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## Appendix 1. Detailed analysis

### Responses to specific questions raised by ISSB

#### *Descriptions of industries (1a, 2a questions)*

##### *FB-AG industry description (question 1(a))*

1. The industry description in FB-AG is not clearly differentiated from that of the Processed Foods industry (FB-PF) as the former explicitly includes the processing of agricultural products for individual consumption among the activities that it covers. The term 'processing' comprises a broad range of activities, yet the distinction between the FB-PF and FB-AG standards, both of which address overlapping segments of the same value chain, lacks clarity. We recommend defining the scope of 'processing' more precisely to ensure consistent application and avoid ambiguity in reporting requirements.
2. The FB-AG standard's industry description includes trading activities, yet their treatment lacks emphasis, risking inconsistent or incomplete reporting by preparers. Furthermore, the articulation between disclosures related to these trading activities under FB-AG and those under other relevant SASB standards (such as those related to transportation or finance) remains unclear. For instance, the trading of agricultural commodities involves specialised and complex practices, including the use of financial derivatives, which may overlap with activities addressed in the SASB Security & Commodity Exchanges Standard. To ensure clarity and comprehensive coverage, we recommend defining the scope of trading activities more explicitly and clarifying how they interact with related standards.

##### *FB-MP industry description (question 2(a))*

3. The industry description of FB-MP Standard has inserted '**live animal transportation**' as a business activity. It is documented that transport of live animals within the EU mainly happens by road, while outside EU other transport modes are prevalent such as shipment. The distinction with other SASB standards is not clear, for example the SASB Road Transport Standard, which covers activities such as containerised and bulk freight shipment, including consumer goods and a wide variety of commodities.
4. The basis for conclusion of the FB-MP Standard clarifies the exclusion of aquaculture and fishing activities in the industry description due to their absence in SICS and the fact that the business activities and related risks and opportunities associated with aquaculture and fishing differ significantly from the other types of animal products included in the Standard, like poultry and pork. **EFRAG Secretariat proposes to gather further feedback on this matter from EU stakeholders.**

##### *Topics of disclosure (questions 1d, 2b, 3b)*

5. Some disclosure topics are addressed in certain SASB standards, but omitted or represented differently in others (for example, working conditions). The reason for these differences is not fully explained, which may raise questions about the internal consistency of the approach to standards revision and, in particular, for topics that are of a sector-agnostic nature. We recommend explaining the choices made for establishing the topics for standards.

*IF-EU topics (question 3(b))*

6. The IF-EU approach to supply chain management topic aligns with that in previously consulted standards (EM-MM, EM-CM, EM-IS), but differs from the approach in FB-MP and FB-AG, where environmental and social supply chain management are separate disclosure topics. We welcome the introduction of separate social and environmental supply chain topics. This approach reflects the distinction between ESRS social and environmental topics. In addition, it can be also useful for preparers given the provisions related to management relationship with suppliers under ESRS G1. Accordingly, we recommend ensuring the consistent approach in IF-EU.

*Environmental observations*

*IF-EU topics (question 3(b))*

7. The IF-EU standard omits the Energy Management disclosure topic, retaining instead the Greenhouse Gas Emissions & Energy Resource Planning topic. This creates an inconsistency of approach between the standards. To align with general revision approach, we recommend integrating Energy Management as a standalone topic into the IF-EU standard.
8. We note that revised Greenhouse Gas Emissions & Energy Resource Planning topic places emphasis on the transition risks, while the aspects related to physical climate risks are addressed in the revised Operational Resilience & System Reliability topic. This can be considered as a new approach when contrasted with revision of previous standards, notably in the OG Exploration & Production industry, where the Greenhouse Gas Emissions focused on disclosures of scope 1 GHG from variety of sources, while climate transition risks were addressed, if relevant, in the dedicated topic of Climate Resilience. Including rationale for the chosen topics and metrics distribution would be helpful to better navigate the standards and justify any difference in approach between the standards.
9. According to the Basis for Conclusions, ISSB decided not to provide additional guidance on the applicability of disclosure topics for entities engaged in specific activities, because the responsibility for making materiality judgements ultimately rests with the reporting entity (BC 137). However, we observe that other revised standards take position on applicability of the topic to a specific area of activity. This is done, for example, in FB-AG standard and topic of Land Use & Ecological Impacts, which states 'the metrics associated with this topic are intended to capture information regarding direct farming operations'. According to Basis for Conclusions of FB-AG, this is done to simplify the standards application (BC 51-54). In other instances, such as IF-EU, EFRAG Secretariat considers that the guidance on the applicability of topics to specific activities can be useful information for preparers and proposes to recommend to ISSB to elaborate this aspects in more detail.

*Social topics*

*FB-AG (questions 1 c to f); FB-MP (questions 2(d to e); IF-EU question 3(b to e)*

10. Labour conditions in a company's own operations currently apply only to the FB-AG, while Community Relations and Rights of Indigenous Peoples apply only to the IF-EU. As all three industries are significantly exposed to these risks, expanding the applicability of these topics across the three standards would enhance consistency and standardisation.
11. For topics that are inherently sector agnostic, we encourage the ISSB to consider consolidating them within a future Human Capital standard. This would promote consistency and interoperability with frameworks such as ESRS and GRI. Sector-specific SASB disclosures could then focus on outcome-based metrics tailored to the specific characteristics of each sector. We acknowledge that this recommendation is dependent on the direction of the ISSB's Human Capital project.
12. The topic 'Community Relations & Rights of Indigenous Peoples' refers to several ICF standards (IF-EU-210a.1.4). If this topic was to be replicated for FB-AG and FB-MP (as per

mentioned recommendations), these references to ICF performance standards would also need to be extended to these sectors.

13. Unlike the IF-EU proposed standard, the FB-AG and FB-MP proposed standards do not include affordability as a reporting topic. This is an area that will be further explored by Secretariat during the public consultation.

*FB-MP (question 2(b))*

14. Food waste is a topic in FB-AG, but not in FB-MP. The meat, poultry and dairy industry makes perishable products, and therefore this topic is also relevant there .

*FB-AG (question 1(d)): Deletion of the GMO Management disclosure (FB-AG-430b.1. Discussion of strategies to manage the use of genetically modified organisms (GMOs))*

15. This topic and its disclosure have been deleted with the justification that the topic no longer generates as much attention as it did. This is not a strong reason for eliminating something that can still generate strong responses among consumers. Even if there is less attention now that can change easily. The Basis for Conclusions also states that 'GMO regulations have been stable in recent years', but the EU regulatory framework for GMOs is changing with the forthcoming Regulation on New Genomic Techniques (NGTs), which introduces a two-tier regime for market access, labelling requirements, identity-preservation systems and eligibility for organic production. This has financial consequences for producers linked to EU markets, including costs of segregation, compliance with member state opt-out rules for cultivation, and strategic positioning in non-GMO and organic value chains. The EU is a major importer of feed materials (notably soy and maize); therefore, these issues remain central for global producers. Given consumer sentiment and a dynamic regulatory environment, deleting GMO/NGT disclosures means reducing decision-useful information.
16. Finally, the Basis for Conclusions justifies the proposed deletion by comparing it to a proposed deletion in the 2025 Processed Foods draft standard. This comparison is not appropriate because the deleted metric FB-PF-270a.2 was a limited disclosure change addressing a specific type of market claim. In contrast, the proposed amendments to the Agricultural Products standard eliminate the entire GMO Management disclosure topic, which covers upstream operational issues such as seed use, production systems, traceability, and regulatory compliance. These upstream factors remain material, particularly for producers serving markets with evolving or stringent rules such as the European Union.

*Architecture of and consistency between the three draft standards*

17. Some topics are only included in one or two draft standards:
  - (a) 'labour conditions', which is only in FB-AG, although the other two standards mention 'labour conditions' under 'supply chain management',
  - (b) 'Social Supply Chain Management' is only a standalone topic in FB-AG and FB-MP. Similarly, only Processed Foods had a section on Social Supply Chain Management among the SASB 2025 draft standards.
  - (c) 'community relations and rights of indigenous peoples', which is only in IF-EU.,
  - (d) 'employee recruitment, development & retention' which is only in IF-EU. Further research should be conducted to assess if this topic would also be material for FB-AG.
18. The reasons why such topics have not been replicated across the three standards are unclear and raise questions in terms of completeness of material risks and opportunities identified for these industries. In keeping with our response to the 2025 SASB consultation, we believe that these topics should be replicated across the three standards for consistency and considering their relevance to the three sectors. The rationale for including the following topics has been described below:

- (a) 'Labour conditions': these are sector-agnostic topics. And the question raised is how labour-related disclosures in sectoral SASB standards would relate to and differ from disclosures included in a future ISSB standard on human capital.
  - (b) 'Social Supply Chain Management': having this topic in all standards would improve consistency and align better with the steps of due diligence and the ESRS approach, which supports preparers in reporting on how they manage risks and opportunities.
  - (c) Community relations and rights of indigenous peoples: the risks and opportunities on communities relations and rights of indigenous peoples connected to the food and beverage sector have been well documented in reports from a variety of stakeholders and also reflected in the sustainability statements of several preparers reporting under ESRS.
  - (d) 'Employee recruitment, development & retention', we understand that labour shortages can be particularly challenging for the industry because of the growing need for highly skilled workers in the energy transition and this is a topic reported by some ESRS reporters in 2025. However, the agricultural and meat, poultry, dairy sectors can also face labour shortages of low skilled as well as high skilled workers. Machinery is widely used and digitalisation also changes the way these sectors work. Therefore, we suggest exploring if this topic could be expanded in other standards and if it would be sector-agnostic.
19. Scope and definition of 'Labour conditions' The scope of 'labour conditions' is unclear. The disclosure under FB-AG-310a.1 include the prevention and detection of child and forced labour, as well as information on other violations of internationally recognised labour rights and norms, or serious violations of local law or the entity's policies. The term may create confusion with the more common term 'working conditions', which is also used in ESRS S1. It evokes topics like working hours, workplace health and safety, wage adequacy, representation by union or staff reps, holiday entitlements, collective bargaining etc., none of which are mentioned under 'Labour Conditions' in FB-AG. Preparers are thus required to disclose how they monitor and manage labour conditions without being told what those entail. The absence of a proper definition could affect standardisation and interoperability with ESRS.
20. We recommend defining 'labour conditions' and applying this definition consistently across the different metrics and sub-metrics and standards. It is currently unclear how the term 'labour conditions' interacts with the definition of 'working conditions', used in ESRS S1. The wording of Point 3 of FB-AG-310a.1 highlights forced labour and child labour, and very broadly refers to disclosure requirements regarding 'other violations of internationally recognised labour rights and norms'. In order to enhance interoperability with ESRS, it would be beneficial to clearly articulate and specify the labour rights and norms included in the scope of 'labour conditions' and particularly, whether 'working conditions', used in ESRS, are also to be included.
21. In addition, we note that 'labour conditions' also appears under 'social supply chain management' in FB-AG and FB-MP, but not with the same meaning as in the standalone topic 'labour conditions'.
22. As mentioned in the 2025 consultation response, we would encourage the ISSB to approach workforce health and safety disclosures in a sector-agnostic manner and apply them consistently in all sector standards, while allowing industry-specific disclosures to complement this baseline where justified by particular occupational risks. Apart from improving clarity and comparability, this would also avoid inconsistencies between FB-AG, FB-MP and IF-EU. For example, the disclosure of average hours of health, safety and emergency response training is required in FB-MP (FB-MP-320a.1. (3)) and in IF-EU (IF-EU-320a.1. (3)) but not in FB-AG. FB-MP-320a.2 ('Description of efforts to assess, monitor and mitigate acute and chronic health conditions arising from workplace hazards') is also only required in FB-MP. Finally, there is no apparent reason why a 'description of management

systems used to foster a safe working environment' is only required in IF-EU, but not FB-AG and FB-MP.

*Governance topics*

*Government assistance*

23. Undertakings in FB-AG and FB-MP operate in a generally heavily subsidised sector. Dependency on government assistance, through mechanisms such as the EU Common Agricultural Policy (CAP) or the US Farm Bills, is a relevant financial dimension that cannot be assessed through current SASB disclosures. While the IF-EU requires metrics related to planned sources of funding (including internal resources, external financing, and grants or third-party assistance) in the context of 'Energy Affordability', an equivalent metric is absent in FB-AG and FB-MP. We argue that SASB could consider in FB-AG and FB-MP also a topic focusing on undertaking's funding structure, in particular its dependency on government assistance and the strategic risks arising from potential changes to agricultural policy. In addition, across all three standards, the linkages between government assistance and competition should also be addressed.

*Animal health and welfare*

24. The FB-MP addresses two separate but related disclosure topics 'Antibiotic use in animal production' and 'Animal Health & Welfare'. The BfC explains the rationale for separating these issues, namely, to create a distinction between the risks and opportunities related to the effects on human health (in the case of Antibiotic use) and the ones related to animal welfare practices (in the case of Animal Health & Welfare). We consider this distinction to some extent artificial. For example, the (mis)use of antibiotics has a direct effect on animal health, which can cause diseases, which is what the Animal Health & Welfare topic aims to capture. Conversely, metrics related to biosecurity and disease management information are also relevant in assessing risks to human health, since the effects of a disease outbreak are not necessarily confined to the animal/livestock population.
25. Moreover, the focus specifically on antibiotics represents a relatively narrow scope, given the broader range of veterinary medical treatments, including anti-inflammatory drugs, growth-promotion treatments, and hormones<sup>1</sup>, which are also relevant to both animal health outcomes and human health risks.
26. Given the two previous points, EFRAG suggests that SASB consider consolidating the two topics into a single overarching disclosure topic, including a metric that covers a broader range of the use of relevant medical products. **EFRAG Secretariat proposes to gather further feedback on this matter from EU stakeholders.**

*Other topics – Digital transformation and just transition*

27. We encourage the ISSB to explore whether industry specific disclosures, particularly for the IF-EU, but also for FB-AG, could be expanded to reflect the ongoing and future climate and digital transitions currently reshaping these industries and affecting business models. This could include developing and consulting on sector specific metrics that allow companies to explain their transition strategies, including related targets.
28. Overall, in the energy sector, just transition and digital transformation have been frequently reported by preparers as material risks and opportunities under ESRS in 2024 and 2025. Companies recognise that their business models are evolving and that resilience increasingly depends on human capital. These transitions can affect employees (e.g., upskilling to improve retention), communities (including Indigenous Peoples for vertically integrated companies), and consumers (e.g., energy affordability and access).

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<sup>1</sup> As identified in GRI 13: Agriculture, Aquaculture and Fishing

29. Connected dynamics apply to the food and beverage sector. Sustainability related shifts across the value chain, including workforce impacts and growing consumer expectations for transparency through mechanisms such as traceability are being observed. We thus consider that disclosure such as those related to certification data may not be the most effective or informative approach to reflect the risks, opportunities and impacts connected to the context of digital transformation and just transition.

*Metrics and technical protocols (questions 1e, 2c, 3c)*

*Environmental metrics*

30. We consider that revisions to proposed metrics and technical protocols need to be done in a way that ensures consistency of approach between the standards.
31. As indicated already in our comment letter sent in 2025, we observe potential duplication and redundancy between IFRS S2 and the climate-related content of SASB standards. This refers, for example, to provisions related to targets such as FB-AG-110a.2 or FB-MP-110a.2 that repeat the IFRS S2 requirements. We recommend eliminating the redundancy between standards to reduce complexity for preparers and users of reports.

*FB-AG metrics (question 1(e))*

32. The FB-AG-110a.3 related to total fleet fuel, although based on the EM-SV-110a.1 included in the 2025 revision could benefit from the further alignment between revised standards. It can be noted that the EM-SV equivalent provision introduces additional methodology details, notably for use of the lower heating values from fuels. We note that including the provision related to LHV in FB-AG would not only be favourable for consistency of approach between standards, but it is also an important element for the interoperability between IFRS and ESRS.
33. The addressing of nitrous oxide (N<sub>2</sub>O) emissions in the FB-AG standard needs harmonisation with the topic description. While the GHG management topic summary acknowledges fertiliser use as a source of direct emissions, N<sub>2</sub>O is not explicitly addressed as a distinct metric - unlike methane (CH<sub>4</sub>) in the Meat, Poultry & Dairy standard. This raises a question of whether N<sub>2</sub>O should not be specifically highlighted to ensure consistency in disclosure requirements.
34. In addition, the FB-AG standard introduces a topic of Food Loss & Food Waste while narrowing down the quantitative metrics to the food loss defined by FAO. Considering the broader relevance of waste in the industry, acknowledged by the description of the topic, EFRAG Secretariat proposes to investigate this point further.

*FB-MP metrics (question 2(c))*

35. Addressing methane emissions across standards requires further harmonisation. Topic summary of FB-MP highlights releases of methane as likely matter for the industry – in line with that, some GHG metrics, such as FB-MP-110a.1, include provision on the % of methane. This approach resembles other industries, such as EM-EP, consulted in 2025. However, the standards differ in the approach with regards to the targets. It is not clear why methane targets were included in EM-EP-110a.3, but not in FB-MP-110a.2, despite both standards identifying methane as likely material.

*IF-EU metrics (question 3(c))*

36. The metrics IF-EU-110a.7 Description of how climate-related transition risks and opportunities influence capital strategy and investments is intended to be limited to transition risks and 'does not include climate-related physical risks' (paragraph 3). This can be seen as contradicting the provision of 4.2 within the same metrics, which requires including information about resilience to climate-related physical risks. EFRAG recommends clarifying the scope of this disclosure.

37. We also note the need for a consistent approach to addressing GHG targets. Nine of the revised standards maintain a separate metrics for GHG targets. In 2025, EFRAG commented that these amendments potentially replicate IFRS S2 (27, 33-35) without providing sector-specific content. We understand that according to BC provided by ISSB, while noting the feedback received, the consulted standards do not take a significantly different approach to metrics than 2025 amendments. At the same time, the IF-EU revision deviates from the previous approach by deleting IF-EU-110a.3 dedicated to GHG targets. Instead, it introduces new provisions under technical protocols of other disclosures, seeing them as 'factors' (IF-EU-110a.7 paragraph 4.5). While this approach has merit and we recognise that ISSB intention may have been to avoid duplication with IFRS S2, the change introduced in IF-EU creates inconsistencies comparing to other consulted standards.
38. The climate-related disclosures location within the topics raises concerns about coherence. The IF-EU introduces climate-related metrics under *GHG Management* (IF-EU-110a.6) and *Operational Resilience & System Reliability* (IF-EU-550a.4). In addition, the climate-related risks are also a part of disclosure IF-EU-240a.5. within *Energy Affordability* topic, as well as IF-EU-420a.4. in *Demand Side Management*. A less fragmented approach to locating such metrics would improve coherence and comparability, as well as reduce the burden on preparers.
39. The published materials underline that the ISSB decided not to add metrics on scope 1, scope 2 and scope 3 GHG to all SASB standards to avoid duplication with requirements in IFRS S2. EFRAG, in its feedback of 2025, noted several instances where this principle could be further enforced. In this consultation, we note that IF-EU sets out a new precedent by requiring the disclosure of the scope 3 category 3 greenhouse gas emissions (IF-EU-110a.2). While the need to address specific categories of scope 3 emissions in the SASB standard may be of interest, we recommend adopting consistent approach across the revision.
40. IF-EU-110a.5 (3) requires disclosing information about how an entity plans to comply with applicable jurisdictional law or regulation to discontinue any of the major energy sources it uses. It can be noted that this requirement presents certain overlap with IF-EU-110a.7 (4.1) requiring to describe jurisdictional or industry climate-related regulations that could influence its investment in specific energy sources or technologies. To reduce complexity, we recommend streamlining the disclosures or precisising the difference between these two requirements, in particular in light of BC153 that states IF-EU-110a.7 is dedicated to narrative information which provide context to quantitative IF-EU-110a.5.
41. We also suggest a closer alignment of the language between climate disclosures in IF-EU and IFRS S2 – for example, IF-EU-110a.6 that states 'planned capacity includes the entity's investment and disposal plans, such as plans to which the entity is not contractually committed', unlike the language of IFRS S2 which uses 'for example (...) including plans the entity is not contractually committed to'.

#### *Social metrics*

42. We also reiterate our previous comments regarding the inclusion of the IFC Performance Standards as part of SASB disclosure requirements as well as the absence of reference to IFC Performance Standard 7 on Indigenous Peoples. These standards overlap substantially with the some SASB disclosures and we would welcome clarification as to how they articulate with SASB disclosures, both in terms of their process and objectives. In addition, the IFC Performance Standards (dating from 2012) may not reflect recent developments in business and human rights, nor the evolution of soft law and hard law frameworks. We also note that the IFC is undertaking a revision of its Sustainability Framework, including the Performance Standards, for 2026–2028. We would welcome further clarity on how SASB intends to reflect these factors, including the exclusion of IFC Performance Standard 7 on Indigenous Peoples
43. Articulation of financial materiality and references to impact In 'social supply chain management' the list of 'processes, controls and procedures to monitor, manage and oversee labour conditions and impacts on local communities in the supply chain including

human rights due diligence' (under FB-MP-430c.1.2 (items 1–6); FBAG-430d.1 (items 1-6) is well aligned with the UNGPs and OECD MNE Guidelines, as well as related guidance. We also note similar alignment with the reference to human rights due diligence and related processes under the 'labour conditions' metrics (FB-AG-310a.1) and with 'due diligence practices' under the topic 'community relations & rights of indigenous peoples' (IF-EU-210a.4.). These references are also broadly consistent with the steps described in the ESRS.

44. In keeping with our response to the 2025 SASB consultation, we believe that the references to human rights due diligence generally signals an impact materiality perspective, in line with international standards such as the UNGPs and OECD MNE Guidelines. Conversely, SASB disclosures are directed toward a financial materiality approach. While impacts on human rights and processes to identify and address them may also inform a financial materiality assessment, the references to impacts and human rights due diligence and the steps of due diligence in metrics across SASB standards could create confusion for preparers. This may be particularly the case for preparers, reporting under double materiality. They could interpret these references as signalling that the metrics extend to impact materiality, thus affecting the information disclosed.
45. Moreover, no clear definition of 'impact' is provided. Providing such a definition would also be an opportunity to 1) clarify the role of impacts in the SASB standards and articulation with financial materiality; 2) explain how the concept relates to the notion of impacts as defined in ESRS, thereby enhancing interoperability between the frameworks.

#### *Consistency between draft standards*

46. Due diligence is mentioned in all three draft standards, but not under the same topics and metrics and not for the same stakeholders. Due diligence and its different steps are included in the FB-AG and FB-MP standards under 'social supply chain management' (FB-AG-430d.1, FB-MP-430c.1). 'Labour conditions' in FB-AG includes disclosures about human rights due diligence and its steps as a process to manage and oversee labour conditions in the entity's direct operations (FB-AG-310a.1). IF-EU-210a.4 refers to due diligence, and its different steps are included under 'community relations & rights of indigenous peoples' where they apply specifically to due diligence in relation to indigenous peoples' rights. It is unclear why reporting about the steps of due diligence is not applicable to workers in own operations and to supply chains in the IF-EU sector and why the same steps are not applicable to indigenous people in FB-AG and FB-MP. Besides, it is unclear why due diligence is only explicitly required for indigenous peoples in the IF-EU sector and not for local communities in general.

#### *Certification*

47. The draft standards FB-AG and FB-MP require that companies disclose certification schemes they use for evaluating compliance with criteria and standards for food safety (FB-AG-250a.4, FB-AG-250a.5, FB-MP-250a.5), freedom from deforestation in their supply chain (FB-AG-430c.1, FB-MP-430b.1), social supply chain management (FB-AG-430d.2, FB-MP-430c.2) and animal welfare (FB-MP-410a.3). Certification can support risk management, but we believe such information can be of limited use only for users of sustainability statements. Aside from the well-documented shortcomings of some certification schemes, the problem is one of transparency. Users of sustainability reports should be able to understand what the company does to ensure compliance with applicable standards, but certification relies on methods owned and developed by certifying organisations which may not allow for sufficient transparency.

#### *Third-party audit or verification*

48. The metrics on third-party audit verification (FB-AG-430d.3, FB-MP-430c.3 and IF-EU-430a.) risk incentivising quantity of audits over quality, thereby undermining effective risk mitigation and prevention, in light of the well documented shortcoming of audit schemes. Whilst we understand the contribution of such tools to managing risks and opportunities we

recommend the ISSB consider how to refine and complement metrics on third-party audit verification to avoid such a situation.

*Social and community related elements under 'environmental supply chain management'*

Ensure Consistency Between FB-AG430c.1 and FB-AG430c.3, aligned with EUDR

49. The 'environmental supply chain management' topic incorporates social and community related elements, such as engagements and partnerships with farmers and local communities, including indigenous peoples, and disclosure of investments to support sustainable agriculture practices under FB-AG430c.3. However, FB-AG430c.1 remains restricted to environmental status (deforestation/conversion free) and omits social aspects of due diligence. To enhance decision usefulness and interoperability, we recommend aligning FBAG430c.1 with FBAG430c.3 disclosures on land use rights, human and labour rights, and the rights of indigenous peoples (including FPIC where applicable). Alternatively, we recommend better articulating the social aspects of due diligence relevant under this topic with the topic of 'social supply chain management'.
50. The proposed changes would also ensure alignment with the EU Deforestation Regulation (EUDR), which mandates that operators demonstrate both 'deforestation free' status and legality in the country of production before placing relevant commodities on the EU market. The EUDR specifically incorporates the principle of Free, Prior and Informed Consent (FPIC) as well as respect of labour rights, human rights<sup>i</sup>. In turn, it will also improve comparability and financial relevance of disclosures for investors, given the clear implications for, inter alia, capital allocation, and supply chain costs.

*Traceability*

51. In keeping with our comments in the 2025 SASB consultation, we believe that the draft standards do not address the issue of traceability satisfactorily. FB-AG and FB-MP do not sufficiently address traceability, despite the fact that its importance is recognised in several jurisdictions, including the EU.<sup>1</sup> In FB-AG, the only explicit reference to traceability appears in proposed metric FB AG 430d.2, which captures only the percentage of sourced agricultural products certified to standards that 'trace the path of products through the supply chain'. This metric is narrowly limited to certification of procured inputs and does not address operational traceability requirements such as chain of custody systems, segregation and identity preservation, batch level documentation, or animal origin tracking, all of which are necessary to demonstrate regulatory compliance in key markets.
52. There are no traceability-related expectations at all in FB-MP. That means no metrics or protocols referencing livestock movement traceability, feed to farm verification, carcass or slaughterhouse traceability, origin documentation, or export compliance traceability systems. Given the legal traceability requirements for meat, poultry and dairy products in the EU, and the increasing reliance on tracing to meet sanitary, deforestation, and import control rules, there is a gap that should be addressed.
53. Therefore, the absence of operational traceability metrics in FB-AG and FB-MP does not seem to reflect the sector specific financial risks associated with export eligibility, compliance costs and market expansion.

*IF-EU-240a.3 (1) Number of residential customer electric disconnections for non-payment, (2) percentage reconnected within 30 days*

54. We question the rationale for deleting disclosure IF-EU-240a.3. This is a simple and easily comparable metric that gives users decision-useful information about how much the reporting company is exposed to affordability risks with regard to its residential customers. It would not have to be a stand-alone disclosure anymore but could be integrated into the new disclosure IF-EU-240a.6 ((1) Number of active participants and (2) number of eligible participants in energy affordability-related actions or programmes, disaggregated by (a) residential, (b) commercial and (c) industrial participants).

*Consistency between SASB standards*

55. As explained in sub-section on the architecture of and consistency between the three draft standards, it is unclear why the topic 'community relations & rights of indigenous peoples' is in IF-EU, but not in FB-AG or FB-MP. FB-AG and FB-MP acknowledge the importance of reporting on community relations and the rights of indigenous peoples by including references to them under 'social supply chain management' and in FB-AG-430c.3, but they do not elevate them to a stand-alone topic. These three sectors also have strong connections with land-related issues. Elevating them to a topic would emphasise the importance of community relations and rights of indigenous people issues for the three sectors, facilitate reporting for preparers and improve comparability. At the level of specific disclosures, IF-EU includes a disclosure about engagement processes (IF-EU-210a.4 Description of engagement processes and due diligence practices related to upholding Indigenous Peoples' rights'), but there are no equivalent disclosures in FB-AG and FB-MP. However, these sectors are also closely connected to issues such as sovereignty over natural resources. Correcting this inconsistency would also be in line with ESRS where engagement is covered in much the same way for all affected stakeholders.
56. Disclosure FB-AG-430d.1 ('Processes, controls and procedures for managing labour conditions and impacts on local communities in the supply chain, including human rights due diligence') and the identical disclosure in proposed standard FB-MP (FBMP-430c.1) combine disclosures on supply-chain labour conditions with disclosures on community risks and opportunities. ESRS separate disclosures on value-chain workers (ESRS S2) from disclosures on affected communities (ESRS S3), since these stakeholder groups require different due-diligence processes and give rise to different material risks and opportunities. The combined SASB disclosure obscures these distinctions and results in aggregated information that is less comparable, and ultimately less useful for assessing risks, opportunities and reporting on due-diligence quality.
57. The ESRS S3 refers 'human rights defenders'. In FB-AG, FB-MP and IF-EU, while such issues could potentially be captured under the reference to 'negative impacts on local communities, including Indigenous Peoples'. This could be an area of further exploration from the ISSB as 'human rights defenders' are not mentioned explicitly.
58. We note the absence of reference to conflict-affected and high-risk area ("CAHRA") across the different standards, in spite of the potential financial materiality that operations in such areas can represent in the value chains of preparers' activities in the different industries, in particular for FB-AG and IF-EU. We would welcome some clarifications as to the reasons why this topic has not been included.
59. Disclosure on indigenous peoples' right to free, prior and informed consent (FPIC) is treated differently between ESRS and proposed standards FB-AG and FB-MP (FB-AG430d.1 and FB-MP-430c.1). The latter use rather soft language like '*promot[ing]* the use of free, prior and informed consent (*or consultation*) processes when engaging with indigenous peoples' [emphasis added]. ESRS, on the other hand, require disclosure about how companies ensure respect for the rights of indigenous peoples in stakeholder engagement, including their right to FPIC. Replicating the topic of 'Community Relations & Rights of Indigenous Peoples' and its references to FPIC across the three standards would also support more consistent disclosure across sectors.
60. The disclosure 'IF-EU-210a.1. 'processes used to manage risks and opportunities associated with community rights and interests' does not define 'community rights' but provides a list of what such 'rights and interests' include. The difference, or connection, between 'rights' and 'interests' could be clarified. In addition, this list includes terms whose understanding may vary depending on preparers, thus affecting standardisation efforts (e.g. 'fair wage', 'respect for infrastructure', etc.), unless these would be specifically defined. The revised ESRS topical standard S3 on affected communities opens with a paragraph on objectives that links the standard to international and European human rights instruments and conventions

(para. 4) and lists examples of rights (para. 5) and not 'interests'. Moreover, a definition of 'affected community' is provided in the revised ESRS 'Annex II – Aggregated acronyms and glossary of terms'. The metric IF-EU-210a.1 might similarly benefit from the same clarity, fostering further alignment with revised ESRS S3.

*IF-EU-240a.4 Discussion of impact of external factors on customer affordability of electricity, including the economic conditions of the service territory*

61. We note the deleted disclosure IF-EU-240a.4. No justification for this deletion is given in the Basis for Conclusions, and there is no apparent reason why a disclosure that can give users decision-useful information about external risk factors to the company's revenues has been deleted. The main content of IF-EU240a.4 could be integrated into the new comprehensive metric IF-EU-240a.5 (*Description of energy affordability-related risks and opportunities and strategies to manage them*). In a world where climate, trade and geopolitics are becoming less predictable, the potential impact on a company's revenue and balance sheet of factors over which it has no control is likely to increase. IF-EU-240a.5 also covers those external factors to some degree, but not explicitly. It would be good to give them more visibility.

*FB-MP-410b.1 Use of innovation in food products to address sustainability-related risks and opportunities.*

62. Innovative food products cater to a growing health- and sustainability-conscious consumer segment, but these products can also be subject to higher risks of greenwashing with financial effects for the company. Disclosure FB-MP410b.1 could therefore be supplemented by a requirement that the company describes how it makes sure that information to consumers, especially product-level information, is accurate, especially in its marketing division, if it does engage in food product innovation of this kind. Strategy disclosures on their own do not serve that purpose equally well.

*Governance metrics*

*Certification*

63. In addition to the comments in paragraph 47, EFRAG recommends that SASB make it more explicit that the list of relevant standards for certification is illustrative and non-exhaustive to better reflect practices in various jurisdiction. One option to achieve this, while also enhancing consistency across metrics, would be to use the formulation 'Examples of [xxx] include:', as already applied in FB-MP-430c.2 and FB-MP-410a.4.
64. Furthermore, we would like to highlight the absence of reference to the World Organisation for Animal Health (WOAH), a recognized science-based intergovernmental organisation, whose standards are integrated into EU animal health and welfare legislation.

*Third-party audit or verification*

65. Similar to the comments in paragraph 48 the metrics on third-party audit verification for animal welfare included in FB-MB standard (FB-MP-410a.3.) risk incentivising quantity of audits over quality, thereby undermining effective risk mitigation and prevention, in light of the well documented shortcoming of audit schemes.

*Cyber-security incidents*

66. The IF-EU includes a metric on cyber security (IF-EU-550a.1.). This metric is useful, particularly considering the highly critical nature of the energy sector and electricity subsector, which is defined as such by the EU Network of Information Security Directive (NIS 2<sup>2</sup>). Additionally, as cybersecurity incidents may arise independently of regulatory non-compliance, the new formulation represents a clear improvement over the current version of the metric, helping users assess operational resilience and risk exposure. EFRAG also highlights that cybersecurity incidents in the IF-EU industry can have far-reaching

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<sup>2</sup> Directive (EU) 2022/2555

consequences across multiple dimensions. On the one hand, such incidents may disrupt electricity infrastructure, compromising the reliability of energy supply. On the other hand, they may involve network intrusions and data exfiltration. In these situations, while the immediate impact may be limited, the theft of sensitive or classified information can still undermine information security and system resilience, potentially enabling future disruptions. **EFRAG Secretariat proposes to gather further feedback on this matter from EU stakeholders.**

*Trading activities and live animal transportation*

67. While 'trading activities' are mentioned in the industry description for the FB-AG (see para 2 of this paper), no particular emphasis is placed on them in the metrics or technical protocols. There might be a risk that some preparers do not consider them the scope of their reporting.
68. A similar remark can be made regarding 'live animal transportation' (see para 3 of this paper). These activities are introduced in the industry description of the FB-MB standard but there are no specific metrics requiring information related to transportation. For example, non-compliance with applicable legislation<sup>3</sup> poses a risk to the company and can increase costs. Scientific evidence has shown that transporting animals in poor conditions over long periods of time or over long distances has negative consequences on animal welfare. Besides, animal transportation can contribute to the risk of transmissible animal diseases. Information on strategies and/or investments to mitigate these negative consequences and risks could provide decision-useful information.

*Specific comments on the Agricultural Products standard*

69. The metrics FB-AG-160a.3 Total area of land sustainably managed, by product, and FB-AG-160a.6 Description of strategies to manage environmental resources and implement sustainable agriculture practices in direct farming operations do not provide clarity on how to report on sustainably managed land at the supply chain level.
70. Disclosures relating to **pesticides and fertilisers** are limited to how these inputs are used in sustainable farming practices. It is unclear why there is not a broader disclosure requiring preparers to disclose the extent to which their supply chains rely on pesticides and fertilisers, this would support a better assessment of a preparer's dependence on specific inputs and provide greater transparency regarding potential exposure for workers and local communities to these products (or substances).
71. References to **organic food production**, and a breakdown of production according to relevant certification schemes, could be considered, with appropriate adjustments, for the MP standard, particularly under 'Land Use & Ecological Impacts'.

*Interoperability (questions 1g, 2f, 2e)*

72. Preparers have emphasised that alignment on key concepts and terminology is essential for interoperability across sustainability standards. We have therefore assessed several concepts where additional clarity could support application.

*Social definitions*

73. The term *labour conditions* is not defined and appears to be used inconsistently across the three draft standards. It is also unclear how this term relates to *working conditions*, which is more commonly used in ESRS and is a critical concept in the context of labour rights.
74. Similarly, while we welcome the use of the term *non-employees* and the corresponding disaggregation of health and safety metrics, we note differences between SASB's definition, based on control of work, and applicable to self-employed individuals, agency workers, and third-party workers, and the definition used in ESRS. The ESRS defines these categories

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<sup>3</sup> EU animal transport legislation: this provides the EU baseline that member states must respect to ensure animal welfare during transport.

within the concept of 'own workforce', which includes workers provided by undertakings primarily engaged in employment activities (NACE Code N78). Further alignment on this point would help ensure consistent application by preparers as there is a difference in scope between the two sets of standards

75. At a general level, the SASB standards refer to similar steps for managing risks as ESRS. At a granular level, however, it is more difficult to see alignment, both in terms of the steps and their sequence, which could affect interoperability. This may be exacerbated by the lack of a topical standard that is the foundation for social and human rights disclosures.

*Scope of entities covered by 'Social Supply Chain Management' in FB-AG and FB-MP*

76. The proposed SASB standards do not define 'supply chain', unlike ESRS revised. Although the SASB industry description refers to entities that 'produce, trade, process and distribute' the management approach reflected under the topic of 'Social Supply Chain Management' focuses primarily on the supply chain, contrary to the ESRS, that explicitly address the impacts, risks, and opportunities across the entire upstream and downstream value chain.
77. The difference in the scope of the 'supply chain' across the two standards creates a risk that issues arising downstream of a company's operations, beyond its direct suppliers, may not be adequately captured by SASB standards. This may also limit comparability and interoperability with the ESRS, which explicitly addresses impacts, risks, and opportunities across the entire value chain.

*Topics to which due diligence and related steps apply*

78. As noted above, all three standards include references to due diligence steps, but under different topics and with regard to different constituencies/stakeholders. This could affect inter-operability with ESRS where disclosures related to due diligence are defined in a way that applies to all sectors by default and are split between the equivalent IFRS S1 and sector standards. In addition, these disclosures apply to topics considered material for wider constituencies/stakeholders: own workforce, workers in the value chain, affected communities, and consumers and end users.

*Governance*

*Architecture and consistency between and within the three draft standards*

*Governance disclosure*

79. FB-AG and FB-MB includes requirements regarding the governance bodies and management's role relating to oversight of 'labour conditions' (FB-AG-310a.1. FB-AG-430d.1. FB-AG-430d.1. FB-MP-430c.1. 5.1,5.2 and 5.3. as well as specific provisions to disclose information about the governance processes, controls and procedures it uses to monitor, manage and oversee 'food loss and food waste (FB-AG-150a.2); while IF-EU Standards refers to 'governance mechanisms to monitor workforce compliance (IF-EU-210a.4). The respective technical protocols also refer to paragraphs 26-37 of IFRS S1. As IFRS S1 includes the core content to be reported regarding the **governance processes, controls and procedures an entity uses to monitor, manage and oversee sustainability-related risks and opportunities** there is no need to repeat this provision within each standard. Moreover, it is not clear why the current provisions in each standard only speak to risks and opportunities related to 'labour conditions, workforce compliance and food loss and food waste).

*Sustainability risks and opportunities*

80. The FB-MB includes a metric requiring entities to provide a **description of risks and opportunities** related to biosecurity, including **strategies** for disease management (FB-MP-410a.5.). It is unclear why there is a need for this particular metric with the focus on biosecurity. In fact, IFRS S1 includes the core content to be reported regarding the sustainability risks and opportunities and the strategies to manage them. Consequently, there is no need to repeat this provision within each standard. This is the approach within

ESRS 2 with the provisions of IRO and SBM being 'general disclosure requirements', and clearly linked to the outcome of the materiality assessment.

*Political influence and lobbying*

81. EFRAG would like to draw attention to a specific element appearing in two metrics of the IF-EU, IF-EU-420a.4 on 'Energy Affordability' and IF-EU-240a.5 on 'Demand-side Management', namely, participation in regulatory or legislative processes, including interactions with regulators, legislators, policymakers, and representative industry associations. This is listed as a possible strategy to manage the related risks and opportunities of the respective topics. This approach diverges significantly from the ESRS logic, where political influence and lobbying activities are treated as a standalone topic, with disclosure requirements under G1-5. SASB already follows this ESRS logic in the Oil & Gas – Midstream Standard by including a standalone topic on the 'Management of the Legal and Regulatory Environment.' EFRAG considers the latter SASB approach more appropriate and consistent with the ESRS.

*Social and Environmental Supply Chain Management*

82. Regarding the disclosure topic of 'social supply chain management' it is unclear why '**corruption and compliance with applicable jurisdictional laws or regulation**' is only considered as an issue related to the supply chain in the FB-AG and FB-MP (**FB-MP-430c.1., FB-AG-430d.1.**). Risks related to corruption and non-compliance can be considered sector agnostic<sup>4</sup> and are prevalent in direct operations as well as along the value chain. In this context, ESRS/CSRD tackle 'anti-corruption and anti-bribery' as a standalone subtopic for business conduct. Moreover, a similar concern was raised in our response to the 2025 consultation regarding the inconsistent approach for the disclosure topic of 'business ethics'. The observed inconsistencies may be exacerbated by the lack of an ISSB topical standard that is the foundation for business conduct disclosures.
83. EFRAG Secretariat considers that the comments from 2025 related to the interoperability of specific SASB metrics are equally applicable. This applies in particular to the comments made to metrics which were either similar or identical to the currently proposed amendments (listed in Appendix B of the Basis for Conclusions).

*Other remarks*

84. At this stage, EFRAG Secretariat has no comments regarding the following questions. We intend to engage with stakeholders to gather their feedback.
- (a) IF-EU industry description (question 3(a))
  - (b) Direct farming inclusion in FB-AP standard (question 1(b))
  - (c) scope of entities in FB-AP standard (question 1(c))
  - (d) Metrics that would benefit from the inclusion of specific proportionality mechanisms (questions 1h, 2g, 3f)
  - (e) International applicability (questions 1f, 2e, 3d)

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<sup>4</sup> Although it is documented that certain sectors are structurally more vulnerable due to significant financial interests, government involvement, and complex regulations.