

Request for Information *Consultation on Agenda Priorities*—Survey

Document purpose:

The International Sustainability Standards Board (ISSB) welcomes views from stakeholders, who can submit responses to the Request for Information via a survey or comment letter.

The purpose of this document is to provide stakeholders with an overview of the survey only; please do not submit this document in response to the Request for Information.

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

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Introduction

Invitation to comment

The ISSB published the Request for Information *Consultation on Agenda Priorities* on 4 May 2023. Comments must be received by 1 September 2023.

The ISSB will develop and pursue its next two-year work plan subject to public consultation on agenda priorities (agenda consultation). The objective of the agenda consultation is to ask all those interested in sustainability-related financial reporting for their views on:

- the strategic direction and balance of the ISSB's activities;
- the suitability of criteria for assessing which sustainability-related matters (including topics, industries and activities) to prioritise and add to the ISSB's work plan; and
- a proposed list of new research and standard-setting projects that could be added to the ISSB's work plan.

Responses to the Request for Information will help the ISSB prioritise its activities for a two-year period. This period will commence in 2024 following determination of the work plan. The agenda consultation focuses on activities that form part of the ISSB's mission to deliver a comprehensive global baseline of sustainability-related financial disclosures that meet the information needs of an entity's existing and potential investors, creditors and other lenders—the primary users of general purpose financial reports.

This survey has been developed to help stakeholders respond to the questions in the Request for Information. The questions in this survey are identical to the questions in the Request for Information.

The ISSB encourages survey responses to increase its efficiency in gathering, analysing and drawing conclusions from the feedback. The ISSB will nevertheless accept comment letters in lieu of survey responses, which can be submitted by email to commentletters@ifrs.org or online [from the project comment letter page](#).

Your comments on this Request for Information are vital to the ISSB's standard-setting process.

Introduction

Working with the online survey

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

About the survey

- The survey consists of this introduction, an 'About You' section and eight sections containing questions aligned with those in the Request for Information.
 - The 'About You' section must be completed in order to submit your response, but you do not need to respond to all the questions to submit your response.
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Question 1—Strategic direction and balance of the ISSB’s activities.

Paragraphs 18–22 and Table 1 of the Request for Information provide an overview of activities within the scope of the ISSB’s work.

(a) From highest to lowest priority, how would you rank the following activities?

Please drag and drop to rank, where 1 is the highest priority and 4 is the lowest priority.

- 1 supporting the implementation of ISSB Standards (IFRS S1 and IFRS S2)
- 2 beginning new research and standard-setting projects
- 3 enhancing the Sustainability Accounting Standards Board (SASB) Standards
- 4 researching targeted enhancements to the ISSB Standards

(b) Please explain the reasons for your ranking order and specify the types of work the ISSB should prioritise within each activity.

We believe it is very important that the ISSB gives priority to supporting the implementation of IFRS S1 and IFRS S2 in order to assist preparers in avoiding divergent interpretations of the Standards and therefore ensure their consistent application. In particular, the ISSB should fully support the works of the Transition Implementation Group (TIG) in addressing the practical questions that will inevitably arise in the first years of application.

Even companies with relatively mature systems in the sustainability reporting area will probably find this exercise quite complex, at least at the outset. Ensuring that all companies have the same understanding of the requirements is key to fostering comparability. Given that IFRS Sustainability Disclosure Standards (SDS) are principle-based, further guidance and educational materials will probably be needed in the short term to complement what is already included in IFRS S1 and S2. Since the TIG is not empowered to issue guidance, the ISSB should stand ready to provide such guidance and possibly to identify the need to make any urgent targeted amendment in IFRS S1 and S2, whilst allowing for due process to be followed. Wherever possible, such guidance should be aligned with the guidance to be developed by EFRAG in the context of the European Sustainability Reporting Standards (ESRS) so as to maintain a high level of interoperability between both sets of Standards.

If the ISSB shows its willingness to support first-time adoption with a high level of responsiveness and adaptability, jurisdictions should be all the more eager to endorse the IFRS SDS. However, the ISSB should ensure that, though providing effective disclosure will be an evolving process, the requirements do not become a continually moving target. Given this, we believe that researching targeted enhancements, as described on page 14 of the Request for Information (RFI), is the lowest priority for the next two years at least, except insofar as these are responses to urgent implementation problems as noted above. In addition, before issuing new materials, the ISSB should perform appropriate outreach to ensure that the materials fulfil their intent and are clear and understandable.

Beginning new research and standard-setting projects should be the ISSB’s number two priority in order to complement the global baseline consistently with IFRS S1 general requirements to ultimately cover a wide

range of environmental, social and governance topics, beyond climate change and its wider consequences notably on people. To do so, the ISSB should first consider what architecture it wants to adopt as regards sustainability-related topics, sub-topics, etc. to be addressed by IFRS SDS and what is its ambition in terms of progress over the next few years, until the global baseline is finalized. Having a broad overview of the IFRS framework envisaged by the ISSB will help stakeholders to have a clearer understanding of its direction of travel in the field of sustainability reporting beyond the two-year period covered by this public consultation, which is quite a short timeframe for standard-setting purposes. This will furthermore help jurisdictions and companies in their decision to endorse/adopt these standards and to plan ahead in developing systems, processes and controls for the collection and reporting of appropriate data.

As a third priority, we believe the ISSB should work on the enhancement of the Sustainability Accounting Standards Board (SASB) Standards since these Standards are cited as a primary source of guidance for applying IFRS S1 to help entities identify their sustainability-related risks and opportunities and produce sustainability-related disclosures in the absence of specific IFRS SDS. The ISSB should nonetheless provide clarity on its intent with respect to the SASB Standards, along with a clear timeframe (see point (c) below). If it is envisaged that these industry-specific standards become a permanent component of the IFRS SDS architecture, with mandatory application, they need to be revised on a basis consistent with IFRS S1 and S2 and with the ongoing project to make these standards truly suitable for mandatory use on an international basis. Current concerns such as the relatively low attention devoted to social issues in these standards also need to be addressed, requiring significant allocation of resource.

(c) Should any other activities be included within the scope of the ISSB's work? If so, please describe these activities and explain why they are necessary.

- Yes
- No

Optional: please explain

In addition to the activities listed above, we believe the ISSB should, first and foremost, clarify its intent as regards the standards and frameworks that are now under its responsibility considering the consolidation of the Climate Disclosure Standards Board (CDSB) and the Value Reporting Foundation (VRF) which was itself formed from the merger of the SASB Foundation and the International Integrated Reporting Council (IIRC). We also refer to the recent announcement according to which the ISSB will assume the monitoring responsibilities of the Task Force on Climate-Related Financial Disclosures (TCFD) starting in 2024.

Since companies worldwide are currently using these frameworks or standards, we believe it is very important to clearly state the ISSB's intent as regards whether these elements will continue to be monitored and available for use and, if so, for how long. The ISSB should clearly indicate what is intended as regards a transition plan to a single set of sustainability disclosure standards, namely the IFRS SDS, rather than the current fragmentation of ESG disclosure initiatives. Preparers need to have a clear direction and timeline in order to get ready for this transition.

Additionally, and referring to the announcement made in March 2022 as regards the signature of a Memorandum of Understanding between the ISSB and the Global Reporting Initiative (GRI) aiming at coordinating the work programmes and standard-setting activities of the two organisations, it would be useful to clarify what are the ISSB and GRI's objectives for the coming months as regards the creation of an interconnected two-pillar system for sustainability reporting that address the needs of broader stakeholders, not only those of primary users of general purpose financial reports.

Question 2—Criteria for assessing sustainability reporting matters that could be added to the ISSB's work plan

Paragraphs 23–26 of the Request for Information discuss the criteria the ISSB proposes to use when prioritising sustainability-related reporting issues that could be added to its work plan.

(a) Do you think the ISSB has identified the appropriate criteria? Please explain your response.

- Yes
- No

Optional: please explain

We agree with the criteria that have been listed by the ISSB and note that they are consistent with the ones used by the IASB in order to identify its own priorities. However, it should also be pointed out that the maturity of sustainability reporting is not the same as the maturity of financial reporting. In this respect, the criterion number 6 “the complexity and feasibility of the potential project and its solutions” should be considered with greater importance than some other criteria which seem less critical at the time being.

(b) Should the ISSB consider any other criteria? If so what criteria and why?

- Yes
- No

Optional: please explain

We suggest adding another criterion which would consider whether the potential project envisaged by the Board will contribute to the interoperability with other sustainability disclosure standards, including the ESRS. This is particularly critical for European and non-European companies in the scope of the CSRD if they decide, or are required to, also apply IFRS SDS. Duplicative reporting should be avoided wherever possible in order to reduce costs for companies. We also believe that interoperability will help to make the IFRS SDS the global baseline that the ISSB wishes to establish.

Question 3—New research and standard-setting projects that could be added to the ISSB’s work plan

Paragraphs 27–38 of the Request for Information provide an overview of the ISSB’s approach to identifying sustainability-related research and standard-setting projects. Appendix A describes each of the proposed projects that could be added to the ISSB’s work plan.

(a) Taking into account the ISSB’s limited capacity for new projects in its new two-year work plan, should the ISSB prioritise a single project in a concentrated effort to make significant progress on that, or should the ISSB work on more than one project and make more incremental progress on each of them?

- Single project
- More than one project

(i) If a single project, which one should be prioritised? You may select from the four proposed projects in Appendix A or suggest another project. Please explain your response.

- Biodiversity, ecosystems and ecosystem services
- Human capital
- Human rights
- Integration in reporting
- Other—please explain

Optional: please explain

No other comments to provide.

(ii) If more than one project, which projects should be prioritised and what is the relative level of priority from highest to lowest priority? You may select from the four proposed projects in Appendix A or suggest another project (or projects). Please explain your response.

- Biodiversity, ecosystems and ecosystem services
- Human capital
- Human rights
- Integration in reporting
- Other—please explain

Optional: please explain

First, we recognize that it is difficult to decide which new research and standard-setting projects should be put on the ISSB’s workplan for a two-years period starting in 2024 given that all the projects listed by the

ISSB are important and require particular attention as part of standard-setting activities aimed at defining a comprehensive, high-quality framework for sustainability reporting.

We do, however, acknowledge that the ISSB's resources are not unlimited and that in any case (i.e. work on a single project or on more than one project), it is very unlikely that the ISSB will be able to issue another IFRS SDS within such a short period of time as the IFRS Foundation's due process is demanding, unless the ISSB is able to significantly leverage the work already performed by other standard-setters such as EFRAG/the EC or organisations similar to the TCFD.

We also note that the projects on Biodiversity, ecosystems and ecosystem services (BEES), Human capital and Human rights as defined by the ISSB are very broad projects, with overlaps between the last two projects. As regards the BEES project, we are concerned that this project seems to address all environmental topics except climate change through the lens of biodiversity. Even though there are many interactions between all environmental topics, a clearer and more granular approach would help ensuring that each topic is covered in the most relevant and effective way. Besides, such a huge project would preferably be named "Nature" for the purpose of clarity.

This being said, we would recommend starting with the definition of the precise list of topics, sub-topics, etc. the ISSB wishes to address in the coming years (including beyond the period covered by this public consultation) in order to have a clear overview of the envisaged architecture for the IFRS framework as already mentioned under question 1 (b). We believe the ESRS architecture as regards environmental and social matters is particularly relevant since following this would greatly assist with interoperability. This architecture recognises the inter-relations between all environmental and social topics while achieving sufficient clarity of the boundaries between topics to allow separate development of standards. As regards social topics, the ESRS deal with human capital and human rights but consider a granularity depending on the category of affected stakeholders (i.e. employees, non-employees, workers in the value chain, etc.) which allows clearer definition of the topic to be covered than that proposed in this consultation.

Assuming the IFRS architecture would be very close to the one established by EFRAG for the ESRS as this would foster comparability between two well-recognized sustainability reporting frameworks, we believe the ISSB should give equal priority to social topics – focusing on own workforce (see ESRS S1) and workers in the value chain (see ESRS S2) – and to environmental topics, focusing on biodiversity (see ESRS E4). In order to complete the IFRS framework as quickly as possible, it is important for the ISSB to mobilise resources in all these areas in order to respond to stakeholders' needs in the most efficient way.

As regards social topics, we recommend starting work on own workforce (covering both employees and non-employees) as it is probably the project which would be the easier to complete within a reasonable timeframe. Though local regulations may complicate some disclosure requirements, flexibility in the required level of granularity should allow this to be addressed. A major advantage of this project is that data collection with respect to own workforce is overall reliable and based on mature reporting systems. The ISSB should also consider starting a standard-setting project with respect to workers in the value chain to address human rights matters that are not currently sufficiently addressed by regulatory or voluntary frameworks though it is indeed a very important subject.

We also believe biodiversity is a priority with respect to environmental topics considering important interactions with climate change (which is already covered by IFRS S2) and the urgency in this regard as confirmed during COP15 held in December 2022 and which led to the adoption of the Kunming-Montreal Global Biodiversity Framework containing goals and targets to protect and restore nature.

With respect to biodiversity-related financial disclosures, we believe the ISSB could build on the Taskforce on Nature-related Financial Disclosures (TNFD) even though this framework is not as mature as the TCFD framework for climate. We also acknowledge that biodiversity is, as such, a complex topic. The ISSB will thus need time until it is able to adopt a Standard in this regard. Therefore, it is relevant to start research as soon as possible to identify areas of focus to address in this critical topic on which the ISSB should show its ambition.

Lastly, and as mentioned in our answer to the Exposure Draft ED/2021/6 – IFRS Practice Statement on Management Commentary, we repeatedly support the existence of a global standard ensuring the explanation of financial information in relation to sustainability reporting, which would be based and open enough to be applicable in all possible regulatory environments. We still support this and therefore agree that, in due course, a research project should be carried out on integration in reporting. However, we do not consider the ISSB should give priority to this project as it could indeed hinder the development of topical standards. Such project would truly make sense once the IFRS SDS cover all E, S and G topics the ISSB wants to address. When time comes, we believe such a project should be dealt jointly by the ISSB and the IASB.

Question 4—New research and standard-setting projects that could be added to the ISSB’s work plan: Biodiversity, ecosystems and ecosystem services

The research project on **biodiversity, ecosystems and ecosystem services** is described in paragraphs A3–A14 of Appendix A to the Request for Information. Please respond to these questions:

(a) Of the subtopics identified in paragraph A11, to which would you give the highest priority? Please select as many as applicable.

Please explain your choice and the relative level of priority with particular reference to the information needs of investors. You may also suggest subtopics that have not been specified.

To help the ISSB analyse the feedback, where possible, please provide:

- a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
 - your view on the importance of the subtopic with regard to an entity’s sustainability-related risks and opportunities and the usefulness of the related information to investors.
-
- Freshwater and marine resources and ecosystems use
 - Land-use and land-use change

- Pollution (including emissions into air, water and soil)
- Resource exploitation (for example, material sourcing and circular economy)
- Invasive non-native species
- Other—please specify

Optional: please explain

To enable interoperability with other standards, such as ESRS E4, we believe a project on biodiversity should consider:

- direct impact drivers of biodiversity loss (including climate change, land-use change, fresh water-use, change and sea-use change, direct exploitation, invasive alien species, pollution);
- impacts on the state of species;
- impacts on the extent and condition of ecosystems;
- impacts and dependencies on ecosystem services.

However, and as explained under question 3, a project on biodiversity should be clearly defined and should not be too broad though we acknowledge that biodiversity and ecosystems are closely connected to other environmental matters. Said differently, other IFRS SDS should ultimately also cover pollution, water and marine resources and circular economy.

(b) Do you believe that sustainability-related risks and opportunities related to **biodiversity, ecosystems and ecosystem services** are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

- Yes
- No

Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.

No other comments to provide.

(c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard-setters and framework providers to expedite the project, while taking into consideration the ISSB's focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A13 should be utilised and prioritised by the ISSB in pursuing the project? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the

information needs of investors. If you would like to suggest materials that are not specified, please select 'Other' and give your suggestion(s) in the comment box. You can suggest as many materials as you deem necessary.

To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

- [The Climate Disclosure Standards Board \(CDSB\) Framework application guidance for biodiversity and water-related disclosures](#)
- [The SASB Standards](#)
- The Integrated Reporting Framework
- [The Global Reporting Initiative \(GRI\) standards \(for example, GRI 304 – Biodiversity\)](#)
- [The Taskforce on Nature-related Financial Disclosures \(TNFD\)](#)
- The Partnership for Biodiversity Accounting Financials (PBAF)
- The Capitals Coalition
- [The Science Based Targets Network](#)
- [The European Financial Reporting Advisory Group \(EFRAG\)](#)
- The European Commission's Align project
- The EU Business and Biodiversity Platform
- The World Benchmarking Alliance
- The United Nations Declaration on the Rights of Indigenous Peoples
- Other—please specify

Optional: please explain

[No other comments to provide.](#)

Question 5—New research and standard-setting projects that could be added to the ISSB's work plan: Human capital

The research project on **human capital** is described in paragraphs A15–A26 of Appendix A to the Request for Information. Please respond to these questions:

Of the subtopics identified in paragraph A22, to which would you give the highest priority? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You may also suggest subtopics that have not been specified.

To help the ISSB analyse the feedback, where possible, please provide:

- a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
 - your view on the importance of the subtopic with regard to an entity's sustainability-related risks and opportunities and the usefulness of the related information to investors.
-
- Worker wellbeing (including mental health and benefits)
 - Diversity, equity and inclusion
 - Employee engagement
 - Workforce investment
 - The alternative workforce
 - Labour conditions in the value chain
 - Workforce composition and costs
 - Other—please specify

Optional: please explain

As mentioned under question 3, we believe the ISSB should address human capital matters along with human rights matters, and take an approach that considers, first and foremost, which category of stakeholders is addressed (for instance, employees or workers in the value chain). Due to the intertwined nature of human capital and human rights, it is likely that there will be significant overlap in required disclosures having the effect of increasing the confusion that already exists related to social issues if the ISSB addresses human capital and human rights separately.

By consolidating human capital and human rights, the ISSB will have the opportunity to create a clear architecture which will more easily enable the understanding of “social materiality” and to integrate these into decision making processes. A general foundation for social disclosures is required to enable a broad understanding of risks and opportunities ensuring comparability. Sector or topic specific disclosures would stem from this common foundation.

As the ISSB is aware, human rights are not limited to the value chain but are applicable at all levels of corporate operations. For example, child labour is a specific human right which can be present at the corporate level, not solely in the value chain. By the same token, all entities have a workforce, therefore workforce-related topics such as mental health and well-being should be applied universally, rather than in a separate standard.

We recognise that human rights are broad and as such the intention may be to hasten the development of own workforce disclosures by prioritising them through the human capital definition. We believe this can still be achieved under an approach consolidating human rights and human capital by identifying appropriate stakeholder categories and setting prioritisation by those closest to the corporate entity.

(b) Do you believe that sustainability-related risks and opportunities related to **human capital** are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

- Yes
- No

Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.

We do believe that risks and opportunities related to human rights and human capital will differ across sectors and topics, with further variance by geography due to local customs and laws. A general foundation will support analysis and understanding of universal rights, and sector or topic specific standards may be developed in order to specifically address social risk and opportunity in addition to the general foundation. There are multiple examples of standards and guidance acknowledging these differences, an obvious one being the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and then the topic or sector specific standards that layer onto this foundational guide.

(c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard-setters and framework providers to expedite the project, while taking into consideration the ISSB's focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A25 should be prioritised by the ISSB in pursuing its research? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. If you would like to suggest materials that are not specified, please select 'Other' and give your suggestion(s) in the comment box. You can suggest as many materials as you deem necessary.

To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

- The SASB Standards and related research and standard-setting projects
- [The CDSB Framework for reporting environmental and social information](#)
- The Integrated Reporting Framework
- The Capitals Coalition
- [The International Labour Organization \(ILO\)](#)
- [The European Financial Reporting Advisory Group \(EFRAG\)](#)
- [The Global Reporting Initiative \(GRI\)](#)

- The US Securities and Exchange Commission
- The World Economic Forum (WEF) International Business Council's core metrics and disclosures on sustainable value creation
- Other—please specify: [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Workforce Disclosure Initiative \(WDI\)](#)

Optional: please explain

[No other comments to provide.](#)

Question 6—New research and standard-setting projects that could be added to the ISSB's work plan: Human rights

The research project on **human rights** is described in paragraphs A27–A37 of Appendix A to the Request for Information. Please respond to these questions:

- (a) Within the topic of **human rights**, are there particular subtopics or issues that you feel should be prioritised in the ISSB's research? You can suggest as many subtopics or issues as you deem necessary.

To help the ISSB analyse the feedback, where possible, please provide:

- a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- your view on the importance of the subtopic with regard to an entity's sustainability-related risks and opportunities and the usefulness of the related information to investors.

[See our answer to question 5 \(a\) above.](#)

(b) Do you believe that sustainability-related risks and opportunities related to **human rights** are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

- Yes
- No

Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.

See our answer to question 5 (b) above.

(c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard-setters and framework providers to expedite the project, while taking into consideration the ISSB's focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A36 should be prioritised by the ISSB in pursuing its research? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You can suggest materials that are not specified—please select 'Other' and give your suggestion(s) in the comment box. You can suggest as many materials as you deem necessary.

To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

- [The CDSB Framework for reporting environmental and social information](#)
- The SASB Standards
- The Integrated Reporting Framework
- [The International Labour Organization](#)
- [The UN Guiding Principles on Business and Human Rights and the associated UN Guiding Principles Reporting Framework](#)
- [The World Benchmarking Alliance's Corporate Human Rights Benchmark](#)
- [The United Nations Declaration on the Rights of Indigenous Peoples](#)
- The cross-industry metrics associated with the WEF International Business Council's dignity and equality theme
- [Other—please specify: The European Financial Reporting Advisory Group \(EFRAG\), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)

Optional: please explain

[No other comments to provide.](#)

Question 7—New research and standard-setting projects that could be added to the ISSB's work plan: Integration in reporting

The research project on **integration in reporting** is described in paragraphs A38–A51 of Appendix A to the Request for Information. Please respond to these questions:

(a) The integration in reporting project could be intensive on the ISSB's resources. While this means it could hinder the pace at which the topical development standards are developed, it could also help realise the full value of the IFRS Foundation's suite of materials. How would you prioritise advancing the integration in reporting project in relation to the three sustainability-related topics (proposed projects on biodiversity, ecosystems and ecosystem services; human capital; and human rights) as part of the ISSB's new two-year work plan? Please explain your response.

- Integration in reporting project is a **higher priority**
- Integration in reporting project is a **lower priority**

Optional: please explain

[See our answer to question 3 \(a\) \(ii\).](#)

(b) In light of the coordination efforts required, if you think the integration in reporting project should be considered a priority, do you think that it should be advanced as a formal joint project with the IASB, or pursued as an ISSB project (which could still draw on input from the IASB as needed without being a formal joint project)? Please explain how you think this should be conducted and why.

- Formal joint project
- ISSB project

Optional: please explain

[Given the IASB's current work on connectivity and the work already conducted on the Management Commentary, we support a formal joint project to respond the need to have a comprehensive project on integrated reporting that is consistent with both IFRS Accounting Standards and IFRS Sustainability Disclosure Standards.](#)

(c) In pursuing the project on integration in reporting, do you think the ISSB should build on and incorporate concepts from:

(i) the **IASB's Exposure Draft *Management Commentary***?

If you agree, please describe any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.

- Yes
- No

Optional: please explain

The ISSB could usefully build on the developments made on the concept of value creation under Chapter 3—Objective of management commentary and on the attributes of information under Chapter 13—Completeness, balance, accuracy and other attributes.

(ii) the Integrated Reporting Framework?

If you agree, please describe any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.

- Yes
- No

Optional: please explain

The ISSB could usefully build on the developments made on the concept of value creation under paragraph 2B Value creation, preservation or erosion for the organization, and for others and on the guiding principles with respect to connectivity of information under paragraph 3B Connectivity of information.

(iii) other sources?

If you agree, please describe the source(s) and any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.

- Yes
- No

Optional: please explain

No comments provided.

(d) Do you have any other suggestions for the ISSB if it pursues the project?

No comments provided.

Question 8—Other comments

Do you have any other comments on the ISSB's activities and work plan?

No other comments to provide.