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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 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 to 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 and 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 the FB-MP Standard includes '**live animal transportation**' as a business activity. It records the fact that transport of live animals within the EU happens mainly by road, while outside the 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, such as poultry and pork. At the same time, within EU-27 the only entity listed in the SASB Navigator that practically uses FB-MP is a company active in fish and shellfish production. Extending the search to EEA, two additional companies are shown as reporting under the FB-MP Standard, which are also active in the fish industry. This may suggest a certain degree of inconsistency between the decision on the scope and the practical application of the Standard. Further research on why including aquaculture is relevant is recommended.

IF-EU industry description (question 3(a))

5. The proposed industry description identifies several energy sources, but, it does not include sources such as biogas, biomass or geothermal. These continue to be important sources of renewable energy in the EU. We recommend considering them in the description to avoid ambiguity on whether these sources are within the scope of the standard. Alternatively, the provisions could be modified by adding 'and other renewable energy sources'.
6. The description could also emphasise the focus on commercial generation rather than small-scale installations. To achieve this, highlighting explicitly electricity generation connected to the grid or including a specific threshold (e.g. 1 MW) may be considered.

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

7. Some disclosure topics are addressed in certain SASB Standards but are 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 revising standards and in particular for sector-agnostic topics. We recommend explaining the choices made for establishing the topics of standards.

IF-EU topics (question 3(b))

8. The IF-EU approach to supply chain management 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))

9. The IF-EU standard omits the Energy Management disclosure topic, retaining instead the Greenhouse Gas Emissions & Energy Resource Planning. This creates an inconsistency of approach between the standards. To align with the general approach to revision, we recommend integrating Energy Management as a stand-alone topic into the IF-EU Standard. This would also be beneficial for alignment with ESRS disclosures. In the section on metrics, EFRAG provides additional suggestions about including information on the fuels used.
10. We note that the 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 the revision of previous standards, notably in the OG Exploration & Production industry, where the Greenhouse Gas Emissions focused on disclosures of Scope 1 GHG from a variety of sources, while climate transition risks were addressed where relevant in the dedicated topic of Climate Resilience. Including a 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.
11. According to the Basis for Conclusions, the 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 a position on the applicability of the topic to a specific area of activity. This is done, for example, in the FB-AG Standard and the 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 the Basis for Conclusions of FB-AG, this is done to simplify the application of the standards (BC 51-54). In other instances, such as IF-EU, the EFRAG Secretariat considers that

the guidance on the applicability of topics to specific activities can be useful information for some preparers and recommends the ISSB elaborate this aspect in more detail.

12. In addition, the reference to 'impacts' in the 'Ecological Impacts' topic may seem confusing. We recommend considering 'Biodiversity and ecosystems management' as aligning with ESRS and with the respective terminology of SASB.

Social topics

13. Input from the consultation confirmed the need to clarify how the requirements in IFRS S1 interact with the narrative disclosures required in sector-specific SASB Standards. Greater clarity on the interaction between these requirements would support consistent application, reduce the risk of duplication and improve interoperability across the ISSB Standards.

Additional considerations to account for in the standards

14. Additional feedback indicates that the standards have a strong focus on risks and would benefit from being rebalanced by more emphasis on opportunities.

FB-AG (question 1(c)–(f)), FB-MP (question 2(d)–(e)), and IF-EU (question 3(b)–(e))

15. Labour conditions in a company's own operations currently apply only to 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.
16. 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. Input from preparers during the consultation process confirmed support for moving to sector-agnostic disclosures, including for community relations & rights of indigenous peoples and due diligence topics. 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.
17. The topic 'community relations & rights of indigenous peoples' refers to several ICF standards (IF-EU-210a.1.4). If this topic were to be replicated for FB-AG and FB-MP (as per aforementioned recommendations), these references to ICF performance standards would also need to be extended to these sectors.
18. 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 the EFRAG Secretariat during the public consultation.

FB-MP (question 2(b))

19. 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))

20. This topic and its disclosure have been deleted with the justification that the topic no longer generates as much attention as it did. We would welcome further clarify on how such concept is defined and its connection with New Genomic Techniques (NGTs). The Basis for Conclusions also states that 'GMO regulations have been stable in recent years'. However, the EU regulatory framework for GMOs and topics, which are connected, is changing, including with the forthcoming Regulation on 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 optout 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.

21. 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 EU. Further consideration should be given to the articulation of the proposed standards with the most recent EU amended rules for new genomic techniques (NGTs).

Architecture of and consistency between the three draft standards

22. Some topics are only included in one or two draft Standards.
 - (a) 'Labour conditions' 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 stand-alone topic in FB-AG and FB-MP. Similarly, only Processed Foods has a section on Social Supply Chain Management among the SASB 2025 draft Standards.
 - (c) 'Community relations & rights of indigenous peoples' is only in IF-EU.
 - (d) 'Employee recruitment, development & retention' is only in IF-EU. Further research should be conducted to assess if this topic would also be material for FB-AG.
23. 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, 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. 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 how they manage risks and opportunities.
 - (c) *Community relations & rights of indigenous peoples*. The risks and opportunities for 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 and 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.
 - (e) *Scope and definition of 'Labour conditions'*. The scope of 'labour conditions' is unclear. The disclosure under FB-AG-310a.1 includes 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. It is not clear why child and forced labour are singled out when the sector also presents other labour/human rights risks that could also be emphasised. Besides, 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.

24. We recommend defining 'labour conditions' and applying this definition consistently across the different metrics, 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.
25. 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 stand-alone topic 'labour conditions'.
26. 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 in FB-AG and FB-MP.

Governance topics

Government assistance

27. 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 the 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

28. The FB-MP addresses two separate but related disclosure topics: 'Antibiotic use in animal production' and 'Animal Health & Welfare'. The Basis for Conclusions explains the rationale

for separating these issues, namely to create a distinction between 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 because antibiotic use is a complex and two-sided phenomenon presenting risks to both human health and animal health. Using antibiotics for growth promotion or disease prevention can drive antibiotic resistance and weaken essential hygiene and husbandry practices, 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. Our concern is particularly supported by the stakeholders' (i.e. subject matter experts') feedback.

29. 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 hormones¹, which are also relevant to both animal health outcomes and human health risks. Based on stakeholders' (i.e. subject matter experts) feedback, we suggest considering a metric covering the use of antibiotics alongside other treatments and emerging practices that are prevalent in the industry (such as breed selection).

Other topics – Digital transformation and just transition

30. We encourage the ISSB to explore whether industry-specific disclosures, particularly for IF-EU and FB-AG, could be expanded to reflect 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.
31. 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).
32. 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 disclosures, 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.
33. Consultation responses indicated that just transition could be reflected partly in sector-agnostic standards and partly in sector-specific standards to address more granular sector-specific concerns.

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

Environmental metrics

34. We consider that revisions to proposed metrics and technical protocols need to be done in a way that they ensure consistency of approach between the standards.
35. 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 the SASB Standards. This refers, for example, to provisions related to targets such as FB-AG-110a.2 or FB-MP-

¹ As identified in GRI 13: Agriculture, Aquaculture and Fishing.

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))

36. We question the relevance of FB-AG-110a.3 related to total fleet fuel for the agricultural industry. If retained, this metrics, although based on the EM-SV-110a.1 included in the 2025 revision, could benefit from further alignment between the 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 interoperability between IFRS Accounting Standards and ESRS.
37. The addressal of nitrous oxide (N₂O) 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, N₂O is not explicitly addressed as a distinct metric – unlike methane (CH₄) in the Meat, Poultry & Dairy Standard. This begs the question of whether N₂O should not be specifically highlighted to ensure consistency in disclosure requirements.
38. In addition, the FB-AG Standard introduces the topic of Food Loss & Food Waste while narrowing down the quantitative metrics only to waste from human-edible products as defined by FAO. Considering the broader relevance of waste in the industry, which is additionally acknowledged by the description of the topic, EFRAF it may be pertinent to consider other types of waste from the agriculture value chain.
39. We also consider that the metrics FB-AG-430c.2, which currently focus only on nature- and climate-related physical risks, should be complemented with transition risks. This would allow closer alignment with the operational and regulatory context of the industry, reflecting the relevance of potential risks (e.g. changing customer preferences, health and dietary regulations, EU policy on deforestation, etc.) as well as sources of opportunities (e.g. carbon removals and EU regulatory projects).
40. As commented in our 2025 letter, the renewable energy metrics focus only on renewable electricity. This limits their interoperability and overlooks common and relevant renewable fuels for transition, such as biogas in the agriculture industry. We recommend recognising sources such as biogas in FB-MP-130a.1 by extending paragraph 3 on metrics to all energy sources instead of only to electricity.
41. We also note the absence of metrics on the use of plant health products (e.g. pesticides and fertilisers). These indicators are relevant to business resilience and legal, reputational and transition risks, and they can represent significant factors in the emission of pollutants, especially influencing water pollution, which in turn connects to remediation costs and regulatory risks. As for the impacts from fertilisers, TNFD's (food and agriculture guidance) indicators on nitrogen use efficiency and nitrogen balance (total N inputs over total N outputs) could be helpful to consider and would remain in line with existing SASB's description of industry challenges. Concerning chemicals, TNFD's indicator on volume and concentration of pesticides could be equally helpful to consider for inclusion.
42. Water management metrics do not adequately address water pollution. Considering the related impact from agricultural activities, water pollution should be addressed, also given similar existing metrics in other revised standards (e.g. EM-EP-140a.2 on hydrocarbon content in discharged water). A helpful addition to consider specifically for agricultural activities could be an indicator aligned with TNFD's approach to disclosing the water pollutant loading rate (tonnes of pollutant/month) based on locally developed models for pollutants from non-point sources, average nitrogen and phosphorus nutrient loads over the past five years of operation.

43. The current metrics FB-AG-160a.4 and FB-AG-430c.1, while focused on the relevant aspect of deforestation and land conversion, are nevertheless limited in scope. We recommend broadening them to encompass sustainable or regenerative agricultural practices, which is also in line with FB-AG-160a.3. This approach would help better capture information related to industry-specific risks and opportunities and how entities manage their impacts as well as reflect current reporting practices from entities in the industry.

FB-MP metrics (question 2(c))

44. Addressing methane emissions across standards requires further harmonisation. The topic summary of FB-MP highlights releases of methane as a likely matter for the industry – in line with the fact that some GHG metrics, such as FB-MP-110a.1, include provisions on the percentage of methane. This approach resembles other industries, such as EM-EP, consulted in 2025. However, the standards differ in the approach to 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. We recommend including this metric.
45. The current standard lacks disclosure requirements regarding dependencies on ecosystem services, despite their significance as a source of material financial risk for the sector. Key ecosystem services – such as pollination, soil quality and water regulation—are critical to agricultural operations and resilience. At minimum, this issue warrants inclusion as a narrative disclosure to ensure a more comprehensive reporting framework.
46. The current scope of several metrics only addresses the entity’s direct animal production operations, despite the industry’s reliance on contract or independent farmers for animal supply. To ensure comprehensive value chain coverage, the metrics FB-MP-160a.4. (which in principle should already cover value chain), FB-MP-160a.8. and FB-MP-160a.9 should be expanded to explicitly include third-party sourcing of animals and animal proteins.
47. In addition to that, the FB-MP-160a.8 indicator currently focuses solely on physical climate risks, overlooking material transition risks that may be material for the industry (e.g. shifting consumer preferences, stricter regulations, the EU’s Farm to Fork strategy, dependence on public subsidies, and exposure to EU and national policies. We recommend considering these aspects in the indicator.
48. The removal of FB-MP-160a.2 (the percentage of pasture and grazing land managed under a conservation plan) is justified in the BC117 by the lack of a clear definition of ‘conservation plan’. We caution against this decision, as the sustainable management of land and land use change remain material issues for livestock farming, with pasture management playing a critical role. Instead, we recommend retaining the FB-MP-160a.2 metrics and providing a definition or quality principles to clarify what constitutes as a ‘conservation plan’. Otherwise, we recommend considering the use of related metrics – such as the TNFD’s for ‘Extent of land ecosystem that is sustainably managed (km²) by type of ecosystem / type of business activity’ – or the one used in FB-AG-160a.3 ‘Total area of land that is sustainably managed.’
49. Similarly to FB-AG, we note that water management metrics lack a dedicated provision to address pollutants in water. Therefore, as per our comment on FB-AG, we recommend the addition of an indicator aligned with the TNFD approach, such as ‘water pollutant loading rate (tonnes of pollutant/month)’.
50. We note that the definition of water withdrawals proposed in SASB is more granular than in ESRS, and it includes the notion of produced water. In dairy production, produced water is particularly relevant, given the number of operations of extracting it from milk during manufacturing of products such as cheese or whey. Further guidance on the treatment of produced water could be helpful for stakeholders.

IF-EU metrics (question 3(c))

51. 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.

52. We also note the need for a consistent approach to addressing GHG targets. Nine of the revised standards maintain a separate metric 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 the Basis for Conclusions the ISSB provided, while noting the feedback received the consulted standards do not take a significantly different approach to metrics compared to the 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 the ISSB’s intention may have been to avoid duplication with IFRS S2, the change introduced in IF-EU creates inconsistencies compared to other consulted standards.
53. The location of climate-related disclosures within the topics raises concerns about coherence. IF-EU introduces climate-related metrics under GHG Management (IF-EU-110a.6) and Operational Resilience & System Reliability (IF-EU-550a.4). In addition, climate-related risks are also a part of disclosure IF-EU-240a.5 within Energy Affordability 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.
54. 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. In its feedback in 2025, EFRAG 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 a consistent approach across the revision.
55. 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 the description of 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, particularly in light of BC153, which states that IF-EU-110a.7 is dedicated to narrative information, providing context to quantitative IF-EU-110a.5.
56. We also suggest a closer alignment in language across climate disclosures in IF-EU and IFRS S2. For example, IF-EU-110a.6 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 used in IFRS S2, which reads, ‘for example ... including plans the entity is not contractually committed to’.
57. EFRAG also cautions about feasibility of disclosure IF-EU-110a.6, which requires the disclosure of planned capacity (MW) over ‘short-, medium- and long-term, including the entity’s investment and disposal plans, such as plans to which the entity is not contractually committed and plans to redeploy, repurpose, upgrade or decommission existing assets, as well as how [the undertaking] plans to comply with applicable jurisdictional law or regulation to discontinue any of the major energy sources it uses’. Few preparers that engaged with EFRAG indicated that such forward-looking information may be uncertain, commercially sensitive and subject to frequent change, making a reliable and comparable disclosure challenging.
58. Undertakings in the sector often operate biomass-fuelled power plants, generating biogenic CO₂ emissions. IF-EU-110a.1 requires disclosure of gross GHG Scope 1 emissions in

accordance with IFRS S2. In March 2026, the ISSB's Transition Implementation Group (TIG) considered how biogenic emissions should be reported under IFRS S2, leading to their inclusion in the corresponding scopes (the conclusion acknowledges the possibility of disaggregating data under IFRS S1). ESRS E1 requires the separate disclosure of biogenic emissions from Scope 1, and it prevents the inclusion of biogenic CO₂ in Scope 1, 2 and 3. In effect, this situation may lead to a divergent Scope 1 disclosure for undertakings under ESRS and SASB (as supported by GHGP) compared to the undertakings reporting under SASB and IFRS Accounting Standards.

59. We note the conceptual challenges in IF-EU-110a.5 and IF-EU-110a.6, as these include disclosures related to capacity, which is required to be disaggregated by major energy sources and types of energy storage. Typically, the installed capacity is reported in MW and the energy storage in MWh. Aggregating these two into a single total would result in a disclosure that is not meaningful, as it combines two non-comparable units of measure. We recommend installed capacity and storage capacity as separate line items rather than as disaggregated components of a single capacity total.
60. In addition, with regard to above-mentioned installed capacity metrics (IF-EU-110a.5), we consider that investor-useful information would include not only information on major energy sources but also on fuels used. A breakdown by fuel consumption would help to identify assets not used and related risks.
61. We note that the requirement to report facilities 'in or near' environmentally sensitive locations (IF-EU-160a.2) would have more utility for investors if made more specific by distinguishing between: (a) assets located within such areas and (b) assets in their vicinity. To achieve this, the disclosure should clearly indicate whether a facility is located within a sensitive area and, if not, provide proximity information (e.g. distance to the boundary). At the same time, we note that some companies resort to the use of a shorter distance (e.g. 1 km) and reiterate our comment on the needed flexibility and principle-based approach in this regard.
62. In addition, it could be pertinent to include within the ecosystem and biodiversity related-metrics metrics on the share of operations (generation) affected or lost due to environmental factors (e.g. water availability constraints, bird migration impacts or broader climate-related effects), given the relevance of this information for investors assessing performance and risk.

Social metrics

63. 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 on how they interact with SASB disclosures, both in terms of their process and objectives. In addition, the IFC Performance Standards (2012) may not reflect recent developments in business and human rights or 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

Articulation of financial materiality and references to impact

64. 'Social supply chain management' lists '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.

65. In keeping with our response to the 2025 SASB consultation, we believe that the references to human rights due diligence generally signal an impact materiality perspective in line with international standards, such as the UNGPs and OECD MNE Guidelines. Conversely, SASB disclosures are geared toward a financial materiality approach. Input from preparers during the consultation process confirmed the need to clarify materiality and how financial materiality relates to impacts, due diligence and other related concepts. While impacts on human rights and processes to identify and address them may also inform the financial materiality assessment, references to impacts and human rights due diligence and to the due diligence steps 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.
66. Moreover, no clear definition of 'impact' is provided. Providing such a definition would also be an opportunity to: (i) clarify the role of impacts in the SASB Standards and its interaction with financial materiality; and (ii) explain how the concept relates to the notion of impacts as defined in ESRS, thereby enhancing interoperability between the frameworks.

Consistency between draft standards

67. Due diligence is mentioned in all three draft standards but not under the same topics and metrics or 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 the steps in this 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 peoples 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

68. The draft standards FB-AG and FB-MP require that companies disclose the 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

69. In light of the well documented shortcomings of audit schemes, 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. 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 in line with EUDR

70. The 'environmental supply chain management' topic incorporates social and community related elements, such as engagements and partnerships with farmers and local communities (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).
71. 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 for labour rights and human rights. 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 and Sustainable Sourcing

72. 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.¹ Traceability is also linked to sustainable sourcing and transparency on value chain risks and opportunities. Some of the ESRS reporters already disclose their sustainable sourcing strategy and metrics (e.g. 'per centage of sustainably sourced livestock and animal feed').
73. In FB-AG, the only explicit reference to traceability appears in proposed metric FB AG 430d.2, which captures only the per centage 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.
74. There are no traceability-related expectations at all in FB-MP. That means there are 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 as well as the increasing reliance on tracing to meet sanitary, deforestation, and import control rules, there is a gap that should be addressed.
75. 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 and (2) percentage reconnected within 30 days

76. In the information collected across sources during the consultation, the rationale for deleting disclosure IF-EU-240a.3 is questioned. It was 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

77. As explained in the 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 to land-related issues. Elevating them to a topic would emphasise the importance of community relations & 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.
78. 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 disclosures obscure these distinctions and result in aggregated information that is less comparable and ultimately less useful for assessing risks, opportunities and reporting on due-diligence quality.
79. The ESRS S3 refers to 'human rights defenders'. In FB-AG, FB-MP and IF-EU, 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 for the ISSB as 'human rights defenders' are not mentioned explicitly.
80. We note the absence of reference to conflict-affected and high-risk areas (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, particularly FB-AG and IF-EU. We would welcome some clarification on the reasons why this topic has not been included.
81. Disclosure on indigenous peoples' right to free, prior and informed consent (FPIC) is treated differently between ESRS and the proposed standards FB-AG and FB-MP (FB-AG430d.1 and FB-MP-430c.1). The latter use rather soft language such as '*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.
82. As a result of additional research conducted to support the consultation, we highlight that the SASB Standards refer in several instances to 'Free, Prior and Informed Consent (or consultation)' without clearly distinguishing between consent and consultation. As consent and consultation represent different levels of stakeholder, current drafting could create uncertainty regarding the intended disclosure expectations. It may also affect the standardisation and comparability of reporting across entities. By comparison, ESRS refer to Free, Prior and Informed Consent (FPIC) and provide a definition of the concept in the ESRS Glossary. Clarification would therefore be welcome regarding the relationship between

consent and consultation, the circumstances under which each is expected to apply and how they are intended to be reflected in disclosures prepared in accordance with the SASB Standards. Such clarification would contribute to greater consistency in implementation and reporting across preparers. Alternatively, alignment with ESRS would suggest focusing only on 'consent'.

83. Since the issuance of the SASB consultation, we note that the nature-related practice statement for IFRS S1 also contains a number of disclosures related to engagement with indigenous people. It may be worth clarifying if the two would overlap and whether a different lens should be applied by companies (i.e. would the stakeholder with indigenous people in the nature-related practice statement only cover nature dependencies or risks?).
84. 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 link the standard to international and European human rights instruments and conventions (para. 4). It also lists examples of rights (para. 5), not 'interests'. Moreover, a definition of 'affected community' is provided in the revised ESRS Glossary. 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

85. 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.

86. 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 requiring the company to describe 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 related to animal health and welfare

Certification

87. In addition to the comments in paragraph75 , 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. Based on stakeholder feedback we note that variations across schemes exists and are driven by local contexts, cultural differences and regulatory requirements. One way to achieve flexibility s 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. Moreover, allowing to report other certification

(not on the list) could be complemented by requiring transparency on the criteria that any certification must meet to qualify.,

88. Furthermore, we would like to highlight the absence of reference to the World Organisation for Animal Health (WOAH), a recognised, science-based intergovernmental organisation whose standards are integrated into EU animal health and welfare legislation. Stakeholders acknowledge the global relevance of WOAH as a foundation for animal welfare standards and guidelines (e.g. OECD).

Third-party audit or verification

89. Similar to the comments in paragraph 76, in light of the well documented shortcomings of audit schemes the metrics on third-party audit verification for animal welfare included in the FB-MB Standard (FB-MP-410a.3.) risk incentivising quantity of audits over quality, thereby undermining effective risk mitigation and prevention.
90. In sum, while certification and third-party audits might not provide a complete or fully reliable picture, we still consider this a useful minimum indicator (also to assess public 'humane washing') to retain, but it need to be complemented with other disclosures

(Activity metric) FB-MP-000.A: Number of processing and manufacturing facilities

91. It would be useful to add an indicator of average stocking density per farm site (total number of animals / total livestock area) to enable a contextualised assessment of the health, environmental and animal welfare risks associated with stocking density. The activity metric 'Number of processing and manufacturing facilities' could be amended accordingly to add this performance indicator or even replace it entirely.

Unit of measure

92. We note the change in unit of measure from carcass weight to live for reasons of consistency among the metrics in FB-MP. We would welcome further clarification for this amendment given the current industry practices.

Governance metrics: others

Cybersecurity incidents

93. The IF-EU includes a metric on cybersecurity (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 2²). 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 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.
94. With regard to IF-EU-550a.2, it should be noted that the definitions of SAIDI/SAIFI events are determined by national regulations. While these are largely aligned with IEEE 1366, as referenced in the technical protocol, some differences may remain. In certain cases, major event days are included within the overall statistics, whereas under IEEE 1366 they are typically excluded and reported separately. This difference in treatment may affect comparability and should therefore be clarified to ensure consistent interpretation of reported metrics. Trading activities and live animal transportation

² Directive (EU) 2022/2555

95. 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 the risk that some preparers do not consider them the scope of their reporting.
96. 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 legislation³ 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.
97. Consulted stakeholders strongly supported this argument. Based on their feedback and additional desktop research we would like to suggest some relevant metrics:
- (a) journey time [hours]: including the loading and unloading activity, with specific considerations for vulnerable animals (pregnant and very young animals); and
 - (b) in-transit mortality and morbidity rate

Other comments on the Agricultural Products Standard

98. 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. Additionally, we would welcome clarification on why ‘management of the use of fertilisers, pesticides and other chemicals’ is considered an example of sustainable management practices. While these inputs support plant productivity, their use can have negative effects on animal health, water quality and air quality.
99. 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).
100. 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)

101. Preparers have emphasised that alignment on key concepts and terminology is essential for interoperability across sustainability standards. Input from EU preparers during the consultation process also confirmed the importance of alignment in terms of definitions and architecture with the ESRS to reduce the reporting burden and avoid the need for correspondence tables between standards. We have therefore assessed several concepts where additional clarity could support application.

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

Social definitions

102. 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.
103. 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. ESRS define these categories under 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. Clarification on whether and how the concept applies to seasonal workers would also be welcome.
104. As a result of additional research conducted to support the consultation, we note that throughout the draft standards the notions of value chain and supply chain are both used. The proposed SASB Standards would benefit from additional clarification regarding the definition of these two terms, how they relate to one another and how they connect to concepts such as tiers of suppliers and established business relationships. It should be noted that the ESRS Glossary already provides a definition of 'value chain'.
105. 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

106. The proposed SASB Standards do not define 'supply chain' unlike the revised ESRS. Although the SASB industry description refers to entities that 'produce, trade, process and distribute', the management approach reflected under the topic 'Social Supply Chain Management' focuses primarily on supply chain as opposed to ESRS, which explicitly address the impacts, risks and opportunities across the entire upstream and downstream value chain.
107. The difference in the scope of the 'supply chain' across the two standards creates the 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 ESRS, which explicitly address impacts, risks and opportunities across the entire value chain.

Topics to which due diligence and related steps apply

108. 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

109. 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 the undertaking uses

to monitor, manage and oversee 'food loss and food waste' (FB-AG-150a.2). Meanwhile, IF-EU Standards refer 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

110. 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 taken to 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

111. 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 stand-alone topic, while disclosure requirements under G1-5. SASB already follow this ESRS logic in the Oil & Gas – Midstream Standard by including a stand-alone topic on the 'Management of the Legal and Regulatory Environment'. EFRAG considers the latter SASB approach more appropriate and consistent with ESRS.

Social and Environmental Supply Chain Management

112. 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 agnostic⁴ 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 stand-alone subtopic for business conduct. Moreover, a similar concern was raised in our response to the 2025 consultation regarding the inconsistent approach to 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.
113. The 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).

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