Staff paper

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ISSB Meeting

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Project	**Enhancing the SASB Standards**
Topic	**Feedback summary—Meat, Poultry & Dairy SASB Standard**
Contacts	Patricia Braun (patricia.braun@ifrs.org) Sam Goodyear (sam.goodyear@ifrs.org)

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 summary of the stakeholder feedback received on parts (a)–(d) of question 2 in the Invitation to Comment on the *Meat, Poultry & Dairy* SASB Standard for the March 2026 Exposure Draft *Proposed Amendments to the SASB Standards and IFRS S2 Industry-based Guidance* (March 2026 Exposure Draft).

2. Agenda Paper 6 provides background and context to the project on Enhancing the SASB Standards, an overview of engagement activities undertaken during the public consultation, and a statistical breakdown of stakeholder feedback. It also sets out the structure of the agenda papers for this meeting.

3. The ISSB will not be asked to make any decisions during the session for this paper. In this paper, the staff outlines the key topics, issues and considerations raised during the consultation that it expects to be the focus of its work related to parts (a)–(d) of question 2 in the coming months. The staff will present further analysis and recommendations at future ISSB meetings.

Structure of the paper

4. This paper is structured as follows:

   (a) Key takeaways (paragraphs 5–10);

   (b) Summary of stakeholder feedback and areas of staff focus:

      (i) Question 2(a)—*Industry Description* (paragraphs 11–17);

      (ii) Question 2(b)—*Disclosure Topics* (paragraphs 18–21);

      (iii) Questions 2(c) and 2(d)—*Metrics and Technical Protocols* (paragraphs 22–55); and

   (c) Questions for the ISSB (paragraph 56).

Key takeaways

5. Respondents broadly agreed with the proposed amendments to the *Meat, Poultry & Dairy* SASB Standard. Most respondents supported the proposed amendments to the industry description and disclosure topics, while many supported the proposed amendments to the metrics and technical protocols.

6. Most respondents supported the proposed amendments to the industry description, and many supported the inclusion of animal feed production in the industry activities. However, many respondents requested specifying clearer boundaries between the classification of the meat, poultry and dairy industry and those of adjacent industries, including the processed foods and agricultural products industries.

7. Many of the respondents who commented on the proposed approach to consider a new Standard for aquaculture and fishing supported the proposed approach, while only a few opposed developing a separate SASB Standard.

8. Most respondents supported the proposed amendments to the disclosure topics, including the addition of Product Innovation, the revision of the supply chain topics, the retention of Antibiotic Use in Animal Production as a stand-alone disclosure topic,

and the clearer emphasis on animal health reflected in the revisions and renaming of the Animal Care & Welfare disclosure topic to the Animal Health & Welfare disclosure topic.[1] However, a few respondents, including investors and preparers, suggested various additional topics were relevant, with Labour Conditions, Food Loss & Food Waste, Community Relations & Rights of Indigenous Peoples, Employee Recruitment & Retention, Climate Resilience, and Waste Management most commonly noted.

9. Many respondents supported the proposed amendments to the metrics and technical protocols but suggested refinements to improve comparability, feasibility and applicability across business models within the meat, poultry and dairy industry. Recurring themes included:

   (a) suggestions for additional metrics, including Scope 3 emissions with greenhouse gas emissions disaggregation, animal mortality rates and water quality.

   (b) suggestions to improve the proposed metrics to better reflect the upstream value chain. Respondents also expressed mixed views on a few proposed amendments for metrics, for example, those on confined animal feeding operations and written nutrient management plans.

   (c) concerns about implementation and data availability, particularly with supply chain-related metrics.

10. The staff notes the recommendations related to Scope 3 emissions metrics in Agenda Paper 6E for this meeting, as well as the ISSB's decisions at its October 2026 meeting, both of which are relevant to the feedback discussed in this paper.

[1] Paragraphs BC126—BC130 on the Basis for Conclusions on Proposed amendments to the SASB Standards and IFRS S2 Industry-based Guidance

Summary of stakeholder feedback and areas of staff focus

Question 2(a)—Industry Description

11. The proposed amendments to the industry description in the *Meat, Poultry & Dairy* SASB Standard included some additions to clarify the industry scope. As explained in paragraphs BC106-BC107 of the Basis for Conclusions on *Proposed amendments to the SASB Standards and IFRS S2 Industry-based Guidance*, the ISSB decided not to include aquaculture and fishing activities in the scope of this Standard.

12. Most respondents agreed with the proposed amendments to the industry description. Respondents particularly valued the more comprehensive coverage of the industry value chain, including production, processing and distribution activities. Investors and preparers were especially supportive, noting the changes would improve comparability and consistency.

13. Some respondents provided comments regarding the explicit inclusion of animal feed production in the activities described in the industry description. Those respondents broadly agreed with this amendment. They emphasised that feed is often the largest operational cost and a critical component of the meat, poultry and dairy industry value chain. While respondents supported the proposal, a few raised concerns that the metrics in this Standard alone do not adequately cover the sustainability-related risks and opportunities of stand-alone feed producers.

14. Many respondents stated that the boundaries between this Standard and those for adjacent industries are not sufficiently clear. Respondents highlighted particular uncertainty around the classification of processed animal products, packaging and distribution activities, and integrated or diversified business models operating across multiple stages of the food value chain. Stakeholders requested guidance on the application of the SASB Standards for entities operating at the intersection of multiple industries.

15. Some respondents provided additional suggestions, such as greater recognition of smallholder farmers, cooperatives and other production models. Respondents also mentioned by-product markets and rendering activities, and other animal protein examples like lamb and mutton, suggesting the inclusion of these in the industry description to ensure adequate coverage of relevant activities to support identification of the applicable Standard.

16. Some respondents, including investors, preparers and accounting firms, supported the ISSB's consideration of whether to create a new industry under the Sustainability Industry Classification System® (SICS) covering direct aquaculture and fishing activities, and in relation to this, a new SASB Standard. However, stakeholders, particularly national standard-setters and accounting firms, requested interim disclosure guidance. For example:

> Although the Exposure Draft and Basis for Conclusions explain the ISSB's decision to exclude aquaculture and fisheries from the scope of the Meat, Poultry & Dairy SASB Standard, which the TAC supports, the TAC considers that entities with significant aquaculture or fisheries activities would benefit from clearer direction on how to identify relevant industry-based disclosures. The TAC recommends that the ISSB identifies existing disclosure topics and metrics within related SASB Standards that may be relevant to those activities. These could include, where appropriate, metrics in the Meat, Poultry & Dairy, Processed Foods or other related SASB Standards. This would support decision-useful reporting for the aquaculture industry and provide a practical interim approach while the ISSB considers how best to address aquaculture within the Sustainability Industry Classification System (SICS). (Letter 53 – *UK Sustainability Disclosure Technical Advisory Committee (TAC)*)

17. The staff notes that IFRS S1 sets out requirements about sources of guidance including but not limited to the SASB Standards to support the provision of disclosures (see IFRS S1 Paragraphs 54–58).

Question 2(b)—Disclosure Topics

18. The proposed amendments to the disclosure topics included:

    (a) revisions to the existing disclosure topics of Greenhouse Gas Emissions, Energy Management, Water Management, Land Use & Ecological Impacts, Food Safety, Antibiotic Use in Animal Production, Workforce Health & Safety and Animal Health & Welfare;

    (b) the addition of the Product Innovation disclosure topic; and

    (c) the reorganisation of the two existing supply chain-related disclosure topics into two new disclosure topics: Environmental Supply Chain Management and Social Supply Chain Management.

19. Most respondents supported the proposed amendments to the disclosure topics for the *Meat, Poultry & Dairy* SASB Standard. Some respondents, including investors, national standard-setters and preparers, welcomed the addition of the Product Innovation topic, which recognises opportunities alongside risks, and supported the revised approach to supply chain management.

20. Almost all respondents that provided comments on the proposal to retain Antibiotic Use in Animal Production as a standalone topic but amend it, agreed with this approach. A few respondents commented on the proposal to change the title of the Animal Care & Welfare disclosure topic to Animal Health & Welfare, noting the change better recognises the risks related to disease outbreaks.

21. Respondents proposed the addition of further disclosure topics. For example:

    (a) a few respondents, including investors, recommended the inclusion of a disclosure topic related to labour conditions or labour practices, noting that entities are exposed to risks arising from child and forced labour, as well as from work being carried out in cold or humid conditions.

    (b) a few respondents, including national standard-setters and public-interest bodies, suggested the inclusion of a disclosure topic related to food loss and

food waste, referring to the standards of the Global Reporting Initiative, GRI 13, which includes this topic for the animal protein industry. They also argued that meat, poultry and dairy products are highly perishable and losses can affect operational efficiency and costs.

(c) a few respondents, including national standard-setters, accounting firms and investors, suggested the inclusion of a disclosure topic related to community relations and rights of Indigenous Peoples. They noted the industry is exposed to risks associated with land access. The staff notes that such feedback was also received from stakeholders through outreach activities during the consultation period, particularly from emerging markets and developing economies.

(d) a few respondents, including national standard-setters, suggested the inclusion of a disclosure topic related to employee recruitment, development and retention. They stated that entities are exposed to labour shortages in relation to both low-skilled and high-skilled roles.

(e) a few respondents, including national standard-setters and accounting firms, suggested the inclusion of a disclosure topic related to climate resilience or climate adaptation. They indicated that information about an entity's capacity to adapt would help users assess their operational resilience. This suggestion was also reinforced by other respondents that requested metrics related to a 'just transition'.[2]

(f) a few respondents, including investors and accounting firms, suggested the inclusion of a disclosure topic related to waste management. They highlighted that entities in this industry generate large volumes of animal waste, which could be associated with regulatory and reputational risks.[3]

[2] The staff notes that aspects related to climate resilience and adaptation are included in the Land Use & Ecological Impacts and Environmental Supply Chain Management disclosure topics.

[3] The staff notes that although the amendments propose to remove metric FB-MP-160a.1 related to animal litter and manure, aspects related to animal waste are included in the Land Use & Ecological Impacts disclosure topic.

Question 2(c)—Metrics and Technical Protocols

22. The staff notes that due to commonalities between the *Meat, Poultry & Dairy* SASB Standard and the *Agricultural Products* SASB Standard, very similar feedback was sometimes received in relation to metrics included in identical or very similar form in the proposed amendments to both SASB Standards. This feedback has therefore been omitted from this paper, but is included in Agenda Paper 6A. This section focuses instead on feedback that was specific to this industry.

23. Many respondents, including many of the investors who responded to this question, agreed with the proposed amendments to the metrics and technical protocols in the *Meat, Poultry & Dairy* SASB Standard. However, most respondents also suggested ways to enhance some metrics or raised some concerns. The following sub-sections describe comments received on particular metrics, grouped by disclosure topic.

Greenhouse Gas Emissions

24. Of the respondents that provided comments to the proposed metrics on greenhouse gas emissions, most supported retaining metrics for industry-specific greenhouse gas emissions, including the addition of disaggregated methane. However, many indicated that the current metrics may not fully capture the industry's climate-related risks and opportunities.

25. The most common concern related to metrics in this disclosure topic, one raised by various stakeholder groups, was that a focus on gross Scope 1 emissions may provide an incomplete picture of the risks and opportunities associated with greenhouse gas emissions for entities that source livestock or feed from third parties, because in these cases, relevant emissions arise from the upstream value chain and would be captured in Scope 3 emissions. Some of those respondents also suggested greenhouse gas emissions disaggregation for Scope 3 emissions, including methane and nitrous oxide, as well as emissions reduction targets for each gas. The staff notes the Alternative View of Dr Richard Barker outlined in the Basis for Conclusions on *Proposed*

amendments to the SASB Standards and IFRS S2 Industry-based Guidance, and the recommendations related to this area put forth in Agenda Paper 6E for this meeting.[4]

Energy Management

26. Limited feedback was received in relation to Energy Management, although respondents generally welcomed the proposed amendments to the metric, and supported the alignment with IFRS S1 and IFRS S2. A few respondents requested clarification regarding whether biomass and self-generated energy were included in the calculation outlined in the technical protocols.

Water management

27. Respondents that provided comments on the water management metrics generally welcomed the proposals. Respondents noted that withdrawal and consumption data helps users understand whether production capacity is exposed to local water constraints.

28. A few respondents, mostly preparers, raised concerns with the proposed discharge metric, arguing that there could be some data-availability challenges and requested clarification on how to categorise effluents used for soil fertilisation. A few other respondents also suggested the addition of a water-quality metric to better capture pollution-related risks and effects on an entity's prospects.

Land Use & Ecological Impacts

29. Many of the respondents commenting on metrics related to this topic thought the proposed metrics provide useful information about an entity's exposure to nature-

[4] The staff notes that paragraphs BC40-BC46 in the Basis for Conclusions on Proposed amendments to the SASB Standards and IFRS S2 Industry-based Guidance stated that the proposed metrics in the Exposure Draft are intended to complement the requirements in IFRS S2, by providing information about the underlying drivers of, and risks associated with, those emissions and the entity's management of those risks. For example, within the proposed metrics in the Environmental Supply Chain Management disclosure topic, there are proposed metrics on deforestation in the supply chain and sourced livestock from farms with nutrient management plans. These metrics provide information about an entity's sourcing decisions and relationships with suppliers that can influence the entity's Scope 3 greenhouse gas emissions and therefore its performance in relation to related risks and opportunities.

related risks. However, they provided several recommendations they believed would improve applicability, accommodate jurisdictional factors and better account for different production systems. Respondents also provided mixed views about location-related metrics versus metrics related to management practices and implementation outcomes.

30. A few respondents suggested that the metrics on spatial footprint in or near environmentally sensitive locations and on area disturbed and restored could be included in the Environmental Supply Chain Management disclosure topic, deeming them relevant not only for direct operations, but also for the supply chain.

31. Additional feedback on the proposed metrics was consistent with feedback given on them in relation to the *Agricultural Products* SASB Standard. As stated in paragraph 22, information on this can be found in Agenda Paper 6A.

Food safety

32. Of the respondents that provided comments on Food Safety metrics, most supported the proposed amendments, particularly the addition of the metric FB-MP-250a.5. *Percentage of production volume from sites certified to internationally recognised food safety standards for (1) own operations and (2) co-packing operations* and the greater focus on how food safety is managed throughout the value chain in the proposed metric FB-MP-250a.6. *Processes, controls and procedures to ensure food safety throughout the value chain*.

33. Respondents, including national standard-setters and public interest organisations, also welcomed retaining and improving the metric FB-MP-250a.4. *Information about markets that restrict, ban or suspend imports of the entity's products*, with just a few respondents suggesting minor refinements to the technical protocol, including disclosure of the jurisdictions affected and the estimated volume or revenue exposed to restrictions or bans.

Antibiotic Use in Animal Production

34. Most respondents that provided comments related to antibiotic use in animal production welcomed the proposed amendments, noting that antibiotic use disclosures provide useful information about antimicrobial resistance risks. Some supported the decision to retain this as a separate disclosure topic, while a few suggested it could be merged with the Animal Health & Welfare disclosure topic.

35. Most respondents that provided suggestions to improve the metric in this disclosure topic, including investors and preparers, recommended including disaggregation between therapeutic, prophylactic and growth promotion use cases.

36. A few respondents, mostly preparers, raised concerns with the unit of measurement and some practical limitations with data collection at the farm level for live weight. As an alternative, they suggested a unit based on sales or production volume.

37. A few respondents suggested that information about antibiotic use in the value chain could be included in a separate metric, for example on supplier compliance with policies restricting routine use.

38. A few respondents also suggested a metric based on targets to reduce antibiotic use.

39. The Canadian Cattle Association[5] mentioned some jurisdictional differences related to monitoring and measuring antibiotic use in Canada. They also suggested that additional qualitative information would provide users more context about the risks associated with antibiotic use.

Workforce Health & Safety

40. Almost all the respondents that provided feedback on the workforce-related metrics welcomed the proposed amendments to the metrics in the disclosure topic. Nevertheless, respondents expressed mixed views on the merits of requiring

[5] Comment letter 45: Canadian Cattle Association.

disclosure of fatalities as an absolute number rather than a rate, and raised questions about workforce definitions, the availability of non-employee data and the decision-usefulness of the training hours metric.

41. A few respondents supported retaining and revising the metric FB-MP-320a.2. *Description of efforts to assess, monitor, and mitigate acute and chronic health conditions* and suggested additional disclosures on monitoring, exposure controls and occupational illnesses. Suggestions included capturing chronic exposure to agrochemicals through the feed production chain.

Animal Health & Welfare

42. Many respondents provided comments on the Animal Health & Welfare metrics. Most of them, including investors, accounting firms and national standard-setters, welcomed the proposed amendments to the metrics, in particular, the addition of a specific metric for animal health and broader coverage of different types of livestock in the new metric FB-MP-410a.4. *Description of animal welfare strategy, including targets, procedures and value chain integration*.

43. Most of the respondents that provided comments on the proposed metric related to biosecurity supported the new metric FB-MP-410a.5. *Description of risks and opportunities related to biosecurity, including strategies for disease management*, while proposing changes to improve its clarity and usefulness. A few respondents suggested defining biosecurity and differentiating between entities that raise animals and those that only process or source animal products. They also proposed adding quantitative information, such as mortality rate or the proportion of production covered by biosecurity plans.

> The shift to broader animal welfare strategy and biosecurity disclosure better captures systemic disease and operational risk, both of which have direct earnings implications through production disruption and regulatory exposure. (Letter 31 – *Neuberger*)

44. Views differed on removing the gestation crate and cage-free egg metrics. Some respondents supported replacing them with broader strategy disclosure, with their reasons including the better coverage of information for entities that do not raise animals. Others argued that narrative disclosure alone would not replace the comparable quantitative information these metrics provided. These stakeholders proposed retaining the existing metrics or incorporating broader, species-specific information on housing and confinement into the strategy metric.

45. Multiple other suggestions, particularly from animal welfare organisations, were provided in relation to the metrics and technical protocols. These included suggestions for terminology, the retention of species-specific metrics, and disclosure of production or operations covered by animal welfare policies.

Product Innovation

46. Most respondents commenting on this disclosure topic supported the addition of the metric on product innovation and welcomed its focus on sustainability-related opportunities. They considered information about product innovation useful for understanding how entities respond to changing consumer preferences and demand for less resource-intensive products.

47. A few respondents questioned the emphasis on alternative proteins and called for recognition of other sustainability improvements within livestock production. They argued that alternative proteins themselves could carry their own sustainability risks and opportunities and questioned their prominence in the technical protocols.

48. A few respondents suggested including quantitative information to complement narrative disclosures. Suggestions included revenue and share of revenue associated with alternative proteins or other lower-impact products, and capital allocation and research and development expenditure. They also proposed disclosure of the proportion of animal and non-animal proteins sold, arguing it would help investors assess an entity's exposure to risks in different markets.

Environmental Supply Chain Management

49. Most respondents supported the proposed metrics for Environmental Supply Chain Management. Respondents emphasised the importance of livestock and animal feed sourcing for the industry.

50. Some respondents suggested additional metrics should be added or retained to capture environmental dependencies and risks they believed were not fully addressed by the proposals. These suggestions included the retention of metric FB-MP-440a.1 *Percentage of animal feed sourced from regions with High or Extremely High Baseline Water Stress*, and the addition of metrics on supply chain water consumption, the percentage of products sourced from sustainably managed land, and soil health in the supply chain.

51. Respondents provided mixed views related to the complexity or difficulty of disclosing information related to the upstream value chain. On the one hand, respondents requested more location-related information, for example, disclosure of sourcing from or near environmentally sensitive locations. On the other, however, stakeholders cautioned that precise farm-level outcome data may be difficult to obtain and favoured practice-based indicators or credible proxies, with transparent disclosure of methods and coverage. The staff notes that the ISSB decided at the October 2026 meeting to confirm that when applying the SASB Standards in the context of applying ISSB Standards, the requirements of IFRS S1, which include proportionality mechanisms for determining the scope of the value chain, are applicable and can assist regarding the concerns about precise farm-level outcome data.

52. Views were mixed on the proposed metric FB-MP-430b.4. *Percentage of animal protein sourced from confined animal feeding operations*. A few respondents supported the metric as useful context for users. Others questioned whether confinement alone indicates environmental risk in this area, noting that particularly in some regions, housed systems can support animal welfare, biosecurity and food safety. Suggested changes included contextual information about risks and management practices, and a neutral breakdown by production system, including

confined, semi-intensive and pasture-based systems. Respondents also requested guidance on estimating or converting live weight where entities purchase carcasses or processed products rather than live animals.

53. Views were also mixed on metric FB-MP-430b.3. *Percentage of sourced livestock from farms implementing and maintaining a written nutrient management plan*. A few respondents considered the metric useful, while others, including investors, argued that having a plan does not demonstrate its quality, implementation or effectiveness. Suggested improvements included information on verification and corrective actions, and supplementary indicators such as nutrient surplus or loss, manure managed by method, and nitrogen or phosphorus pollution events. Respondents also noted that smallholder producers may apply nutrient management practices without formal written plans. They therefore suggested allowing documented and verified practices as an alternative.

Social Supply Chain Management

54. Most respondents supported the proposed amendments to the social supply chain management metrics, noting their potential to provide users with useful information about upstream labour conditions, human rights, community impacts and supplier oversight.

55. In addition to feedback discussed in Agenda Paper 6A, respondents raised concerns with the cost and practicality of collecting information across fragmented supply chains, particularly for some protein chains like dairy or entities that source carcass for meat processing. They emphasised that relevant sustainability risks and opportunities depend on production systems, supply chain structures and supplier-contract type.

Questions for the ISSB

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

Questions for the ISSB

1. Does the ISSB have any questions related to the content of this paper?
2. Does the ISSB have any comment on the staff's initial thinking on the focus of its work as outlined in this paper?