Staff paper

Transition Implementation Group on IFRS S1 and IFRS S2

Date	**November 2026**
Topic	**Submissions log**
Contacts	**issb_tig@ifrs.org**

This paper has been prepared for discussion at a public meeting of the Transition Implementation Group on IFRS S1 and IFRS S2 (TIG). 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*.

Introduction

1. This paper summarises the full list of questions received from stakeholders to the Transition Implementation Group on IFRS S1 and IFRS S2 (TIG). This submission log includes questions submitted via the TIG mailbox (issb_tig@ifrs.org) as at 3 November 2026, herein referred to as the 'submissions log'.

2. The submissions log captures the following information:

   (a) submission number (sub. #);

   (b) topic;

   (c) stakeholder question;

   (d) TIG meeting date;

   (e) TIG paper reference; and

   (f) current status.

3. According to TIG Terms of Reference, implementation questions discussed by the TIG should meet the following criteria:

   (a) must be related to, or arise from, the implementation of IFRS S1 and/or IFRS S2;

   (b) may result in possible diversity in practice; and

   (c) are expected to be pervasive, that is, relevant to a wide group of stakeholders.

IFRS Sustainability

Staff paper

Transition Implementation Group on IFRS S1 and IFRS S2
Submissions log compiled by ISSB Staff

4. The TIG submissions log as at 3 November 2026.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
1	Defining 'business activities'	Paragraph 29(b)-(c) of IFRS S2 requires disclosure of the amount and percentage of assets or business activities that are: • vulnerable to climate-related transition risks; and • vulnerable to climate-related physical risks How should companies determine the meaning of 'business activities' in this context?	March 2024	AP1	No further discussion planned at this time.
2	Defining 'vulnerable'	Paragraph 29(b)-(c) of IFRS S2 requires disclosure of the amount and percentage of assets or business activities that are: • vulnerable to climate-related transition risks; and • vulnerable to climate-related physical risks. How should companies determine the meaning of 'vulnerable' in this context?	March 2024	AP1	No further discussion planned at this time.
3	Revision of preceding period estimated amounts	IFRS S1 requires entities to revise preceding period estimated amounts, if new information provides evidence of circumstances that existed in that period. Reference is made to 'amounts disclosed for metrics' in this context. The question asks whether an entity should apply this requirement only to estimated amounts that are metrics or to all estimated amounts that are disclosed.	March 2024	AP2	No further discussion planned at this time.
4	Capital markets authorities supporting implementation	How can capital markets authorities support implementation of the IFRS Sustainability Disclosure Standards in capital markets?	September 2024	AP1	No further discussion planned at this time.
5	Licensing for software providers	How can licensing for the S1 and S2 frameworks be expedited to enable integration into the software already widely used by many ESG reporters?	September 2024	AP1	No further discussion planned at this time.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
6	Reporting period alignment with financial reporting period	An entity currently reports emissions for the period October 1 – September 30 while their financials are reported for the period January 1 – December 31. Should the entity begin reporting emissions for the period January 1 – December 31 when transitioning to IFRS S1 and IFRS S2?	September 2024	AP1	No further discussion planned at this time.
7	Early application of ISSB Standards	If an entity decides to incorporate certain ISSB requirements in 2023 as a preliminary step towards full implementation by 2024, will this initial action be considered as the first year of implementation?	September 2024	AP1	No further discussion planned at this time.
8	Financed emissions – insurance	Does paragraph B63 of IFRS S2 consciously omit reporting underwriting emissions for Insurers, contrary to the Partnership for Carbon Accounting Financials, or will IFRS S2 potentially include this requirement in future revisions?	September 2024	AP1	No further discussion planned at this time.
9	Adapting requirements for regional considerations	How can disclosure requirements be adapted to reflect specific regional characteristics, given that companies operate in distinct environments with unique sustainability-related challenges and opportunities?	September 2024	AP1	No further discussion planned at this time.
10	Location of reporting	Are sample reports available for preparing disclosure in compliance with IFRS S1 & S2? Are entities able to apply either of the two approaches below when preparing disclosure? • Separate Sections Approach: Preparers answer each item between the S1 paragraphs 26-53 (Indeed, in parallel to the "Proposed IFRS Taxonomy" document, it can be the first level subparagraphs of IFRS S1 and IFRS S2) • Table of IFRS References: Preparer prepare a narrative Sustainability Report and provide an annex as a table of IFRS references to the relevant sections of the Sustainability Report.	September 2024	AP1	No further discussion planned at this time.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
11	Application of paragraph B50 of IFRS S1 in particular circumstances	How should a reporting entity apply the requirement in paragraph B50 of IFRS S1 to revise preceding period estimated amounts when the reporting entity estimates current period amounts using prior period information from an entity in its value chain?	June 2024	AP1	No further discussion planned at this time.
12	Comparative information when there is an acquisition or disposal	How do the requirements on disclosing comparative information apply in the case of acquiring or disposing a subsidiary?	June 2024	AP2	No further discussion planned at this time.
13	Presentation of mitigation actions/plans	In the identification and disclosure of sustainability-related risks, how should mitigation plans or actions be considered?	September 2024	AP2	No further discussion planned at this time.
14	Scope of value chain for asset management entities	Are assets managed by an asset management entity, but not consolidated due to the absence of 'control' over the entity in which the assets are held, considered as part of the asset management entity's value chain?	September 2024	AP1	No further discussion planned at this time.
15	Scope 3 Category 15 GHG emissions: loan commitments	How should an entity that participates in commercial banking activities measure absolute gross financed emissions for undrawn loan commitments?	September 2024	AP1	No further discussion planned at this time.
16	Scope 3 Category 15 GHG emissions	Is an entity required to measure and disclose Scope 3 emissions for specific asset classes and/or financial activities that are not explicitly referenced in the ISSB Standards, if material?	September 2024	AP4	No further discussion planned at this time.[i]

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
17	Disclosure of insurance associated emissions	Are insurance-associated emissions required to be disclosed, if material, under IFRS S2? If so, are companies required to align to the Partnership for Carbon Accounting Financials standard?	September 2024	AP1	No further discussion planned at this time.
18	Timing of disclosure	Is it mandatory for entities to publish a quarterly sustainability report if the entity is already publishing annual and quarterly financial statements?	September 2024	AP1	No further discussion planned at this time.
19	Jurisdictional relief GHG emissions measurement method	Is an entity permitted to utilise the jurisdictional relief in IFRS S2 (which permits an entity to measure its greenhouse gas emissions using a method that is different from the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) (GHG Protocol Corporate Standard) if required to by a jurisdictional body or an exchange on which it is listed) in circumstances in which only part of reporting entity is subject to such requirement?	September 2024	AP3	No further discussion planned at this time.[i]
20	Value chain	Is there any practical guidance on how to conduct a value chain assessment, which is a core requirement in IFRS S1 and IFRS S2?	September 2024	AP1	No further discussion planned at this time.
21	Scope 3 GHG emissions	How should entities reconcile the optionality provided in the GHG Protocol Value Chain Standard with the requirements set out in IFRS S2 related to Scope 3 GHG emissions? Specifically, the GHG Protocol Value Chain Standard includes optionality about the GHG emissions within categories to be included in an entity's measure of its Scope 3 GHG emissions; it also sets out optionality in respect to aspects of measurement of Scope 3 GHG emissions such as when information could be excluded from measurement; how should an entity consider those 'optional' requirements when applying IFRS S2?	September 2024	AP1	No further discussion planned at this time.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
22	Use of GWP values from the latest IPCC assessment	Can an entity apply the jurisdictional relief in a circumstance in which the entity is required by a jurisdictional authority to use GWP values that are different from those in the latest IPCC assessment?	September 2024	AP5	No further discussion planned at this time.[i]
23	Information about asset manager financed emissions	Does the requirement in paragraph B37 of IFRS S2 to disclose additional information about financed emissions included in an entity's measure of Scope 3 greenhouse gas (GHG) emissions contradict the requirement in paragraph B61(a) of IFRS S2 for an entity that participates in asset management activities to disaggregate financed emissions by Scope 1, Scope 2 and Scope 3 GHG emissions? That is, are an asset manager's financed emissions required to be: • disaggregated between Scope 1, Scope 2 and Scope 3; or • categorised under an asset manager's Scope 1, Scope 2 and Scope 3 greenhouse gas emissions?	November 2025	AP1	No further discussion planned at this time.
24	Organisation and presentation of sustainability-related financial disclosures	How should disclosures prepared applying ISSB Standards be identified and organised within an entity's sustainability report, particularly when they are provided alongside other information that is not required by ISSB Standards? Do ISSB Standards require references to be provided to specific ISSB Standards' disclosure requirements, for example references to metrics in IFRS S2?	November 2025	AP1	No further discussion planned at this time.
25	Information about asset manager financed emissions	Is an entity that participates in asset management activities and provides additional information about its financed emissions in accordance with paragraph B61 of IFRS S2 required to provide a breakdown of its financed emissions by asset class?	November 2025	AP1	No further discussion planned at this time.
26	Measurement of financed emissions	Is an entity required to use the measurement methodology issued by Partnership for Carbon Accounting Financials (PCAF) in measuring its financed emissions?	November 2025	AP1	No further discussion planned at this time.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
27	Asset manager subsidiary	If an entity that participates in insurance activities also participates in asset management activities via a subsidiary, is the entity required to provide disclosures about transition risk and financed emissions for the assets that are managed by its subsidiary (ie the asset management subsidiary)?	November 2025	AP1	No further discussion planned at this time.
28	Transition relief in IFRS S2	Does the transition relief in paragraph C5 of IFRS S2 apply to the current year information in the second reporting period for which ISSB Standards are applied?	November 2025	AP1	No further discussion planned at this time.
29	Statement of compliance	When an entity makes a statement of compliance in accordance with paragraph 72 of IFRS S1, are there requirements to: • use particular words; • for the statement to be signed by specific individuals; and • have a separate statement for IFRS S2?	November 2025	AP1	No further discussion planned at this time.
30	GHG emissions related to transactions between entities in a group	How does an entity that is a group measure and disclose GHG emissions attributable to transactions between entities within the group?	November 2025	AP2	No further discussion planned at this time.
31	Commercially sensitive information	Does the relief from disclosing commercially sensitive information about a sustainability-related opportunity provided in IFRS S1 apply to IFRS S2?	November 2025	AP1	No further discussion planned at this time.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
32	Scope 3 GHG emissions	Is the requirement to measure and disclose Scope 3 GHG emissions limited to emissions captured by the 15 categories in the GHG Protocol Value Chain Standard?	November 2025	AP3	No further discussion planned at this time.
33	Reporting entity	Does the example in paragraph B38 of IFRS S1 of an entity that prepares consolidated financial statements and consequently, prepares sustainability-related financial disclosures for the parent and its subsidiaries mean that ISSB Standards require particular entities to apply ISSB Standards?	March 2026	AP1	No further discussion planned at this time.
34	Biogenic emissions	Are biogenic emissions required to be included in an entity's measurement and disclosure of absolute gross GHG emissions generated during the reporting period?	March 2026	AP2	No further discussion planned at this time.
35	Anticipated financial effects	A submission has been received related to the quantification of anticipated financial effects. The submission includes a number of questions about the conceptual and practical challenges of the requirement to disclose anticipated financial effects.	TBD	TBD	This question is being reviewed for possible discussion at a future TIG meeting.
36	GHG emissions: leased offices	A submission has been received related to the measurement and classification of GHG emissions for leased office space.	n/a[ii]	n/a[ii]	This question is being considered through a process other than a TIG discussion.[ii]
37	Climate-related targets	What is meant by the terms 'targets' used in the climate-related targets requirements in IFRS S2? Three specific questions were asked.	July 2026	AP1	No further discussion planned at this time.

Sub. #	Topic	Question	TIG meeting	TIG paper reference	Current status
38	Reporting entity	If an entity is required by law or regulation to publish parent-only and consolidated financial statements, does the requirement in paragraph 20 of IFRS S1 that requires the sustainability-related financial disclosures be for the same reporting entity as the related financial statements prescribe whether such an entity is required to prepare sustainability-related financial disclosures for the parent-only entity or the consolidated entity?	November 2026	AP1	To be reported to the TIG.
39	GHG emissions associated with claims-settlement activities—motor vehicle insurance	When an insurer settles a motor vehicle insurance claim by having the insured vehicle repaired or replaced through its supply chain, are emissions associated with such activities captured within the entity's Scope 3 Category 1 (Purchased goods and services) or Scope 3 Category 15 (Investments)? Or are those emissions beyond the 15 categories of Scope 3 GHG emissions that IFRS S2 requires an entity to consider?	November 2026	AP3	To be reported to the TIG.
40	GHG emissions associated with claims-settlement activities—various insurance products	Are emissions associated with activities related to settling different types of insurance claims captured within Scope 3 Category 1 (Purchased goods and services) or Scope 3 Category 15 (Investments)? Or are those emissions beyond the 15 categories of Scope 3 GHG emissions that IFRS S2 requires an entity to consider?	November 2026	AP3	To be reported to the TIG.
41	Reference to GHG Protocol Corporate Standard in IFRS S2—Land Sector and Removals (LSR) Standard	Is an entity required to apply the GHG Protocol LSR Standard to meet the requirement in IFRS S2 to measure its GHG emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004)?	November 2026	AP2	To be reported to the TIG.

[i] In response to application challenges identified by entities implementing IFRS S2, the ISSB proposed targeted amendments to IFRS S2 in April 2025. These application challenges included those that were identified through stakeholder questions submitted to the Transition Implementation Group on IFRS S1 and IFRS S2 (TIG). Refer to the project page for more information about the amendments to IFRS S2: IFRS - Amendments to Greenhouse Gas Emissions Disclosures (Amendments to IFRS S2).

[ii] IFRS S2 requires an entity to use the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) (GHG Protocol Corporate Standard) for the measurement of its GHG emissions (only to the extent that they do not conflict with the requirements in IFRS S2). Therefore, questions about the application of measurement requirements in the GHG Protocol Corporate Standard are outside the remit of the TIG. Questions related to the application of the GHG Protocol Corporate Standard rather than the ISSB Standards have been provided to the GHG Protocol to consider as part of their revisions process: GHG Protocol Corporate Suite of Standards and Guidance Update Process | GHG Protocol.