

SURVEY ON THE ISSB'S EXPOSURE DRAFT ON PROPOSED OF AMENDMENTS TO THE SASB STANDARDS

The ISSB has published its Exposure Draft of Proposed Amendments to the SASB Standards <https://www.ifrs.org/content/dam/ifrs/project/enhancing-the-sasb-standards/sasb-ed-2025-1-proposed-amends.pdf> and consequential amendments to the Industry-based Guidance on Implementing IFRS S2. It is proposing to make:

- Changes to nine SASB Standards in those industries it has identified as 'priority industries'
- Targeted amendments to 41 additional SASB Standards, based on the proposed amendments to the 'priority industries' to maintain consistency across topics
- Consequential amendments to the Industry-based Guidance on implementing IFRS S2, based on the relevant SASB amendments

The Exposure Drafts, accompanying Basis for Conclusions document, and other supporting materials, are available to download from the ISSB's website at: <https://www.ifrs.org/projects/work-plan/enhancing-the-sasb-standards>

This survey is being conducted by the FRC, acting as the Secretariat to the UK Sustainability Disclosure Technical Advisory Committee (TAC). The TAC is preparing its response to the ISSB's consultation

We are interested in hearing from all UK stakeholders including both users and preparers of sustainability reporting, sectoral/thematic/SASB Standard experts, data providers, and other interested bodies. We will take your perspectives into consideration as we develop the TAC's response. We may also share your anonymised responses with the FRC to enable them to respond to this consultation.

You can share your views with us by completing this short survey which consists of 30 questions. Please note that you do not need to complete all questions in order to submit your response to this survey. The deadline for responding to this survey is **Friday 29 August 2025**. We will publish a short, anonymised summary of the survey results by November 2025.

Your personal information will be anonymised before it is published, shared with the TAC or the FRC, and at the conclusion of the research period. It will be treated in line with the FRC's Privacy policies available here at <https://www.frc.org.uk/about-us/policies-and-procedures/privacy/>. By completing this survey, you agree to your personal information being treated in this way.

Please note that we may also use your personal data to contact you about your response where you have consented to this within this survey. Your contact details will not be used for any other purpose.

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Please contact UKSustainabilityTAC@frc.org.uk with any questions.

Survey Questions

Stakeholder information

1. Please provide your name
2. Please provide your job title
3. Please provide your email address
4. Please provide your organisation name
5. We may want to follow up with you about points that you make in your survey response. Are you happy for us to contact you about your response?
 - Yes
 - No

Stakeholder Groups

Please select your sector/sectors and industry/industries from the list below. If your sector/industry is not listed, you can specify it in the 'Other' field, below.

6. Consumer Goods
 - Apparel, Accessories & Footwear
 - Appliance Manufacturing
 - Building Products & Furnishings
 - E-Commerce
 - Household & Personal Products
 - Multiline and Specialty Retailers & Distributors
 - Toys & Sporting Goods
7. Extractives & Minerals Processing
 - Coal Operations
 - Construction Materials
 - Iron & Steel Producers
 - Metals & Mining
 - Oil & Gas – Exploration & Production
 - Oil & Gas – Midstream
 - Oil & Gas – Refining & Marketing
 - Oil & Gas – Services
8. Financials
 - Asset Management & Custody Activities
 - Commercial Banks
 - Consumer Finance
 - Insurance
 - Investment Banking & Brokerage

- Mortgage Finance
- Security & Commodity Exchanges

9. Food & Beverage

- Agricultural Products
- Alcoholic Beverages
- Food Retailers & Distributors
- Meat, Poultry & Dairy
- Non-Alcoholic Beverages
- Processed Foods
- Restaurants
- Tobacco

10. Health Care

- Biotechnology & Pharmaceuticals
- Drug Retailers
- Health Care Delivery
- Health Care Distributors
- Managed Care
- Medical Equipment & Supplies

11. Infrastructure

- Electric Utilities & Power Generators
- Engineering & Construction Services
- Gas Utilities & Distributors
- Home Builders
- Real Estate
- Real Estate Services
- Waste Management
- Water Utilities & Services

12. Renewable Resources & Alternative Energy

- Biofuels
- Forestry Management
- Fuel Cells & Industrial Batteries
- Pulp & paper Products
- Solar Technology & Project Developers
- Wind Technology & Project Developers

13. Resource Transformation

- Aerospace & Defense
- Chemicals
- Containers & Packaging
- Electrical & Electronic Equipment

- Industrial Machinery & Goods

14. Services

- Advertising & Marketing
- Casinos & Gaming
- Education
- Hotels & Lodging
- Leisure Facilities
- Media & Entertainment
- Professional & Commercial Services

15. Technology & Communications

- Electronic Manufacturing Services & Original Design Manufacturing
- Hardware
- Internet Media & Services
- Semiconductors
- Software & IT Services
- Telecommunications

16. Transportation

- Air Freight & Logistics
- Airlines
- Auto Parts
- Automobiles
- Car Rental & Leasing
- Cruise Lines
- Marine Transportation
- Rail Transportation
- Road Transportation

17. Other – please specify your sector and industry

Stated objectives

Do you agree with the following objectives of the ISSB's proposed amendments to the SASB Standards?

18. Enhancing the international applicability of industry groupings (including to reflect value chains in emerging markets & developing economies), disclosure topics, metrics, and supporting technical protocols. Please state yes or no, and why.

19. Improving interoperability and alignment 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
- Yes
 - No
20. If you selected yes to Q19, which of the following frameworks would you like to see interoperability/alignment with? Please select all that apply.
- Global Reporting Initiative ('GRI') Standards
 - Guidance published by the Taskforce on Nature-related Financial Disclosures ('TNFD')
 - European Sustainability Reporting Standards ('ESRS')
 - UK Transition Plan Taskforce ('TPT') Sector Specific Guidance
 - Other – please specify
21. Why would you like to see interoperability/alignment with these frameworks?
22. If you selected no to Q19, please explain your answer.
23. Amending disclosure topics and metrics relating to biodiversity, ecosystems, and ecosystem services ('BEES') and human capital to align with the ISSB's global research projects on these topics, and to enable feedback on those research projects via the SASB Exposure Draft. Please state yes or no, and why.
24. Aligning language and concepts in the SASB Standards with the IFRS Sustainability Standards. Please state yes or no, and why.
25. Enhancing the clarity, conciseness, and cost effectiveness of SASB Standards for preparers. Please state yes or no, and why.

Using the SASB Standards

26. Which SASB Standard(s) do you use?
- We do not use the SASB Standards
 - Coal Operations
 - Construction Materials
 - Iron & Steel Producers
 - Metals & Mining
 - Oil & Gas – Exploration & Production
 - Oil & Gas – Midstream
 - Oil & Gas – Refining & Marketing

- Oil & Gas – Services
- Processed Foods
- Other

27. If you do not use the SASB Standards, what would make you more likely to use them?

28. What other Standards and Frameworks do you use?

- ESRS
- TNFD
- GRI
- UK TPT Sector Specific Guidance
- Other - please specify

Priority Industry Comments

The ISSB has proposed amendments to nine 'priority industries'. Amendments relate to the following SASB Standards:

Coal Operations SASB Standard
 Construction Materials SASB Standard
 Iron & Steel Producers SASB Standard
 Metals & Mining SASB Standard
 Oil & Gas – Exploration & Production SASB Standard
 Oil & Gas – Midstream SASB Standard
 Oil & Gas – Refining & Marketing SASB Standard
 Oil & Gas – Services SASB Standard
 Processed Foods SASB Standard

29. Do you have comments on any of the amended draft Standards? If so, please identify which draft Standard(s) you would like to comment on. We are interested to hear your views on the following matters:

- Whether the revised Drafts adequately reflect the business activities of the industries concerned;
- Whether the topics reflect the most relevant risks & opportunities affecting entities' prospects in the sector(s) concerned;
- The decision-usefulness of the enclosed metrics and technical protocols;
- Whether there are any UK-specific considerations that should be addressed within them;
- Whether the drafts are consistent with IFRS S1 and IFRS S2;

- Whether you have any comments about interoperability/alignment with UK regulation/other standards and frameworks;
- Whether you foresee any challenges in implementing the amended draft Standards;

We welcome comments on *amendments but also more generally* on potential areas for improvement in the revised Drafts.

Targeted amendments

The ISSB is proposing targeted amendments to another 41 SASB Standards with a view to maintaining consistent guidance for the same topics in different Standards where appropriate. These amendments result from the amendments to the nine 'priority industries' and relate to the following five topics:

Greenhouse Gas Emissions
Energy Management
Water Management
Labour Practices
Workplace Health and Safety

You can find a complete list of the affected industries and topics from the ISSB's website at this address on page 5

<https://www.ifrs.org/content/dam/ifrs/project/enhancing-the-sasb-standards/sasb-ed-2025-1-table-list.pdf>

30. Do you have any comments on any of the other 41 SASB Standard Drafts or the ISSB's overall approach to making these amendments? If so, please specify what you would like to comment on and share your comments.