
IFRS Foundation Trustees meeting – Due Process Oversight Committee

Date **October 2026**
Topic **ISSB Annual Reporting Protocol**
Contacts **Bryan Esterly** (Bryan.Esterly@ifrs.org)
Nicholas McInnis (nicholas.mcinnis@ifrs.org)

This document is prepared for discussion at a public meeting of the IFRS Foundation Trustees' Due Process Oversight Committee (DPOC). The Trustees are responsible for governance of the IFRS Foundation, oversight of the International Accounting Standards Board (IASB) and the International Sustainability Standards Board (ISSB), and for delivery of the IFRS Foundation's objectives as set out in the IFRS Foundation *Constitution*.

Purpose

1. This paper considers various matters on which the International Sustainability Standards Board (ISSB) technical staff reports to the DPOC annually:
 - (a) the receipt of comment letters and survey responses including their public availability;
 - (b) the availability of board papers to observers; and
 - (c) the ISSB's dialogue with securities and other regulators.
2. This report is for the year ending 30 September 2026 and no action is required to be taken by the DPOC.

Summary

3. The technical staff confirms that:
 - (a) except for ten confidential letters, all other comment letters analysed with respect to ISSB consultations have been posted on the IFRS Foundation website.
 - (b) all agenda papers distributed to ISSB members for public ISSB meetings were made available on the IFRS Foundation website. Furthermore, there were no cases in which a document discussed by the ISSB in a public meeting was withheld or had any material removed from observers.
 - (c) regular dialogue has been maintained with securities regulators and prudential supervisors.

Comment letters

4. The requirements of the [Due Process Handbook](#) (Handbook) related to comment letters are included in paper DP5C(i) for this meeting.
5. In the year to 30 September 2026, 486 comment letters were received. Details of all the comment letters considered during the year are set out in the [Appendix](#) to this paper.
6. The ISSB received five comment letters on each of its Exposure Drafts for *Enhancing the SASB Standards—Phase 1* and *Enhancing the SASB Standards—Phase 1—Continued*, that at the request of the respondents were treated as confidential and were therefore not posted to the website. All other comment letters received by the ISSB are available on the IFRS Foundation website.

ISSB papers made available to observers

7. Paragraphs 3.11–3.12 of the Handbook explain the importance of making available to observers the papers discussed by ISSB members in their public meetings.
8. In the year to 30 September 2026, all agenda papers distributed to ISSB members for public ISSB meetings were made available on the IFRS Foundation website. Furthermore, there were no cases in which a document discussed by the ISSB in a public meeting was withheld or had any material removed from observers.
9. The staff have reported to the DPOC throughout the year on the late posting of papers for ISSB meetings (defined in the Handbook as papers posted less than five working days in advance of meetings).¹

Securities and other regulators

10. Paragraphs 3.56–3.58 of the Handbook explain the ISSB’s dialogue with securities and other regulators.
11. The ISSB’s engagement of regulatory authorities is focused on:
 - (a) adoption of the ISSB Standards (including in relation to relevant prudential regulation);
 - (b) education and capacity building (including their assistance in facilitating capacity building with relevant stakeholders); and
 - (c) obtaining input on the ISSB’s ongoing technical work.

Securities regulators

12. During the year to 30 September 2026, the ISSB and relevant staff have maintained extensive dialogue with securities regulators in support of our shared interest in the quality, understandability and enforceability of Standards that improve the transparency and usefulness of information disclosed in general purpose financial reports. This dialogue has also focused on advancing jurisdictional adoption and implementation considerations. Engagements typically include updates on key projects on the ISSB’s agenda, including exposure drafts that are upcoming or currently open for public comment. Engagement also provides an opportunity for securities regulators to identify key areas of interest or challenge that are important to adoption, implementation and disclosure oversight considerations in their respective jurisdictions. Engagement with capital market authorities has informed the development of the IFRS Foundation Regulatory Implementation Programme aimed to support jurisdiction’s adoption and implementation decision-making.
13. One of the main vehicles for engaging regulators has been through the Jurisdictional Adopters Working Group (JWG).² The Jurisdictional Working Group (JWG) was expanded in 2026 to reflect the growing number of jurisdictions using or planning to use ISSB Standards. The JAWG now brings together the key jurisdictional authorities from those jurisdictions that have adopted or otherwise used ISSB Standards or are well advanced in the adoption process, with IOSCO continuing as an observer

¹ In Agenda Paper DP3 of the March 2026 DPOC meeting, the staff noted that Agenda Papers 3 and 3A from the November 2025 ISSB meeting were distributed less than five working days in advance of the meeting. This is due to the November 2025 meeting being a special meeting convened on 6 November 2025 as a result of strategic timing considerations to advance the work on nature.

² JAWG membership is available on [IFRS - Jurisdictional Adopters Working Group](#)

with increased regional representation. The main objective of the JAWG is to enable a two-way dialogue between the ISSB and jurisdictional authorities and to promote globally comparable sustainability-related disclosures for capital markets.

14. The JAWG held its inaugural meeting virtually in February 2026 and discussed the group's objectives, priorities and focus areas for 2026. The JAWG discussed an overview of the jurisdictional landscape and IFRS Foundation initiatives to support global comparability of sustainability-related disclosures through the IFRS Foundation's Regulatory Implementation Programme. One key focus area was on emerging cross-border challenges resulting from differences in jurisdictional requirements and how ISSB Passporting could address comparability for investors and the potential burden and complexities for companies operating across borders or those that have subsidiaries in multiple jurisdictions.³ JAWG members requested to continue to explore more comprehensively the relevance of passporting for jurisdictional authorities' consideration.
15. In response to this request, JAWG members were offered the possibility to join two optional sessions in April and May 2026 to have an in-depth discussion on cross border challenges and ISSB Passporting. The JAWG held its first in-person Plenary meeting in July 2026 in London. It continued its discussions about ISSB Passporting as a way to mitigate against the effects of regulatory fragmentation. JAWG members decided to set up a dedicated discussion platform for deeper dialogue about practical and operational aspects of ISSB Passporting.
16. In addition to engagement with regulators through the JAWG, there has been continued engagement with IOSCO through several different forums.⁴ ISSB members and technical staff have engaged with the IOSCO Monitoring Forum, mainly relating to standard-setting updates and on the consultations on amendments to IFRS S2 and proposed enhancements to SASB Standards and material to support application of ISSB Standards resources relating to supporting implementation of IFRS S1 and IFRS S2. The ISSB's engagement with the IOSCO's Growth and Emerging Markets Committee (GEMC)⁵ Network for ISSB Adoption or Other Use of ISSB Standards has also provided opportunities to update securities regulators on standard-setting developments. The focus of the engagement with the GEMC Network has been on enhancing GEMC members understanding of how they can leverage the resources in the Regulatory Implementation Programme and other resources developed by the IFRS Foundation to further regulators adoption considerations. The Network also serves as a forum for peer learning and for connecting jurisdictional regulators in Emerging Markets and Developing Economies with IFRS Foundation Implementation Partners, including the World Bank, IMF, IFC and other international bodies interested in providing technical assistance to enhance regulatory frameworks.
17. Engagement continues with the ASEAN Capital Markets Forum (ACMF). ASEAN remains an important region for the ISSB's adoption and implementation efforts. Since 2023, the principal platform for regional engagement has been the ACMF–IFRS Foundation Dialogue on ISSB Standards (AID), which aims to support the advancement of ACMF members' adoption of ISSB Standards and collaboration in promoting consistent, high-quality sustainability-related disclosure standards across

³ ISSB Passporting entails an option granted by individual jurisdictional authorities through regulation that allows foreign issuers or local subsidiaries of foreign entities to comply with local requirements by using ISSB Standards as issued by the ISSB as the basis for reporting.

⁴ Including the IOSCO leadership, Monitoring Forum, which is the IOSCO body that has taken over IOSCO's focus on sustainability-related disclosures previously housed under the IOSCO Sustainable Finance Task Force (STF), and through the IOSCO Growth and Emerging Markets Committee.

⁵ The Growth and Emerging Markets Committee of IOSCO comprises 90 members and 24 non-voting associate members who include the world's fastest growing economies and 10 of the G-20 members. Emerging economies are expected to represent a growing portion of IOSCO membership as new members continue to join.

ASEAN jurisdictions. It also serves as the platform for facilitating regular engagement on ISSB capacity building for regulators and corporates across ASEAN.

18. During the year, there has been continued bilateral engagement with jurisdictional regulators through the development and update of jurisdictional profiles and snapshots and as jurisdictions progress through their adoption considerations, including by consulting publicly with stakeholders on adoption roadmaps or national standard-setting proposals. As more jurisdictions embark in the process to develop roadmaps and regulators introducing ISSB Standards into regulatory frameworks, this type of engagement continues to increase. The IFRS Foundation is making jurisdictional consultations on the adoption or other use of ISSB Standards available to stakeholders on its website ([IFRS - Jurisdictional sustainability consultations](#)).

Prudential regulators

19. During the year to 30 September 2026, the ISSB has continued its regular dialogue with prudential regulators, including specific engagements conducted about the ISSB's work on Enhancing the SASB Standards and on Nature-related Disclosures. Engagement included meetings with the International Association of Insurance Supervisors (IAIS) secretariat and members of IAIS, the Australian Prudential Regulation Authority (APRA), the European Insurance and Occupational Pensions Authority (EIOPA) and the European Central Bank (ECB). Engagement with prudential regulators is also conducted through the International Institute of Finance (IIF) (a global banking body).

Appendix

Comment letters received as at 30 September 2026

Project	Due Process Stage	No. of Letters
International Sustainability Standards Board		
Enhancing the SASB Standards—Phase 1	Exposure Draft	238
Amendments to the IFRS S2 Industry-based Guidance—Phase 1	Exposure Draft	91
Enhancing the SASB Standards—Phase 1—Continued	Exposure Draft	157