

**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 Industry-based Guidance on Implementing IFRS S2. 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.

**Question 1—Consequential amendments to the IFRS S2 industry-based guidance**

The ISSB proposes to make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards in order to maintain alignment between the IFRS S2 industry-based guidance and the climate-related content in the SASB Standards.

Paragraphs BC11–BC14 of the Basis for Conclusions describe the reasons for this proposal.

**01-A Response Do you agree that the ISSB should make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards as set out in the SASB exposure draft? Why or why not?**

- Agree

We agree with the consequential amendments and consider that aligning the revisions with updates to the SASB Standards facilitates easier preparation of disclosures, supports cost-effectiveness, and enhances decision-usefulness for report users. It also improves interoperability and consistency between IFRS S2 and other sustainability-related standards and frameworks.

**Question 2—Effective date**

The ISSB proposes to set an effective date for the consequential amendments that is the same as the effective date of the corresponding amendments to the SASB Standards. The ISSB proposes that the effective date be 12–18 months after the amendments are issued and to permit early application.

Paragraph BC15 of the Basis for Conclusions describes the reasons for this proposal.

**02-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 aligning the effective date of the amendments to the IFRS S2 industry-based guidance with the effective date of the SASB Standards will help ensure consistency in climate-related disclosures going forward. Setting the effective date 12 to 18 months after the release of the amendments allows companies sufficient time to prepare. In addition, we consider that allowing a 12–18 month period before the amendments become effective post-finalisation would enable preparers to continue implementing IFRS S2 using the existing guidance, thereby reducing the risk of disruption.