
ISSB Meeting

Date	February 2026
Project	Enhancing the SASB Standards
Topic	Stakeholder feedback and project next steps
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This paper has been prepared for discussion at a public meeting of the International Sustainability Standards Board (ISSB). This paper does not represent the views of the 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*.

Purpose

1. This paper provides the International Sustainability Standards Board (ISSB) with:
 - (a) a summary of aspects of stakeholder feedback on the July 2025 Exposure Draft *Proposed Amendments to the SASB Standards* (July 2025 Exposure Draft) regarding the ISSB's execution of its 2024-2026 work plan and strategy related to the project on Enhancing the SASB Standards; and
 - (b) staff recommendations on the next steps for the project on Enhancing the SASB Standards based on that stakeholder feedback.
2. This paper is the first in a planned series of papers. This paper focuses on feedback regarding matters on which the ISSB did not ask questions in the July 2025 Exposure Draft's Invitation to Comment. This paper also does not address the feedback received on the Exposure Draft *Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2* which was also published in July 2025. The staff will present detailed findings regarding the questions the ISSB asked in these exposure drafts in a future ISSB meeting.

Structure of paper

3. This paper is structured as follows:
 - (a) Background;
 - (b) Overview of engagement activities and comments received during the consultation;
 - (c) Stakeholder feedback beyond the focus of the consultation; and
 - (d) Staff recommendations.

Background

4. The ISSB is enhancing the SASB Standards as part of its 2024-2026 work plan¹ with the objective of promptly supporting the high-quality implementation of IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures* and ensure that the SASB Standards continue to be relevant and fit for use by regulators whose jurisdictions adopt ISSB Standards and by companies that use the SASB Standards in disclosing sustainability-related financial information.
5. As described in [Agenda Paper 6](#) for the July 2024 ISSB meeting, the ISSB has adopted a phased approach to enhancing the SASB Standards, beginning with an initial set of 12 prioritised industries. The July 2025 Exposure Draft contained proposed amendments to nine of the twelve prioritised SASB Standards. The public comment period ended on November 30, 2025.
6. The proposed amendments reflected a comprehensive assessment of each prioritised industry, including evaluating the industry groupings as defined under the Sustainable Industry Classification System® (SICS), the industry description, the disclosure topics, the metrics and the detailed technical protocols. In the same exposure draft, the

¹ As outlined in the ISSB March 2024 meeting Agenda Paper 2 – [Strategic direction and balance of the ISSB's activities](#).

ISSB also proposed ‘targeted amendments’ to another 41 SASB Standards to achieve consistent disclosures for the same topics in different SASB Standards where appropriate. These targeted amendments covered metrics for the disclosure topics related to greenhouse gas emissions, energy management, water management, workforce health and safety, and labour practices.

7. The ISSB received 238 comment letters and survey responses to the July 2025 Exposure Draft. The staff is currently undertaking in-depth review of this feedback which falls into two categories of comments:
 - (a) detailed responses on the questions asked in the July 2025 Exposure Draft; and
 - (b) broader comments including comments going beyond the focus of the consultation covering:
 - (i) the ISSB’s strategy and execution of its 2024-2026 work plan; and
 - (ii) the due process documents and consultation process.
8. Appendix A in Agenda Paper 6 provides a timeline of relevant agenda papers provided to the ISSB during the project on Enhancing the SASB Standards.

Overview of engagement activities and comments received during the consultation

9. The consultation was open for a 150-day comment period between 3 July 2025 and 30 November 2025. We obtained feedback through:
 - (a) outreach activities such as public discussions, roundtable meetings and bilateral meetings; and
 - (b) written feedback in the form of public comment letters and responses to an online survey that contained the 15 questions in the Invitation to Comment.

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10. During the consultation period, we conducted a total of 183 meetings, reaching over 380 organisations.² We also hosted an online webcast in September 2025 with information about the July 2025 Exposure Draft which was attended by over 800 participants. As illustrated in chart 1 and chart 2, we sought to engage with a diverse range of stakeholders across regions and types.
 11. At the end of the consultation period, the ISSB received 238 comment letters and survey responses from 226 respondents in relation to the July 2025 Exposure Draft and 91 responses to the related consultation regarding whether to make consequential amendments to the *Industry-based Guidance on Implementing IFRS S2*.
 12. The charts below group the respondents by stakeholder type and geographical region for both the outreach activities and the comment letters and survey responses.³ A more detailed analysis will be provided in a future ISSB meeting alongside a review of feedback received on the questions asked in the July 2025 Exposure Draft.

² 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 an industry association, the complete list of organisations in attendance is not available. Staff estimates that the number of organisations reached through our engagement activities was significantly higher than the 380 listed here.

³ Industry groups are classified in the category which represents their members.

Chart 1- Respondents by stakeholder type

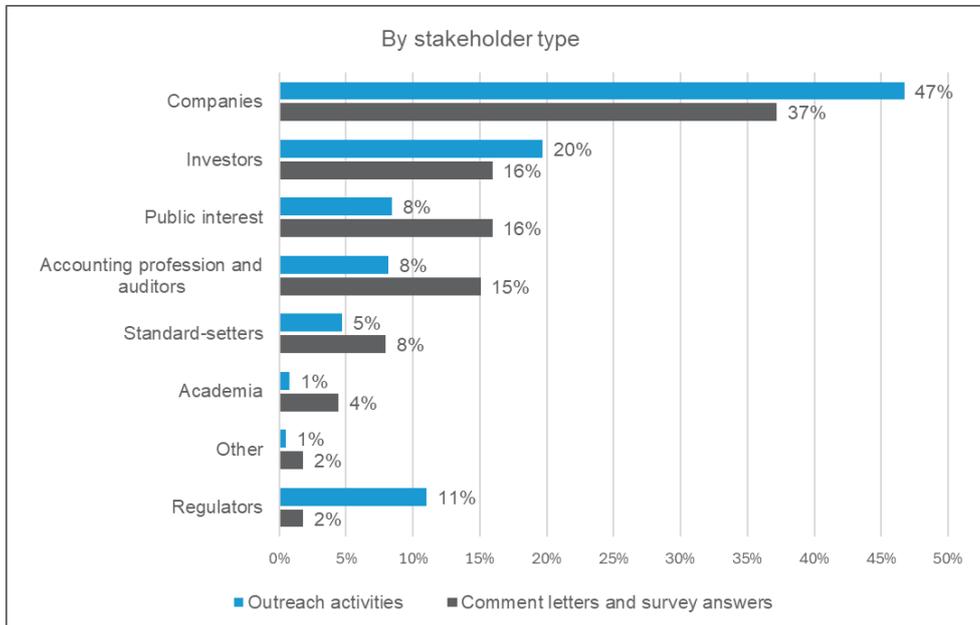
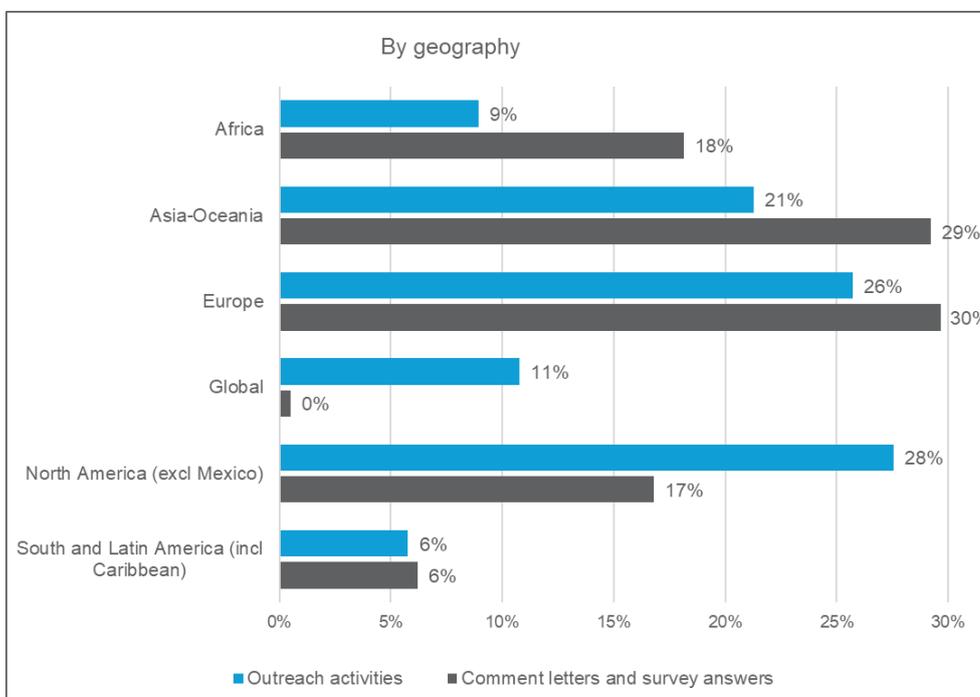


Chart 2- Respondents by geography⁴



⁴ Preliminary figures. The location of the stakeholders operating globally is being reviewed to ensure consistency between the classification of the outreach activities and the comment letters.

Stakeholder feedback beyond the focus of the consultation

13. In response to the July 2025 Exposure Draft, some stakeholders, especially accounting firms, standard-setters and regulators, provided feedback on topics that had implications beyond the questions directly asked in the July 2025 Exposure Draft, generally through their cover letters and answers to question 1 of the Invitation to Comment (presented in Appendix A). Specifically, these stakeholders used the consultation as an opportunity to provide their thoughts on a number of key matters such as:
- (a) the ISSB’s strategic direction as set out in its 2024-2026 work plan, covering:
 - (i) perceived confusion regarding the role and status of the SASB Standards in relation to the ISSB Standards;
 - (ii) feedback regarding the ‘future state’ of the ISSB Standards, including its current plan to enhance the SASB Standards while also conducting research and standard-setting in the areas of human capital and BEES; and
 - (b) challenges stakeholders faced in responding to the July 2025 Exposure Draft, such as the complexity and length of the due process documents.
14. In this paper, the staff focuses on the above feedback. We think it is important for the ISSB to consider this feedback at this time because it will inform the next steps for the project, including the prospective exposure draft on the three remaining SASB Standards prioritised as part of the first phase of the project.

Feedback on the ISSB’s strategy and execution of its work plan

15. Most respondents indicated that they were supportive of the ISSB’s work to enhance the SASB Standards based on the answers to the questions on the proposed approach

to the amendments (Questions 1—5 in the Invitation to Comment). We will present detailed analysis in subsequent meetings of the ISSB.⁵

16. Some stakeholders – including many of those that indicated that they were broadly supportive of the ISSB’s work related to the SASB Standards – provided feedback for the ISSB on its overall strategy and its execution of its 2024-2026 work plan as it relates to the project on Enhancing the SASB Standards. As detailed below, we have organised this feedback into two further sub-categories:
 - (a) feedback on the current role and status of the SASB Standards; and
 - (b) feedback on the future state of the ISSB Standards, including the role of the SASB Standards and their interaction with ISSB projects on BEES and human capital.
17. After discussing feedback in each sub-category, the staff provides some analysis regarding actions that the ISSB can take to address this feedback, both through the project on Enhancing the SASB Standards and through other means.

Feedback on the current role and status of the SASB Standards

18. A few respondents that were national standard-setters and accounting firms explained that stakeholders remained confused on the authority of the SASB Standards (specifically the requirement in IFRS S1 that an entity ‘shall refer to and consider’⁶ the applicability of topics and metrics in the SASB Standards). They also raised other points regarding the clarity of how concepts from the ISSB Standards relate to the SASB Standards when reporting using IFRS S1 and IFRS S2.
19. These stakeholders sought additional clarification on whether the concepts and principles contained in IFRS S1 apply to the SASB Standards.

⁵ For the purpose of this paper, the following terms are used to describe the extent of feedback among users: ‘almost all’ - all except a very small minority; ‘most’ - a large majority with more than a few exceptions; ‘many’ - a small majority or a large minority; ‘some’ - a small minority, but more than a few; ‘a few’ - a very small minority.

⁶ See paragraphs 55(a) and 58(a) of [IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information](#) for the requirements to ‘refer to and consider’ the SASB Standards.

The architectural design that positions the SASB Standards as providing supporting industry content for the ISSB Standards should make it clear that the general requirements in IFRS S1 (i.e., the concepts and principles, including materiality) and practical reliefs (including on availability of information without undue cost or effort) are clearly applicable to the industry content. ... We do not think it is sufficient for these points only to be made in educational material. (Comment letter 174: Deloitte).

20. Some also asked to reconsider the terminology of ‘Standards’ when the ISSB refers to the SASB Standards, and the use of the word ‘shall’ in the technical protocols of SASB Standards. These stakeholders indicated that this language obfuscates the role of the SASB Standards as non-mandatory guidance.
21. Some respondents gave specific suggestions regarding steps that the ISSB could take to provide further clarity regarding the interaction between the SASB Standards and IFRS S1 and IFRS S2, such as removing any content from the SASB Standards that is duplicative with IFRS S1 and IFRS S2 and ensuring that there are no conflicts between disclosures required in ISSB Standards and in the SASB Standards.

(...) some of the proposed narrative metrics contain requirements that essentially summarise content from the IFRS Sustainability Disclosure Standards rather than being additive requirements. (Comment letter 121: KPMG).

Staff analysis of feedback on the current role and status of the SASB Standards

22. The staff believes that the ISSB can take several steps to address this feedback, both in finalising its amendments to prioritised Standards, and in subsequent phases of work.
23. We note for example that the ISSB discussed during its [March 2025](#) meeting whether to describe the amended SASB Standards that have been subject to public consultation in accordance with the IFRS Foundation due process as ‘ISSB industry-based guidance’, which would more clearly show the link to ISSB Standards while stating that the materials when used in conjunction with the ISSB Standards have a

- status as ‘guidance’. The ISSB could consider this when it finalises amendments to the prioritised Standards.
24. Also, work could focus on refining interactions with IFRS S1 and IFRS S2 during the ISSB’s redeliberations on topics such as:
- (a) the role that the SASB Standards play in providing industry-specific guidance on greenhouse gas emissions (which are already cross-industry metric categories in IFRS S2);
 - (b) the role of narrative metrics currently detailed in the SASB Standards, to see if connections to ‘core content’ in IFRS S1 or IFRS S2 could be clarified or simplified; and
 - (c) the role and extent of cross-references to IFRS S1 and IFRS S2 in the SASB Standards.
25. Stakeholder feedback regarding the status of the SASB Standards was provided despite the ISSB publishing in July 2025 educational material addressing that topic specifically. [‘Using ISSB Industry-based Guidance when applying ISSB Standards’](#) explains the requirement in ISSB Standards that an entity ‘shall refer to and consider the applicability of’ the ISSB industry-based guidance (defined in the educational material as the SASB Standards and the IFRS S2 industry-based guidance). It also explains considerations related to applying the ISSB industry-based guidance and the disclosure requirements that can relate to how an entity has used the ISSB industry-based guidance. This builds on educational material published in February 2024 on ‘Using the SASB Standards to meet the requirements in IFRS S1’ which sought to provide clarity for stakeholders.⁷
26. It is clear that some stakeholders remain confused about the role of the SASB Standards in supporting the implementation of ISSB Standards. In addition to comments regarding ‘shall refer to and consider’, some stakeholders also provided

⁷ [Using the SASB Standards to meet the requirements in IFRS S1](#) (19 February 2024).

comments that either directly expressed a desire for further clarity around how concepts in ISSB Standards apply in relation to the SASB Standards (see the comment referenced above in paragraph 18), or otherwise indicated that the concepts and principles of IFRS S1 and IFRS S2 were not being clearly reflected in the proposed amendments to the SASB Standards in the July 2025 Exposure Draft. For example, a few respondents stated that the SASB Standards should focus on providing material information for investors, which is the primary objective of the SASB Standards.

27. Beyond refinements to the technical content itself, we believe that the ISSB should continue to explore ways to strengthen stakeholders' understanding of how the SASB Standards can be used in the context of IFRS S1 and IFRS S2. Consideration should be given to the 'location' of this beyond the work undertaken to date through educational material by including further clarifications either in the ISSB or SASB Standards.⁸ This could for example include materials such as application guidance or illustrative examples.⁹

Feedback on the future state of the ISSB Standards and interaction with ISSB projects on BEES and human capital

28. Many stakeholders explicitly supported the continued development of industry-specific guidance alongside the projects on BEES and human capital, such as CPP Investment (Comment letter 191) stating 'We agree that the proposed amendments appropriately link SASB's industry metrics to the ISSB's ongoing research on BEES'. Impax Asset Management (Comment letter 91) also 'particularly welcome the emphasis on international applicability and the explicit link to biodiversity, ecosystems and ecosystems services (BEES), and human capital'.

⁸ The ISSB discussed in the Agenda Paper 6 [Update on project activities and approach](#) of the May 2025 meeting the different ways in which additional guidance to explain the current role and status of the SASB Standards could be provided to stakeholders, including whether this guidance should be included at the beginning of every SASB Standard as 'front matter' or should be provided as educational material. It considered during this discussion whether this would risk front matter being disproportionate in the context of the overall balance of the SASB Standards.

⁹ Such as [Accompanying Guidance](#) on IFRS S1.

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29. Although supportive of the need for relevant industry-based content, a few respondents, particularly standard-setters, expressed the view that their engagement with the July 2025 Exposure Draft would have been more straightforward if the ISSB could clarify the long-term role of the SASB Standards in the context of the ISSB Standards. The staff's understanding is that they were of the view that the non-mandatory nature of the SASB Standards and their position separate to the ISSB Standards may for example have reduced appetite for engagement.

It would be helpful for the ISSB to clarify whether the SASB Standards are intended to function as standalone Standards or as guidance materials that complement the IFRS Sustainability Disclosure Standards. (Comment letter 77: Australian Accounting Standard Board).

[The FRC recommended that] ... as a priority, the ISSB communicates the future architecture of the IFRS Sustainability Disclosure Standards, including how the SASB Standards fit into that architecture. The future architecture should prioritise the continuance of the global baseline of sustainability disclosures for capital markets established by IFRS S1 and IFRS S2. In particular, the FRC would value greater clarity about whether the SASB Standards are intended to be a foundation or substitute for future topic-specific IFRS Sustainability Disclosure Standards. (Comment letter 118: Financial Reporting Council UK).

30. These stakeholders generally linked this question of 'future state' to the ISSB's current work plan, including the ISSB's pursuit of enhancements to the SASB Standards in parallel with its projects on BEES and human capital.

We believe the SASB Standards are entering a phase of strategic transition within the IFRS framework. As the ISSB continues to develop thematic standards, there is an opportunity to align the SASB Standards with this trajectory. (Comment letter 165: Canadian Sustainability Standards Board).

31. While generally supportive of the role that industry-specific disclosures can play in a future system of ISSB Standards, a few stakeholders (that were standard-setters) recommended that the ISSB pause its industry-specific work or otherwise take steps to prioritise its projects on BEES and human capital. These stakeholders indicated that

doing so would avoid duplicative work and inconsistencies across ISSB Standards and the SASB Standards. We note this feedback reiterates views previously expressed during the [ISSB Consultation on Agenda Priorities](#).

32. Some stakeholders also provided detailed suggestions on how the ISSB could organise thematic and industry-based disclosure requirements in a system of Standards.

Staff analysis of feedback regarding the future state of the ISSB Standards and interaction with ISSB projects on BEES and human capital

33. The feedback received in response to the July 2025 Exposure Draft is particularly important because of how it relates to other aspects of the ISSB's work extending beyond the project on Enhancing the SASB Standards. The feedback summary above is intended to provide the ISSB with insight into how some stakeholders, particularly national standard-setters and accounting firms, are thinking about the ISSB's strategic direction, both about how it is carrying out its current work plan, and how the ISSB could approach future work. As detailed below in our recommendations (see paragraphs 50-57), we do not believe that the project on Enhancing the SASB Standards can, or should, be the primary avenue through which the ISSB responds to stakeholders' request for greater clarity regarding future strategic direction and the long-term role of the SASB Standards in the context of the ISSB Standards.
34. In our view, there remains significant value in continuing the project on Enhancing the SASB Standards alongside the ISSB's projects on BEES and human capital under the ISSB's 2024-2026 work plan, especially given the importance of industry-specific information identified during the research activities for those projects. The ISSB's current approach to its work plan contributes to an efficient use of the ISSB's resources and stakeholder feedback that allows the ISSB:
 - (a) to enhance its industry-based guidance to contribute to the highest priority in its current work plan, which is to support the implementation of IFRS S1 and IFRS S2, for example, by ensuring that industry-specific disclosure topics are

- highly relevant and that metrics provide useful and comparable information;
and
- (b) to feed those insights into the ISSB’s broader ‘thematic’ research and standard-setting activities, particularly as the ISSB considers in its projects on BEES and human capital how to address common investor information needs regarding metrics and industry-specific information identified in the research phase of those projects.
35. As outlined in the July 2025 Exposure Draft and accompanying Basis for Conclusions, the ISSB plans to use the stakeholder feedback to evaluate whether the SASB Standards contain appropriate guidance on industry-specific information on BEES and human capital that is decision-useful to investors while being cost-effective for preparers. We therefore plan to consider the feedback from this consultation together with the information gathered during the BEES and human capital research projects when assessing:
- (a) whether additional guidance or requirements are needed on metrics within the standard-setting project on BEES (when developing the prospective exposure draft on nature-related disclosures); and
- (b) whether standard-setting is necessary and feasible for human capital-related disclosures, including metrics.
36. For example, in the agenda paper on BEES for the ISSB’s January 2026 meeting, the staff noted ‘related questions’ for the ISSB to consider on the different information areas that are the focus of the BEES standard-setting project, some of which reference the SASB Standards.¹⁰
37. Overall, we believe that the ISSB’s projects within the 2024-2026 work plan are complementary, even if their expected completion dates are not aligned. We believe that there is an opportunity for continued and enhanced feedback loops between the

¹⁰ See paragraph 35 Table 1 of ISSB January 2026 meeting Agenda Paper 3 - [Objective and scope of standard-setting on nature-related risks and opportunities](#).

projects and that there will be improved clarity for stakeholders about the interactions between them, including seeing tangible examples of these interactions in the ISSB's discussions. For example, this would become more apparent through the finalisation of SASB Standards included in Phase 1 of the project and the research for a phase 2 of the project, progressing alongside an exposure draft for nature-related disclosures and further progress on the human capital research project.

Feedback on the due process documents and consultation process

38. Some stakeholders from various types of organisations encountered challenges when responding to the July 2025 Exposure Draft, pointing to the length of the document, the timing, the extent of the changes, and the complexity of the consultation (which, as noted, was a combination of comprehensive amendments to nine prioritised Standards and 'targeted amendments' to a further 41 Standards on 5 topics).
39. Organisations tasked with soliciting feedback from their own stakeholders encountered limitations on their ability to engage stakeholders given the lack of resources having the broad and specialised set of expertise, combining strong understanding of ISSB Standards, subject-matter expertise, and industry-specific expertise as illustrated below.

The scale and complexity of the proposed amendments have made meaningful consultation difficult. In Aotearoa New Zealand, we have been unable to engage stakeholders effectively, mainly due to time pressures and the technical depth required. We understand this challenge is not unique to our jurisdiction...
(Comment letter 79: External Reporting Board).

40. Of the respondents who commented on the challenges related to the consultation, a few mentioned their internal operational hurdles to provide comments on a single document versus a document per industry. In a bilateral engagement, one standard-setter noted that the inclusion of comprehensive amendments to the *Processed Foods* SASB Standard alongside eight industries in the Extractives & Minerals Processing sector was a particular challenge because of the differences in content, and suggested

that it would have been more efficient to propose amendments to that Standard alongside other prioritised industries in the Food & Beverages sector.

41. Some respondents highlighted the need for greater visibility into future phases of the project, suggesting that the ISSB establish a multi-year workplan or otherwise outline a timeline of planned enhancements to the remaining industries. They stated that such communications would be particularly helpful in a global context where other organisations such as the Global Reporting Initiative, GHG Protocol and European Financial Reporting Advisory Group are also soliciting feedback on sustainability-related standards.

[Enhanced clarity] would also benefit jurisdictional standard-setters and regulators who are rolling out the standards in their respective disclosure regimes and considering the role of SASB as part of their approach. (Comment letter 148: Norges Bank Investment Management).

42. Some stakeholders expressed a desire for the ISSB to strengthen the rationale for the proposed amendments in the Basis for Conclusions. Suggested improvements included:
- (a) better articulating how the amendments meet investor needs;
 - (b) drawing more connections between disclosure topics and sustainability-related risks and opportunities that could reasonably be expected to affect an entity's prospects;
 - (c) adding rationale for which topics were selected for targeted amendments; and
 - (d) publishing a summary of the original basis on which disclosure topics and metrics were included in the current SASB Standards.

Staff analysis of feedback on the due process documents and consultation process

43. The staff welcomes this constructive and timely feedback and thinks that future phases of project work can be responsive to the challenges identified by stakeholders.
44. We observe that although efforts were made to present the exposure draft in a way that would facilitate engagement with parts of the proposals rather than the entire consultation, the sheer size of the July 2025 Exposure Draft was a factor that added complexity for stakeholders. It is also the case that many stakeholders are experiencing ‘consultation fatigue’ given that there have been many other consultations related to sustainability reporting, including by other organisations and at a jurisdictional level, that have called on the same stakeholders for input.
45. Many of the comments are linked to the complexities created by the combination of comprehensive amendments to prioritised SASB Standards alongside targeted amendments impacting many industries. Future consultations could seek to respond to this feedback through, for example:
 - (a) considering the benefits of consulting on a smaller range of proposals at one time;
 - (b) consulting on comprehensive amendments to industries within a single sector at a time;
 - (c) exploring alternative ways to package proposals (for example, standalone consultation documents for individual topics or industries) to make them more accessible to stakeholders that aren’t focused on a prioritised industry or sector; or
 - (d) reconsidering the ‘targeted amendments’ approach altogether.
46. We also think there are ways we can explore better supporting the market in future phases of the project on Enhancing the SASB Standards, such as:

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- (a) improving the utility of basis for conclusions documents and other supporting materials to strengthen the rationale for changes and articulate links to effects on entity prospects;¹¹
 - (b) sharing best practices and materials to support jurisdictional stakeholder engagement with the Sustainability Standards Advisory Forum; and
 - (c) strengthening partnership with translators, including through providing detailed technical tracking of similar or identical metrics across industries.
47. Regarding challenges faced by stakeholders in reaching individuals with relevant expertise, we think that this aspect is endemic to setting sustainability-related standards, but that this should improve over time. It also reflects the reality that getting feedback from those with particular industry expertise and knowledge is more complex than seeking feedback on proposals that are less specialised.

Staff recommendations

48. Overall, despite the challenges outlined above, engagement was high and the ISSB received many thoughtful, substantive responses to the July 2025 Exposure Draft. We are confident that the depth of the feedback is sufficient to support the ISSB's redeliberations to finalise Phase 1 of the project and achieve the objective of timely support for the implementation of IFRS S1 and IFRS S2.
49. The staff analysed these comments in the context of Phase 1 of the project, including the current work on the remaining three SASB Standards prioritised as part of that phase, and will consider the comments in determining the best approach for the next phase (Phase 2) of the project. In making our recommendations, we sought to consider both the feedback highlighted in this paper and the broad support for the ISSB's work to enhance the SASB Standards, particularly from investors.

¹¹ The basis for conclusions accompanying the prospective exposure draft for ratification (see Agenda Papers 6B and 6E for this meeting) contains a number of changes compared to the basis for conclusions of the July 2025 Exposure Draft in response to this stakeholder feedback.

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50. Overall, the staff thinks that much of the stakeholder feedback highlighted in this paper can be addressed in the next steps of the project on Enhancing the SASB Standards. These include redeliberating the July 2025 Exposure Draft and the consultation on the prospective exposure draft for the remaining three prioritised industries. Other feedback, such as feedback focused on the future state of the ISSB Standards, is relevant to the broader work of the ISSB and the staff recommends this be considered in that context.

Staff recommendation #1—Continue executing the project on Enhancing the SASB Standards while responding to stakeholder feedback

51. The staff recommends that the ISSB continue executing the project on Enhancing the SASB Standards as set out in the ISSB’s 2024-2026 work plan. Specifically, the staff recommends executing on the planned next steps, which include:
- (a) proceeding with the finalisation of proposals from the July 2025 Exposure Draft *Proposed Amendments to the SASB Standards*;
 - (b) requesting that the ISSB ratify an exposure draft of proposed amendments to the three remaining ‘Phase 1’ industries, as set out in Agenda Paper 6B; and
 - (c) planning for ‘Phase 2’ of the project on Enhancing the SASB Standards, which the ISSB will discuss in subsequent ISSB meetings.

Next steps for proposed amendments in the July 2025 Exposure Draft

52. The staff plans to present the ISSB with detailed analysis of stakeholder feedback on the July 2025 Exposure Draft at a subsequent meeting. This analysis will enable the ISSB to discuss how to approach the redeliberations and next steps.
53. As discussed in paragraphs 22-27 and 33-37, there are several ways in which the updated SASB Standards can be responsive to broader stakeholder input regarding the role of the SASB Standards in ISSB Standards, while also remaining aligned with the

ISSB's projects on BEES and human capital. The staff plans to analyse this issue further for discussion by the ISSB in subsequent meetings.

Ratify exposure draft of proposed amendments to three remaining prioritised SASB Standards

54. The staff recommends proceeding with the ratification of an exposure draft for the remaining three SASB Standards in Phase 1, as presented in Agenda Paper 6B and related draft versions of the prospective exposure draft (Agenda Paper 6D) and Basis for Conclusions (Agenda Paper 6E). The staff thinks that, considering stakeholder feedback, moving forward with ratification is appropriate because:
- (a) the prospective exposure draft is a continuation of the July 2025 Exposure Draft, which was essentially split into two parts;
 - (b) most stakeholders—including almost all investors—are supportive of the ISSB pursuing the project on enhancing the SASB Standards and of its objective, which is to provide timely implementation support for IFRS S1 and IFRS S2;
 - (c) the prospective exposure draft is significantly narrower in scope and complexity than the July 2025 Exposure Draft in that it only proposes amendments to three SASB Standards and includes no 'targeted amendments' to others, meaning stakeholders will face fewer challenges related to the volume and complexity of the proposals;
 - (d) the metrics proposed in the prospective exposure draft and in the July 2025 Exposure Draft overlap significantly, meaning that stakeholders who responded to the July 2025 Exposure Draft will be familiar with both the structure and many of the specific proposed amendments; and
 - (e) postponing the publication of the prospective exposure draft would disrupt the project's momentum and impede the ISSB's ability to receive timely feedback on the proposals.

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55. Agenda Paper 6B provides further details regarding the prospective exposure draft—which is proposed for ratification by the ISSB—including how we sought to respond to feedback to the July 2025 Exposure Draft.

Plan ‘Phase 2’ of SASB enhancements project

56. The staff recommends the ISSB start discussing Phase 2 of the project on Enhancing the SASB Standards, as envisioned in the project plan dating back to July 2024, in the coming months. This is based on the significant and positive engagement of stakeholders during Phase 1 and the continued importance of providing timely support for the implementation of IFRS S1 and IFRS S2. The staff thinks that, considering stakeholder feedback, it is appropriate to start discussions of Phase 2 and to agree target timing because:
- (a) stakeholders—particularly investors—continue to show broad support for the project on Enhancing the SASB Standards and interest in which sector(s) the ISSB will prioritise next;
 - (b) this work is an opportunity to incorporate feedback from Phase 1 and insights from the BEES and human capital projects;
 - (c) the due process documents and consultation process will be improved based on actionable stakeholder feedback received; and
 - (d) execution of Phase 2 supports the implementation of IFRS S1 and IFRS S2 for the growing number of jurisdictions that have already implemented ISSB Standards and are looking for support.
57. If the ISSB agrees with this recommendation, the staff will present to the ISSB in subsequent meetings the potential activities to undertake in Phase 2 that could support in a timely manner the implementation of IFRS S1 and IFRS S2.

Staff recommendation #2—Respond to strategic stakeholder feedback holistically

58. The staff recommends addressing the broader comments on the ISSB’s strategy and execution of its workplan – such as the future state of ISSB Standards – in more detail separately from Phases 1 and 2 of the project on Enhancing the SASB Standards. Staff believes the related considerations are relevant to the broader work of the ISSB and therefore should be addressed in that context.
59. The staff will bring a paper considering the best approach to address this feedback at a later date.

Questions for the ISSB

60. The staff presents the following questions for the ISSB.

Questions for the ISSB

1. Does the ISSB have any comments or questions on matters presented in this paper?
2. Does the ISSB agree with the staff recommendation to continue executing the project on Enhancing the SASB Standards, in particular, executing on the planned next steps as set out in paragraph 51?
3. Does the ISSB agree with the staff recommendation to respond to strategic stakeholder feedback holistically with the approach to be discussed at a future date?
4. Does the ISSB have any other suggestions for how to best respond to the stakeholder feedback presented in this paper?

Appendix A – Extract of the public consultation (Question 1)



Question 1—Objective

The ISSB is proposing to amend the SASB Standards with the objective of providing timely support to entities applying IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures*. The proposed amendments have been drafted under the assumption that an entity would apply the SASB Standards alongside IFRS Sustainability Disclosure Standards. This assumption allows the SASB Standards to remain targeted and proportionate while avoiding unnecessary duplication of requirements already included in IFRS S1 and IFRS S2. The proposed amendments aim:

- to further enhance the international applicability of:
 - industry groupings, including to reflect value chains in emerging markets and developing economies;
 - disclosure topics in those industry groupings; and
 - metrics and supporting technical protocols;
- to improve interoperability with other sustainability-related standards and frameworks, while ensuring continued focus on the needs of investors in order to serve as a global baseline of sustainability-related disclosures to meet the needs of capital markets;
- to amend the disclosure topics and metrics in the SASB Standards related to biodiversity, ecosystems and ecosystem services (BEES) and human capital, to align the SASB enhancements with the ISSB's research projects on those topics and to enable feedback on this Exposure Draft to provide input to those research projects;
- to align the language and concepts in the SASB Standards with IFRS Sustainability Disclosure Standards; and
- to enhance the SASB Standards' clarity, conciseness and cost-effectiveness for preparers.

(a) Do you agree with the objective of the proposed amendments to the SASB Standards and related areas of focus?

- Agree _____
- Disagree _____

(b) Do the proposed amendments meet this objective? Why or why not?

- Yes _____
- No _____
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