

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

- Organisation

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

Institute of Singapore Chartered Accountants

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

Please select the individual standards you wish to comment on from below:

**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.

**01-A Response Do you agree with the objective of the proposed amendments to the SASB Standards and related areas of focus?**

- Agree

Enhance international applicability In particular, we appreciate the objective to enhance international applicability of metrics and supporting technical protocols. This would mitigate some of the challenges with adopting the SASB Standards, e.g. by revising the definitions in the topic of workforce health and safety such that they are more applicable for other jurisdictions and easier to align between operations in

different jurisdictions. Improve interoperability We appreciate the objective to improve interoperability with other sustainability-related standards and frameworks. We understand the challenges in achieving full harmonisation in the various reporting standards and frameworks. In spite of this, minimising duplicative reporting should remain a key priority in enhancing the SASB Standards, as many companies are still required by stakeholders from different jurisdictions to provide information under different reporting standards. On this note, we would like to reiterate the importance for the ISSB Standards, and SASB Standards as applicable, to serve as a true global baseline of investor-focused sustainability-related disclosures. Ideally, we should move toward a state where the concurrent application of other key standards, such as GRI Standards or ESRS, is seamless and integrated. This is a key objective to minimise the implementation costs of sustainability reporting and encourage global adoption of the ISSB Standards. Improve disclosure topics and metrics related to biodiversity, ecosystems and ecosystem services (BEES) and human capital While feedback to the relevant disclosure topics in the SASB Standards would be useful for standard-setting activities related to BEES and human capital, we would like to emphasise the importance of ensuring that the eventual standards on these topics, if any, undergo the full robust due process for setting the IFRS Sustainability Disclosure Standards. On this note, it would be important to ensure that amendments to the relevant standards, such as water management, labour practices and workforce health and safety, are carefully considered at this juncture to minimise any potential rollback of requirements in future. This would also apply to any other component of the SASB Standards that might be incorporated into the requirements in the IFRS Sustainability Disclosure Standards in future – mandatory adoption would necessitate a more comprehensive review of the amendments.

## **01-B Response Do the proposed amendments meet this objective? Why or why not?**

- Yes

However, we note the following:

- The priority industries comprise resource companies. The targeted amendments that arise from the proposed amendments to the priority industries might not be as applicable for other industries, e.g. those relating risks associated with discharged water.
- The proposed amendments require some of the metrics to be further disaggregated, e.g. renewable energy consumed from self-generation or direct contracts. For the reasons above, it is important for entities to exercise judgement and apply the concept of materiality to determine if the requirements are applicable. We note that the SASB Standards, including the proposed amendments, provide for this under the section for "Identifying applicable Industry Standards, disclosure topics and metrics" at the beginning of each SASB Standard. We suggest that ISSB take the opportunity to highlight the importance of an entity's materiality assessment in identifying the relevant disclosure topics and metrics. This would help address misconceptions that could lead to unnecessary onerous reporting, e.g. the mistaken belief that every requirement is mandatory. At a minimum, the key statement clarifying that the reporting entity is responsible for assessing which disclosures are material should be bolded for emphasis. Since some of the proposed amendments to the priority industries will be applied to the other industries as consequential targeted amendments, we suggest for our suggestion in the previous paragraph to be applied to the non-prioritised industries as well. Alignment of the language and concepts in the SASB Standards with IFRS Sustainability Disclosure Standards ISSB could consider highlighting the linkage between the requirements in the SASB Standards and the corresponding requirements in IFRS S1 and S2, to support the use of SASB standards for IFRS S1 and IFRS S2 application and reduce the risk of duplicative reporting. We note that the technical protocol for metrics in the SASB Standards comprises the following types:
- Requirements that are a summary of what is already in the IFRS Sustainability Disclosure Standards rather than additive requirements, e.g. paragraph 4 of EM-MM-140a.4
- Requirements that make the relationship with IFRS S1 clear and how they are additive, e.g. paragraph 3.1 of metric FB-PF-430b.1 which states "In preparing this disclosure, the entity shall apply the requirements in paragraph 51-53 of IFRS S1 that are applicable to the entity's deforestation or conversion targets." As the ISSB Standards require companies to refer to and consider the SASB Standards, we recommend that ISSB make a clearly referenced link between the requirements in the SASB Standards and the corresponding requirements in IFRS S1 and IFRS S2. Common requirements between IFRS S1 and IFRS S2 and the SASB Standards should be clearly labelled,

such that the additional requirements for the consideration of IFRS Sustainability Disclosure Standards are highlighted. Clearly identifying the relationship between both standards and the additional requirements would make it easier for entities applying the IFRS Sustainability Disclosure Standards to determine which disclosure requirements have been met, without creating confusion for those adopting the SASB Standards alone.

## **Question 2—Enhancements to interoperability with other standards and frameworks**

In considering necessary amendments to the SASB Standards, the ISSB has identified possible amendments that would enhance the interoperability and alignment of the SASB Standards with other sustainability-related standards and frameworks, such as those of the Global Reporting Initiative (GRI), European Sustainability Reporting Standards, and the guidance published by the Taskforce on Nature-related Financial Disclosures (TNFD).

Paragraphs BC33–BC41 of the Basis for Conclusions explain the approach taken to improving interoperability and alignment with other sustainability-related standards and frameworks. Appendix B of the Basis for Conclusions provides a list of some of the proposed amendments that would enhance interoperability with the GRI Standards and alignment with TNFD disclosure recommendations, while maintaining a focus on the needs of primary users of general purpose financial reports.

### **02-A Response Do you agree with the proposed approach to enhancing interoperability and alignment with other sustainability-reporting standards and frameworks? Why or why not?**

- Agree

Agree. In particular, we agree that engagement with GRI, EFRAG and TNFD to maximise interoperability is essential considering the current or expected widespread adoption of these standards in key jurisdictions. This is particularly important for Singapore where the GRI Standards are commonly adopted. Given that the ISSB Standards require companies to refer to and consider the SASB Standards, this alignment is necessary for the ISSB Standards to serve as a true global baseline for investor-focused sustainability-related disclosures. It also supports a building blocks approach that allows additional disclosures from other major reporting standards to be incorporated with minimal incremental effort.

### **02-B Response Do you agree that the proposed amendments to the nine priority industries and targeted amendments to other SASB Standards will result in improved interoperability and thus achieve the objectives of improving the decision-usefulness of disclosed information for primary users and cost-effectiveness for preparers? Why or why not?**

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### **02-C Response Could the interoperability and alignment of any disclosure topics or metrics be further enhanced while achieving the objectives of improving the decision-usefulness and cost-effectiveness of the information? What amendments would you propose and why?**

- Yes. Even though alignment is generally improved, some opportunities for further alignment remain. For example, interoperability could be enhanced by the choice of language when referring to “environmentally sensitive areas” and the GRI Standard’s “ecologically sensitive areas”, as the meaning of both phrases defined within the respective standards appears to be aligned. If there are any differences in the definitions, or in technical protocols for that matter, they should be highlighted in relevant materials, e.g. the Basis for Conclusions or comparison documents, to

facilitate the application of the SASB Standards and IFRS Sustainability Disclosure Standards, as applicable, alongside other sustainability reporting standards.

### **Question 3—Amendments to the climate-related content in the SASB Standards**

The ISSB is proposing to enhance the nine priority industries comprehensively, including the climate-related content in the priority industries. The ISSB also is proposing targeted amendments to some climate-related metrics in other SASB Standards. The proposed amendments are intended to assist preparers in identifying climate-related risks and opportunities and to enhance the decision-usefulness of industry-specific information about these risks and opportunities.

The *Industry-based Guidance on Implementing IFRS S2* (IFRS S2 industry-based guidance) is derived from, and is largely identical to, the climate-related content in the SASB Standards. The ISSB has maintained alignment between the SASB Standards and the IFRS S2 industry-based guidance. Therefore, the ISSB considered that the proposed amendments to the climate-related content in the SASB Standards could have implications for preparers who are implementing IFRS S2. The ISSB decided that it should propose making consequential amendments to the IFRS S2 industry-based guidance should it amend the climate-related content in the SASB Standards. That proposal is set out in the separate Exposure Draft [Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2](#). The ISSB also considered how it could use the effective date of the final amendments to ensure that they would not negatively affect preparers' implementation of IFRS S1 and IFRS S2.

**03-A Response Do you agree that the ISSB should amend the climate-related content in the SASB Standards for the priority industries and make targeted amendments to the climate-related content in the SASB Standards for other industries, as proposed in this Exposure Draft? Why or why not?**

**03-B Response Do you agree that the proposed amendments would enhance the decision-usefulness of the industry-specific information about climate-related risks and opportunities? Why or why not?**

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**03-C Response Do you agree that the proposed amendments would further clarify how the climate-related content in the SASB Standards and the IFRS S2 industry-based guidance relates to the requirements in IFRS S2?**

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### **Question 4—Information related to biodiversity, ecosystems and ecosystem services and human capital**

The ISSB proposes to amend disclosure topics and metrics in the SASB Standards related to biodiversity, ecosystems and ecosystem services (BEES) and human capital. The ISSB is pursuing research projects on BEES and human capital.<sup>[1]</sup>

The ISSB seeks to understand the extent to which the SASB Standards, and the proposed amendments, meet user needs for information on risks and opportunities related to BEES and human capital.

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<sup>[1]</sup> 'Biodiversity, ecosystems and ecosystem services (BEES)' refers to biodiversity as a foundational characteristic of natural systems and a proxy for functional, productive and resilient ecosystems that provide the ecosystem services upon which

life on earth relies. 'Human capital' refers to the people who make up a company's own workforce and workers in the company's value chain. Further descriptions of these terms and the research projects can be found in the ISSB's June 2024 Feedback Statement on Consultation on Agenda Priorities: <https://www.ifrs.org/content/dam/ifrs/project/issb-consultation-on-agenda-priorities/agenda-consultation-feedback-statement-june-2024.pdf>.

**04-A Response Do the SASB Standards, including the proposed amendments, enable entities to provide decision-useful information about their BEES-related risks and opportunities to users of general purpose financial reports? Why or why not?**

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**04-B Response (b) In the nine industries that the ISSB has prioritised for enhancement in the Exposure Draft, are there other BEES-related disclosures not addressed through the proposed amendments that would be useful for users of general purposes financial reports in their decision-making? If so, please explain which disclosures and why.**

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**04-C Response Do the SASB Standards, including the proposed amendments, enable entities to provide decision-useful information about their human capital-related risks and opportunities to users of general purpose financial reports? Why or why not?**

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**04-D Response In the nine industries that the ISSB has prioritised for enhancement in the Exposure Draft, are there other human capital-related disclosures not addressed through the proposed amendments that would be useful for users of general purposes financial reports in their decision-making? If so, please explain which disclosures and why.**

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**Question 5—Effective date**

The ISSB proposes to set an effective date for the amendments that will occur between 12 and 18 months after their issuance and permits early application. The ISSB's rationale for this proposal can be found in paragraph BC161 of the Basis for Conclusions.

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

- Agree

We agree that preparers need time to adjust their internal controls and processes to implement the amendments. However, we suggest that the effective date be set at least two years after their issuance. Beyond making the necessary system and process adjustments, entities also need at least one full reporting cycle, i.e. a full year of data, to test whether the processes and outputs are reasonable and to build confidence in their data. This could be further complicated for entities with businesses in multiple

industries. The effective date would also depend on how the amendments would be applied, e.g. the treatment of comparative information and whether any transition reliefs are provided. If comparative information must be restated, a longer lead time will be required to allow companies to retrieve the necessary historical data or identify appropriate proxies. Regarding comparative information, we suggest that the ISSB prioritise forward-looking and decision-useful disclosures and allow prospective application of the amendments. Accordingly, the ISSB should consider carefully whether restating comparative information is necessary. In situations where retrospective application may be required, such as amendments relating to baseline years for target setting, preparers should have the flexibility to exercise judgement and apply the concept of materiality. Notwithstanding the above, we support the ISSB permitting early adoption. This would allow some companies more time to adopt the amendments, while still permitting others to use the amended standards voluntarily as soon as possible.

Please select which individual SASB standard(s) you wish to comment on:

*Note: Please select question 15 if you would like to comment on the ISSB's proposed targeted amendments related to greenhouse gas emissions, energy management, water management, labour practices or workforce health and safety in any or all of the 41 additional SASB Standards.*

Question 15—Targeted amendments to the SASB Standards

### **Question 6—Coal Operations SASB Standard**

The Exposure Draft includes proposals to enhance the *Coal Operations* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Coal Operations* SASB Standard as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments result in a Standard that achieves the objective of meeting the needs of users in a manner that is cost- effective for preparers.

The ISSB proposes:

- to revise the Coal Operations industry description;
- to add two activity metrics relating to workforce composition;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics, and add metric EM-CO-110a.3 *Total Scope 1 methane emissions*;
- to revise the Water Management disclosure topic and associated metrics, remove metric EM-CO-140a.2 and add three metrics:
  - EM-CO-140a.3 *Description of water-related risks and opportunities and strategies to manage them, including any targets set to monitor progress*;
  - EM-CO-140a.4 *Total water discharged by (1) destination and (2) level of treatment*; and
  - EM-CO-140a.5 *Percentage of production from mine sites where acid and metalliferous drainage (1) has the potential to occur, (2) is actively mitigated or (3) is under treatment or remediation*;
- to revise the Waste Management disclosure topic and associated metrics, including changing the disclosure topic name to Waste & Hazardous Materials Management;
- to revise the Biodiversity Impacts disclosure topic and associated metrics, including changing the disclosure topic name to Ecological Impacts, remove metric EM-CO-160a.2 and add metric EM-CO-160a.4 *(1) Total spatial footprint of operations, (2) area disturbed and (3) area restored*;

- to revise the metrics in the Rights of Indigenous Peoples disclosure topic, relocate them to the Community Relations disclosure topic and rename the topic 'Community Relations & Rights of Indigenous Peoples', resulting in the metrics:
  - EM-CO-210b.3 *Percentage of (1) proved and (2) probable coal reserves in or near Indigenous Peoples' land; and*
  - EM-CO-210b.4 *Description of engagement processes and due diligence practices related to upholding Indigenous Peoples' rights;*
- to add an Operations in Conflict Areas disclosure topic and two metrics:
  - EM-CO-210c.1 *Percentage of (1) proved and (2) probable coal reserves in conflict-affected and high-risk areas; and*
  - EM-CO-210c.2 *Description of engagement processes and due diligence practices related to operating in conflict-affected and high-risk areas;*
- to revise the Labour Relations disclosure topic and associated metrics, including changing the disclosure topic name to Labour Practices;
- to revise the Workforce Health & Safety disclosure topic and associated metrics;
- to revise the Reserves Valuation & Capital Expenditures disclosure topic and associated metrics, including changing the disclosure topic name to Climate Resilience; and
- to revise the Tailings Storage Facilities Management disclosure topic and associated metrics.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**06-A Response Do you agree with the proposed amendments to the Coal Operations SASB Standard? Why or why not?**

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**06-B Response Do you agree with the Coal Operations industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

- 

**06-C Response Do you agree with the disclosure topics in the Coal Operations SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

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**06-D Response Do you agree with the metrics and technical protocols in the Coal Operations SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to primary users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**06-E Response Do you agree with the proposed new metric EM-CO-110a.3 Total Scope 1 methane emissions? Why or why not? If not, what would you suggest instead and why?**

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**06-F Response Are there any jurisdictional considerations related to the Coal Operations SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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06-G Response Do you have any comments on how the proposed amendments will affect the Coal Operations SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects).

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### **Question 7—*Construction Materials SASB Standard***

The Exposure Draft includes proposals to enhance the *Construction Materials* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Construction Materials SASB Standard* as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments result in a Standard that achieves the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Construction Materials industry description;
- to add two activity metrics relating to workforce composition;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics;
- to revise the Air Quality disclosure topic and associated metric;
- to revise the Energy Management disclosure topic and associated metric;
- to revise the Water Management disclosure topic and associated metric;
- to revise the Waste Management disclosure topic and associated metric;
- to revise the Biodiversity Impacts disclosure topic and associated metrics, including changing the disclosure topic name to Ecological Impacts;
- to revise the Workforce Health & Safety disclosure topic and associated metrics;
- to revise the Product Innovation disclosure topic and associated metrics;
- to add a Supply Chain Management disclosure topic and associated metric EM-CM-430a.1 *Description of the process to manage supply chain risks arising from environmental and social*

issues; and

- to revise the Pricing Integrity & Transparency disclosure topic and associated metric.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**07-A Response Do you agree with the proposed amendments to the Construction Materials SASB Standard? Why or why not?**

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**07-B Response Do you agree with the Construction Materials industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

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**07-C Response Do you agree with the disclosure topics in the Construction Materials SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

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**07-D Response Do you agree with the metrics and technical protocols in the Construction Materials SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to primary users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**07-E Response Do you agree with the proposed addition of the Supply Chain Management disclosure topic and associated metric? If you disagree, which aspects do you disagree with and what would you suggest instead?**

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**07-F Response Are there any jurisdictional considerations related to the Construction Materials SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**07-G Response Do you have any comments on how the proposed amendments would affect the Construction Materials SASB Standard's interoperability and alignment with other sustainability-**

**related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)**

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### **Question 8—Iron & Steel Producers SASB Standard**

The Exposure Draft includes proposals to enhance the *Iron & Steel Producers* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Iron & Steel Producers* SASB Standard as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments result in a Standard that achieves the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Iron & Steel Producers industry description;
- to revise the activity metric EM-IS-000.A, add two activity metrics relating to workforce composition and add one activity metric to disaggregate recycled steel production;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics;
- to revise the Air Quality disclosure topic and associated metric;
- to revise the Energy Management disclosure topic and one associated metric, and remove one metric;
- to revise the Water Management disclosure topic and associated metric;
- to revise the Waste Management disclosure topic and associated metric;
- to add a Labour Practices disclosure topic and two associated metrics:
  - EM-IS-310a.1 *Percentage of employees covered by collective agreements*; and
  - EM-IS-310a.2 (1) *Number of work stoppages* and (2) *the total days idle*;
- to revise the Workforce Health & Safety disclosure topic and associated metric; and
- to revise the Supply Chain Management disclosure topic and associated metric.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

#### **08-A Response Do you agree with the proposed amendments to the Iron & Steel Producers SASB Standard? Why or why not?**

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#### **08-B Response Do you agree with the Iron & Steel Producers industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

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**08-C Response Do you agree with the disclosure topics in the Iron & Steel Producers SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

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**08-D Response Do you agree with the metrics and technical protocols in the Iron & Steel Producers SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**08-E Response Are there any jurisdictional considerations related to the Iron & Steel Producers SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**08-F Response Do you have any comments on how the proposed amendments would affect the Iron & Steel Producers SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)**

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### **Question 9—Metals & Mining SASB Standard**

The Exposure Draft includes proposals to enhance the Metals & Mining SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the Metals & Mining SASB Standard as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments achieve the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Metals & Mining industry description;

- to revise the activity metrics and add one activity metric relating to workforce composition;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics;
- to revise the Air Quality disclosure topic and associated metric;
- to revise the Water Management disclosure topic and one associated metric, remove one metric and add three metrics:
  - EM-MM-140a.3 *Total water discharged by (1) destination and (2) level of treatment;*
  - EM-MM-140a.4 *Description of water-related risks and opportunities and strategies to manage them, including any targets set to monitor progress; and*
  - EM-MM-140a.5 *Percentage of production from mine sites where acid and metalliferous drainage (1) has the potential to occur, (2) is actively mitigated or (3) is under treatment or remediation;*
- to revise the Waste & Hazardous Materials Management disclosure topic and associated metrics;
- to revise the Biodiversity Impacts disclosure topic and associated metrics, including changing the disclosure topic name to Ecological Impacts, and to remove one metric and add metric EM-MM-160a.4 (1) Total spatial footprint of operations, (2) area disturbed and (3) area restored;
- to revise the Security, Human Rights & Rights of Indigenous Peoples disclosure topic and associated metrics through separating them into two disclosure topics: a revised Community Relations disclosure topic titled Community Relations & Rights of Indigenous Peoples, and a new disclosure topic, Operations in Conflict Areas. Revisions to the metrics would include:
  - revising metrics EM-MM-210a.2 and EM-MM-210a.3 and relocating them to the revised Community Relations & Rights of Indigenous Peoples disclosure topic with new metrics EM-MM-210b.3 and EM-MM-210b.4;
  - revising metric EM-MM-210a.1 and relocating it to the proposed Operations in Conflict Areas disclosure topic as metric EM-MM-210c.1; and
  - adding new metric EM-MM-210c.2 to the proposed Operations in Conflict Areas disclosure topic;
- to revise the Labour Practices disclosure topic and associated metrics;
- to revise the Workforce Health & Safety disclosure topic and associated metric and add metric EM-MM-320a.2 *Description of management systems used to foster a safe working environment;*
- to add a Supply Chain Management disclosure topic and associated metric EM-MM-430a.1 *Description of the process to manage supply chain risks arising from environmental and social issues;*
- to revise the Business Ethics & Transparency disclosure topic, including changing the disclosure topic name to Business Ethics, and associated metrics; and
- to revise the Tailings Storage Facilities Management disclosure topic and associated metrics.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**09-A Response Do you agree with the proposed amendments to the Metals & Mining SASB Standard? Why or why not?**

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**09-B Response Do you agree with the Metals & Mining industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

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**09-C Response Do you agree with the disclosure topics in the Metals & Mining SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

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**09-D Response Do you agree with the metrics and technical protocols in the Metals & Mining SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**09-E Response Do you agree with the proposed addition of a Supply Chain Management disclosure topic and associated metric? Why or why not? If not, what would you suggest instead and why?**

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**09-F Response Are there any jurisdictional considerations related to the Metals & Mining SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**09-G Response Do you have any comments on how the proposed amendments would affect the Metals & Mining SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)**

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#### **Question 10—Oil & Gas – Exploration & Production SASB Standard**

The Exposure Draft includes proposals to enhance the *Oil & Gas – Exploration & Production* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Oil & Gas – Exploration & Production* SASB Standard as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments result in a Standard that achieves the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Oil & Gas – Exploration & Production industry description;
- to revise the activity metrics and add two activity metrics relating to workforce composition;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics and add metric EM-EP-110a.4 *Total Scope 1 methane emissions*;
- to revise the Air Quality disclosure topic and associated metric.
- to revise the Water Management disclosure topic and associated metrics and add two new metrics;
  - EM-EP-140a.5 *Total water discharged by (1) destination and (2) level of treatment*; and
  - EM-EP-140a.6 *Description of water-related risks and opportunities and strategies to manage them, including any targets set to monitor progress*;
- to revise the Biodiversity Impacts disclosure topic and associated metrics, including changing the disclosure topic name to Ecological Impacts, and to add metric EM-EP-160a.4 (1) *Total spatial footprint of operations*, (2) *area disturbed* and (3) *area restored*;
- to revise the Security, Human Rights & Rights of Indigenous Peoples disclosure topic and associated metrics through separating them into two disclosure topics: a revised Community Relations disclosure topic titled Community Relations & Rights of Indigenous Peoples, and a new disclosure topic, Operations in Conflict Areas. Revisions to the metrics would include:
  - revising metrics EM-EP-210a.2 and EM-EP-210a.3 and relocating them to the revised Community Relations & Rights of Indigenous Peoples disclosure topic as new metrics EM-EP-210b.3 and EM-EP-210b.4;
  - revising metric EM-EP-210a.1 and relocating it to the proposed Operations in Conflict Areas disclosure topic as metric EM-EP-210c.1; and
  - adding new metric EM-EP-210c.2 to the proposed Operations in Conflict Areas disclosure topic;
- to revise the Workforce Health & Safety disclosure topic and associated metrics;
- to revise the Reserves Valuation & Capital Expenditures disclosure topic and associated metrics—including changing the disclosure topic name to Climate Resilience;
- to revise the Business Ethics & Transparency disclosure topic and associated metrics—including changing the disclosure topic name to Business Ethics;
- to revise the Management of the Legal & Regulatory Environment disclosure topic and associated metric;
- to revise the Critical Incident Risk Management disclosure topic and associated metrics;

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**10-A Response Do you agree with the proposed amendments to the Oil & Gas – Exploration & Production SASB Standard? Why or why not?**

- 

**10-B Response Do you agree with the Oil & Gas – Exploration & Production industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

-

**10-C Response Do you agree with the disclosure topics in the Oil & Gas – Exploration & Production SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

•

**10-D Response Do you agree with the metrics and technical protocols in the Oil & Gas – Exploration & Production SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**10-E Do you agree that the proposed amendments to the Water Management disclosure topic would provide useful information to primary users in a cost-effective manner for preparers?**

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**10-F Response Do you agree with the proposed addition of metric EM-EP-160a.4 (1) Total spatial footprint of operations, (2) area disturbed and (3) area restored and with the content of that metric? Why or why not? If not, what do you recommend and why?**

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**10-G Response Are there any jurisdictional considerations related to the Oil & Gas – Exploration & Production SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**10-H Response Do you have any comments on how the proposed amendments would affect the Oil & Gas – Exploration & Production SASB Standard’s interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity’s prospects.)**

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#### **Question 11—Oil & Gas – Midstream SASB Standard**

The Exposure Draft includes proposals to enhance the *Oil & Gas – Midstream* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards

internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Oil & Gas – Midstream SASB Standard* as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments result in a Standard that achieves the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Oil & Gas – Midstream industry description;
- to add two activity metrics relating to workforce composition and one activity metric for the total operational pipeline under management;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics and add metric EM-MD-110a.3 *Total Scope 1 methane emissions*;
- to revise the Air Quality disclosure topic and associated metric;
- to revise the Ecological Impacts disclosure topic and associated metrics;
- to add a Workforce Health & Safety disclosure topic and two associated metrics:
  - EM-MD-320a.1 *(1) Number of fatalities and (2) total recordable incident rate for (a) employees and (b) non-employee workers; (3) average hours of health, safety and emergency response training; and*
  - EM-MD-320a.2 *Description of management systems used to foster a safe working environment;*
- to revise the Competitive Behaviour disclosure topic and associated metric; and
- to revise the Operational Safety, Emergency Preparedness & Response disclosure topic and associated metrics, including changing the disclosure topic name to Critical Incident Risk Management, and to remove two metrics and add two metrics:
  - EM-MD-540a.5 *Process safety event rates for loss of primary containment (1) events of greater consequence (Tier 1) and (2) events of lesser consequence (Tier 2); and*
  - EM-MD-540a.6 *Description of management systems used to identify and mitigate low-probability, serious accidents.*

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**11-A Response Do you agree with the proposed amendments to the Oil & Gas – Midstream SASB Standard? Why or why not?**

- 

**11-B Response Do you agree with the Oil & Gas – Midstream industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

- 

**11-C Response Do you agree with the disclosure topics in the Oil & Gas – Midstream SASB**

**Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

•

**11-D Response Do you agree with the metrics and technical protocols in the Oil & Gas – Midstream SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**11-E Response Do you agree with the proposed addition of metric EM-MD-110a.3 Total Scope 1 methane emissions? Why or why not? If not, what would you suggest instead and why?**

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**11-F Response Are there any jurisdictional considerations related to the Oil & Gas – Midstream SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**11-G Response Do you have any comments on how the proposed amendments would affect the Oil & Gas – Midstream SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)**

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## **Question 12—Oil & Gas – Refining & Marketing SASB Standard**

The Exposure Draft includes proposals to enhance the *Oil & Gas – Refining & Marketing* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Oil & Gas – Refining & Marketing* SASB Standard as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments result in a Standard that achieves the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Oil & Gas – Refining & Marketing industry description;
- to revise the activity metrics and add two activity metrics relating to workforce composition;
- to revise the Greenhouse Gas Emissions disclosure topic and associated metrics;
- to revise the Air Quality disclosure topic and associated metrics;
- to revise the Water Management disclosure topic and one associated metric, remove one metric and add metric EM-RM-140a.3 *Total water discharged by (1) destination and (2) level of treatment*;
- to revise the Hazardous Materials Management disclosure topic and associated metrics;
- to revise the Workforce Health & Safety disclosure topic and associated metrics;
- to revise the Product Specifications & Clean Fuel Blends disclosure topic and associated metrics;
- to revise the Pricing Integrity & Transparency disclosure topic and associated metric;
- to revise the Management of the Legal & Regulatory Environment disclosure topic and associated metric; and
- to revise the Critical Incident Risk Management disclosure topic and associated metrics and remove one metric.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**12-A Response Do you agree with the proposed amendments to the Oil & Gas – Refining & Marketing SASB Standard? Why or why not?**

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**12-B Response Do you agree with the Oil & Gas – Refining & Marketing industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

- 

**12-C Response Do you agree with the disclosure topics in the Oil & Gas – Refining & Marketing SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

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**12-D Response Do you agree with the metrics and technical protocols in the Oil & Gas – Refining & Marketing SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**12-E Response Are there any jurisdictional considerations related to the Oil & Gas – Refining & Marketing SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**12-F Response Do you have any comments on how the proposed amendments would affect the Oil & Gas – Refining & Marketing SASB Standard’s interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity’s prospects.)**

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### **Question 13—Oil & Gas – Services SASB Standard**

The Exposure Draft includes proposals to enhance the *Oil & Gas – Services SASB Standard*, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Oil & Gas – Services SASB Standard* as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments achieve the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Oil & Gas – Services industry description;
- to revise one activity metric, remove three activity metrics and add two activity metrics relating to workforce composition;
- to revise the Emissions Reduction Services & Fuels Management disclosure topic and one associated metric, including changing the disclosure topic name to Greenhouse Gas Emissions, and to remove metric EM-SV-110a.3 and add metric EM-SV-110a.4 *(1) Gross Scope 1 emissions and (2) percentage subject to emissions-limiting regulations*;
- to add an Air Quality disclosure topic and associated metric EM-SV-120a.1 *Air pollutant emissions: (1) NOx (excluding N<sub>2</sub>O), (2) SOx, (3) volatile organic compounds and (4) particulate matter*;
- to revise the Water Management Services disclosure topic and an associated metric, including changing the disclosure topic name to Water Management, and to remove metric EM-SV-140a.1 and add two metrics:
  - EM-SV-140a.3 *(1) Total water withdrawal, by source (2) total water consumed; (3) percentages of water (a) withdrawn and (b) consumed from water-stressed locations; and*
  - EM-SV-140a.4 *Total water discharged by (1) destination and (2) level of treatment;*
- to revise the Chemicals Management disclosure topic and an associated metric, including changing the disclosure topic name to Hazardous Materials Management, and remove metric EM-SV-150a.1;
- to revise the Ecological Impact Management disclosure topic and an associated metrics, including changing the disclosure topic name to Ecological Impacts, and remove metric EM-SV-160a.1;
- to revise the Workforce Health & Safety disclosure topic and associated metrics;

- to revise the Business Ethics & Payments Transparency disclosure topic and associated metrics, including changing the disclosure topic name to Business Ethics;
- to revise the Management of the Legal & Regulatory Environment disclosure topic and associated metric; and
- to revise the Critical Incident Risk Management disclosure topic and associated metric.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**13-A Response Do you agree with the proposed amendments to the Oil & Gas – Services SASB Standard? Why or why not?**

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**13-B Response Do you agree with the Oil & Gas – Services industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

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**13-C Response Do you agree with the disclosure topics in the Oil & Gas – Services SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

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**13-D Response Do you agree with the metrics and technical protocols in the Oil & Gas – Services SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**13-E Response The proposed amendments discussed in paragraphs BC126–BC130 would revise, add and remove a series of metrics in the Oil & Gas – Services SASB Standard to better reflect an entity's business activities while 'off-contract'. Do you agree with these proposed amendments? Why or why not? If not, what would you suggest instead and why?**

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**13-F Response Are there any jurisdictional considerations related to the Oil & Gas – Services SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.**

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**13-G Response Do you have any comments on how the proposed amendments would affect the Oil & Gas – Services SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)**

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**Question 14—Processed Foods SASB Standard**

The Exposure Draft includes proposals to enhance the *Processed Foods* SASB Standard, with a focus on ensuring that the Standard enables entities applying IFRS Sustainability Disclosure Standards internationally to provide decision-useful information to users of general purpose financial reports. The information provided should enable users to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of an entity engaging in activities associated with this industry.

The ISSB is interested in feedback on the amendments proposed in this Exposure Draft and on the *Processed Foods* SASB Standard as a whole. The ISSB is particularly interested in feedback related to whether the proposed amendments achieve the objective of meeting the needs of users in a manner that is cost-effective for preparers.

The ISSB proposes:

- to revise the Processed Foods industry description;
- to revise the Energy Management disclosure topic and associated metric;
- to revise the Water Management disclosure topic and associated metrics, remove metric FB-PF-140a.2 and add new metric FB-PF-140a.4 *Total water discharged by (1) destination and (2) level of treatment*;
- to revise the Food Safety disclosure topic and an associated metric, remove metrics FB-PF-250a.1, FB-PF-250a.2 and FB-PF-250a.3 and, add two new metrics:
  - FB-PF-250a.5 *Percentage of production volume from sites certified to internationally recognised food safety standards for (1) own operations and (2) co-packing operations*;
  - FB-PF-250a.6 *Processes, controls and procedures for ensuring food safety throughout the value chain*;
- to revise the Health & Nutrition disclosure topic and associated metrics by removing metrics FB-PF-260a.1 and FB-PF-260a.2, and adding three new metrics:
  - FB-PF-260a.3 *Approach and strategy for managing health and nutrition attributes of product portfolio, including any targets set to monitor progress*;
  - FB-PF-260a.4 *Revenue from products classified as healthy by a recognised nutrient profile model*;
  - FB-PF-260a.5 *Revenue from products sold (1) in jurisdictions that require health warning labels and (2) that are required to carry a health warning label*;
- to revise the Product Labelling & Marketing disclosure topic and associated metrics by removing metrics FB-PF-270a.1, FB-PF-270a.2 and FB-PF-270a.4, and adding two new metrics:
  - FB-PF-270a.5 *Description of marketing policy and related governance and oversight processes*;
  - FB-PF-270a.6 *Revenue from products sold (1) in jurisdictions that restrict the advertising of specific products to children and (2) subject to regulations that restrict the advertising of specific products to children*;
- to revise the Packaging Lifecycle Management disclosure topic and associated metrics;

- to add a Product Innovation disclosure topic and associated metric FB-PF-410b.1 *Use of innovation in food products to address sustainability-related risks and opportunities*;
- to remove the Environmental & Social Impacts of Ingredient Supply Chain and Ingredient Sourcing disclosure topics and all associated metrics, and replace them with new Environmental Supply Chain Management and Social Supply Chain Management disclosure topics;
- to add three metrics to the new Environmental Supply Chain Management disclosure topic:
  - FB-PF-430b.1 *Percentages of sourced commodities determined to be deforestation- or conversion-free, including any targets set to monitor progress*;
  - FB-PF-430b.2 *Priority commodities and products that are sensitive to environmental risks in the supply chain*; and
  - FB-PF-430b.3 *Description of strategies to manage environmental resources and implement sustainable agriculture practices in the supply chain*; and
- to add three metrics to the new Social Supply Chain Management disclosure topic:
  - FB-PF-430c.1 *Processes, controls and procedures for managing labour conditions and impacts on local communities in the supply chain, including human rights due diligence*;
  - FB-PF-430c.2 *Percentages of sourced commodities certified to internationally recognised standards that trace the path of products through the supply chain*; and
  - FB-PF-430c.3 *Percentage of high-risk suppliers subject to an independent third-party audit or verification in the previous three years, with description of non-conformances and corrective actions*.

The section on 'Proposed amendments to the SASB Standards' in the Basis for Conclusions sets out the ISSB's reasoning for these proposals.

**14-A Response Do you agree with the proposed amendments to the Processed Foods SASB Standard? Why or why not?**

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**14-B Response Do you agree with the Processed Foods industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?**

- 

**14-C Response Do you agree with the disclosure topics in the Processed Foods SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?**

- 

**14-D Response Do you agree with the metrics and technical protocols in the Processed Foods SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?**

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**14-E Response** Are there any jurisdictional considerations related to the Processed Foods SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

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**14-F Response** Do you have any comments on how the proposed amendments would affect the Processed Foods SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)

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### **Question 15—Targeted amendments to the SASB Standards**

Beyond the amendments proposed to the nine priority SASB Standards, the ISSB proposes that the corresponding metrics in other SASB Standards be aligned to maintain consistent disclosures on these common topics among industries where appropriate. Forty-one additional industries would be affected by the proposed targeted amendments. The ISSB proposes targeted amendments to the metrics in other SASB Standards for:

- greenhouse gas emissions;
- energy management;
- water management;
- labour practices; and
- workforce health and safety.

Paragraphs BC47–BC48 of the Basis for Conclusions set out the ISSB's reasoning for proposing the targeted amendments. The section on 'Proposed amendments for the SASB Standards' in the Basis for Conclusions sets out the reasoning for specific amendments to the topics noted above. Appendix A to the Basis for Conclusions contains a full list of SASB Standards and metrics within those that would be affected by the targeted amendments.

**15-A Response** Do you agree with the proposal to align corresponding metrics in other SASB Standards beyond the nine priority industries to maintain consistent disclosures on these common topics in industries subject to equivalent disclosure requirements? Do you agree that doing so would improve the comparability of information? Why or why not?

- Agree

We broadly agree with the approach to making sustainability-related disclosures consistent across industries, provided they are decision-useful, comparable and practical. However, we note the following:

- The priority industries comprise resource companies. The targeted amendments that arise from the proposed amendments to the priority industries might not be as applicable for other industries, e.g. those relating risks associated with discharged water.
- The proposed amendments require some of the metrics to be further disaggregated, e.g. renewable energy consumed from self-generation or direct contracts. For the reasons above, it is important for entities to exercise judgement and apply the concept of materiality

to determine if the requirements are applicable. We note that the SASB Standards, including the proposed amendments, provide for this under the section for “Identifying applicable Industry Standards, disclosure topics and metrics” at the beginning of each SASB Standard. We suggest that ISSB take the opportunity to highlight the importance of an entity’s materiality assessment in identifying the relevant disclosure topics and metrics. This would help address misconceptions that could lead to unnecessary onerous reporting, e.g. the mistaken belief that every requirement is mandatory. At a minimum, the key statement clarifying that the reporting entity is responsible for assessing which disclosures are material should be bolded for emphasis. Since some of the proposed amendments to the priority industries will be applied to the other industries as consequential targeted amendments, we suggest for our suggestion in the previous paragraph to be applied to the non-prioritised industries as well.

**15-B Response Do you agree that these proposed targeted amendments should be implemented before completing a comprehensive review of each of the SASB Standards affected by these amendments? Do you agree that this approach would support the objective of enhancing the SASB Standards to provide timely support to entities in applying IFRS S1? Why or why not?**

- Agree

We support the phased approach undertaken by ISSB given the number and diversity of industries covered by the SASB Standards which will result in continual enhancements to the standards over the coming years. Subsequent changes should be made where relevant, but in a way that minimises the disruption to reporting.

**15-C Response Do you agree with the proposed targeted amendments associated with greenhouse gas emissions? Why or why not?**

- 

**15-D Response Do you agree with the proposed targeted amendments associated with energy management? Why or why not?**

- Agree

However, some of the amended disclosures might not be material or applicable for many entities, e.g. the requirement to split renewable energy consumed into self-generation versus direct contracts, and the applicability of paragraph 3.6.1 where the purchase of renewable electricity through contractual instruments is not material. In some jurisdictions, the amount of self-generated renewable electricity may be limited. Consideration should also be given to whether distinguishing between self-generation and direct contracts provides meaningful decision-useful information. For example, long-term climate targets rarely differentiate renewable energy consumption based on whether it is self-generated or purchased. We also note that the targeted amendments are not applied to certain SASB Standards that identify energy management as a useful disclosure topic. In some of these cases, imposing a breakdown of renewable electricity consumed into self-generation versus direct contracts could result in overly granular reporting, e.g. those for the real estate sector are already required to be disaggregated by property sector. In view of the above, we suggest that ISSB highlight the importance of an entity’s materiality assessment in identifying the relevant disclosure topics and metrics. This would help address misconceptions that could lead to unnecessary onerous reporting such as the mistaken belief that every requirement is mandatory.

**15-E Response Do you agree with the proposed targeted amendments associated with water management? Why or why not?**

- Agree

However, some of the amended disclosures might not be material or applicable for many entities, e.g. the requirement to split renewable energy consumed into self-generation versus direct contracts, and the applicability of paragraph 3.6.1 where the purchase of renewable electricity through contractual instruments is not material. In some jurisdictions, the amount of self-generated renewable electricity may be limited. Consideration should also be given to whether distinguishing between self-generation and direct contracts provides meaningful decision-useful information. For example, long-term climate targets rarely differentiate renewable energy consumption based on whether it is self-generated or purchased. We also note that the targeted amendments are not applied to certain SASB Standards that identify energy management as a useful disclosure topic. In some of these cases, imposing a breakdown of renewable electricity consumed into self-generation versus direct contracts could result in overly granular reporting, e.g. those for the real estate sector are already required to be disaggregated by property sector. In view of the above, we suggest that ISSB highlight the importance of an entity's materiality assessment in identifying the relevant disclosure topics and metrics. This would help address misconceptions that could lead to unnecessary onerous reporting such as the mistaken belief that every requirement is mandatory.

**15-F Response Do you agree with the proposed targeted amendments associated with labour practices? Why or why not?**

- Agree

In particular, we support the proposed amendments to allow an entity to disclose how it identifies water-stressed locations. This would allow the disclosures to be more decision-useful, e.g. avoid miscategorising water-stressed locations in situations where there are governance measures in place to mitigate physical water scarcity, as is the case for Singapore. Similar considerations provided for Question 15(d) would apply. Paragraph 3 of the technical protocol for the "percentage of water consumed from water-stressed locations – it appears that the phrase "with High or Extremely High Baseline Water Stress" should be struck through and deleted, instead of underlined, to be consistent with the proposed amendments to the nine priority industries.

**15-G Response Do you agree with the proposed targeted amendments associated with workforce health and safety? Why or why not?**

- Agree

We agree that the revised definitions for employees help entities operating across multiple jurisdictions navigate jurisdictional differences and provide more clarity in preparing the disclosures. For example, the revised definitions allow entities to align the definition of "employee" with the approach used by their human resource departments, instead of shoehorning categorisations based on reporting standards, particularly in jurisdictions where manpower arrangements are disparate and complicated. This is an important step toward alleviating the challenges of applying the SASB Standards. In particular, we support the proposed amendments to remove the "near miss frequency rate" disclosure as there are significant challenges in collecting the relevant information, e.g. difficulties in collecting information especially from contracted employees and underreporting, which would not make the disclosure meaningful.

**15-H Response Are the proposed targeted amendments to the additional 41 industries appropriate and relevant for the individual SASB Standards? Are there any jurisdictional considerations related to these SASB Standards that have not been addressed in the proposals for targeted amendments that should be taken into account? If so, please explain.**

- Yes

However, we note the following:

- The priority industries comprise resource companies. The targeted amendments that arise from the proposed amendments to the priority industries might not be as applicable for other industries, e.g. those relating risks associated with discharged water.
- The proposed amendments require some of the metrics to be further disaggregated, e.g. renewable energy consumed from self-generation or direct contracts. For the reasons above, it is important for entities to exercise judgement and apply the concept of materiality to determine if the requirements are applicable. We note that the SASB Standards, including the proposed amendments, provide for this under the section for "Identifying applicable Industry Standards, disclosure topics and metrics" at the beginning of each SASB Standard. We suggest that ISSB take the opportunity to highlight the importance of an entity's materiality assessment in identifying the relevant disclosure topics and metrics. This would help address misconceptions that could lead to unnecessary onerous reporting, e.g. the mistaken belief that every requirement is mandatory. At a minimum, the key statement clarifying that the reporting entity is responsible for assessing which disclosures are material should be bolded for emphasis. Since some of the proposed amendments to the priority industries will be applied to the other industries as consequential targeted amendments, we suggest for our suggestion in the previous paragraph to be applied to the non-prioritised industries as well.

**15-I Response Do you agree that the proposed targeted amendments to the SASB Standards would enhance the interoperability and alignment with other sustainability-reporting standards and frameworks? Why or why not? (Note that the ISSB is focused on providing material information for users about the effects of sustainability related risks and opportunities on an entity's prospects.)**