

## Exposure Draft *Amendments to Greenhouse Gas Emissions Disclosures*—Survey

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### **Document purpose:**

The International Sustainability Standards Board (ISSB) welcomes views from stakeholders, who can submit responses to the Exposure Draft via a survey.

**The purpose of this document is to provide stakeholders with an overview of the survey only; please do not submit this document in response to the Exposure Draft.**

This document is provided for information only. To submit a survey in response to the Exposure draft, please access the survey directly [here](#).

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## Introduction

### Invitation to comment

The International Sustainability Standards Board (ISSB) published the Exposure Draft *Amendments to Greenhouse Gas Emissions Disclosures* on **28 April 2025**. The ISSB will consider all comments received by **27 June 2025**. You can respond to the Exposure Draft by submitting this survey. The questions in this survey are identical to the questions in the Exposure Draft. The ISSB encourages survey responses to increase the efficiency with which the ISSB can gather, analyse and draw conclusions from the feedback. If you have submitted your comments using this survey, you **do not** need to submit them again as a comment letter in a PDF format. Your comments on this Exposure Draft are vital to inform the ISSB's standard-setting process.

### Working with the online survey

- To work with the online survey, you must enable cookies in your browser and on the survey site to prevent data loss if completing the survey over a long period.
- We recommend you complete the survey in one session. However, if you wish to come back to the survey to pick up where you left off, you must use the same browser and you must not clear your cookies.
- We also recommend you keep a copy of your survey answers if you are working with it over a long period. The survey questions are identical to the questions in the Exposure Draft.
- Please complete the survey in question order. If you need to return to a previous answer, you can navigate through the survey using the forward and back buttons, or by using the table of contents, which can be accessed from every page of the survey via the three lines in the upper left corner of the page.
- The survey will be saved automatically when you navigate to the next page. Please note that if you leave the survey before moving to the next page, the answers on the current page will not be saved. Each text box has a character limit of 20,000 (between 2860 and 5000 words with spaces included).
- To submit your response, please select the 'Submit' button at the end of the survey.
- Your survey response will be made publicly available on the IFRS Foundation website in line with the IFRS Foundation's transparent due process.
- We recommend you refer to the ISSB's Exposure Draft *Amendments to Greenhouse Gas Emissions Disclosures* and the accompanying Basis for Conclusions on the Exposure Draft while completing the survey to better inform your response.

### About the survey

- The survey consists of this introduction, an 'About You' section and six sections containing questions aligned with those in the Exposure Draft.
- The 'About You' section must be completed in order to submit your response, but you do not need to respond to all the questions to submit your response.
- Most of the questions consist of two parts:

- a multiple choice question to indicate whether you agree or disagree with the proposal. This is an optional question that is gathered for the purpose of analysing the survey responses.
- a text box where you can explain your answer, subject to a character limit.

Not for submission

## AY About you

AY-1 Please provide your full name and email address:

☐ First name

☐ Last name

☐ Email

AY-2 Are you responding as an individual, or on behalf of an organisation?

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AY-3 Please provide the name of the organisation you are responding on behalf of:

AY-4 Are you responding on behalf of a global/international organisation?

☐ Yes

☐ No

AY-5 Which jurisdiction are you (if responding as an individual) or your organisation (if responding on behalf of an organisation) based in?

Selection from dropdown

AY-6 Which of the following stakeholder groups best describes you or your organisation?

**Select from the following stakeholder groups:**

Academia

Accounting professions and auditors

Commercial partners

Companies

Investors

Media

Policy makers

Public interest

Regulators

Standard-setters

Student

**Select from the following entity types:**

Academic  
Accounting firm  
Accounting professional body or association  
Commercial partner  
Apply IFRS standards  
Apply IFRS for SMEs Standards  
Consultant or advisor  
Trade, industry or representative body  
Buy side  
Sell side or sell side advisor  
Rating agency  
Data aggregator  
Professional body  
Media  
Central bank  
Policy maker including Government  
Public interest body, NGO or not for profit  
Charity  
Individual  
Prudential  
Sustainability regulator  
Capital markets  
Auditing  
Other regulator  
Accounting standard setter  
Accounting standard setter - government and not-for-profit reporting  
Auditing standard setter  
Sustainability standard setter  
Student

AY-7 Which of the following industries best describes you or your organisation

**Select from the following industries:**

Accountancy  
Agriculture  
Apparel  
Banking  
Biotechnology  
Chemicals  
Circular Economy  
Climate Change or Carbon Reduction  
Communications

Consulting  
Consumer Goods and Services  
Education  
Electronics  
Energy  
Engineering  
Entertainment  
Environmental  
Finance  
Food & Beverage  
Government  
Healthcare  
Hospitality  
Industrial  
Insurance  
Machinery  
Manufacturing  
Media  
Not For Profit  
Other  
Pensions  
Real Estate  
Recreation  
Retail  
Shipping  
Sustainability  
Technology  
Telecommunications  
Transportation  
Utilities

#### **PD Use of your personal data**

AY-8 Survey responses will be on the public record and posted on our website unless the respondent requests confidentiality. Such requests will not normally be granted unless supported by a good reason, for example, commercial confidentiality. If you would like to request confidentiality, please contact us at [commentletters@ifrs.org](mailto:commentletters@ifrs.org) before submitting your survey response.

By selecting 'I confirm' below, I confirm that: I give my explicit consent for any of my personal data (including my name) contained in this survey response to be published on the IFRS Foundation's website. If I am submitting this survey response on behalf of another individual or organisation and this survey response contains any other individual's personal details, I confirm

that any such individuals have given their explicit consent to have their personal data published on the IFRS Foundation's website. By submitting a survey response on behalf of myself or an organisation I agree that the IFRS Foundation may contact me from time to time for the purpose of seeking further information or consultation in relation to this matter. Consent can be withdrawn by emailing [commentletters@ifrs.org](mailto:commentletters@ifrs.org).

☐ I confirm

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### AY About you

AY-9 Would you like to include any additional introductory information?

☐ Yes

☐ No

AY-10 Please provide any additional details relevant to you (if responding as an individual) or your organisation (if responding on behalf of an organisation).

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CL-1 Would you like to include a cover letter (for example, to provide an overview of your comments)?

☐ Yes

☐ No

CL-1 Please provide your cover letter in the text box below.

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### Question 1—Measurement and disclosure of Scope 3 Category 15 greenhouse gas emissions

The ISSB proposes to permit entities to limit their disclosure of Scope 3 Category 15 greenhouse gas emissions. This limitation would permit entities to exclude some of their Scope 3 Category 15 greenhouse gas emissions, including those emissions associated with derivatives, facilitated emissions and insurance-associated emissions, when measuring and disclosing Scope 3 greenhouse gas emissions in accordance with paragraph 29(a)(i)(3) of IFRS S2.

(a) The ISSB proposes to add paragraph 29A(a), which would permit an entity to limit its disclosure of Scope 3 Category 15 greenhouse gas emissions to financed emissions, as defined in IFRS S2 (being those emissions attributed to loans and investments made by an entity to an investee or counterparty). For the purposes of the limitation, the proposed paragraph 29A(a) would expressly permit an entity to exclude greenhouse gas emissions associated with derivatives. Consequently this paragraph would permit an entity to exclude emissions associated with derivatives, facilitated emissions or insurance-associated emissions from its disclosure of Scope 3 greenhouse gas emissions.

The proposed amendment would not prevent an entity from choosing to disclose greenhouse gas emissions associated with derivatives, facilitated emissions or insurance-associated emissions should it elect to do so.

Paragraphs BC7–BC24 of the Basis for Conclusions describe the reasons for the proposed amendment.

Do you agree with the proposed amendment? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_



(b) The ISSB also proposes to add paragraph 29A(b), which would require an entity that limits its disclosure of Scope 3 Category 15 greenhouse gas emissions in accordance with the proposed paragraph 29A(a), to provide information that enables users of general purpose financial reports to understand the magnitude of the derivatives and financial activities associated with the entity's Scope 3 Category 15 greenhouse gas emissions that are excluded. Therefore, the ISSB proposes to add:

- paragraph 29A(b)(i) which would require an entity that has excluded derivatives from its measurement and disclosure of Scope 3 Category 15 greenhouse gas emissions to disclose the amount of derivatives it excluded; and
- paragraph 29A(b)(ii) which would require an entity that has excluded any other financial activities from its measurement and disclosure of Scope 3 Category 15 greenhouse gas emissions to disclose the amount of other financial activities it excluded.

The term 'derivatives' is not defined in IFRS Sustainability Disclosure Standards, and the ISSB does not propose to define this term. As a result, an entity is required to apply judgement to determine what it treats as derivatives for the purposes of limiting its disclosure of Scope 3 Category 15 greenhouse gas emissions, in accordance with the proposed paragraph 29A(a). The proposed paragraph 29A(b)(i) would require an entity that has excluded derivatives from its measurement and disclosure of Scope 3 Category 15 greenhouse gas emissions to explain the derivatives it excluded.

Paragraphs BC7–BC24 of the Basis for Conclusions describe the reasons for the proposed disclosure requirements.

Do you agree with the proposed disclosure requirements? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_

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## Question 2—Use of the Global Industry Classification Standard in applying specific requirements related to financed emissions

Paragraphs 29(a)(vi)(2) and B62–B63 of IFRS S2 require entities with commercial banking or insurance activities to disclose additional information about their financed emissions. These entities are required to use the Global Industry Classification Standard (GICS) for classifying counterparties when disaggregating their financed emissions information in accordance with paragraphs B62(a)(i) and B63(a)(i) of IFRS S2.

(a) The ISSB proposes to amend the requirements in paragraphs B62(a)(i) and B63(a)(i) of IFRS S2 and to add paragraphs B62A–B62B and B63A–B63B that would provide relief to an entity from using GICS in some circumstances. Under the proposals, an entity can use an alternative industry-classification system in some circumstances when disaggregating financed emissions information disclosed in accordance with paragraphs B62(a)–B62(b) and B63(a)–B63(b) of IFRS S2.

Paragraphs BC25–BC38 of the Basis for Conclusions describe the reasons for the proposed amendment.

Do you agree with the proposed amendment? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_

(b) The ISSB also proposes to add paragraphs B62C and B63C to require an entity to disclose the industry-classification system used to disaggregate its financed emissions information and, if the entity does not use GICS, to explain the basis for its industry-classification system selection.

Paragraphs BC25–BC38 of the Basis for Conclusions describe the reasons for the proposed disclosure requirements.

Do you agree with the proposed disclosure requirements? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_

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### **Question 3—Jurisdictional relief from using the GHG Protocol Corporate Standard**

The ISSB proposes to amend paragraphs 29(a)(ii) and B24 of IFRS S2 to clarify the scope of the jurisdictional relief available if an entity is required by a jurisdictional authority or an exchange on which it is listed to use a method other than the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) to measure greenhouse gas emissions for a part of the entity. The amendment would clarify that this relief, which permits an entity to use a different method for measuring greenhouse gas emissions, is available for the relevant part of the entity when such a jurisdictional or exchange requirement applies to an entity in whole or in part, for as long as that requirement is applicable.

Paragraphs BC39–BC43 of the Basis for Conclusions describe the reasons for the proposed amendment.

Do you agree with the proposed amendment? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_

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#### Question 4—Applicability of jurisdictional relief for global warming potential values

The ISSB proposes to amend paragraphs B21–B22 of IFRS S2 to extend the jurisdictional relief in the Standard. The ISSB proposes that if an entity is required, in whole or in part, by a jurisdictional authority or exchange on which it is listed to use global warming potential (GWP) values other than the GWP values that are required by paragraphs B21–B22 of IFRS S2, the entity would be permitted to use the GWP values required by such a jurisdictional authority or an exchange for the relevant part of the entity, for as long as that requirement is applicable.

Paragraphs BC44–BC49 of the Basis for Conclusions describe the reasons for the proposed amendment.

Do you agree with the proposed amendment? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_

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### Question 5—Effective date

The ISSB proposes to add paragraphs C1A–C1B which would specify the effective date of the amendments. The ISSB expects the amendments would make it easier for entities to apply IFRS S2 and would support entities in implementing the Standard. Consequently the ISSB proposes to set the effective date so that the amendments would be effective as early as possible and to permit early application.

Paragraphs BC50–BC51 of the Basis for Conclusions describe the reasons for the proposal.

Do you agree with the proposed approach for setting the effective date of the amendments and permitting early application? Why or why not?

- ☐ Broadly agree
- ☐ Broadly disagree
- ☐ Neither agree nor disagree

Optional: Please explain \_\_\_\_\_

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**Question 6—Other comments**

Do you have any other comments on the proposals set out in the Exposure Draft?

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Not for submission