employees*;

Feedback:

- Current definitions likely to be misinterpreted
- Investors interested primarily in the absolute number for fatalities, not just the rate
- 'Near miss frequency rate' (NMFR) cannot be compared between entities because the underlying criteria for defining such incidents are preparer-determined
- Investors are interested in leading indicators/internal metrics used by entities to monitor performance



Proposed metric: (1) *Number of fatalities* and (2) *total recordable incident rate for (a) employees and (b) non-employee workers*; (3) *average hours of health, safety and emergency response training*

Response:

- Replace the term 'direct employees' with 'employees' and the term 'contract employees' with 'non-employee workers' to enhance clarity and mitigate misinterpretation
- Replace the 'fatality rate' sub-metric with an absolute number; add activity metrics for normalization
- Remove NMFR from quantitative metric, but include new disclosure regarding internal metrics used to manage and monitor performance (such as NMFR) in accompanying qualitative metrics

Workforce metrics: improvements to interoperability

Metric in the SASB Exposure Draft	Disclosures in GRI Standards
<i>(1) Number of fatalities and (2) total recordable incident rate for (a) employees and (b) non-employee workers; (3) average hours of health, safety and emergency response training</i>	403-5 Worker training on occupational health and safety 403-9 Work-related injuries 403-10 Work-related ill-health

- Verbatim definitions of:
 - Employees and non-employee workers – utilising GRI’s ‘control of work’ principle
 - Recordable incidents and work-related incidents
- Removal of near miss frequency rate aligns with GRI disclosures
- Aligned disclosure of quantitative information related to fatalities, total recordable incident rate and average hours of training
 - SASB Standards metric combines work-related injuries and illnesses into one disclosure, whereas GRI Standards require disaggregation of injuries and ill health
 - Difference in scope of total recordable incident rate – SASB Standards include both work-related injuries and illnesses, GRI Standards include only injuries
 - GRI Standards require disaggregation of training and education disclosure by ‘significant location of operation’

Nature and human capital-related metrics

Discussion

For the **water management** and **workforce health & safety** metrics highlighted in this presentation:

- Do you have any comments on the approach taken to improve interoperability with other standards and frameworks?
- Do you agree that the proposed amendments to the metrics described above will result in decision-useful information for investors while still being cost-effective for preparers to disclose?
- Are there any jurisdiction-specific standards or other requirements that would pose challenges to preparers in implementing the proposed amendments to these metrics?

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