

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:

HKICPA

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).

The Hong Kong Institute of Certified Public Accountants (HKICPA) is the only body authorised by law to set and promulgate standards relating to financial reporting, auditing, ethics and sustainability disclosures for professional accountants in Hong Kong. We are grateful for the opportunity to provide you with our comments on the Exposure Draft (ED) on Proposed Amendments to the SASB Standards. In forming our views as outlined below, we have undertaken the following activities: (a) issued an Invitation to Comment on the ED on 7 July 2025 to its members and other stakeholders; and (b) sought input and developed its views through its Sustainability Disclosure Standards Committee, having reflected on its respondents' views. The Committee comprises preparer representatives from various industry sectors, regulators, investors, as well as technical and industry experts from small, medium and large accounting firms.

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

Agree

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

- Yes

Yes

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

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?

- Agree

Agree

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?

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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?

- Agree

Agree

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?

- Agree

Agree

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.^[1]

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.

^[1] '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?

- Yes

Yes

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.

- No

No

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?

- Yes

Yes

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.

- No

No

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

Agree

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 7—Construction Materials SASB Standard, Question 9—Metals & Mining SASB Standard, Question 10—Oil & Gas – Exploration & Production SASB Standard, Question 11—Oil & Gas – Midstream

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?

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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?

- Agree

Agree

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?

- Agree

A respondent from this industry commented that the proposed amendments to the Construction Materials industry description more accurately reflect the cement industry by appropriately excluding forestry and paper pulp activities, which are subject to different regulatory frameworks and are distinct from cement production.

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?

- Agree

Agree

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?

•

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?

- Agree

A respondent from this industry supported the amendments, particularly those related to tailings storage facilities management, GHG emissions, water management and community relations, as they are areas that are material to their business and that are already subject to internal governance and external reporting. The amendments are expected to enhance consistency and improve disclosure quality. The respondent also welcomed the shift toward jurisdiction-agnostic language and international best practices, noting that reframing location-specific requirements into globally applicable concepts will improve the standard's usability across operations and enhance comparability for global stakeholders.

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?

- Agree

Agree

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.)

- Yes

A respondent from this industry welcomed the interoperability and alignment introduced in the proposed amendment, which will reduce duplication, enhance interoperability, and support streamlined reporting, as their current reporting aligns with those international frameworks.

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?

- Agree

Agree

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?

- Agree

A respondent from this industry agreed with the industry description and considered that dividing the oil and gas industry into upstream, midstream, downstream, and services aligns well with the characteristics of the sector.

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?

- Agree

Agree

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?

- Agree

Agree

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?

- Agree

Agree

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?

- Disagree

A respondent from this industry disagreed with the proposed addition of metric EM-EP-160a.4, noting that disclosing total operational space and disturbed area offers limited value due to the difficulty in standardising such data. This challenge is compounded by the significant variation in ecological conditions across regions, which makes the resulting disclosures potentially non-comparable and less useful for decision-making. This feedback highlights the need for a clearer definition of “total operational space” and “disturbed area” to support meaningful and consistent reporting across jurisdictions.

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.

- No

No

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?

- Agree

Agree

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?

- Agree

Please refer to responses in Question 10(b) above.

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?

- Agree

A respondent from this industry noted that as oil and gas leaks or accidental releases during storage and transportation can have both immediate and long-term serious impacts on surrounding communities, this remains a major concern for oil and gas companies as these incidents could affect the companies' reputation and operations. As such, the respondent recommend that the revised standards for the midstream sector include specific requirements related to environmental impact (e.g. leakage risks), operational efficiency (e.g. energy consumption management) and social responsibility (e.g. community relations).

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?

- Agree

A respondent from this industry disagreed with the proposed addition of metric EM-ED-160a.3. Please refer to responses in Question 10(f) above.

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.

- No

No

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?

- Agree

Agree

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?

- Agree

Please refer to responses in Question 10(b) above.

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?

- Agree

Agree

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?

- Agree

Agree

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) NO_x (excluding N₂O), (2) SO_x, (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?

- Agree

Agree

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?

- Agree

Please refer to responses in Question 10(b) above.

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?

- Agree

Agree

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?

- Agree

Agree

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?

- Agree

Agree

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.

- No

No

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?

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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?

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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?

-

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?

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

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

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

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

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

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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.

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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.)